



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

March 4, 2011

Joseph J. Nicolella, Jr., General Manager- NH Operations
Schnitzer Steel Industries, Inc.
25 Sandquist Street
Concord, NH 03301

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

by Standard Permit for Solid Waste Collection/Storage/Transfer Facility, prepared
New England Metal Recycling, LLC dated January 28, 2011; WMD Doc Log #
2011610

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:

Application

1. In Section II(7) the collection rate is 1820 tons per day. In Section IV, the abutter notification states 475,000 tons per year. The Operating Plan, Section 3.1, states the facility will be open 6 days a week. If the facility is open 52 weeks, the 1820 tons per day would equal 567,840 tons per year, not 475,000 tons per year. Please provide an approved design capacity (Env-Sw 102.09) expressed in tons per week.
2. Attachment I(3)(f)(iv) shows who manages the company, but it does not show the ownership of the company. Please explain.
3. The abutter notifications are included in Section IV, but the return receipts are missing. Please submit .
4. Please revise the Host Solid Waste Management District address listed in Section IV with the new address for the Lamprey Solid Waste Management District. The new address is: PO Box 299, Stratham, NH 03885. Please resend the abutter notification to this new address.

Site Drawings

1. On Sheet 1, what does the label "CU/SS/Other" mean? Please explain.
2. Please include on the Drawings an explanation of what the "Zorba Covered Storage Bins" means. What does the term "Zorba" mean and what is included in the bins?
3. In the "Ferrous Product" hatched area on Drawing 1, what apparatus does the "40'R" refer to?

DES Web Site: www.des.nh.gov

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4. Please describe on Drawing 1 which activities occur and which materials are accepted in the “wet” car processing building.
5. Does the “N-F” designation on the plans mean “non-ferrous raw”? Please explain.
6. Storage for the liquids from the wet-car process is not shown on the plans. Please explain.
7. Section 5.9 of the Operating Plan describes how the petroleum and fluids will be contained. Please show these above-ground storage tanks and other listed measures, on the site plans.
8. Section 3.2 mentions signage is provided, but none is shown on the plans. Please explain.
9. On Drawing 1 please explain how the “Peddler Ferrous Area” and the vehicles exiting the facility are separated. What is the purpose of the dashed line that appears between the two areas? Please place this dashed line in the legend.
10. Please place on the Drawings all the groundwater monitoring wells within and adjacent to the facility. Also include who is responsible for the repair or replacement of these wells when damaged, and who will contact the Department concerning this damage.

Wetland Report

1. The area designation shown on the pictures cannot be found on the Wetland Overview Plan, as stated in the “Facility Area” portion of the Wetland Delineation letter. Please explain.
2. The 100-year floodplain is mentioned in the “Un-Developed Area” portion of the Wetland Delineation letter, but not on the Wetland Overview Plan. Please explain.
3. Areas D and E in photos 5 and 6, respectively, show debris not actively managed within the facility. Please explain.

Design Report

1. On page 2, it states hot loads are not expected and a hot load area is not shown in the Site Drawings. However, a hot load area is needed, per Env-Sw 404.03(a)(3). Please explain.
2. In Section 5.1 a statement is made that the NEMR’s current and proposed operations take place outside the special flood hazard zone, but Sheet 1 shows storage areas inside this area. Please explain.
3. Env-Sw 1002.05(b) states that facilities and practices shall protect all waste storage, handling and disposal areas against impact from the 100-year flood. Please explain how these areas will be protected.
4. Please review the proposed locations of each Stormwater Treatment Area and provide a

narrative about whether or not the proposed stormwater upgrades will impact the quality of groundwater. If groundwater is impacted, please address the need for new groundwater monitoring wells.

Operating Plan

1. In Section 3.0, the operating hours are stated as 6AM-11PM. Per Env-Sw 1105.08(b), operating hours must be within the 6AM-6PM timeframe. Please explain.
2. Section 4.4 mentions non-ferrous raw material. What material does this consist of? While an explanation is in Section 2.3 of the Closure Plan, it also needs to be in the Operating Plan.
3. Section 4.2 states that non-ferrous raw will be placed in bins on an impervious pavement. Please describe type of bin.
4. Section 5.9 references Env-Wm 1402 for oil storage requirements. This designation is not an updated rule reference. Please explain.
5. Please add asbestos contractor information to the Emergency Phone Numbers in Attachment 5, as well as the following information: the Federal Emergency Management Agency (FEMA)(Boston) at 617-223-9562, and FEMA Region 1 at 202-898-6189; and the Centers for Disease Control and Prevention (Atlanta, Georgia) at 404-639-3311.
6. Section 3.6 lists 35,000 tons of metal product stored at the facility. The closure cost estimate separates this 35,000-ton amount into 30,000 tons of select processed recyclables and 5,000 tons non-select processed recyclables. Please explain here in the Operating Plan the different materials that comprise these two amounts.
7. Drawing 3 shows a processing section in the non-ferrous building. Please explain in Section 2.1 of the Operating Plan what type of processing activities occur.
8. Section 5.5 states no odors will be produced. However, please provide a plan of activities in case odors do occur.
9. Section 5.8 mentions safeguards for leachate spill prevention and lists bullet points. Please explain this bullet-pointed information in more detail.
10. Please include in the Operating Plan that during construction of the buildings and the construction of the paved/concrete areas, all monitoring wells need to be protected. Please state how the existing wells will be protected. Please also state that the Department will be contacted if one is damaged, per Env-Sw 1104.07, and will not attempt to repair or replace any damaged well, or install any new well, without first contacting the Department for approval. Please place this information on the Drawings as well.
11. Section 4.3 states that Non-Ferrous Raw and bypass residuals will be shipped offsite to a Non-Ferrous Recovery Plant and several landfills. Please give the address of the Non-

Joseph Nicolella, Jr.
Schnitzer Steel Industries, Inc.
March 4, 2011
Page 4 of 5

Ferrous Recovery Plant and at least 2 names and addresses of the landfills the Non-Ferrous Raw and bypass residuals will be sent to, and eliminate the phrase "References for acceptance are available upon request."

12. Section 3.3 mentions the acceptance and rejection procedures of the facility. Please describe the locations non-metallic waste will be delivered to, in case this waste is accepted by the facility.
13. Changes to the operating plan and closure plan require updates to those plans and a corresponding submittal to the Department, per Env-Sw 315, Env-Sw 1105.11(b), and Env-Sw 1106.04(c). Please include language in Section 8.0 of the Operating Plan and Section 7.0 of the Closure Plan to include the language of this requirement.

Cost Estimate

In line 1, "Metals (Ferrous and Non-Ferrous)(Pre-Processed)", how is the amount \$210,000 calculated?

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,



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Joseph Nicolella, Jr.
Schnitzer Steel Industries, Inc.
March 4, 2011
Page 5 of 5

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