Recyclers of Scrap & Precious Metals

HARDING

METALS, INC

OPERATING PLAN

Scrap Metal Collection, Storage and Transfer Facility

1.0 FACILITY IDENTIFICATION

Facility Name: Harding Metals, Inc. (HMI)

Mailing Address: PO Box 418
Northwood NH 03261-0418
(603)942-5573

Location Address: 42 Harding Drive
Northwood, NH 03261

Permit Number: DES-SW-TP-92-024

Facility Type: Collection/Storage/Transfer (Commercial Metal Recycling)

Facility Capacity: 75,000 tons/year

Facility Service Type: Unlimited Service Area Facility

Facility Service Area: Material delivered to the facility will generally be from individuals and businesses located within a 300 mile radius.

Facility Permittee,

Property Owner,

Operator

Harding Metals, Inc
P.O. Box 418 Northwood NH 03261

The Harding Metals, Inc recycling facility (HMI), located on Route 4 in Northwood, New Hampshire, is an existing collection, storage, and transfer facility, operating under a temporary solid waste permit (DES-SW-TP-94-024) This Operating Plan has been prepared to comply with current solid waste rules.

2.0 AUTHORIZED AND PROHIBITED MATERIALS

2.1 Authorized Materials

The following materials are authorized for receipt and processing at the facility:

Ferrous scrap metals consisting of iron, steel and cast iron in various forms, such as:

A. Prepared Steel – Material of a certain size, thickness and quality requirement to be described as commodity grade prepared scrap. This material requires no further processing

B. Unprepared Steel – Material of miscellaneous size, thickness and quality requiring processing (shearing, cutting, baling, etc) into prepared steel (above)

C. Mixed Steel – Material of miscellaneous size, thickness and quality requiring sorting and processing to create a marketable ferrous material

D. Cast iron materials consisting of, but not limited to; boilers, radiators, obsolete machinery, etc., that are not steel

E. Light iron – Material consisting of light gauge steel, white goods, appliances, roofing material and other sheet steel items generated from households, industrial sources, transfer stations and municipal solid waste facilities

F. Obsolete machinery and other equipment generally from manufacturing operations

Non-Ferrous scrap materials including:

A. Aluminum

B. Brass

C. Copper

D. Lead and Lead Acid Batteries

E. Stainless Steel and High Temperature Alloys

F. Catalytic Convertors

G. Any other non-ferrous recyclable materials that have value

Electronic Scrap

Non – Metallic Scrap

A. Office Paper

B. Cardboard

C. Miscellaneous Plastics

2.2 Prohibited Materials

The following items are prohibited for processing at the facility:

A. Hazardous material and hazardous waste

B. Sludge and septage material

C. Contained gaseous material

D. Infectious material

E. Explosives or explosive materials

F. TV's or CRT's

* Refer to the following attachments for scrap acceptance guidelines and prohibited items. Attachment 1 – General Scrap Acceptance Guidelines; Attachment 2 - Guidelines for Iron and Steel Scrap.

3.0 ROUTINE OPERATIONS PLAN

3.1 Operating Hours

The facility operates between the hours of 6:00 am and 1:00 am, Monday through Friday and at busy points during the year Saturday from 6:00 to 12:00.

Primary operations are from 6:00 to 4:00 Monday through Friday. These operations include accepting recyclables, packaging and processing recyclables, and shipping recyclables, housekeeping and maintenance related operations as well.

Harding does operate a small second shift that begins at 3:00 pm and shuts down at 1:00 am. It is responsible for reloading empty trailers with supplies (bins, boxes, drums, etc.) that their customers would use to assist with their recycling programs. Second shift is also responsible for housekeeping of the back scale area of Building #1

At busy times of the year when materials cannot be processed through the regular Monday – Friday work week Harding Metals does run a shift on Saturday to bail and process materials.

3.2 Access Control & On-Site Traffic Patterns

Unauthorized entry to and unauthorized use of the facility is prohibited by restricting access to the facility and the activities of the general public while within the facility. Public access to the facility is via the driveway on Route 4. The driveway is secured by a locked gate when the Facility Operator is not present. When the gate is open, all traffic must stop at the Main Office Building, so that all entry to the facility is monitored; permitting access to authorized parties only.

Access to the facility by other means is restricted by natural site features along the south, east and west boundaries. Traffic flow within the site is designed to separate retail unloading activities and traffic from commercial/industrial unloading, processing and loading activities. Traffic is directed based upon the types and quantities of materials delivered and delivering vehicles. The Site Operator directs suppliers within the facility and signs are posted for directional, traffic flow, and speed and restriction purposes. (Refer to Figure #5 Traffic Pattern Exhibit)

3.3 Material Acceptance & Rejection Procedures & 3.4 Quantity & Source of Incoming Materials Documentation.

Upon arrival to the facility customers that are dropping off materials are directed to either the truck scales for weighing the materials or directed to Building # 3 The Spinner Building.

Typically larger loads of single commodities are directed to the truck scale. Once on the scales customers come inside the office to give their names and addresses and to state what they have for material. A visual inspection is done by trained staff from inside the building or using a camera mounted over the scale. If the materials appear to be as described by the customer a weight slip is generated with the abbreviation for the material the customer has along with the gross weight of the vehicle. This given to the customer with the instructions it needs to be signed by an employee that assists then unload The customer then is given direction with the assistance of a yard map as to where they need to go to drop off the material, they are also given the name of an employee that will be available to help them unload. Once they reach that

area of the yard the designated employee will ask for the slip to make sure that they have checked in at the office and to confirm that the visual inspection performed there was accurate. They assist in the unloading to assure that all materials drop off are as specified and that there is not any unauthorized materials. When the unloading is completed the designated employee signs the weight slip and returns it to the customer. The customer then gives the slip the employee at the main desk to prove the materials have been inspected and they meet criteria, If at the inspection point in the yard the employee deems that the materials do not meet criteria, they are authorized to change the commodity abbreviation to the correct one and redirect the customer that drop off point in the yard and assist with the unloading.

If customers are directed to Building #3 they are waited on by a trained employee that will inquire about their name and address, then inspect, accept and weigh using the computer system enter the materials and weights in our system so that when all of the customers materials have been accepted they can go back to the main office and be paid correctly.

Harding Metals picks up materials from customers either in Box Vans, Roll Off containers, or Flat Bed trailers. Harding Metals drivers will inspect material at the time of loading, they make sure that package counts are correct and unauthorized materials are placed in or on the trailer.

Box Vans retuning to the facility with materials are parked in the Truck Parking Lot (see Figure 1 Overall Site Plan). They are then scheduled to be unloaded at the Back Scale located in Building #1 Plant Office. When these are unloaded they are weighed on a certified scale and then inspected to assure that the commodity listed on the packing slip or receipt is correct. This information is recorded in our computer system then the materials are staged to be transferred to the temporary stockpiles around the yard.

Roll Off containers are weighed on the truck scale. They commodity is check by visual inspection and then the driver is given direction to area of the yard where commodity is stored. At the time of dumping that driver does a visual inspection to assure the commodity meets the criteria. If there are any questions or issues with the Roll off Load, it is explained at the Plant Office as the truck and container are being weighed out. Typically this will result in management looking at the material.

Unauthorized material discovered at the time of inspection or during unloading is not accepted or permitted to be unloaded.

If unauthorized material is found after it had been unloaded and the vendor has departed the facility, that material is segregated, placed on an impervious or covered surface and the supplier will be contacted to pick up and remove the material from the facility.

If the supplier cannot be identified, then a third party vendor will be contacted to provide for disposal or recycling of the material in accordance with the applicable rules and regulations.

Records of incoming material inspection, content, weight and supplier are maintained at HMI's Main office actively for 3 years beyond the current operating year. After that records are archived for additional 3 years.

3.5 Quantity & Destination of Metal Products and Non-Ferrous Raw

99.5% of the incoming materials leave the facility for recycle. These materials include all forms of ferrous and non –ferrous scrap, cardboard, plastic, mixed office paper, wood, and e- scrap. The quantity of recyclable product shipped off-site is determined by weights obtained on the

certified scales on site, with the weights and its destination recorded and maintained at HMI's Main office actively for 3 years beyond the current operating year. After that records are archived for additional 3 years.

3.6 Storage Time and Capacity Limits Documentation

HMI keeps a backlog of approximately 4-6 week's worth of production on site. This is necessary to bulk process and ship materials after sorting has occurred. Production rate typically equals incoming material added each day. The facility may store up to 11500 tons of material.

3.7 Methods and Procedures for Managing Materials

3.7.1 Collection

The collection of materials and products will be determined by the procedures outlined in Section 3.3 and Section 3.4. Upon the completion of inspection, materials received will be stockpiled in the manner necessary to segregate the materials into commodities for processing as a marketable product.

3.7.2 Storage

The storage of materials and metal products will be maintained on an impervious surface in bulk stockpiles or bulk storage bins placed on an impervious surface throughout the facility as indicated on the Site Layout, Figures #1, 2, &3 as each operating area may be developed. Some of the larger pieces ferrous and non-ferrous metals will be stockpiled outside on the ground.

3.7.3 Transfer

The transfer of material and metal products will occur internally around the site based upon the segregation required to classify the material by commodity such as; prepared or unprepared steel, light iron, aluminum, etc. The transfer of material may occur in bulk or non-bulk quantities by truck, container or bulk movement by processing equipment such as a crane or loader. The off-site transfer of material, metal products and bypass residuals will occur in bulk or packaged form by truck.

3.7.4 Processing

The processing of material on site may occur through one or more of the following techniques: physical sorting or separation of the material by commodity or product; cutting by portable or stationary hydraulic shears, torches, plasma cutters, saws; bailing; crushing, wire chopping or other mechanical or manual means customary to the scrap metal recycling industry.

3.7.5 Treatment

The "treatment" of incoming material is not applicable to the operation.

3.7.6 Disposal

99.5% of the incoming materials leave the facility as recyclable metal products. The metal products are shipped to various domestic and international customers and consumers depending on market conditions. These customers may include, but are not limited to, processors, re-melters and manufacturers of steel, aluminum, brass, copper, stainless steel, lead, etc. The remaining 0.5% is managed as Solid Waste and is stored in a covered 30 yard roll off container. It is a combination of office trash, paper and cardboard that is mixed with wood that can't be recycled and mixed low grade plastics that have no scrap value. When the container is full it is delivered to the Turnkey Landfill in Rochester NH.

4.0 RESIDUAL WASTE MANAGEMENT

Harding Metals does manage residue waste. It will include windblown pieces of litter and smaller pieces of metals in areas were metals have been sheered up and sweepings from areas were industrial turnings have been handled. Methods to manage these wastes include hand picking, raking, and sweeping. For ferrous materials, an electric magnet will assist in cleaning up. The picked litter will go in the trash, the metals material that are swept, raked or picked up are recycled.

5.0 FACILITY MAINTENANCE, INSPECTION & MONITORING PLAN

Harding Metals maintains it facility and equipment according to manufactures and industry standards. Equipment is inspected daily and defects are reported to maintenance where they evaluated and prioritized. Equipment service records are kept at Building #1 The Maintenance Shop. Harding Metals has a trained Maintenance staff at the facility with a Manager that the authority to call outside contractor for assistance if necessary.

Safety inspections are preformed daily and documented monthly in all areas of the facility. See Attachment #6 for and example of the form used. Yard inspections are done daily, documented weekly. See Attachment # 7 for and example. Both of these inspections are kept online in the junkster/home/kevin/operations file folder. AST';s are inspected weekly, documented monthly. See attachement #8 for an example of the form used. These records are kept in file in the HR Manager's Office.

Harding Metals will start sampling and monitoring Storm Water the in 2015. There will be 4 documented sampling events at designated fall outs on the property. There will be other precipitation related event noted as well.

Harding Metals has to monitor ground water wells located at various point around it facility. Twice a year designated wells are sampled for either contaminates of ground water levels or sometime both. This information is provided to the NHDES as required by our groundwater permit.

5.1 Spontaneous Combustion

Spontaneous combustion is not likely, but is possible to occur in some materials stored at the facility. HMI manages a stockpile of cardboard, Gaylord boxes of office paper, a roll off container of broken pallets, boxes of plastic and bins of industrial turnings. If "Hot Work is necessary in these areas the scope of work and area have to be assessed to minimize the chance of a fire. Harding Metals examines its inventory daily for signs of hot spots or fire.

Other flammables for Harding Metals would be fuels and or supplies that the maintenance staff would require at the maintenance shop. They are stored in a secure location away from stock piles (in the Maintenance building). Employees, property, and the general public are at low risk. Employees have Hazard Communication training and fire suppression equipment is located in multiple locations throughout the site. In the event of a fire that cannot be quickly suppressed by HMI personnel, the Northwood fire department will be called and is adequately equipped to assist.

5.2 Fire Hazards

Fire hazards could exist in the following areas, due to the presence of papers, fuels, heat and human activities:

- Maintenance Building
- Pallet Roll Off
- Court Yard – Cardboard Pile
- Spinner Building
- Aluminum Building
- Main Office Building

Fire Extinguishers are easily accessed at all of these locations. Fire extinguishers are inspected weekly basis, documented monthly. Employees have Hazard Communication training, which addresses potential fire hazards and procedures for preventing fires.

5.3 Vector Production

There is no storage or handling of food, biological waste, organic waste and other vector carrying sources. Solid waste generated on site is disposed of in a municipal solid waste dumpster located outside the office.

5.4 Generation of Methane, Hazardous and/or Explosive Gas

Not applicable. None of the materials accepted or generated by the facility have the potential to generate these gases.

5.5 Odors

The current processes do not produce significant odors.

5.6 Dust

Most all of the operation and drive areas are paved with asphalt pavement and concrete to minimize generation of dust from the drive and operating surfaces. Drive areas are swept with a mechanical sweeper on a regular schedule.

5.7 Windblown Litter

Most all materials managed at Harding Metals are heavy so that it does not have the potential to become windblown, but a there are a few items that do and have the possibility to. These would be office paper, Cardboard, plastic, and office trash. In order to reduce the risk of this happening, office paper is stored inside and our trash roll off has a cover. Once a year during the spring the perimeter of the working area of the property is walked by employees and any trash that is found is picked up. The facility has a large natural buffer and this makes it very unlikely that any windblown materials would leave the property.

5.8 Leachate

Industrial turnings are stored in a specially designed area to capture the fluids that could be present in them and prevent them from being released to the environment. This area is found on Figure 2 Insert A. These fluids are a combination of oil based and water based cutting fluids. The moisture is reduced through an evaporator and the resulting oils are disposed of through an authorized disposal service (Safety-Kleen). The majority of working surfaces in this area has been paved or consists of concrete. These areas are swept regularly to reduce the risks of contaminants being exposed to rain or other moisture. Any material that has an oily residue must be stored inside or in a covered container. Harding Metals samples a number of test wells and a surface water station at different times during the year to monitor conditions.

HMI is proactive with the identification of potential sources of contamination and has the following programs to minimize the potential impact of these sources to nearby water bodies.

- SWPPP
- Outdoor Material and Product Stockpile Management
- Indoor Material and Stockpile Management
- Designated Scrap Processing Areas
- Spill Prevention and Response Procedures

5.9 Spills

A Spill Prevention, Control and Countermeasure (SPCC) plan was developed to address federal (CFR part 112) and state (Env-Wm 1402) requirements for oil storage at the facility. Key features of the plan are:

Petroleum and fluids at the facility are stored in 11 aboveground storage tanks (AST) and 7 other storage areas for smaller containers. Attachment #4 provides detail of all fluid storage areas in the facility and its volume.

Identification of potential risks of oil contamination from on-site activities include leaks from ASTs, fueling activities, the operation of processing equipment including heavy machinery, and the storage of fluids such as motor oil, hydraulic fluid and diesel fuel.

Spill Response and Notification Procedure - See section 6.1.3

6.0 CONTINGENCY PLAN

6.1 Emergency Scenarios – Immediate Actions

Immediate actions to follow by any responsible party, in an event of emergency are detailed below.

6.1.1 Fire & Explosion

- Assess the situation and evaluate fire, health and safety hazards;
- Take any action necessary to prevent risk to employees.
- If necessary, activate fire alarm;
- If necessary, dial 911 to notify the Northwood Fire Department

6.1.2 Injury

- Assess the situation and evaluate health and safety hazards;
- Take any action necessary to prevent additional risk to employees; (evacuate the facility, shut off machines, etc.)
- If trained, administer first aid and make efforts to stabilize the condition;
- If necessary, dial 911 to notify Emergency Services or evacuate to the nearest emergency room

6.1.3 Spill Response Procedure (As described in the SPCC)

In an event of a spill or oil discharge the following procedure will be followed immediately by facility personnel:

- Assess the situation and evaluate fire, health and safety hazards;
- Stop the discharge;
- Notify your immediate supervisor via two-way radio or phone. Follow up with notification to the HR Manager or General Manager.
- Contain and remove all discharged oil and oil-contaminated debris;

• Small spills (less than 25 gallons) that are readily cleaned-up with the on-site spill kits, spill response will likely be handled by HMI personnel;

• Larger spills, that require additional equipment (vacuum truck, excavator, roll-offs, booms, etc.), and spills that reach surface water, will be handled by an emergency response contractor. The emergency response contractor for HMI is Safety Kleen 1-888-375-5336

• Stockpile and/or dispose discharged oil and oil-contaminated materials in accordance with all applicable local, state and federal regulations;

• Monitor and mitigate fire, health and safety hazards and notify Emergency Services as necessary by dialing 911;

• Take any action necessary to prevent environmental damage from the discharge; and

• Investigate to determine the possible presence of free product.

6.2 Incidents Notification

Incidents involving injuries and other health and safety issues are reported according to OSHA requirement.

All incidents or situations at the facility which involve an imminent and substantial risk to human health, safety or the environment and/or which constitute a violation of the solid waste rules or the facility permit shall be reported to the NHDES.

A verbal report should be made as soon as practicable.

A written report shall be submitted within 5 working days of the time the facility operator becomes aware of the incident or situation and include information as:

- Facility name, location by street and municipality, and permit number;
- Permittee name, mailing address and telephone number;
- Identification of all persons involved in the incident or situation, including
- name, title and affiliation;

A description of the incident or situation, including:

The date and time the incident or situation occurred;

The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities;

Measures employed to contain releases caused by the incident or situation; and

An assessment of actual or potential hazards to the environment, safety and human health related to the incident; and

Including the measures that Harding Metals, Inc. has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation.

6.2.1 Nuisance Situation

Complaints made by abutters or other third parties that involve operating conditions or practices having the potential to adversely affect human health, safety or the environment or which involve a recurring or persistent nuisance situation shall be reported to the NHDES, in writing.

6.2.2 Oil Spill

If an oil spill occurs which exceeds the requirements of Env-Or 604.06 verbal notification shall be made directly to the NHDES during normal working hours or to the NH State Police after normal working hours.

Please refer to Attachment #3 for Emergency Phone Numbers

7.0 EMPLOYEE TRAINING PROGRAM

7.1 Certified Operators Requirements

The facility shall be staffed with persons qualified by reason of education, experience and performance history to operate the facility in accordance with all applicable requirements of the solid waste rules and the permit. HMI is a Commercial Metals recycling Facility our requirement for staffing are:

All persons who operate the facility shall be certified by either issued certification or interim certification in accordance with Env-Sw 1600.

During the hours of operation there shall be at least one supervisor who shall be certified as a Principle Operator Step 4. Assitant operators or

The NHDES administers an operator training program and written examination for operator certification on an annual basis. It is HMI's policy that all personnel will renew their certificate on time by attending those training programs or qualified company equivalent training.

7.2 New Employees

HMI's orientation and training program for new employees includes:

- HMI New Employee Orientation; See Attachment #9
- Introduction to HMI's Operating Plan;
- Introduction to HMI's SWPPP;
- Introduction to HMI's SPCC Plan

7.3 Refresher

Annual refresher of HMI's programs is scheduled every year and attended by all employees. The refresher includes review of the following:

- Hazard Communication

- Changes in regulations and requirements
- Operating Plan Updates
- SPCC Plan & SWPPP

7.4 Monthly Meetings

The HR Manager or General Manager conducts monthly meetings to discuss safety issues, facility plans (SPCC, etc.), and inform employees of any changes to the facility's plans. A record of each meeting's agenda and attendance is maintained at HMI's Office accordance with Company retention policies.

8.0 Record Keeping

Operation Records, which would include material inspection, purchases, sales, deliveries, operation expenses are stored in the Main Office (Building # 1 on Figure 1).

DOT records, which would include driver's qualification files, DVIRs, driver's logs, drug and alcohol tests, and any tickets, citations or violations, would be stored in the Main Office.

Safety records, which would include facility inspections, safety testing and training, equipment inspections, PPE assessments, Job Safety Assessments, and safety committee meeting minutes, first reports of injury and accident reports are stored in the Main Office building.

Environmental records, which would include all permits, sampling data, training records, manifests, complaints received and related response actions, inspections and meetings, and operator certificates are stored at the Main Office

Accounting records, Personnel Records, Records for the Weights and Measures, records for the Dept of Health and Human Services Control of Radiation are kept at the Main Office,

All maintenance and service records are kept at the Maintenance Shop (Building #4)

Harding Metals will notify DES in writing 30 days before any changes in operators or operations or before any permanent changes to the facility or facility design are started. Harding Metals will also give the same notification if and changes are expected to materials received at its facility if not covered under its current permit.

Harding Metals will file and Annual report with NHDES on or before March 31st of each year with the forms provided by NHDES and will file Financial Assure paperwork on or before November 15th of each year.