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DEPT OF PLANNING  
AND PERMITTING  
CITY & COUNTY OF HONOLULU



Attorneys for Intervenor  
**SCHNITZER STEEL HAWAII CORP.**

BEFORE THE PLANNING COMMISSION  
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAII

In the Matter of the Application of

DEPARTMENT OF ENVIRONMENTAL  
SERVICES, CITY AND COUNTY OF  
HONOLULU

Application to Modify SUP No. 2008/SUP-2  
(SP09-403) by Modifying (1) Condition No. 1  
of the Planning Commission's Findings of  
Fact, Conclusions of Law, and Decision and  
Order, dated June 10, 2019, and (2) Condition  
No. 5 of the LUC's Findings of Fact,  
Conclusions of Law, and Decision and Order  
Approving with Modifications the City and  
County of Honolulu Planning Commission's  
Recommendation to Approve Special Use  
Permit, certified on November 1, 2019

FILE NO. 2008/SUP-2  
LUC DOCKET NO. SP09-403

INTERVENOR SCHNITZER STEEL  
HAWAII CORP.'S **AMENDED LIST OF  
EXHIBITS**; CERTIFICATE OF SERVICE

HEARING:  
Date: August 9, 2023  
Time: 1:30 p.m.

**INTERVENOR SCHNITZER STEEL HAWAII CORP.'S AMENDED EXHIBIT LIST**

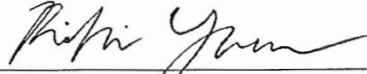
Comes now, Schnitzer Steel Hawaii Corp. ("Schnitzer"), by and through its attorneys,  
Watanabe Ing LLP, and hereby submits its Amended List of Exhibits regarding Applicant's  
application to modify special use permit in the above-captioned proceeding.

The Amended List of Exhibits is a list of exhibits that may be used in support of Schnitzer’s case pursuant to the contested case hearing to be held on August 9, 2023. Schnitzer reserves the right to further amend its Amended List of Exhibits and identify any additional exhibits not expressly identified above for rebuttal purposes in response to any pleadings, arguments, exhibits, issues, and witnesses identified by any party pursuant to the Rules of Planning Commission Section 2-71(c).

For the purpose of identification of its exhibits, Schnitzer will be using the identification letter “S” before each exhibit number.

Exhibit No.	Description
S-1	Solid Waste Management Permit (Permit Number RY-0013-20) issued by Director of Health, State of Hawai’I on December 30, 2021, to Schnitzer Steel Hawaii Corp.
S-2	Renewal Application for Solid Waste Management Permit for the Schnitzer Steel Hawaii Corp Facility, to Director of Health, State of Hawai’I, dated March 13, 2020.
S-3	Schnitzer Steel Hawaii Corp Yearly ASR Totals for 2020 – 2023
S-4	Schnitzer Steel’s 48C Tax Credit Program Round 1 Draft Concept Paper
S-5	Department of Energy Qualifying Advanced Energy Project Credit (48C) Program Webpage Printout, printed July 27, 2023
S-6	Schnitzer Steel’s 48C Tax Credit Program Round 1 Final Concept Paper and Grant Proposal, submitted July 31, 2023
S-7	Photograph of Planned Demonstrative Aid – Sample of Scrap Metal
S-8	Photograph of Planned Demonstrative Aid – Sample of Automobile Shredder Residue

DATED: Honolulu, Hawai'i, August 7, 2023.



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IAN L. SANDISON  
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Attorneys for Intervenor  
SCHNITZER STEEL HAWAII CORP.

## Project Overview

**Company Overview:** With more than 100 years in the field, Schnitzer Steel Industries, Inc. ("Schnitzer") is globally recognized for its proficiency in metals reprocessing, reutilization, recycling, and production. We serve over four million clients every year across 108 facilities supporting a workforce of over 3,400 individuals. Schnitzer has taken great strides to decrease our carbon footprint and we are constantly striving to push our emissions lower and encourage manufacturing efficiencies. By the end of FY 2025, we commit to reducing scope 1 and scope 2 greenhouse gas (GHG) emissions from our recycling operations by 25%. We have a long history of recycling a myriad of products to create value out of waste and further the circular economy. Prior experience in dealing with a wide range of scrap sources— industrial manufacturers, railroads, auto salvage facilities, metal dealers, and more—attests to our capabilities and adaptability. With a focus on operationally efficient and high-quality scrap metal processing, Schnitzer utilizes advanced technologies, including mega-shredders, to produce uniform, valuable metal pieces, enhancing their utility in new metal production. Its recycling facilities' aggregate processing capability surpasses five million tons of ferrous metal and six hundred million pounds of nonferrous metal annually. Our commitment to continual investment in our facilities for improved efficiencies, quality, and regulatory and environmental compliance, coupled with our strategic focus on synergies between our auto and metals recycling facilities, showcases Schnitzer's strong prior experience and dedicated evolution in the recycling sector.

**Project Scope:** We seek federal investment of \$6M in tax credits under section 48(e), section (I) of Appendix A (Other advanced energy property designed to reduce greenhouse gas emissions), to incorporate a state-of-the-art briquetting technology at our Kapolei recycling plant on the island of Oahu, Hawaii. This technology, which has demonstrated commercial viability by Toyota in Japan, will allow Schnitzer to further a circular economy in steel production, reduce landfill waste, create a new fuel source, and reduce GHG emissions. The technology will divert current waste material, automotive shredder residue (ASR), from Hawaii's landfill and thus reduce scope 3 GHG emissions. Between April 2022 and April 2023, approximately 26,905 metric tons (MT) of ASR generated 240 MT of CO<sub>2</sub> equivalent (MT CO<sub>2</sub>e). When broken down into monthly values, about 2,070 MT of ASR were responsible for the emission of approximately 18 MT CO<sub>2</sub>e. This measure solely accounts for the ASR disposal process, excluding the additional CO<sub>2</sub> emissions incurred during ASR transport. By innovatively transforming ASR into a reusable briquette product instead of directing it to the landfill, we could potentially avoid the 240 MT CO<sub>2</sub>e associated with its disposal. In addition to contributing to GHG emissions savings, this project will create a new fuel source alternative to metallurgical coal used in industrial manufacturing such as steel. Additionally, this project would advance the recycling of electric vehicles and internal combustion engines beyond current practice by avoiding landfill disposal of ASR. The technology will clear the ASR of plastics and compress remaining materials into briquettes. These briquettes can then be burned, like coal, as an energy source in industrial manufacturing processes such as steelmaking. Schnitzer is an ideal company to implement such technology. Since we specialize in recycling and steel production, we can leverage ASR briquettes in our steelmaking facilities.

## Commercial Viability

**Project Plan:** *Project Timeline:* We expect six months of planning, contracting, and permitting (estimated completion Fall 2024); 12 months of equipment purchases and procurement lead time (see *Risk Management Plan*), and one year of construction/installation (estimated to start Fall 2024). Operation will begin in Fall 2025. Within six months of commissioning, the facility is expected to ramp up to full production capacity. Thus, we anticipate reaching full capacity within a 3-year time frame. *Siting and Permitting:* The project will be sited within our existing facility at 91-056 Hanua St., Kapolei, HI 96707. The site is roughly seven acres, with the major process equipment covering around 35,000 square feet. We will pursue any required permits, which may include an air permit modification. Supply of ASR will come from Schnitzer's metals recycling yard. This project will be piloted with guaranteed offtake of all briquettes by Schnitzer's CA and OR steel manufacturing plants. Strategic future expansion will include

sales of the briquettes to other buyers in manufacturing and recycling operations (see *Market Information*). *Risk Management Plan: Legal:* This project could face permitting obstacles, such as receiving timely approvals in a state with stringent environmental regulations. We are proactively engaging the community (HI municipalities, workers, and grassroots groups), explaining how briquetting technology will have a net positive impact on land quality and resources by diverting 100% of ASR from the landfill while creating economic benefits. They show early project support (see also *Workforce and Community Engagement*). *Financial:* The project's long-term success will be tied to the strength of offtake arrangements, briquette pricing, and briquette market demand. We will pursue offtake agreements with potential HI and mainland buyers (see *Market Information*), and we will conduct regular reviews to assess ongoing operational efficiency and financial viability. *Procurement:* Delays in timely receipt of equipment due to shipping logistics are a perennial risk in HI, present before COVID-19 strained the global supply chain. These risks will be mitigated by advance planning for early procurement. *Construction:* Securing a trained workforce is challenging on an island with a limited labor pool and high demand. Between now and full application submission, we will assess the ability to hire union labor. We are committed to paying local contractors above prevailing wages. Our ability to secure a strong and skilled construction workforce is supported by workforce partnerships at the local level (see *Workforce and Community Engagement*). *Physical Climate and Environmental Risks:* Project location is in the 89th percentile for risk to properties from projected floods (tides, rain, and river and storm surges) within 30 years.<sup>1</sup> Nevertheless, the site's location on the leeward side of the island means that it is relatively sheltered from prevailing winds, rain, and hurricanes. In addition, Schnitzer maintains flood insurance. **Business Plan:** *Financial Information:* This project is not a standalone venture; it aligns with Schnitzer's dedication to the success of our business and to creating a more sustainable future. Equity investment for this project will come from Schnitzer (100%) and no debt obligations will be incurred. Funds will be allocated from operating expenses and sourced from regular company revenue generated by our commercial and manufacturing divisions. Schnitzer does not have any federal, state, or local government funding for its HI location, though we may pursue such opportunities in the future. *Market Information:* According to guidance from Toyota of Japan, the briquettes will have a marketable value of \$50/ton. Schnitzer will initially consume all the briquettes produced in its own steel manufacturing plants as a fuel source, offsetting the cost to purchase met coal. Potential downstream customers in the future are waste management companies, recycling facilities, steel and other metals manufacturers, and other organizations who burn metallurgical coal ("met coal") and similar fuels today. We will focus on HI for initial market penetration, targeting HI buyers as well as operations across the US. We expect steel manufacturers and landfill operators engaged in recycling operations, seeking to adopt more eco-friendly and cost-effective fuel alternatives, to serve as our primary niche market. Market forecasts support our confidence in growth potential. A Research Nester report projects the briquetting machine market size to reach \$5 billion USD in 2035, exhibiting a compounded annual growth rate (CAGR) of over 7% during the forecast period.<sup>2</sup> Similarly, a GlobeNewswire report estimates this industrial segment to grow at a CAGR of ~7% over the forecast period and to dominate the market's revenue contribution through 2028.<sup>3</sup> <sup>4</sup> *Cost Information:* By transforming ASR waste into briquettes and incorporating them as part of steel production, the project is primed to make substantial contributions to improved cost and waste

<sup>1</sup> Climate and Economic Justice Screening Tool (CEJST)

<sup>2</sup> Research Nester. (n.d.). Briquetting Machine Market Size, Growth Forecasts 2035. Retrieved from <https://www.researchnester.com/reports/briquetting-machine-market/4067>

<sup>3</sup> GlobeNewswire. (2022, August 25). Global Briquetting Machine Market is Predicted to Grow at a CAGR of 7% during 2022-2031. Retrieved from <https://www.globenewswire.com/news-release/2022/08/25/2504790/0/en/Global-Briquetting-Machine-Market-is-Predicted-to-Grow-at-a-CAGR-of-7-during-2022-2031-Market-to-Grow-on-Account-of-Increasing-Focus-on-Utilizing-Renewable-Energy-Resources-Researc.html>

<sup>4</sup> Future Market Insights. (n.d.). Briquetting Machine Market Size, Growth, Trends, Share | 2033. Retrieved from <https://www.futuremarketinsights.com/reports/briquetting-machine-market>

management. One major cost trade-off involves competing factors of transport and landfill costs. Oahu's only municipal landfill is at risk of closure due to land use permitting issues and the challenge of finding an alternative site.<sup>5</sup> The potential closure of Oahu's landfill presents significant challenges for the recycling industry, particularly waste disposal costs and logistics. The Honolulu City Council is exploring options to export a portion of its annual 500,000 tons of landfill waste on a 2,600-mile journey to the mainland West Coast.<sup>6</sup> Hawaiian Waste Systems of Seattle recently submitted one of the lowest bids among three companies contending to ship Hawaiian landfill waste, with a conservative estimate of \$99 per ton. This suggests an estimated cost of \$2.97 million USD per year just for the shipment of ASR waste alone,<sup>7</sup> which is economically impractical. Adopting briquetting technology offers a compelling alternative. By converting ASR waste into metal briquettes, Schnitzer can potentially offset landfill costs, both financial and ecological. Schnitzer will carry out an extensive analysis to compare costs of briquetting technology with similar technologies or materials in the market segment to chart a financially viable path forward.

**Management Plan:** *Key Team Members:* Julian Kift, Senior Director of Metals Technologies, will serve as Project Director. He is an accomplished business unit leader with expertise across a wide range of mining and mineral processing environments. Highly experienced at managing multidisciplinary and engineering teams, he has successfully implemented improved metals separation and recovery technologies. Mr. Kift will oversee the design and commissioning of the project, supported by the Technology Team's 12 team whose experience spans 100+ years in the industry. The HI team is led by Nick Garofalo, Regional General Manager with 10 years at Schnitzer, supported by a team of 18+. Permitting, engineering, project management, and construction will be managed by a local contractor selected through a competitive process. A sales/marketing team will pursue offtake agreements. We have stringent contracting guidelines, including priority consideration for companies with minority and indigenous ownership. *Corporate Health Indicators:* We have no legal claims or liabilities, planned debt restructuring, planned corporate actions, or other factors that could negatively affect the likelihood of project completion.

## **Greenhouse Gas Emissions Impacts**

### **GHG Emissions Impacts of the Facility's Products**

**End Product Impacts:** Our product, the briquettes, will significantly reduce GHG emissions and landfill waste and provide economic benefits through our innovative approach to waste management and recycling. Briquetting technology is the only proven technology to make a viable energy alternative to ASR waste. In terms of ASR processed, 75% becomes ASR briquettes and 25% is recycled plastics. Increasing the recovery rate of plastics provides a distinct GHG reduction benefit. Per EPA's Waste Reduction Model (WARM), the GHG benefit from recycling plastics is 0.925 metric ton CO<sub>2</sub>e per short ton (based on mixed plastics).<sup>8</sup> The reduction is primarily from the avoidance of fossil fuel consumption in the creation of virgin plastics. Made from recycled materials, our briquettes further reduce GHG emissions by eliminating emissions associated with the extraction and raw materials processing of metallurgical coal ("met coal"), the upstream emissions of which are well documented and account for 2-3% more CO<sub>2</sub>e in addition to the combustion emissions. Nonetheless, the ASR processed into reusable briquettes instead of directing it to landfills would avoid the associated 240 MT CO<sub>2</sub>e emissions from end-of-life automobile disposal. This project allows for the 100% recycling of an automobile, including EVs, sending nothing to landfill.

**Product Performance:** Briquettes are used as a consumable in the steel production process as a carbon neutral alternative to met coal. They result in a net-zero carbon footprint, as their carbon equivalent

<sup>5</sup> <https://www.honolulu.gov/opala/newlandfill.html>

<sup>6</sup> NBC News. (n.d.). Hawaii hopes to export trash to mainland. Retrieved July 30, 2023, from <https://www.nbcnews.com/id/wbna25678175>

<sup>7</sup> Ibid.

<sup>8</sup> <https://www.epa.gov/warm>

emissions are the same as those that would have been produced by met coal. The caloric value of the briquettes will be approximately one-third of the equivalent amount of met coal. At 4,000 to 5,000 Kcal/kg calorific value, raw ASR briquettes are suitable for electric arc furnace steel making. Adding back other components can bring their caloric value up to 6,000 kcal/kg.

**GHG Emissions from the Facility:** *Direct Emissions:* An estimated annual 26,905 MT of ASR residue at our recycling plant in Hawaii results in approximately 240 MT of CO<sub>2</sub> equivalent (mtCO<sub>2</sub>e) emissions. On a monthly basis, around 2,070 MT of ASR contributed to emitting approximately 18 MT of CO<sub>2</sub> equivalent, solely from the ASR disposal process, excluding transportation-related emissions, such as the fuel used to transport the waste to the landfill. Each briquette unit is expected to contribute to a further reduction of 18 MTCO<sub>2</sub>e/ton. This approach not only reduces the volume of waste going to landfills but also mitigates the direct emissions associated with landfill disposal. Though briquetting is a mature technology with widespread application worldwide, its application to Schnitzer's ASR is new; therefore, we are still in the process of evaluating the process emission for their creation. The emissions from combusting this material will be highly dependent upon the precise ASR constituents and carbon wt%. *Facility Performance:* We will ensure that all our ASR is either briquetted (75%) or used in recycled plastic (25%), with nothing going to landfill. Our projected recovery rate is 26,905 MT/year of ASR, producing 18,000 briquette units annually. An estimated 10% of the manufacturing facility will be allocated to eligible equipment. The deployed property, including the new briquetting technology, is expected to last for a lifetime of 20 years, making it a significant step toward realizing Schnitzer's commitment to long-term sustainability. *Mitigation Efforts:* Schnitzer commits to further minimizing the environmental impact of our facility and operations. We implemented measures to reduce methane and other GHG emissions from the bio-breakdown process at landfills. This includes enclosing processes to capture volatile organic compounds.

### **Strengthening U.S. Supply Chains and Domestic Manufacturing for a Net-Zero Economy**

**Facility Outputs:** Each year, the Hawaii facility generates 100,000 tons of recycled metal (ferrous metal, steel, and iron) sold and used in various downstream applications. It also generates 30,000 tons of ASR annually and disposes it in an on-island landfill. This project would install a new briquette technology to repurpose the ASR waste, thereby diverting it from the landfill and creating a value-add product, a fuel source that can be used to offset metallurgical coal in industrial processes such as steelmaking. **Facility Inputs:** The Kapolei facility, located on approximately seven acres of land on the island of Oahu, receives 130,000 tons of scrap metal per year inclusive of ferrous metal, steel, and iron. Major capital investments at the site leverage over \$15 million in recycling equipment and supportive tools including a metal shredder (\$3.5M) and a downstream nonferrous metal separator (\$1.5M). All materials received by the facility each year come from the State of Hawaii. After successful transition to the new technology, we will partner with the other two HI recycling companies to take their ASR. **Supply Chain Resilience:** Our metal recycling facility plays a vital role in bolstering the resilience of domestic supply chains that are crucial for energy products by providing critical metals for reuse in manufacturing energy technology, thereby facilitating progress towards a net-zero economy. By processing 130,000 tons of waste material annually and producing 100,000 tons of recycled metal, we create recycled feedstock for various industries, including those essential for renewable energy infrastructure. Moreover, the implementation of the new briquetting technology will allow us to harness ASR waste, showcasing a new innovative approach that completely avoids landfilling waste. The new technology will convert 30,000 tons of ASR waste into fuel briquettes annually. These briquettes provide a coal alternative, assisting in decarbonizing the energy-intensive steel sector. Furthermore, by promoting circular economy principles, we ensure that materials are utilized to their maximum potential from raw material extraction to end-of-life. This approach contributes to resource efficiency, reduction of environmental impact, and the overall resilience and sustainability of supply chains crucial to a net-zero future. **End-Use Applications:** The ASR waste briquette's end-use application is as a steel production fuel source, offsetting the use of coal. Schnitzer will pursue sales for the end use briquettes as enumerated in the market information.

**1. Job creation and workforce continuity.** We anticipate needing **25-30 skilled contract workers** for up to 6-9 months during construction and installation of the briquetting waste-to-energy infrastructure. In the past, Schnitzer utilized a mix of union and non-union workers for similar projects. We will assess the ability to hire union labor for the proposed 48C project. Schnitzer pays locally hired contractors above the prevailing wage for similar jobs in the region, and we will pay contracted workers a competitive rate for their work at our 48C project site. In addition to contracted labor, we anticipate **hiring 6-10 permanent, full-time employees** who will work in separation process operations and maintenance once the project is online. We offer competitive wages and full benefits including quality health insurance, paid leave, and retirement plans. Additionally, all Schnitzer employees have the option of joining a labor union of their choosing. New positions will be advertised through Honolulu Community College, which serves Hawaii's largely Native Hawaiian, Pacific Islander, and Asian-American populations. New training programs on briquetting technologies will upskill current Schnitzer employees, ensuring skilled workforce continuity. The project will also ensure workforce continuity in jobs related to barging briquette products to the mainland, e.g., cargo ship loading, operation, and terminal handling.

**2. Timely Project Completion Through Workforce and Community Engagement.** Schnitzer's goal is to attract, develop, and retain a high-performing workforce that reflects the rich diversity of the local communities. We plan to partner with Honolulu Community College's Construction and Trades department to establish a Federally Approved Applied Trades apprenticeship program. Timely on-site paid apprenticeships will provide Oahu's underrepresented students with on-the-job training and an immediate onramp to a career in metals recycling. As briquetting represents a frontier in recycling technology, Schnitzer will also seek to partner with local chapters of the AFL-CIO and United Steel Workers District 12 to establish a clean energy apprenticeship program for union members. Schnitzer places a continuous focus on enriching our employees' career growth. We currently offer several professional development opportunities such as our Skills Development Program, as well as tuition reimbursement and mentoring through our trade and community college partnerships. Schnitzer management works with employees to set comprehensive career development goals through our Leadership Development Cycle. In addition, the local municipalities and grassroots groups support Schnitzer providing an alternative to landfill.

**3. Energy Community Transition.** Hawaii's last remaining coal-fired plant closed in 2022. Most of the plant's 40 workers transitioned to clean energy jobs in the state. However, we will offer skills training through our partnerships with local trade schools so that former AES employees or their families may enter the scrap metal industry. We will convert existing space at our Oahu plant for briquette manufacturing, thus increasing the economic feasibility of installation and operation, and speeding project development.

**4. Local Environmental Impacts.** Converting existing recycling infrastructure at our Oahu plant to briquette manufacturing will have minimal environmental impact on the local area. Briquetting technology has a net positive impact on land quality and resources: conversion of residual recycling waste to briquettes creates a coal alternative for powering our onshore steel plants. Similarly, this technology allows for the complete recycling of e.g., electric vehicles, thus eliminating the total volume of waste sent to landfill and creating a closed-loop system. Similarly, minor secondary environmental impacts related to transport of briquettes to the mainland will be offset by using briquette power in place of coal.

**5. Disadvantaged communities (DACs).** The proposed project benefits DACs in Waianae Beach, Nānākuli, and Mākaha, near to our project site and where most of our employees live. Composed primarily of Native Hawaiians or Pacific Islanders, these communities are considered disadvantaged owing to socioeconomic factors, exposure to climate change impacts, and hardships that are compounded by inequities related to health, education, and high housing costs. This project will directly benefit these communities by, e.g., reducing the share of household income spent on garbage removal/utilities, increasing energy/recycling sector job training and pathways, and increasing parity in clean energy technology access and adoption through partnership with the Honolulu Community College system.







S-8

BEFORE THE PLANNING COMMISSION  
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STATE OF HAWAII

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FILE NO. 2008/SUP-2  
LUC DOCKET NO. SP09-403

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was duly served  
upon the parties identified below on the date set forth below:

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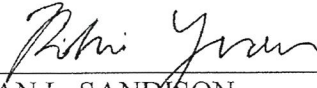
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DATED: Honolulu, Hawai'i, August 7, 2023.



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