Section V Site Report

Narrative Description of the Site

The Harding Metals, Inc. (HMI) property is located at 42 Harding Drive in Northwood, New Hampshire and has a total area of approximately 59 acres. HMI owns the following properties as identified on Town of Northwood Tax Map 234 with their corresponding acreage: Lot 78 (38 acres), Lot 79 (20.2 acres) and Lot 80 (1.1 acres). The metal recycling facility operates on approximately 10 acres of the eastern portion of the site. The remaining portion of the site consists of fields, wooded land and wetlands. The site and surrounding area are serviced by private drinking water supply wells. There is a locked gate to block the driveway into the site, but alongside the drive is a hayfield that is open. The eastern, southern, and western sides are surrounded by woods. Refer to Figure 4 for additional detail regarding surrounding land use and zoning.

Available history information indicates A. J. Price sold a 96-acre parcel of wooded land to the University of New Hampshire (UNH) in 1954. Edwin Harding Jr. bought the property from the University in 1963. Mr. Harding purchased an additional four acres in 1973. Land use prior to ownership by Mr. Harding is unknown. Detailed lot ownership and subdivision history was not developed for this application. Harding Metals began operating at the site shortly after the property was bought by Edwin Harding Jr. in 1963. Edwin Harding Jr. died in 1983, and the company was transferred to his sons, Edwin Harding, III and Joseph Harding. During the 50+ years since it first opened, the company has accepted and processed a variety of scrap metals and metal bearing wastes. A more detailed site history is available in the report titled *"Env-Ws 410 Site Investigation"* report by Nobis Engineering, Inc. dated April 7, 1998 and is available on NHDES OneStop database for Site Number 198404038.

Harding Metals is currently an active recycling facility (NHDES Temporary Permit No._DES-SW-TP-92-024) that accepts a variety of scrap metals and metal-bearing wastes for processing. Examples of materials processed include wire, metal turnings, cans of all types, automobile parts, tanks, truck bodies, vessels, drums, appliances, etc. The metals received at the facility are sorted, crushed, cut and baled, as appropriate, for shipment to other reclamation facilities depending on metal content and type. The materials are separated, processed and stockpiled in designated areas within processing buildings and in the yard. Note that the site does not contain briquetters, shredders, compactors, engine block breakers, cast iron breakers, wire choppers or turning crushers. The separated materials are then transferred to delivery trucks for transport to appropriate facility. Refer to Figures 1, 2 and 3 for additional detail.

The inactive Main Metals Area (MMA) solid waste landfill is approximately 1± acre in size and is located south of the paved area and gravel access road in the area where metal storage and sorting occurs. According to previous reports and site observations, the MMA landfill contains approximately 1,000-cubic yards of steel turnings, sand, sawdust, wooden pallets, tires, empty steel barrels, and fiber barrels. Available data indicates that approximately 2,000 cubic feet of sand and gravel cover was placed over the landfill to create a level work area to sort metals in

the area. An engineered low-permeability cap has not been placed over the MMA solid waste landfill.

The capped Sawdust Disposal Area (SDA) landfill has undergone excavation; segregation and on-site staging of soil, sawdust and other waste material including 70 to 80 drums; and testing of capping materials. During the summer of 1990, soil aeration and closure operations were conducted at the former SDA landfill. The aeration operation was reportedly conducted just north of the current SDA landfill location. After the aeration process was completed, the treated soil and sawdust materials met the 2 ppm remediation goal based on field-screening results that were confirmed with gas chromatograph analyses. The soil and sawdust were then placed back in the original area of excavation and a glacial till cap was constructed over the material.

Four underground storage tanks (USTs) containing petroleum products were formerly located on the property. The four USTs were closed between 1987 and 1994. Three of the USTs were closed by removal and one 2,000-gallon gasoline UST was closed in place due to structural considerations of a building. Aboveground storage tanks (ASTs) containing petroleum products are currently used on various portions of the property for operational equipment, maintenance purposes and fueling equipment. A Spill, Prevention, Control and Countermeasure (SPCC) Plan has been prepared to address potential petroleum releases from ASTs and during site fueling operations.

Analytical results for groundwater samples indicating exceedance of applicable groundwater quality standards for chlorinated volatile organic compounds (VOCs) are reported as of April 1987. Groundwater quality monitoring has been conducted at the site since circa 1987, most recently in accordance with Groundwater Management Permit (GMP) Number GWP-198404038-N-002 issued December 16, 2009 which is in the process of renewal. As detailed in the GMP, a Groundwater Management Zone (GMZ) has been established that includes Lots 78 and 79 and portions of abutting lots to restrict the use of groundwater for drinking water purposes. The groundwater use restriction for properties within the GMZ have been recorded in their respective chain of title for each property.

Flood Hazard Zones

The active portion of the facility is located approximately 400 feet upgradient of a Flood Zone A, associated with the on-site wetlands and Mountain Brook. The elevation difference between the active site area and the flood zone is approximately 70 feet. There is no reported history of flooding of the active areas of the site, and it appears that future flooding is unlikely given the distance and elevation difference from the Flood Zone area. Refer to the attached FEMA map for additional detail-Attachment #5(A)(I).

Wetlands

As noted above, the site contains wetlands associated with Mountain Brook. The wetlands are noted as "Prime Wetland R-1 RT 43" on Northwood Prime Wetland Maps. Active areas of the site are located approximately 400 feet away from these wetlands. Refer to Figure 1 for additional detail.

Habitat for Endangered or Threatened Species

Based on a review by the NH Natural Heritage Bureau, records show that there are no listed rare or endangered species within the site vicinity.

Designated Rivers and Protected Shoreland

Review of a map titled "Designated Rivers of New Hampshire" prepared by NHDES Watershed Management Bureau, dated March 2012, revealed that there are no Designated Rivers located in the immediate site vicinity. However, it should be noted that Mountain Brook flows into North River, which is noted as a Designated River. The North River is located approximately 4 miles from the facility.

Based on review of the NHDES Consolidated List of Water bodies Subject to RSA 483-B, the Shoreland Water Quality Protection Act, Mountain Brook is not listed as a Protected Shoreland.

Water Supplies

No municipal water service is available within the site vicinity. It is our understanding that the site and site vicinity is serviced by private water supply wells.

Hydrogeological Reports/Studies

Refer to Section V, Site Report for information regarding previously completed hydrogeological reports and/or studies performed at the site.

Section V Site Report: Traffic

The facility has been actively operating for over 50 years. As a result, the local and regional road system is already experiencing traffic flow related to this site. The approximate average traffic to and from the site is 25 to 100 trips per day. Vehicles include heavy trucks, small trucks and cars. There are no plans to increase or expand facility operations and as such, no additional traffic flow is expected.