Recyclers of Scrap & Precious Metals

HARDING

METALS, INC

CLOSURE

PLAN

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1.0 FACILITY IDENTIFICATION

Facility Name: Harding Metals, Inc

Mailing Address: PO Box 418

Northwood, New Hampshire 03261-0418

(603)942-5573

Location Address: 42 Harding Drive

Northwood, New Hampshire 03261

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

2.0 CLOSURE SCHEDULE

	Closure Activity Requires	Duration of Activity	Completion Deadline
1	File a notice of intent to close in accordance with Env-Wm 1106.02	15 Days	15 Days before termination of receipt of scrap
2	Terminate all deliveries of scrap.	0 Days	Immediately
3	Remove all secondary products produced by the Facility and/or all recycled products produced by the Facility.	45 Days	1 ½ months after termination of receipt of scrap
4	Remove all wastes, including all bypass wastes and residuals from site to a permitted waste management facility	60 Days	2 months after termination of receipt of scrap
5	Remove, dismantle or otherwise decommission all facility equipment	120 Days	4 months after termination of receipt of scrap
6	Clean the Facility in accordance with Env-Wm 406.02	120 Days	4 months after termination of receipt of scrap
7	Perform all actions necessary, based on actual facility performance and actual site conditions, to monitor and remediate any associated environmental damage. File report to describe responsibilities for existing GWMP & Maintenance-Management of Landfills	180 Days	6 months after termination of receipt of scrap

2.1 Notice of Intent

The Harding Metals, Inc (HMI) facility, located on Harding Drive off (Route 4) in Northwood, New Hampshire, is an existing collection, storage, and transfer facility, operating under a temporary solid waste permit (DES-SW-TP-92-024).

This Closure Plan has been prepared to comply with current solid waste rules and to assist in the unexpected event that the Harding Metals Facility closes. This plan will also accompany the application for a standard solid waste permit application for the facility.

The facility will continued to be maintained and upgraded as necessary; therefore there is no expected date of closure. In any event, prior to commencing closure of the facility, a notice of intent to close will be filed as per the plan described below:

The notice of intent to close shall include:

A. Facility Identification

B. Date the facility intends to stop receiving materials

C. A copy of the facility's approved closure plan or file reference thereto

2.2 Stockpiled Processed Inventory Removal

Following the notice of intent the facility will no longer accept material and will process stockpiled inventory only. Depending on quantity of the existing inventory, removal of the stockpiled inventory should take approximately 1 to 1 ½ months. Processed inventory will be any material that can be shipped or loaded without further handling. This represents approximately 99.5% of the materials located on site.

2.3 Stockpiled Non-Processed Inventory Removal

Non Processed consists of a material that requires machinery or manpower to process into an acceptable form for an end user. HMI will remove all stockpiled non –processed materials inventory in approximately 1 to 1 ½ months.

2.4 Processing Equipment Removal

Equipment at the facility potentially includes a chip wringer system, conveyors, excavators, loaders, shears, 2 top loader balers, forklifts, skid-steers, torches, and other equipment customary to the scrap metals recycling industry.

HMI will decommission and remove all equipment not required for clean up off-site within 120 days from the time it stops taking materials.

2.5 Scrap and Trash Clean-up and Removal

HMI will be responsible for the final clean-up and removal of scrap from the site.

This will be accomplished by the remaining personnel or on site contractor. Visual inspection of the site, to confirm clean-up, will be performed prior to demobilizing. This will take place within 120 days of the time the facility stops accepting scrap.

3.0 AUTHORIZED AND PROHIBITED WASTE

3.1 Authorized Waste

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 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

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. Misc. Plastics

D. Broken Wooden Pallets

3.2 Prohibited Waste

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

4.0 NOTIFICATIONS

Following the filing of the Notice of Intent (section 2.1), HMI will contact its frequent suppliers in writing. The letter will inform them of the upcoming closure and include a copy of the Notice of Intent. Suppliers will be notified at least one week prior to closure.

Simultaneously with the notification to suppliers, a sign will be posted at the entrance gate to the facility notifying any infrequent suppliers of the upcoming closure.

5.0 CLOSURE REQUIREMENTS

To comply with Env-Sw 1006.02(b), all processed recyclable materials shall be removed from the facility to an authorized facility.

5.1 Removal of Stockpiled Inventory

Stockpiled inventory would likely not exist at the time of facility closure. However, in the event of an unplanned closure, the inventory would be removed by another metal recycling operation or authorized contractor.

5.2 Removal of Stockpiled Non-Processed Inventory

If present, stockpiled Non-Processed Inventory would be removed from the site as a raw material by another metal recycling operation or authorized contractor. Any bypass residuals not shipped to another metal recycling operation or authorized contractor would be shipped to an authorized facility for recycling or disposal.

5.3 Removal of Processing Equipment

Removal of processing equipment will be scheduled following the removal of any stockpiled inventory and Non-Processed/Bypass Residuals has been completed.

5.4 Clean-up and Removal of Remaining Scrap and Trash

The clean-up will involve the removal of materials from the facility's ground surface, using a crane, grapple, magnet, mobile shear, dozer, screener raking, or hand picking, as necessary. Material would be removed to the existing ground surface and shipped off-site to an authorized processing facility. In addition, the clean-up will involve removing any trash, debris and other materials from the buildings. All buildings will be secured to restrict unauthorized access or damage.

6.0 POST CLOSURE REQUIREMENTS

Post-closure monitoring and maintenance shall be undertaken as required to assure the facility is closed in a manner to not adversely affect the environment, public health or safety.

6.1 Post Closure Monitoring

Post-closure monitoring will include groundwater quality monitoring in accordance with the groundwater permit for the facility. Reporting will be performed as required by the permit and the permit will be recorded as required by the NHDES.

6.2 Inspections

Facility inspections would continue until the DES signs off on closure. These inspections would be at least monthly. (See Attachment# 7 for Form). Other inspections would depend on future site use.

6.3 Maintenance

Maintenance will depend on future site use. Capped landfill will require mowing and inspection on an annual basis.

7.0 RECORDKEEPING AND REPORTING

Prior to closure HMI will identify a repository for storing all operational and closure activity records. All records will be marked according to their content and shipped to the repository chosen.

7.1 Annual Report

Annual report for the inactive facility as described in Env-Sw 1105.14 will be filed only through closure.

The report shall include the following:

A. Facility name, location by street and municipality, and permit number;

B. Name and address of Permittee;

C. Name, address, certificate number and telephone number of all facility operators, if applicable;

D. Name, address, affiliation and telephone number of the person or persons responsible for managing all post-closure activities at the facility;

E. Facility status, including, as applicable:

1) Date the facility discontinued receipt of waste;

2) Commencement and completion dates for all construction activities at the facility related to the approved closure plan;

3) Anticipated or scheduled date for completing all required post-closure monitoring and maintenance activities.

4). There will be post-closure obligations, this will require and evaluation of the available environmental monitoring data and other information pertaining to facility conditions, including a statement by a qualified professional engineer identifying whether the facility is achieving post-closure performance expectations and whether adjustments to the approved post-closure monitoring and maintenance period or provisions are recommended in light of the performance evaluation.

8.0 OTHER PERMITS

NHDES Groundwater Management permit would be maintained until deemed unnecessary by NHDES. Groundwater Management Data and other information would be submitted until notified by NHDES.

9.0 CLOSURE COST ESTIMATES

The closure cost estimate for the facility will be prepared in accordance with the Closure Plan and the requirements of the NH Solid Waste Rules. The closure cost estimate is to be submitted to the NHDES as required (currently on an annual basis).

The facility's most recent cost estimate is included in Attachment 10. The estimate is based upon representative current market rates for a third party to perform the closure activities.

The cost estimate will be reviewed annually and updated as necessary along with the appropriate financial assurance documents.

Recyclers of Scrap & Precious Metals

HARDING
METALS, INC

42 Harding Drive • P.O. Box 418 • Northwood, NH 03261-0418
(603) 942-5573 • 1-800-370 - JUNK • Fax: (603) 942-5646 • www.hardingmetals.com

10/28/2014

State of New Hampshire
Department of Environmental Services
Solid Waste Management Bureau
6 Hazen Drive, PO Box 95
Concord, New Hampshire 03302-0095
Attention: Laura J. Kieronski

Re: Financial Assurance for Harding Metals, Inc.
Permit No. DES – SW – TP – 92 – 024
Certificate of Deposit with TD Banknorth No. 9731187484

Dear Laura,

Our operation and inventory are very similar to last year. The following is our annual closure cost estimates for the year 2015. Everything accepted at Harding Metals, Inc. is for recycling purposes only. The only trash on site would be household (office) accumulation that would be staged in one 30 yard roll-off.

Cost Estimate

1. Loading and transportation of ferrous and non-ferrous scrap, corrugated cardboard, wooden pallets and other recyclable products.

   Storage capacity of 500 tons of unprepared scrap

Shipping 500 tons x $15.00/ton =	$7,500.00
Loading 500 tons x $2.00/ton =	$1,000.00

   Material would be shipped by tractor trailers to mostly within, but not limited to a one hundred mile radius.

2. Recyclables with a cost impact.

Tires: 2.0 tons x $127.00/ton =	$ 254.00
Used Oil 2000 gallons x $0.99 / gal. =	$1,980.00

3. Non-recyclables: Material to be disposed of such as household trash staged in a 30 yard roll-off container.

Trash	15 tons x $108.00/ton =	$1,620.00
Old Pallets	2 tons x $72.00/ton =	$ 144.00

4. Total cost	$12,498.00
5. 10% contingency	$ 1,249.80
6. Total overall cost	$13,747.80

We are proposing to maintain a balance of at least $13,747.80 in the Certificate of Deposit # 9731187484 with TD Bank for future financial assurance. If you have any questions, I can be reached by dialing 942-5573 or email me at kevin@hardingmetals.com.

Sincerely,

Kevin Campbell
Safety & Environmental Coordinator

Cost Estimate Form for Closure of Solid Waste on/Storage/Transfer Facilities or Recycling Facilities

acility Name: HARDING METALS, INC
ddress: 42 HARDING DRIVE
NORTHWOOD, NH 03261

ES Permit #: DES-SW-TP-92-024

State of New Hampshire
Department of Environmental Services
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95, Concord, NH 03302-0095
PHONE (603) 271-2925 FAX (603) 271-2456 EMAIL solidwasteinfo@des.nh.gov
TDD Access: Relay NH 1-800-735-2964

omplete this form in accordance with the NH Solid Waste Rules Part Env-Sw 1400.

Permitted Material	Permitted Amount	Quantity[1] SPR[2]	Quantity[1] Non-SPR[2]	Unit	Loading Cost Per Unit (Non-SPR)	Transp. Cost Per Unit (Non-SPR)	Disposal Cost Per Unit (Non-SPR)	Total Cost Per Unit (Non-SPR)	Total Cost	Disposal Destination
			0	Ton						
			0	Ton						
crap Metals		500	0	Ton	$2.00	$15.00			$8,500.00	Misc Markets (USA, CAN, China)
sed Tires			2	Ton	$2.00		$125.00	$127.00	$254.00	(BDS) Corinna Maine
sed Oil			2000	Gallon	$0.00		$0.99	$0.99	$1,980.00	(Safety Kleen) Marlborough MA
rash			15	Ton	$0.00	$2.00	$106.00	$108.00	$1,620.00	(Turn Key Landfill) Rochester NH
ld Pallets			2	Ton		$2.00	$70.00	$72.00	$144.00	Eco-Maine
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						
			0	Ton						

ite Cleanup (per approved closure plan)	Description of Work to be Performed		Name of Third Party Providing Estimate
abor			
quipment Decommissioning			
quipment Removal			
uilding Cleaning			
egrading			
ydroseeding			
ther:			
Miscellaneous Closure Work			
dministrative			
ther:			
	Subtotal	$12,498.00	
	10%Contingency	$1,249.80	
	Total *	$13,747.80	
	GRAND TOTAL	$13,747.80	

* Add the costs for qualified professional oversight of all closure activities if the total closure cost estimate is more than $50,000.

[1] Note: The combined Quantity of Select Processed Recyclables (SPR) and Non-SPR must equal the maximum permitted storage capacity.

[2] A (SPR) is a recyclable material (a material comprised of one of the following materials: paper, cardboard, glass, plastic, ferrous metal, non-ferrous metal, or textile materials) which has been physically sorted and separated by material type, formed into bales or otherwise physically processed and packaged in a manner satisfying the specifications for transportation to and acceptance by a market that will use the material for the production of certified waste-derived products.

This closure cost estimate has been figured based on representative current market rates for having a third party perform all required closure and post-closure activities at the point in the facility's active life when the extent and manner of facility operations in compliance with permit conditions and applicable laws and rules makes closure the most expensive, as indicated by the approved facility closure plan.

Signature of Preparer:_____ Date:_____ Signature of Permittee:_____ Date:_____

Date of Last Form Revision: 7/1/14