



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL

January 24, 2014

Patrick Christopher
President of Metals Recycling Business
Schnitzer Steel Industries
69 Rover Street
Everett, MA 02149
Email: patchristopher@schn.com

SUBJECT: MADBURY- New England Metal Recycling (NEMR), LLC, 290 Know Marsh Road

Issuance of Permit # DES-SW-SP-13-002 and retirement of Permit # DES-SW-TP-94-001; Standard Permit for Solid Waste Collection/Storage/Transfer Facility, prepared by New England Metal Recycling, Ref.: WMD Doc log #s 2011610, 2011660, 2011730, 10779, 12731, 12977, 13049, 13125, 13177, and 13206

Dear Mr. Christopher:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed its review of NEMR's above referenced application for a standard permit and has the following comments:

Operating Plan

Application

1. Section 5.0, Facility Maintenance, Inspection and Monitoring Plan, does not mention the oil/water separator (OWS) at the facility. The last mention of the OWS in the Hazardous Waste Remediation Bureau files is in the 2009 Annual Summary Report, dated January 27, 2010 prepared by EOS Research, Ltd. (EOS). EOS refers to the OWS as follows: "*The OWS was replaced during 2009 with an engineered storm water treatment system that includes particulate settling, oil/water separation and constructed wetlands. Periodic cleaning of the oil/water separator will continue to be performed during 2010.*" If the OWS is still functioning for its intended purpose, please identify its location, and provide the operation and maintenance procedures for its inspection, pumping, and reporting.

Site Report

1. Section 4.3, Site Environmental Conditions, briefly provides a discussion of volatile-organic-compound (VOC) contamination at the site. The discussion mentions chlorinated and petroleum based compounds. However, the present on-going, short-term extraction and treatment at monitoring well RDW-5, past efforts at monitoring well RDW-7, and the present on-going investigation of tetrachloroethylene (PCE) contamination at RDW-6 were not mentioned in this section, either by reference or in detail. Please include this additional information in this section.

DES Web Site: www.des.nh.gov

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-2925 Fax: (603) 271-2456 TDD Access: Relay NH 1-800-735-2964

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Page 2 of 2

Plans

1. The 100-year floodplain shown on Sheet 2 is different than the floodplain shown on Sheets 1 and 3. Please explain. Please insure the floodplain is the same on all full-size and half-size sheets, and that a reference to the source of this floodplain and floodplain elevation is shown on these full-size and half-size sheets.

Please address the above comments and submit one copy of the revised application in loose-leaf notebooks at your earliest convenience. Continued review of your applications will commence upon receipt of this information.

Note that in accordance with the provisions of Env-Sw 304.05(d) of the Rules, an incomplete application that becomes a dormant application shall be deemed denied. As defined by Env-Sw 102.54 of the Rules, a dormant application is one that the applicant fails to complete within 12 months of the date the application is deemed to be incomplete by the Department.

If you have any questions, please contact me.

Sincerely,



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