



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

July 19, 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

Standard Permit for Solid Waste Collection/Storage/Transfer Facility, prepared
by New England Metal Recycling, LLC dated January 28, 2011; WMD Doc Log
Nos. 2011610 and 2011660

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. Although a description of stormwater contamination management is provided in the comment letter, please provide a detailed description in the Design Report of the how stormwater contamination will be managed. Please provide details on the Drawings of the stormwater treatment structures which will be used to manage stormwater contamination.
2. 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 include a section in the Flood Emergency Plan how these areas will be protected against the potential release of greasy/oily "leachate" emanating from any metal scrap pile impacted from a flood.

Operating Plan

1. The Operating Plan, Section 3.1, lists 6 days of operations per week while the comment letter states the facility will be open 5 days per week. Please explain. Please include the approved design capacity, per Env-Sw 102.09, in the Operating Plan.
2. Please submit a letter from the Town granting permission to operate outside of the 6AM-6PM timeframe. Also, please address Env-Sw 1105.08(b)(1)(b).

Cost Estimate

1. In line 1, "Metals (Ferrous and Non-Ferrous)(Pre-Processed)", and line 2 "Metals (Ferrous and Non-Ferrous)(Processed)", show on the individual line items the different amounts that add to the sums of \$210,000 and \$38,000, respectively.
2. The Cost Estimate Form for Closure is not signed and dated by the Preparer and Permittee. Please explain.

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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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
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