



The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner



*Celebrating 25 Years of Protecting
New Hampshire's Environment*

VIA EMAIL

July 30, 2012

Joseph J. Nicolella, Jr., General Manager- NH Operations
Schnitzer Steel Industries, Inc.
25 Sandquist Street
Concord, NH 03301
Email: jnicolella@schn.com

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

Standard Permit for Solid Waste Collection/Storage/Transfer Facility, prepared by
New England Metal Recycling, LLC; WMD Doc Log # 2011610, 2011660, and
2011730, and 10779

Dear Mr. Nicolella:

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:

Design Report

1. While response #1 under Design Report states that berms will protect the site from the 100-year flood, these berms are not shown on the site plan. Please show the extent of the existing berms and the proposed additions to these berms, and explain how these berms will protect the site from the 100-year flood, per Env-Sw 1002.05(b).

Operating Plan

1. In the response to Operating Plan comment 1, it is stated that ELVs will be crushed on site in an automobile crusher or tin logger; however, no crusher or tin logger could be found on the site plans. Please explain.
2. Please place the response to Operating Plan comment 2, which addresses the operating outside the timeframe of 6AM-6PM, in Section 3.1 of the Operating Plan. Please show on the site plans the location of the primary gate (located on the frontage of Know Marsh Road).
3. While Section 3.1 of the Closure Plan was resubmitted to add ELVs as a separate line item, Section 2.1 of the Operating Plan was not included. Please explain.
4. In Attachment 3, Page 1, Bullet Points 3, 4, 9, and 11 directly relate to items found in an ELV. However, these bullet points list wastes that are brought in separately from an ELV. Please include a statement in the section "The following materials will NOT be accepted at our facility" explaining whether or not these items apply to "wet" and "dry" vehicle dismantling, or are wastes that are brought in separately.

Joseph Nicolella, Jr.
Schnitzer Steel Industries, Inc.
July 30, 2012
Page 2 of 2

5. In Attachment 3, Page 2, section "Automobiles/Light Trucks," please add a statement that the ELVs will be processed in accordance with the Best Management Practices as discussed in the Motor Vehicle Salvage Yard Environmental Compliance Manual & Self-Audit Checklist.
6. In Attachment 3, Page 2, section "Metal Theft," please describe how the facility prevents vehicle theft through the use and processing of State End-of-Life Forms, Titles/Bill of Sales, and NMVTIS.

Note that the temporary permit listed in Section II (8) (c) of the Application for this facility will be retired upon issuance of this standard permit, per Env-Sw 307.09(e) (1) of the Rules.

Please address the above comments and submit three copies 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,



Paul Gildersleeve, P.E.
Solid Waste Management Bureau
Tel: (603) 271-2935
Fax: (603) 271-2456
E-mail: paul.gildersleeve@des.nh.gov

ec: Kitty Cornwell, Town of Madbury; Email: tcmadbury@comcast.net
J. Michael Joyal, City of Dover; Email: m.joyal@dover.nh.gov
S. Shillaber, PE, Sanborn Head & Associates, Inc.; Email: rsshillaber@sanbornhead.com
Barry Keith, B.H. Keith Associates; Email: BHKeith1@netzero.net
Janet Bernardo, ESS Group, Inc.; Email: jbernardo@essgroup.com
Pat Christopher, Schnitzer Steel Industries, Inc.; Email: patchristopher@schn.com
Paul Deschaine, Lamprey Solid Waste Management District c/o Town of Stratham; Email: strathamta@comcast.net