



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

**VIA EMAIL ONLY**

March 10, 2015

Joseph Harding  
Harding Metals, Inc.  
PO Box 418  
Northwood, NH 03261  
Email: [kevin@hardingmetals.com](mailto:kevin@hardingmetals.com)

**SUBJECT: NORTHWOOD-** Harding Metals, Inc., 42 Harding Drive

Standard Permit for Solid Waste Collection, Storage, and Transfer Facility  
Application, Temporary Permit # DES-SW-TP-92-024, prepared by Harding  
Metals, Inc.; Ref.: WMD Doc Log #s 15592-15603

Dear Mr. Harding:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed a review of the above-cited Standard Permit application. In accordance with the requirements of the New Hampshire Solid Waste Rules (Rules), the following information must be provided to satisfy the provisions of Env-Sw 304.03 for a completeness determination, and Env-Sw 304.07 and Env-Sw 314 for a technical review.

**Completeness**

1. Please include completed Standard Application sheets 7-16 of 19, including the information for Section IX of the Application.
2. No full size plans were submitted. Please explain. Please include the information required in Section VI of the Application and per Env-Sw 314.03(a)(6).
3. Per Section I(3-5)(f)(iv), and Env-Sw 314.05 and RSA 149-M:10, I(b), please add the addresses to the included names of the directors, officers, and shareholders of the corporation.
4. Please include the facility life expectancy required in Section IX, and specified in Env-Sw 314.06(f).
5. Please include the signed acknowledgements of receipt for each required notification recipient, per Section IV(1) of the Application and Env-Sw 314.08(b)(3).
6. Per Section V(2) of the Application and Env-Sw 314.10(b)(5), please provide a current hydrogeological report of this site.

[www.des.nh.gov](http://www.des.nh.gov)  
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7. Sections 3.7.4 and 3.7.5 of the Operating Plan describe processing and treatment activities. However, Env-Sw 1105.11(d)(3)(h) has not been addressed. Please explain.
8. In Section 4.0 of the Operating Plan, Env-Sw 1105.11(d)(4)(a, c, and d) were not addressed. Please explain.

### **Application**

1. Section II(7)(d), the collection rate is stated as 300 tons per day (tpd). The Operating Plan states the facility will be open 5 days a week, which equals 78,000 tpy. However, the notification letters and Section 1.0 of the Operating Plan state the facility will only accept 75,000 tpy. Please explain.
2. Section II(1) lists temporary stockpiles and a recycling center as the collection, storage, and transfer activities. However, the current temporary permit also lists processing and treatment as a facility activity. If the facility will still be processing and treating waste, please list "processing/treatment" under "other (specify):" in this section, and describe this in more detail in the application.
3. In Figure 2, Site Area and GMZ Boundary Plan, the abutters in Lots 1 and 2 live across Route 4 from the property owned by the permittee but were not notified, per Env-Sw 303.05(c). Please explain.
4. In Section VI, a description of the site operations is located under "Preliminary Design Plan Specifications." Please explain.
5. Attachment 4 lists the "Former Incinerator Building" as a location of storage. However, this building cannot be found on any of the site plans. Please explain. Please ensure all of the location of storage items listed on Attachment 4 are shown on the site plans using the same location names.

### **Site Report**

1. The 4<sup>th</sup> and 5<sup>th</sup> paragraphs mention the inactive Main Metals Area solid waste landfill and the capped Sawdust Disposal Area landfill, respectively. Please include the limits of waste of these landfills on a full size and half size sheet that includes the entire facility. Please also include the post-closure monitoring for the Main Metals Area solid waste and Sawdust Disposal Area landfills in the Closure Plan, per Env-Sw 807.03.
2. Per Env-Sw 314.10(b)(2), please include a map showing zoning.
3. Please provide scaled maps showing the requirements of Env-Sw 314.10(b)(4) and the site property line.

4. Per Env-Sw 314.10(b)(5), please provide a current hydrogeological report of this site.

### **Operating Plan**

1. Section 2.1 mentions lead-acid batteries will be accepted at the facility. These cannot be accepted as part of the solid waste permit. Please list them in another section called "Accepted under Other Permits" both in the Operating Plan and the Closure Plan. If they are accepted under another permit, lead-acid batteries need to be properly stored and labeled for shipping. Please explain how these batteries will be properly maintained in Section 3.7.
2. In Section 3.1, third paragraph, it is stated the section shift operations are from 3PM to 1AM, which is outside of the 6AM-6PM timeframe. Therefore, please address Env-Sw 1105.08(b).
3. In Section 3.3, third paragraph from the bottom, it is mentioned unauthorized material is segregated when found. Please describe where on the site this material is segregated, and show the location on a site plan.
4. Section 3.4 is missing. Please explain.
5. In Sections 3.3 and 3.5, it states the records are maintained at the facility for 3 years and are archived for 3 years. However, Env-Sw 1105.06(b) states the records shall be maintained at the facility at all times during the active life of the facility. Please explain. Ensure to reference Env-Sw 1105.06 and 1105.07 in these sections.
6. Section 3.6 states the facility stores up to 11,500 tons; however, Section II(7) of the Application shows 11,600 tons of material. Please explain. Besides the storage capacity, please include the collection rate of the site in Section 3.6.
7. Figure 2 shows the metals area as paved, and in Section 3.7.2 it mentions this area is impervious. However, from inspections it appeared that this area is dirt. Please explain.
8. Section 4.0 mentions residual waste, however, residual waste is not mentioned in the Closure Plan. Instead bypass waste is mentioned in Sections 2.0, 5.2, and 5.3 of the Closure Plan. Please clarify.
9. From inspections it was noted a refueling station/structure is located along the entrance way. Please include a description of this station/structure in Section 5.2 and show it on a site plan. Please show all the above ground storage tanks and other structures on a site plan also.
10. In Section 5.5, please address any odors that might occur at the facility.
11. In Section 5.8, please identify the building used to capture the fluids mentioned in this section.

12. Section 5.9 mentions Env-Wm 1402, which is an outdated reference. Please update this reference to include the current Env-Sw rule reference.
13. In Section 5.9, please describe the location of spill kits in relation to the above-ground storage tanks on site.
14. In Section 6.1.1, no mention of extinguishers or operator training with extinguishers is mentioned. Please explain. Please explain if the buildings have a power shutoff. If so, add a description of the training for this feature to this section.
15. Section 6.1.3 mentions the SPCC Plan. Please include this plan as an appendix or attachment. Also, please state spill kits will be located in each building where necessary with staff trained to use these kits.
16. Please include in Sections 5.8-6.0 to contact the DES Spill Response and Complaint Control Investigation Section at 603-271-3899 and the State Police at 603-223-4381, as well as the times they can be reached. Please also include these numbers, and all emergency contacts, with the Emergency Phone numbers on Attachment 3.
17. In Section 6.1.3, please reference Attachment 3 for emergency contacts.
18. In Section 6.2, add the following spill response steps: 1) call local responders (ie fire department), 2) contact DES/State Police, and 3) submit spill report form from the DES website at <http://des.nh.gov/contactus/emergency.htm>.
19. In Section 6.2.2, while Env-Or 604.06 is mentioned, please include language from this section as well.
20. In Section 7.0, please mention where the operators' training status and certifications are located.
21. In Section 8.0, please reference Env-Sw 1105.06 and Env-Sw 1105.07, and include the facility operating records language from Env-Sw 1105.06(b,d).
22. In Attachment 2, in the subsection called "Items that cannot be accepted in iron and steel scrap," the items listed do not match the items listed in Section 2.2, Prohibitive Materials. Also, the "Guidelines for Iron and Steel Scrap" list is not the same as the items listed in Section 2.1, Authorized Materials. Please explain. Please ensure the accepted and prohibited materials on Attachment 1 also match Attachment 2 as well as Sections 2.1 and 2.2 in the Operating Plan and Section 3.0 of the Closure Plan.

### **Closure Plan**

1. Section 2.0 references Env-Wm; however, the rule nomenclature has changed to Env-Sw. Please ensure the updated nomenclature and rules are updated throughout this Application.
2. In Section 2.0, items 3 and 7 in the closure schedule are not further described as are the other line items in this section. Please explain.
3. Section 5.0 only lists processed recyclable materials as being removed; however, other wastes types are also onsite and need to be removed. Please explain.
4. In Section 5.3, the removal of processing equipment is mentioned. Please describe how this equipment will be removed, by whom, and to where.
5. Section 6.0 does not mention post-closure testing, as is required in Env-Sw 1106.04(e)(6). Please explain.
6. Section 6.1 states "the permit will be recorded as required by the NHDES." Please explain.
7. In Section 7.0, please include a reference to both Env-Sw 1105.06 and 1105.07.
8. In Section 7.0, the location of the repository where the records will be stored was not mentioned. Please explain.
9. Please mention the permits for any landfills or waste storage areas located on the property. If they are not owned by the permittee, per Env-Sw 1106.04(e)(8)(c), include a copy of the written executed access agreement required in Env-Sw 1003.03.

### **Closure Cost Estimate**

1. The "Site Cleanup" section of the estimate does not include the cost of removing processing equipment as mentioned in Section 5.3 of the Closure Plan. Please explain.
2. Please include on the estimate the original signature and date.
3. Section II(7) of the Application lists amounts of material stored, with a total amount of 11,600 tons for non-recyclable waste, unprocessed recyclable waste, and processed recyclable waste. However, the closure cost estimate in Section 9 lists a total of 519 tons of material stored. Please explain.

Please address the above comments by submitting one copy of the required information. Be certain to note the revision date on each replacement page. Continued review of your application will commence upon receipt of this information.

Joseph Harding  
Harding Metals, Inc.  
March 10, 2015  
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Until the Department has completed its completeness and technical reviews, there may be additional comments. In the meantime, if you have any questions, please contact me.

Sincerely,



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