



We protect what matters.

July 31, 2020

Storey County Planning Commission
Attn: Chairman Hindle
Storey County Courthouse, District Courtroom
26 South B St.
Virginia City, NV 89440

RE: **Response in Writing to Commission Request from July 16, 2020**
Storey County Planning Commission Meeting

Dear Chairman Hindle and Planning Commission Members:

We appreciate the opportunity to provide the following information in response to the request by the Storey County Planning Commission that Stericycle address additional questions related to our request for Special Use Permit (SUP) 2020-021 for the development of a medical waste incinerator at 1655 Milan Drive, in McCarran, NV. The SUP application was initially considered during the Storey County Planning Commission ("Commission") meeting on July 16, 2020.

This letter supplements the Stericycle team's prepared presentation at the Commission meeting and responses to additional written public comments submitted to the Commission regarding the facility.

ABOUT STERICYCLE

Stericycle is a publicly traded corporation (NASDAQ: SRCL) based in Bannockburn, Illinois. Stericycle was formed in 1989 following the passage of the Medical Waste Tracking Act, which led to the creation of the medical waste industry.

In response to the growing crisis of needles washing up on the shores of the Atlantic Ocean, Congress established regulations to protect the public and ensure the safe handling and disposal of dangerous and toxic medical waste. Stericycle has since become the established industry leader in this essential industry.

At Stericycle our core purpose is to protect people, promote public health, and safeguard the environment. Our company has been at the forefront of creating innovative solutions to

address medical waste disposal challenges across the globe. Today, Stericycle employs over 17,000 team members worldwide in our two core service lines: regulated medical waste management and secure information destruction. We service over 1,000,000 customers in 18 countries and reported revenues of approximately \$3.3 billion for 2019.

Our services include compliant collection, transportation and treatment of medical waste, collection and disposal of pharmaceutical waste, consulting and training programs to help educate our customers on the proper handling of these regulated waste streams and secure information destruction.

All of our team members adhere to a singular mission: “We Protect What Matters.” Our core business is to protect the environment and public health, and we take our corporate social responsibility very seriously. We are in the business of protecting the Earth and providing safe and effective sustainability solutions for the global health and medical industry.

A few facts about Stericycle that quantify our commitment and contributions:

- More than 900,000 tons of medical waste treated annually
- Approximately 750,000 tons of paper recycled annually
- 42,000 tons of unused pharmaceuticals safely disposed annually
- 23,000 tons of plastic from reusable sharps and medical waste transport containers annually diverted from landfills
- Of 5 billion tons of waste treated globally, 37% is recycled and 12% supports energy recovery; the energy recovery is enough to power 4,900 homes for one year
- Steam energy is used in some of our processing operations to wash customer collection containers
- Many of our facilities have high efficiency gas burners for boilers and washing equipment, high efficiency HVAC systems, and high efficiency lighting and/or motion-sensing LED lighting systems
- 12-15% of our vehicle fleet is replaced annually with more eco-friendly models with 19% lower CO₂ emissions
- Compact mobile collection trucks replaced 100 standard box trucks in 2019, resulting in a 40% fuel reduction and avoidance of 3.5 million pounds of CO₂ emissions

Over the past two years our company has been on journey of transformation and technological improvement, which has included significant changes in leadership. The company today is stronger and more committed than ever to our mission and our responsibility to be a good corporate citizen. The leadership changes below reflect the positive direction of the company.

- Cindy Miller has been named Chief Executive Officer, after serving 30 years with United Parcel Service (UPS)
- Seven new experienced executives have been added to the leadership team
- Several new directors have been added to the Board of Directors with technical expertise
- In 2019, we brought in a new Senior Vice President of Environmental, Health and Safety, who has centralized oversight of EHS matters, implemented an environmental management system, restructured our EHS organization, and driven significant compliance and safety improvements

More recently, Stericycle has been called to action during the COVID-19 pandemic, partnering with leading healthcare providers, pharmacy chains and university labs to provide medical waste services to temporary hospital facilities and hundreds of testing centers.

All of us at Stericycle are proud of our mission and keenly aware of the important role we play in the protection of the environment and the advancement of public health. We are committed to be a model Storey County citizen and neighbor, and we are ready to answer all questions about the facility and our plans for this development.

RESPONSE TO PUBLIC QUESTIONS

As requested by the Commission, we have prepared the following response to the questions raised in the two letters you've received. Additionally, we have addressed topics relating to media coverage of the two Stericycle facilities mentioned during the meeting as well as questions regarding the anticipated day-to-day operations of the proposed facility and planned adherence to regulatory and legal requirements.

Response: Situation with Salt Lake Facility and North Las Vegas Application

Over a period of more than 30 years Stericycle operated a disposal facility in North Salt Lake City. As with all our facilities, we committed to maintain a track record of compliance with all local, state and federal requirements and regulations regarding environmental and workplace protections.

In 2003 the area surrounding the facility was rezoned from industrial to residential use, and residential housing development occurred on the borders of our property. This rezoning removed the natural buffer between the neighborhood residents and our operations, and new neighbors expressed concerns about the safety of the facility and potential emissions from the operations.

We provided full disclosure of our safety and environmental compliance and reassured the community of the safety of our operations. The facility is listed by the State of Utah as only a minor source of emissions in the area. Results from two separate Davis County (UT) Department of Health studies have demonstrated that emissions from the facility present no health risk to the surrounding community.

In May 2013 Stericycle received a Notice of Violation (NOV) from the Utah Department of Air Quality (UDAQ), the first citation for an emissions violation experienced in the facility's 24-year history of operation. Stericycle settled the issue with UDAQ in 2014 with no admission of fault. We agreed to implement a number of improvements, including new air pollution control (APC) equipment. At the same time, we installed a new back-up generator to reduce bypass events associated with power outages.

The facility's overall emissions have been reduced to levels even lower than those required for newly constructed Hospital, Medical, Infectious Waste Incinerator (HMIWI) facilities, which have significantly tightened regulatory limits than existing facilities.

However, the NOV and the alleged non-compliance was covered by the local news media and created some local controversy. Throughout the evolution of this dispute Stericycle was fully transparent and cooperative with local and state officials and worked closely with community leaders to address their concerns.

Today, the North Salt Lake City facility remains fully operational, contrary to the statement made in the letter submitted to the Commission.

In light of the local rezoning around our Utah facility to residential, Stericycle made the decision to relocate to an area with zoning regulations that allowed a concentration of similar industrial operations. We initiated a process to develop a new location in the Apex Industrial Park in North Las Vegas, NV, and applied for and received a special use permit from Clark County for the site.

This site was not fully developed and lacked immediate access to critical infrastructure needs, including water, natural gas and electric. As the process continued, timelines for the necessary infrastructure development remained uncertain and Stericycle determined that a location with better infrastructure was needed for our operations. For that reason, the North Las Vegas site was not developed, and the permit application was withdrawn.

Response: How is waste transported to the incinerator?

Medical waste transportation is federally regulated by the Pipeline Hazardous Materials Safety Administration (PHMSA) within the U.S. Department of Transportation (DOT). Waste must be packaged by the generator (i.e., the hospital, doctor's office or other customer) in either single use or re-usable containers conforming to requirements under 49 CFR 173.134, which specify inner and outer packaging requirements to ensure that containers are leakproof in transit. These containers are tracked throughout handling and transit to ensure that wastes are properly received and documented. Materials will be delivered to the facility via specially permitted truck or tractor trailer vehicles. All transport operations are conducted in accordance with USDOT Federal Motor Carrier Safety Administration requirements (FMCSA) (49 CFR 300-399).

Response: What type of, and how much, traffic will the facility create?

There will be trucks and trailers as well as employees' personal vehicles. At full capacity, several years in the future, we estimate that there will be 10-15 trailers and 30-50 employee vehicles traveling to and from the site each day, as stated in our application.

While this is a regional facility, our operations are relatively small in comparison to other much larger businesses in the industrial park and will have a minimal impact on existing traffic. In terms of safety, Stericycle provides a full defensive driving course to its drivers, including training regarding avoidance of potential wildlife.

In contrast, it has been reported that the Tesla-Giga factory alone has more than 12,000 employees traveling to and from the facility on a daily basis. Other tenants of the park have projected significant job creation, which will result in significant incremental growth in traffic in the area. Our proposed facility will represent only a fraction of the total traffic projected for the region.

Response: What are the specifics of the incinerator's emissions and air quality impacts, including drift of the plume?

As discussed above, Stericycle is regulated by the EPA HMIWI regulations and is required to evaluate air modeling and impact to the environment. Stericycle will be submitting a location-specific air quality modeling analysis (or air dispersion analysis) to the Nevada Division of Environmental Protection (NDEP) Bureau of Air Pollution Control (BAPC) as part of the permitting process. The NDEP BAPC will not issue a permit if the modeling analysis determines that there may be any negative air quality impact.

As further explanation, the following table provides the emissions limits for HMIWIs constructed after 2008 as compared to another incineration facility currently operated by Stericycle. This table reflects that the performance of our facility is better than, and falls well below, the emission limits.

Pollutant, units	Large HMIWI Units New - 2009	Comparable Facility Emissions - 2 Unit Average	% Lower than Limits for New HMIWIs
Particulate, grains/dscf	0.0080	0.00043	-95%
Nitrogen Oxides, ppmv	140	115.25	-18%
Carbon Monoxide, ppmv	11	0.537	-95%
Sulfur Dioxide, ppmv	8.1	0.904	-89%
Hydrogen Chloride, ppmv	5.1	1.99	-61%

Cadmium, milligrams/dscm	0.00013	0.00008	-38%
Lead, milligrams/dscm	0.00069	0.00017	-75%
Mercury, milligrams/dscm	0.0013	0.00042	-68%
Total Dioxins/Furans, nanograms/dscm	9.3	0.0659	-99%
TEQ Dioxins/Furans, nanograms/dscm	0.035	0.00351	-90%

Additionally, past studies of our facility in North Salt Lake, UT, conducted by the Davis County (UT) Health Department identified no impacts upon the health of area residents or the environment. These studies are attached for your review. The proposed HMIWI facility in McCarran must adhere to even more stringent air emission limits than those of the North Salt Lake City facility.

Based upon the HMIWI regulatory limits and the anticipated minimal impact from the facility upon regional air quality, the proposed Stericycle facility will not have a significant negative impact on human health or the environment.

Response: Where and how will ash be stored?

Non-hazardous ash generated by operations will be stored in appropriate containers in specific, designated areas under cover of the building until shipped to an approved solid waste facility for final disposal at a local appropriately permitted landfill. This is standard operating procedure for ash created as part of the incineration process.

Response: Is there a risk to groundwater?

As it relates to storm water and ground water, Stericycle's medical waste incinerators meet US EPA [No Exposure Certification](#) conditions, which means that there are no industrial operations exposed to storm water, including snow, rain, snowmelt or runoff. All operations will be under roof and no operations will be conducted outside of the building. Stericycle operates incineration facilities with No Exposure Certifications adjacent to other water ways or protected wetlands which are monitored and has had no measurable impact on those environments.

The pond addressed at the meeting, and in the written public comments, is upstream of the facility, thereby further ensuring that our facility will have no impact. Based upon the initial

proposed location of the facility and structure, the Milan pond will be located in excess of a quarter mile away.

Response: How frequently will unfiltered toxic pollutants be released into the air through a bypass stack? Will generators be required to prevent release of toxins in event of electrical failure?

The stack bypass safety relief valve or “bypass stack,” as it is often referred to, is a safety valve attached to the secondary chamber of the incinerator. It is designed to open to relieve pressure in the chamber in the event of a power outage or other equipment malfunction. It is engineered as a fail-safe to protect employees and the facility against more significant issues. If a bypass stack opening occurs, there is an automatic shutdown of the system operations, including any ability to feed waste into the system. Bypass events are automatically documented in our continuous emission monitoring system; such events occur very rarely. For example, at the North Salt Lake City facility, there have only been four bypass events since 2014. These events were short in duration (minutes) with no measurable impact to the environment or human health. Additionally, these events were reported to the appropriate State of Utah agency and no action has been taken by the regulator in response. The McCarran facility will be required to track and report these occurrences to the NDEP BAPC.

The facility will be designed with significant system redundancies to minimize the risk of occurrence of a potential bypass event. Although not required by regulation, the facility will have a backup generator installed and an electrical transfer system that will allow for a seamless transition of the facility’s process systems from Nevada’s electrical grid to the generator during any power outage. Stericycle has installed back-up generators at all incineration facilities and, since installation, this implementation has resulted in a decrease in emergency bypass events.

Response: Does Nevada or Storey County require reporting of unplanned discharge incidents?

Yes. As a condition of approval of the SUP, Stericycle is required to obtain a Title V air permit. This permit will require Stericycle to report any unplanned discharge incidents. As noted above, NDEP BAPC is the regulatory authority responsible for issuing and enforcing the air quality permit for the proposed facility. Stericycle is required to notify Storey County of any violation of our permit, the corrective action to be taken and date for such action to be completed. In

addition, Stericycle must also comply with the reporting conditions set forth in Section 4 of the Staffing Report, including:

“Copies of the annual reports of environmental quality necessary to comply with the requirements of the permit issued by the Bureau of Air Pollution Control, Nevada Division of Environmental Protection (NDEP) shall be submitted to Storey County Planning Department. In the event that there is an air discharge in excess of the standards approved by NDEP under the construction or operating permit, the permit holder shall provide Storey County Planning Department a copy of any notice of the event or plan to remediate the event submitted to NDEP. If the Permit Holder is required by the Bureau of Air Pollution Control, Nevada Division of Environmental Protection to prepare a report on the event, the permit holder shall submit a copy of the report to the Storey County Planning Development”.

Response: What mitigations are planned to minimize impacts to public health, road safety, wild horses and other wildlife?

Stericycle has robust environmental, health and safety (EHS) programs. Management of medical waste is a heavily regulated industry, in accordance with federal, state and local requirements. Stericycle ensures safety and compliance through the following EHS management:

- More than 30 EHS regulatory programs will be implemented at the facility, including:
 - OSHA required programs for employee safety and safe working conditions
 - DOT Hazmat operations and safety/defensive driving
 - EPA HMIWI Certified Operator training
 - FDA specific training when applicable for reusable sharps containers
 - Drug Enforcement Administration (DEA) specific training for any DEA material handling or witness controlled burns;
- Corporate internal inspection/auditing programs;
- Regular mandatory testing, monitoring and reporting to NDEP BAPC;
- Semiannual reporting of all operating parameters and annual compliance certification reported to NDEP BAPC;
- Dedicated EHS professionals for safety and permitting compliance.

We are sensitive to the importance of protecting the local wildlife habitat, including the wild horses present on the property. We acquired more than 15 acres in excess of what we needed to ensure the wildlife, including the horses, will have ample area so their conditions would not be disrupted. We plan to be flexible with the fencing around the structures in order to allow for open space. The storm water retention area could be located away from Milan Pond in order to protect the water supply of the horses. Finally, because our air emissions are scrubbed and mitigated to well below acceptable levels, all wildlife will have the benefit of clean fresh air.

Response: How will you control nuisances such as noise, smoke, odor and gas so as not to adversely affect properties in the vicinity?

Stericycle operates incinerators across the country and these types of nuisances are not typically associated with our operations.

- Smoke, odor and gas: All operations are conducted internally. Odor is controlled by ensuring wastes are processed as they arrive. Air is moved through air pollution control equipment, eliminating the presence of smoke or gas in or emission from the facility.
- Noise: There are no planned operations that involve excessive noise. Noise will be limited to the normal operation of trucks and forklifts, which have necessary safety back-up alarms, and which have similar or lower noise profiles than those of other tenants in the industrial park. As an added precaution against the dissemination of excessive noise, Stericycle has purchased a considerable amount of land as a buffer for this operation.
- Per NAC 445B.22087 – Odors, the facility will not discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents the comfortable enjoyment of life or property.

CONCLUSION AND CLOSING

As Stericycle presented during the Commission meeting and has outlined in the detailed explanations above, the McCarran facility will be heavily regulated and will operate in compliance with all applicable regulations and ordinances.

Per the Special Use Permit Staffing Report, page 7, the proposed facility is an appropriate operation within the site zoning classification, as the "property is located within the IS Overlay

(Special Industrial Zone) area within the TRI Center...this project does not require or utilize any of the incentives provided for the IS Overlay and is consistent, as conditioned, with the I2 Heavy Industrial as identified in Chapter 17.37 of the 1999 Storey County Zoning Code.” The transportation impact and emissions from, and the size of, our facility will be less than those of many of the existing residents in the industrial park today.

We believe we will be an excellent fit in the industrial park, as our proposed facility will be a best in class HMIWI -- possibly the most advanced facility in the nation. We are committed to operating with the latest technology innovations for air quality control, workplace and community safety, and energy conservation. We fully intend for our McCarron facility to serve as a showcase site for our global operations.

Moreover, we are excited about the prospect of becoming part of the Storey County community and establishing our home in the region. We recognize the negative impact of the economic downturn from the pandemic on the local community, and we are pleased to have the opportunity to contribute to the local economy through the development and construction of the facility as well as through operation of the facility. We are determined to use local contractors and hire local community members and to put down roots here in Storey County.

Again, we appreciate this opportunity to answer your questions and address the matters presented in the public comments you received. We are committed to full transparency around our plans, and you can be assured that our Stericycle team will continue to meet and work with public officials and members of the local community throughout this process.

We are available to address any additional questions you may have and look forward to the meeting of the Commission on August 6, 2020. In the interim, should you have any further questions, please reach out to Cassie Bittorf, Project Manager, Facilities, at 905-330-6194.

Sincerely,



Richard Moore

Executive Vice President of North American Operations

Received
July 15, 2020

Stericycle, Inc. ("Stericycle") has filed an application with the Storey County Planning Commission (the "Commission") for a special use permit ("SPU 2020-021") to authorize construction and operation of a medical and other special waste incinerator facility (the "Proposed Incinerator Facility") on property located at 1655 Milan Drive, Tahoe-Reno Industrial Center ("TRIC"), McCarran, Storey County, Nevada, a portion of Assessor's Parcel Number (APN) 005-111-73. As the owner of substantial property adjacent to the property where Stericycle is seeking to construct the Proposed Facility, Blockchains, LLC ("Blockchains") respectfully requests that the Commission deny SPU 2020-021 on the following ground:

The Commission should deny SPU 2020-021 pursuant to Section 3(B)(3) of the Staff Report because the application and the Staff's finding do not provide the necessary factual support to demonstrate that Stericycle can adequately mitigate the potential adverse impacts on surrounding uses or protect against potential safety hazards for surrounding uses.

Blockchains received notice of this application on Monday, July 13, only 4 days ahead of the hearing before the Commission that is scheduled for Thursday, July 16. Our response is therefore based on the limited investigation we were able to conduct in the short window we were given. Given Blockchains' future development plans, Stericycle's proposed transportation, storage, and incineration of special waste could have a materially negative impact on Blockchains' properties and future development plans that mitigation efforts may not prevent.

Blockchains owns more than 67,000 acres within and adjacent to TRIC. The location of the Proposed Incinerator Facility is at the southwest corner of Milan Drive and Clark Station road, within parcel APN 005-111-73. This parcel abuts three parcels owned by Blockchains: parcel APN 005-111-61 to the east; and parcels APN 005-111-12 and APN 005-111-67 to the north. Notably, parcel APN 005-111-67 consists of 214 acres of readily developable land, with a slope of only 5-10%. Thus, any negative impact to that land from the Proposed Incinerator Facility will cause injury to Blockchains.

1999 Storey County Zoning Ordinance (the "Zoning Code") Section 17.37.080, requires only a fifty (50) foot set back from any property line. Section 17.12.100(A) of the Zoning Code requires nuisances such as noise, smoke, odor, and gas to be controlled so as to not adversely affect the properties in the vicinity. Despite this requirement, Stericycle's application fails to describe how it plans to control for the obvious nuisances that will be caused by a facility with the stated purpose of transporting, storing, and incinerating medical waste on a 7 day a week, 24 hours a day basis.¹ Without such information, Blockchains is currently unable to quantify the potential nuisance risk that the Proposed Incinerator Facility creates or the potential damage to

¹ Basic internet searches reveal that Stericycle tried and failed to build this plant in Las Vegas [See: <https://apnews.com/b92674089b30c7fa855ccbbaaf983dc7c>] and toxic pollution has been an issue with other Stericycle plants. [See: <https://www.seattletimes.com/seattle-news/tacoma-hazardous-waste-operation-hit-with-1-9-million-state-fine-for-2018-fire/> and <https://www.kuer.org/post/stericycle-agrees-23-million-fine-settle-emissions-violations-utah>.]

Blockchains that the Proposed Incinerator Facility could cause should the Commission grant SPU 2020-021.

Additionally, approximately 3,000 wild horses roam throughout northern Nevada's 300,000-acre Virginia Range, which encompasses TRIC. Blockchains takes seriously its role as a corporate steward of those horses. In 2019, Blockchains established Project Frontier, Inc., a non-profit corporation formed to manage, protect, and promote the safety and welfare of the thousands of wild horses that roam throughout our property at TRIC. Project Frontier, with initial funding from Blockchains CEO, Jeffrey Berns is proactively focused on the protection of the wild horse population, including the preservation of its natural habitat and the prevention of injury or death within the population. The eastern parcel, APN 005-111-67, which is adjacent to the parcel on which construction of the Proposed Incinerator Facility is planned, contains a vital water source for the wild horses, known locally as Milan Pond. The water for Milan Pond comes from existing water rights owned by Blockchains, which donates the water from its hydrant meter service that is monitored by the TRI General Improvement District. Milan Pond typically provides water for approximately 350-400 horses. However, as USA Parkway Pond, where several hundred wild horses have obtained water for the past decade, has been removed for construction in the area, Milan Pond now handles the water needs of many additional horses. Thus, Milan Pond is more vital than ever to the well-being of the wild horse population. Stericycle's application does not include any short-term or long-term impact analysis on how its Proposed Incinerator Facility may affect the public safety and well-being of local wildlife, such as the wild horses, including any potential impact to the integrity of Milan Pond.

In light of the above demonstrable omissions from Stericycle's application, Blockchains is deeply concerned about the repercussions and adverse impact this facility would have on potential development on the adjacent land parcels, many of which are owned by Blockchains, and the deleterious effects it could impose on the wild horses living the area. At this time, Blockchains are asking that the hearing on SPU 2020-021 be rescheduled so as to allow Blockchains sufficient time to perform due diligence on this proposed use. If a rescheduling is denied, Blockchains asks that SPU 2020-021 be denied in its entirety for the legal deficiencies contained in the application described above.



July 15, 2020

Storey County Planning Commission
c/o Kathy Canfield
26 B St.
Virginia City NV 89940
Via email: kcanfield@storeycounty.org

Dear Ms Canfield,

Please distribute this letter to the members of the Storey County Planning Commission regarding **Special Use Permit File 2020-021** by Stericycle to construct a medical waste incinerator at the Tahoe Reno Industrial Center (TRIC). The matter is listed for consideration as Item 6 on the July 16, 2020 Planning Commission Agenda.

On behalf of our 5,000+ Northern Nevada supporters, we urge the members of the Planning Commission to deny this special use permit, at minimum until the numerous concerns and questions about the project are answered and there is full disclosure of the company's record in operating medical waste incinerators throughout the country, including a recently shuttered facility in North Salt Lake, Utah.

The American Wild Horse Campaign provides fertility control to the wild horses at TRIC and throughout the Virginia Range under a Cooperative Agreement with the Nevada Department of Agriculture. We have been grateful for the support of this program from TRIC developers Lance Gilman and Roger Norman, TRIC Project Manager Kris Thompson and numerous businesses at the park, particularly Blockchains LLC.

AWHC is concerned about the impacts of the proposed incinerator on wild horses, which have lived on the lands that now comprise the TRIC for more than a century. The incinerator would be located directly adjacent to Milan Pond, which currently is a key water source for hundreds of wild horses, thanks to water donated by TRIC's largest property owner, Blockchains. The importance of Milan Pond as a resource for water access for wild mustangs has grown this summer in light of the pending permanent closure of access for horses to USA Pond due to construction.

Additionally, we are concerned for the safety of our volunteers and staff who work in our fertility control program at TRIC, as well as for all of the estimated 16,000 people who work in businesses at the park. We have numerous questions and concerns about the project, its impacts, and Stericycle's record of operating incinerators in other communities.

Last year, Stericycle closed a medical waste incinerator in North Salt Lake, Utah amidst community concerns, environmental opposition and after the Utah Division of Air Quality levied a \$2.3 million fine against the company for air pollution violations. Stericycle later abandoned plans to build a new incinerator in a more remote area of Utah, and withdrew its application for a permit to construct an incinerator in the Las Vegas area in December of last year. Please see these articles for more information:

<https://www.deseret.com/2019/2/21/20666458/why-stericycle-s-medical-waste-incinerator-operations-are-leaving-utah>

<https://www.sltrib.com/news/2019/02/22/medical-waste-company/>

<https://www.kuer.org/post/north-salt-lake-residents-upset-about-unfiltered-emissions-medical-waste-incinerator#stream/0>

<https://apnews.com/b92674089b30c7fa855ccbaf983dc7c>

Some of the many outstanding questions and concerns that are not addressed by the staff report include:

- How does the waste get transported to the incinerator?
- What kind of and how much traffic does it create? (This is especially pertinent on Milan Drive, which has a low speed limit and a high level of horse crossings.)
- What are the specifics of the incinerator's emissions and air quality impacts, including drift of the plume?
- Where and how will the ash be stored?
- Is there risk to groundwater? (especially concerning in light of the incinerator's proximity to Milan Pond.)
- How frequently will unfiltered toxic pollutants be released into the air through a bypass stack? Will generators be required to prevent release of toxins in event of electrical failure?
- Does Nevada or Storey County require reporting of unplanned discharge incidents?
- How will Storey County protect the health of the employees who work at TRIC and the wild mustangs, bighorn sheep and other animals who live in the area?

- What mitigations are planned to minimize impacts to public health, road safety, wild horses and other wildlife?
- Will Storey County investigate Stericycle's record of compliance with state and federal air pollution regulations, including its past record in neighboring Utah?
- How will Storey County ensure that the type of air pollution violations that occurred in Utah won't happen here?

In conclusion, respectfully, we do not believe that the information in the staff report is sufficient to support a Planning Commission vote to approve the construction of this medical waste incinerator. We urge you to decline to approve the special use permit at least until outstanding questions and concerns are answered.

Thank you for your consideration.

Sincerely,

Suzanne Roy

Suzanne Roy

Executive Director
sroy@americanwildhorsecampaign.org
919-697-9389