



December 7, 2011

Mr. Paul Gildersleeve, P.E.
Solid Waste Management Bureau
New Hampshire Department of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, NH 03302-0095

Re: Response to Review Comments
Standard Permit Application
New England Metal Recycling LLC
Madbury, New Hampshire
WMD Log #2011610

Dear Mr. Gildersleeve:

This letter presents our responses to comments provided in your July 19, 2011 letter regarding our application for a Standard Permit for our facility on Knox Marsh Road (Route 155) in Madbury. Comments from your letter are provided below in italics, followed by our response in standard type. We have attached the portions of the application documents that have been modified in response to the comments, with all master documents updated accordingly. Modified text is indicated in redline/strikeout mode to facilitate your review.

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.*

Response: The detailed description and design for the stormwater contamination management plan have not been included in the Design Report at this time, due to the fact that technology is consistently changing in the stormwater arena. We are currently pilot testing some of these technologies at other company owned locations and feel it would be premature to commit to a stormwater design at this time. The final stormwater treatment facilities will be designed for the management and removal of suspended solids, oil and metals in accordance with NHDES requirements. The conceptual design as identified in this application has been provided to indicate the approximate location and inclusion of such systems in our design. The detailed design of stormwater treatment facilities will be provided as part of the permit application for Alteration of Terrain; therefore, providing NH DES opportunity for further review and comment at that time.

Schnitzer Steel Industries, Inc.

Metals Recycling Business – Northeast Region
25 Sandquist Street, Concord, NH 03301
Phone: (603) 225-2267 Fax: (503) 471-4736

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.*

Response: The text of the Flood Emergency Plan has been revised to provide more information regarding the protection against the potential release of greasy/oily "leachate" emanating from any metal scrap pile impacted from a flood. A revised copy of the text is attached.

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.*

Response: In the original submission of the Permit Application and subsequent response letter, the indicated collection rate of 1,820 tons per day (in section II (7)), was miscalculated/misreported based on a five-day operating week. The proposed operation of the facility is a six-day operating week (Monday – Saturday), with a collection rate for the facility estimated at 475,000 tons per year, or an average rate of 9,134.61 tons per week. The rated through-put capacity of the proposed equipment for processing upon the installation of all proposed improvements is approximately 509,200 tons per year or 9,972.31 tons per week. Pre-processed inventory ("material") on hand shall not exceed 50,000 tons; post-processed inventory ("metal product") shall not exceed 35,000 tons, and the total quantity of by-pass residuals shall not exceed 12,000 tons.

Section 3.7.1, section 3.7.2 and section 3.7.4 of the Operating Plan have been revised to include the design capacity requirements, per Env-Sw 102.09. Section II (7) of the Standard Permit for Solid Waste Collection/Storage/Transfer Facility application has also been revised to indicate the corrected per day collection rate. The revised text of both items is provided.

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).*

Response: The letter from the Town of Madbury granting permission to our proposed 6:00 AM to 11:00 PM hours of operation was received on October 07, 2011. A copy of the letter is attached.

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.*

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Response: The cost estimates for the Closure Plan were reviewed with the Preparer. Upon further review, it was determined that the preparer had transposed the pre/post processed quantities of waste, as well as included non-SPR costs in the original estimate. The Cost Estimate Form for Closure has been revised to break out the costs of individual line items. A copy of the revised Cost Estimate Form for Closure is attached.

2. *The Cost Estimate Form for Closure is not signed and dated by the Preparer and Permittee. Please explain.*

Response: The signed Cost Estimate Form for Closure was inadvertently left out of the original permit application submission. A copy of the Cost Estimate Form for Closure, dated 01/27/11 is attached.

I believe these responses address your comments as indicated in your letter of July 19, 2011. However, please note that I am also including revisions to section II (5) of the Standard Permit for Solid Waste Collection/Storage/Transfer Facility and sections 3.7.5 and 3.7.6 of the Operating Plan to provide additional information on the handling of ELV's and their associated processes as recommended by Tara Mae Albert of the NHDES.

If you should you have further questions or require additional information, please feel free to contact me via e-mail at jnicolella@schm.com or phone at (603) 225-2267 x1302303.

Sincerely,



Joseph J. Nicoletta, Jr.
General Manager – New Hampshire/Maine Operations

cc: Pat Christopher, Schnitzer Steel Industries, Inc.
Kitty Cornwell, Town of Madbury
J. Michael Joyal, City of Dover
S. Shillaber, PE, Sanborn Head & Associates
Barry Keith, B.H. Keith Associates
Janet Bernardo, ESS Group, Inc.
Wayne Wheeler, PE, WMD-Solid Waste Bureau

**AMENDED PAGE OF
STANDARD PERMIT APPLICATION**

SECTION II. FACILITY DESCRIPTION

Provide a brief description of the facility. Note that more detailed information pertaining to facility operations will be provided in the Operating Plan required under Section VII of this form.

(1)	The type of collection/storage/transfer activity(s):			
	<input type="checkbox"/>	Transfer station	<input type="checkbox"/>	Recycling center
	<input type="checkbox"/>	Temporary stockpile(s)	<input checked="" type="checkbox"/>	Other (specify): Processing/Transfer
(2)	Facility ownership (check one): <input type="checkbox"/> publicly owned <input checked="" type="checkbox"/> privately owned			
(3)	Facility service type: <input type="checkbox"/> limited service area facility (i.e., will receive waste from only specified sources/locations) <input checked="" type="checkbox"/> unlimited service area facility (i.e., will potentially receive waste from any source/location)			
(4)	Facility service area: Note: If the "facility service type," provided in response to (3) above, is a "limited service area facility," then identify the precise geographic area(s) and/or generator(s) that the facility shall be limited to serving. If the facility service type, as provided in response to (3) above, is an "unlimited service area facility," then identify the geographic region and/or generators the facility will most likely serve. Material delivered to the facility will generally be from individuals and businesses located within about 75 miles			
(5)	Type(s) of waste to be received by the facility (be specific): Ferrous and non ferrous scrap metal <u>and end-of-life vehicles (ELV's)</u>			
(6)	Type(s) of waste to be prohibited by the facility (be specific): Hazardous material/waste, sludge and septage, contained gaseous material, infectious material and explosives.			
(7)	Capacity for each of the following:			
(a)	Storing non-recyclable waste: 12,000 tons or cubic yards			
(b)	Storing unprocessed recyclable waste: 50,000 tons or cubic yards			
(c)	Storing processed (market ready) recyclable waste: 35,000 tons or cubic yards			
(d)	Collection rate: <u>4,8201,522</u> tons or cubic yards per day on average annually			
(8)	Identify other waste management activities at the site. Check all of the below which apply. If none apply, check here <input type="checkbox"/> and go to Section III. You must respond to this question to fulfill the reporting requirements in Env-Sw 1105.07(d) and (f). However, the information provided by your response shall not become part of any permit issued pursuant to this application; it is merely intended to identify whether other types of waste management activities, not covered by the requested permit, are or will be conducted at the subject site. Therefore, if any of the below listed activities are or will be occurring at this site, place a check mark in the corresponding box and show the location of each such activity on the site plans prepared pursuant to Section VI of this form. Also, be certain the activities do not adversely affect the ability to properly manage the facility for which a permit is being sought. Also note: Although the below listed activities do not require issuance of a solid waste management facility permit, other local, state or federal permits or approvals may apply. Contact the DES Public Information & Permitting Office [(603) 271-2975], if necessary, for assistance in determining permitting requirements.			
(a)	ACTIVITIES INVOLVING WASTES THAT ARE NOT REGULATED AS SOLID WASTE (Ref. Env-Sw 101.03):			
	<input type="checkbox"/>	Management of yard waste (leaves, grass clippings, garden debris, and small or chipped branches)		
	<input type="checkbox"/>	Burial of stumps at the waste generation site, which have been cut or uprooted from the site, at least 75 feet from any drinking water supply		
	<input type="checkbox"/>	Operation of a "swap shop," collecting and distributing salvaged materials/items for reuse in-kind, pursuant to Env-Sw 1500, including:		
	<input type="checkbox"/>	Collection and distribution of non-hazardous paint for use as paint		
	<input type="checkbox"/>	Collection and distribution of other used furniture, equipment, clothing, etc. for reuse in-kind		
	<input type="checkbox"/>	Other (specify):		
	<input type="checkbox"/>	Management of septage, as defined in RSA 485-A:2,IX-a, by a method not involving disposal with a solid waste		
	<input type="checkbox"/>	Management of sludge as defined in RSA 485-A:2,XI-a, by a method not involving disposal with a solid waste		
	<input type="checkbox"/>	Management of hazardous waste, as defined in RSA 147-A:2, as follows:		
	<input checked="" type="checkbox"/>	Collection of used oil for recycling		
	<input type="checkbox"/>	Collection of household hazardous waste		
	<input type="checkbox"/>	Collection of universal waste, as follows:		
	<input checked="" type="checkbox"/>	Batteries	<input checked="" type="checkbox"/>	Antifreeze
	<input type="checkbox"/>	Pesticides	<input type="checkbox"/>	Thermostats
	<input type="checkbox"/>	Other (specify):		
	<input type="checkbox"/>	Operation of a permitted hazardous waste transfer facility (Provide permit #):		
	<input type="checkbox"/>	Operation of a permitted hazardous waste treatment, storage or disposal (TSD) facility (Provide permit #):		
	<input type="checkbox"/>	Other (specify):		
	<input type="checkbox"/>	Management of solid or dissolved materials in irrigation return flows		
	<input type="checkbox"/>	Management of municipal and industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended		
	<input type="checkbox"/>	Management of radioactive materials as defined and regulated by the New Hampshire Rules for the Control of Radiation, He-P 2000 and He-P 4000		

UPDATED FLOOD EMERGENCY PLAN



FLOOD EMERGENCY PLAN
New England Metal Recycling – Knox Marsh Road, Madbury, NH

(Page 1 of 2)

Pre-Flood Levels

1. Monitor local radio broadcast from the Grey Maine weather station as well as WMUR Channel 9 news as a major storm develops. Water levels can be monitored at www.weather.gov or www.wmur.com as well as visual site inspection.
2. In the event flooding is predicted, make the preparations necessary to acquire materials to construct and prepare sand berms/sandbags for placement around any entrances to buildings (exit doors or overhead doors) and/or metal scrap piles that are at risk of flooding or critical equipment that cannot be moved to higher ground
3. Be ready to move telephone and computer equipment to a safe area above flood levels. Evaluate the need for any additional flood proofing of vital equipment.
4. Notify Safety, Environmental and Risk Management Departments that the flood plan is being executed.

Water levels reach surface area

1. Start moving building contents and equipment to higher levels (higher ground, on pallets, or higher up in racks, or loft areas).
2. Place sand berms and sandbags at all entrances to buildings at risk of flooding.
3. Construct and place sand berms/sandbags (and oil absorbing booms) around all waste storage, handling and disposal areas as necessary to prevent the potential release of greasy/oily "leachate" which may emanate from metal scrap piles impacted by potential flooding.
4. Secure any outside storage or equipment that cannot be moved.
5. Fill or secure empty storage tanks (propane, 55-gallon drums, or other storage containers) to prevent them from floating away.

Water levels rise above building foundations

1. To reduce chance of fire during flooding turn off all utilities.
2. Evacuate area until flood waters recede.
 - a. 1st evacuation route would be to leave from entrance drive to NH Route 155.
 - b. 2nd evacuation route would be to leave through the access road to the closed landfill on the east side of the site to the adjacent property.
3. If unable to evacuate, move personnel to higher ground within the site (closed landfill)
4. Organize damage response to property (i.e. utilities, plumber, electrician, sprinkler company, etc.)

FLOOD EMERGENCY PLAN
New England Metal Recycling – Knox Marsh Road, Madbury, NH
(Page 2 of 2)

Post Flood

1. Employees are required to wear protective gear for clean up, including rubber boots and gloves. Prior to entering any lunch room, worker must walk through chlorine bleach (1 part bleach to 4 parts water) which will cover the sole of the boot. Prior to eating or leaving at the end of the shift, all employees need to wash with soap, water, and final rinse of chlorine bleach (1 part bleach to 4 parts water).
2. Check for spilled flammable liquid, contaminants, etc. and eliminate before work begins
3. Check for broken or disconnected pipes and confirm utilities are operating correctly.
4. Take photos to document damage
5. Engage vendors to assist with drying of equipment and dehumidifying areas of critical importance

Emergency Contacts and Resources:

Refer to emergency contacts accordingly as indicated in the Operating Plan.

REPLACEMENT PAGES
SECTION VII – OPERATING PLAN



OPERATING PLAN

New England Metal Recycling, LLC
Knox Marsh Road; Madbury, NH

Prepared For:

New England Metal Recycling, LLC
c/o Schnitzer Steel Industries, Inc.
PO Box 490905
Everett, MA 02149
(617) 389-8300

Prepared By:

Joseph J. Nicolella, Jr.
General Manager – New Hampshire Operations
Schnitzer Steel Industries, Inc
Metals Recycling Business
25 Sandquist Street
Concord, NH 03301
(603) 225-2267

2.0 AUTHORIZED AND PROHIBITED WASTE

2.1 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 material 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. Automobiles, ~~and~~ obsolete vehicles and end-of-life vehicles (ELV's)
- G. 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

2.2 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

* Refer to the following attachments for scrap acceptance guidelines and prohibited items. Attachment 1 – General Scrap Acceptance Guidelines; Attachment 2 - Shredder In-feed Guidelines; Attachment 3 - Guidelines for Iron and Steel Scrap.

3.0 ROUTINE OPERATIONS PLAN

3.1 Operating Hours

The facility operates between the hours of 6:00 am and 11:00 pm, Monday through Friday, and 6:00 am to 12:00 pm, Saturday.

The facility accepts deliveries between the hours of 7:00 am and 4:00 pm Monday through Friday, and 7:00 am to 12:00 pm, Saturday, unless special arrangements have been made in advance with the Facility Operator. Activities which occur outside of the time when the facility may accept deliveries consist of maintenance of equipment and vehicles. Performing maintenance outside of the time the facility is receiving materials reduces the risk to persons performing maintenance and allows for maintenance to be performed as scheduled.

3.2 Access Control & On-Site Traffic Patterns

Unauthorized entry to and unauthorized use of the facility is prohibited by restricting access to the facility and the activities of the general public while within the facility.

Public access to the facility is via the driveway on Knox Marsh Road. The driveway is secured by a locked gate when the Facility Operator is not present. When the gate is open, all traffic must stop at the scale house or office building, so that all entry to the facility is monitored; permitting access to authorized parties only.

Access to the facility by other means is restricted by a fence along the southern boundary (Pudding Hill Road), natural site features along the northern boundary (the Bellamy River) and natural site features and manmade boundary on the eastern boundary. Weather resistant signs providing information regarding the access restriction are posted around the perimeter of the site. (Refer to Attachment 4 for minimum sign requirements)

Traffic flow within the site is designed to separate retail unloading activities and traffic from commercial/industrial unloading, processing and loading activities. Traffic is directed based upon the types and quantities of materials delivered and delivering vehicles. The Site Operator directs suppliers within the facility and signs are posted for directional, traffic flow, and speed and restriction purposes.

3.3 Waste Acceptance & Rejection Procedures

Upon arrival to the facility all materials are inspected by trained NEMR personnel prior to and during unloading. Authorized material is unloaded and inventoried by commodity, type, etc. Unauthorized material discovered at the time of inspection or during unloading is not accepted or permitted to be unloaded. If unauthorized material is found after it had been unloaded and the vendor has departed the facility, that material is segregated, placed on an impervious or covered surface and the supplier will be contacted to pick up and remove the material from the facility. If the supplier cannot be identified, then a third party vendor will be contacted to provide for disposal or recycling of the material in accordance with the applicable rules and regulations. Otherwise, those wastes will be disposed of through a licensed waste service provider or landfill. NEMR currently has relationships and contracts with

several disposal vendors including, CYN Environmental; Universal Recycling Technologies, LLC; EQ, The Environmental Quality Company; and Waste Management to assist with handling these wastes.

3.4 Quantity & Source of Incoming Waste Documentation

Incoming material is weighed on a certified truck scale at the scale house upon entry to the facility. Upon weighing a Tracking Ticket is issued and the supplier is directed to a designated location for inspection/offloading of the material. After the material is inspected, unloaded and accepted by NEMR personnel, the Tracking Ticket is marked to indicate the material received, validated with the inspector's signature or stamp and the shipment is approved for acceptance and payment.

Records of incoming material inspection, content, weight and supplier are maintained at NEMR's Madbury office and off-site records storage facility in accordance with Company retention policies and Env-Sw 1105.06 and Env-Sw 1105.07.

3.5 Quantity & Destination of Metal Products and Non-Ferrous Raw

3.5.1 Metal Products

The majority of the incoming materials leave the facility as metal products. The quantity of metal product shipped off-site will be determined by weights obtained on the certified truck scales on site, with the weights and its destination recorded and maintained at NEMR's Madbury office and off-site records storage facility in accordance with Company retention policies and Env-Sw 1105.06 and Env-Sw 1105.07.

Some metal products from the facility are transloaded to company-owned processing plants in Massachusetts, Rhode Island, Maine and other domestic locations. The remaining metal is shipped to various domestic and international customers and consumers depending on market conditions. These customers may include, but are not limited to, processors, re-melters and manufacturers of steel, aluminum, brass, copper, stainless steel, lead, etc.

3.5.2 Non-Ferrous Raw and Bypass Residuals

If the proposed shredder is installed, the remaining residuals from the process of shredding light iron, automobiles and shreddable non-ferrous materials such as aluminum and stainless steel comprise the bypass residuals at the facility, Non-Ferrous Raw. The quantity of Non-Ferrous Raw shipped off-site will be determined by weights obtained on the certified truck scales on site, with the weights and its destination recorded and maintained at NEMR's Madbury office and off-site records storage facility in accordance with Company retention policies and Env-Sw 1105.06 and Env-Sw 1105.07.

If the proposed shredder is installed, Non-Ferrous Raw from the facility would be transloaded to a company-owned or third-party Non-Ferrous Recovery Plant for further processing and recovery of product. Any bypass residuals not shipped to a Non-Ferrous Recovery Plant will be transloaded to an authorized facility for recycling or disposal. (Refer to Section 4.3)

3.6 Storage Time and Capacity Limits Documentation

NEMR keeps a backlog of approximately 4-6 week's worth of production on site. This is necessary to bulk process and ship materials after sorting has occurred. Production rate typically equals incoming material added each day. The facility may store up to 50,000 tons of preprocessed material. Post processed inventory will not exceed ,—approximately—35,000 tons and the total quantity of metal product and 12,000 tons of bypass residuals will not exceed 12,000 tons,if/when produced from the proposed shredding operation.

3.7 Methods and Procedures for Managing Waste

3.7.1 Collection

The collection of materials and products will be determined by the procedures outlined in Section 3.3 and Section 3.4. Upon the completion of inspection, materials received will be stockpiled in the manner necessary to segregate the materials into commodities for processing as a marketable product.

The proposed operation of the facility is a six-day operating week (Monday – Saturday), with a collection rate for the facility estimated at 475,000 tons per year, or an average rate of 9,134.61 tons per week.

3.7.2 Storage

The storage of material and metal products will be maintained on an impervious surface in bulk stockpiles or bulk storage bins placed on an impervious surface throughout the facility as indicated on the Site Layout, Drawing 1 as each operating area may be developed. Some non-ferrous metals such as aluminum, copper, brass, etc. may also be stored in the proposed non-ferrous processing building or bulk storage bins. All materials and metal products are stored so they may remain suitable for intended use.

Pre-processed inventory (“material”) on hand shall not exceed 50,000 tons; post-processed inventory (“metal product”) shall not exceed 35,000 tons, and the total quantity of by-pass residuals shall not exceed 12,000 tons.

3.7.3 Transfer

The transfer of material and metal products will occur internally to the site based upon the segregation required to classify the material by commodity such as; prepared or unprepared steel, light iron, aluminum, etc. The transfer of material may occur in bulk or non-bulk quantities by truck, container or bulk movement by processing equipment such as a crane or loader. The off-site transfer of material, metal products and bypass residuals will occur in bulk or packaged form by truck or railcar in the event rail service is reactivated to the facility.

3.7.4 Processing

The processing of material on site may occur through one or more of the following techniques: physical sorting or separation of the material by commodity or product; shredding; cutting by portable or stationary hydraulic shears, torches, plasma cutters, saws; baling; crushing, wire chopping or other mechanical or manual means customary to the scrap metal recycling industry.

The rated through-put capacity of the proposed equipment for processing upon the installation of all proposed improvements is approximately 509,200 tons per year or 9,972.31 tons per week.

The processing of “wet” end-of-life vehicles (ELV’s) occurs in the Wet Car Building and consists of the removal of the battery; refrigerant (CFC’s); mercury switches; fuel (gasoline or diesel), motor oil, transmission fluid, brake fluid and windshield washer fluid with pneumatically assisted pumps or through physical draining. Upon removal, batteries are palletized (with non-conductive materials between layers), mercury switches are stored in sealed 5-gallon containers, and all fluids are transferred into AST #13, 14 and 15 (as identified in Table 1), or 55-gallon drums. All fluids storage containers are equipped with secondary containment.

The removal of refrigerants is sub-contracted to a licensed refrigerant recovery and reclamation contractor. Recovered refrigerants are removed from the site for recycling or disposal by the contractor at the time and completion of removal.

3.7.5 Treatment

The “treatment” of incoming material is not applicable to the operation.

3.7.6 Disposal

Metal Products: The majority of the incoming materials leave the facility as metal products. Some metal products from the facility are transloaded to company-owned processing plants in Massachusetts, Rhode Island, Maine and other domestic locations. The remaining metal is shipped to various domestic and international customers and consumers depending on market conditions. These customers may include, but are not limited to, processors, re-melters and manufacturers of steel, aluminum, brass, copper, stainless steel, lead, etc.

Bypass Residuals: If the proposed shredder is installed, the majority of bypass residuals would leave the facility as Non-Ferrous Raw and be transloaded to a company owned or third-party Non-Ferrous Recovery Plant for further processing and recovery of product. From time to time, Non-Ferrous Raw may be shipped to an authorized third-party for recycling or disposal.

ELV Fluids and Mercury Switches: The fluids from ELV’s are removed from the site by a licensed transporter and brought to a licensed transfer, storage and disposal facility. Oils (motor oil, transmission fluid, brake fluid) are shipped for the oil to energy recovery program; anti-freeze is removed as a universal waste and windshield washer fluid is removed as a hazardous waste. Mercury switches are shipped through the ELVS Mercury Switch Recovery Program.

NEMR utilizes licensed transporter, transfer, storage and disposal facilities such as, Logan Oil, Cyn Environmental, Clean Harbors, United Industrial Services and Interstate Refrigerant Recovery.

4.0 RESIDUAL WASTE MANAGEMENT – NON-FERROUS RAW

4.1 Type and Estimated Quantity of Residual Waste

4.1.1 Non-Ferrous Raw

If the proposed shredder is installed, the residuals from the process of shredding light iron, automobiles and shreddable non-ferrous materials such as aluminum and stainless steel would comprise the bypass residuals at the facility. These primarily include glass, dirt and fibers, other non-metallics and a recoverable quantity of non-ferrous metals which remain after shredding and mechanical/manual separation of material on-site.

Previous technologies, equipment and operations could not cost effectively recover all non-ferrous metals from the bypass residuals upon processing, resulting in the material ultimately being disposed of in a solid waste landfill without further separation. However, technological advances and improvements to equipment have enabled this material to become a raw material for further processing and recovery of non-ferrous metals; Non-Ferrous Raw.

If the proposed shredder is installed, Non-Ferrous Raw from the proposed operations would be placed in bulk storage bins on an impervious surface pending shipment to a company-owned or third-party Non-Ferrous Recovery Plant for further processing and recovery of product. In the event the material is not shipped to a Non-Ferrous Recovery Plant and is disposed of as a bypass waste, the material would be transloaded to an authorized facility for recycling or disposal.

NEMR's proposed shredder operation is expected to produce approximately 190 tons of Non-Ferrous Raw per day.

4.2 Non-Ferrous Raw Management Prior to Removal

If the proposed shredder is installed, only a small quantity of Non-Ferrous Raw (less than 1,000 tons) is expected to typically be stored on site pending disposition. The material is proposed to be placed in bins on an impervious surface to contain the material while awaiting transport. The side/back walls of the bins will be constructed of either interlocking pre-cast concrete blocks, poured concrete or steel. The height of the walls shall be established so as to allow for the movement of material utilizing mobile equipment such as a bucketed skid-steer or wheel loader. The planned storage area includes an area for expansion in the unforeseen event the quantity of material awaiting transport is greater than expected, but within the permitted limits.

4.3 Provisions to meet Env-Sw 1105.10

Application to certify a Waste-Derived Product for Distribution & Use of bypass residuals from a previous metal shredding operation at the site was filed with the New Hampshire Department of Environmental Services (NHDES) on July 1, 1999.

Letters and reports from the disposal sites involved in a 90-day trial demonstration indicate that the trial results were suitable for use as Alternative Daily Cover (ADC) at RCRA Subtitle D landfills. The NHDES issued the certification on July 2, 1999.

If the proposed shredder is installed, NEMR proposes to ship Non-Ferrous Raw and bypass residuals off-site to a Non-Ferrous Recovery Plant for further processing and several landfills. ~~References for acceptance are available upon request.~~

4.4 QA/QC for Non-Ferrous Raw

If the proposed shredder is installed, routine testing of Non-Ferrous Raw would be performed on a quarterly basis when the material is used as ADC. In accordance with the Waste-Derived-Product certification, Non-Ferrous Raw would be tested for Total Petroleum Hydrocarbons (TPH), cadmium, lead, Polychlorinated Biphenyls (PCBs), Semi Volatile Organic Compounds (SVOC), and Volatile Organic Compounds (VOC).

Copies of test results would be sent to receiving facilities and kept on file in NEMR's Madbury office and off-site records storage facility in accordance with Company retention policies.

reputable wholesale dealers and processors. Automobiles received as whole-of ~~“wet” or “ELV’s)~~ from the general public or other sources are currently processed on site in the “wet car” building to remove all fluids, the battery and mercury switches prior to additional processing, stockpiling, and/or off-site transportation. Wet cars received at the facility that would be processed by the proposed future on-site shredding operation would also be prepared in the same manner.

Explosion risks in the shredding box would be minimized by the use of a water injection system. The automated system injects water into the shredder box based on the working load of the shredder motor and creates steam inside the shredding chamber. This creation of steam reduces the amount of oxygen, minimizing the potential for explosive events. The system is also equipped with a dump valve to add maximum water flow in case of fire or a combustion event.

Employees, property, and the general public are at low risk. Employees have Hazard Communication training and fire suppression equipment is located in multiple locations on-site. In the event of a fire that cannot be quickly suppressed by NEMR personnel, the Madbury fire department will be called and is adequately equipped to assist.

5.3 Vector Production

There is no storage or handling of food, biological waste, organic waste and other vector carrying sources. Solid waste generated on site is disposed of in a municipal solid waste dumpster located outside the office.

5.4 Generation of Methane, Hazardous and/or Explosive Gas

Not applicable. None of the materials accepted or generated by the facility have the potential to generate these gases.

5.5 Odors

The current and proposed processes do not produce significant odors. In the event odor complaints are received at the facility steps will be taken to identify the source of the odor and to eliminate the waste stream causing the odors.

5.6 Dust

The operation and drive areas are paved with asphalt pavement and concrete to minimize generation of dust from the drive and operating surfaces. Dust suppression measures are incorporated into the design of the proposed shredder and water is automatically sprayed during the shredding process to control dust.

5.7 Windblown Litter

The material that the facility processes is generally heavy and does not have the potential to become windblown. A very small quantity of papers, labels, small pieces brought in with the materials, and fine material potentially generated by the proposed shredding process have the ability to become windblown. However, since dust control measures have been designed into the proposed shredder, and much of the facility is surrounded with a fence, these materials are not likely to leave the property. All office material that is capable of being recycled is collected for recycling. All office waste is deposited in a covered municipal solid waste dumpster located at the office.

5.8 Leachate

There are no stormwater discharges associated with runoff from the site as defined under the Multi Sector General Permit (MSGP) for stormwater discharge associated with industrial activities. Current and proposed operating areas of the site consist of concrete and asphalt surfaces that significantly limit the infiltration of stormwater during storm events. Stormwater systems incorporated into the current and proposed operating areas of the site are/would be designed to appropriately support each area, minimizing related risks with managing stormwater from the associated operation.

NEMR is proactive with the identification of potential sources of stormwater pollution and has the following programs to minimize the potential impact of these sources to nearby water bodies.

- Inbound Material Control Program

Refer to Section 3.3. and Scrap Acceptance Guidelines (Attachments 1 through 3).

- Outdoor Material and Product Stockpile Management

The storage of material and metal products is maintained on an impervious surface in bulk stockpiles or bulk storage bins placed on an impervious surface throughout the facility as indicated on the Site Layout plan, Drawing 1. Stormwater treatment is provided for all operating areas of the facility including those areas where outdoor stockpiling occurs.

- Indoor Material and Stockpile Management

The indoor material and stockpile management involves storing materials under cover and in such a manner as to not be tracked outdoors by incoming and outgoing work equipment. This may include the storage of materials in plastic or metal bins, gaylord cardboard boxes, or wrapped on pallets.

- Designated Scrap Processing Areas

Scrap metal is stored in designated areas of the facility as indicated on the Site Layout plan, Drawing 1. All materials and metal products are stored in a manner so they may remain suitable for intended use. Stormwater treatment is provided to address the activities performed in these areas.

- Spill Prevention and Response Procedures

The facility has defined spill response procedures in Section 6.1.3 which are based on information contained in the facility's Spill Prevention, Control and Countermeasure (SPCC) Plan.

- Stormwater Best Management Practices (BMPs)

Stormwater Best Management Practices are based on the guidance provided in the Environmental Protection Agency (EPA) multi sector general permit for scrap metal recycling yards (Sector N).

5.9 Spills

A Spill Prevention, Control and Countermeasure (SPCC) plan was developed to address federal (CFR part 112) and state (Env-Wm 1402) requirements for oil storage at the facility.

Key features of the plan are:

- Petroleum and fluids at the facility are stored in ~~40~~ five (5) aboveground storage tanks (ASTs) and, small containers ~~and a mobile tanker truck~~. Table 1 provides detail of all fluid storage components in the facility, its volume, secondary containment and other containment when applicable.
- Identification of potential risks of oil contamination from on-site activities include leaks from ASTs, fueling activities, the operation of processing equipment including heavy machinery, and the storage of fluids such as motor oil, hydraulic fluid and diesel fuel.
- Spill Response and Notification Procedure - See section 6.1.3

5.10 Potential or Anticipated Hazards or Nuisance

Two potential sources for nuisance are noise and vibrations from the proposed shredder operation. It is NEMR's policy to minimize the potential for nuisance by operating only during regularly established hours. Noise and the potential for vibrations have been considered throughout the conceptual design and layout of the proposed facility. No complaints have been filed with NEMR in the three most recent years of facility operation.

5.11 Groundwater Monitoring

Groundwater monitoring wells have been installed to monitor groundwater quality at the facility in accordance with the Groundwater Management and Release Detection Permit for the facility. The monitoring wells are constructed using polyvinyl chloride (PVC) well screen and riser pipe and are provided with a protective casing and a locking cap.

Sampling and analyses of groundwater is to be performed in accordance with the current Groundwater Permit. In accordance with the Permit, monitoring results are to be provided to NHDES for their review.

With regard to inspections, the integrity of the monitoring wells and their protective casings are to be reviewed at the time of sampling. The inspectors are to note that monitoring wells are secure (i.e., locked) and that the exposed portion of the well, the riser pipe and protective casing, have not been disturbed and/or damaged. If damage is identified it is to be reported to the Facility and Operations Manager who is responsible to report the nature of the damage and the proposed method of repair to NHDES. Repair or replacement of a damaged well or installation of a new well is not to be performed without NHDES approval.

8.0 RECORDKEEPING AND REPORTING

8.1 Recordkeeping

A copy of the authorization page of the permit bearing the permit number and the authorization signature shall be prominently displayed at the facility office.

Current operator certification certificates shall be prominently displayed at the scale house office and/or facility office as appropriate.

A copy of the permit, including a complete copy of the last approved operating plan of record and a complete copy of the last approved closure plan of record, shall be maintained at the facility office.

An operating record for each calendar year is maintained by the facility. The operating record contains the following information, in accordance with Env-Sw 1105.06:

- Identification of the facility by name, location, and permit number
- Identification of Permittee
- Identification of facility operators
- Waste receipt documentation
- Wastes generated documentation
- Certified Waste-Derived Products documentation
- Inspection, Maintenance & Repair Records
- Accidents, Violations, Remedial and Emergency Event Response Action Records
- Environmental Monitoring Records
- Contact with Waste Management District

The operating records are maintained at the facility office and off-site records storage facility for the active life of the facility, and will be available to the NHDES for inspection and/or copies provided, at the request of the NHDES.

8.2 Reporting

Notification shall be provided to NHDES in writing within 30 calendar days of any change in the facility address, telephone number, key Certified Operators, and/or contact persons.

NEMR shall report all changes in operational and/or ownership control in accordance with Env-Sw 315.

NEMR will notify the NHDES in writing prior to conducting activities, which are not specifically authorized in the permit.

Upon approval or notification to NHDES, whichever is applicable, the affected pages of this Operating Plan will be amended. As such, this Operating Plan is prepared as a loose leaf document in accordance with Env-Sw 1105.11(b) to facilitate amendment as specified in Env-Sw 315.

The facility files an annual facility report in accordance with Env-Sw 1105.07 by March 31 for the prior calendar year.

3140.00 \Response to DES comments\Section VI\NEMR Madbury NH Facility Operating Plan (rev 6-22-11).doc

LETTER FROM TOWN OF MADBURY

TOWN OF MADBURY

13 Town Hall Road
Madbury, New Hampshire 03823
Telephone: (603) 742-5131 • Fax: (603) 742-2505

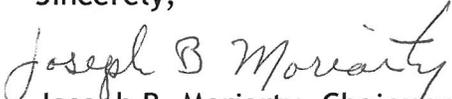
September 30, 2011

Mr. Joseph Nicolella, Jr.
Schnitzer Northeast
25 Sandquist St
Concord NH 03301-3558

Dear Mr. Nicollella:

Having no previous limitations regarding hours of operation at your 290 Knox Marsh Road property, the Board of Selectmen agree with your proposed 6:00 a.m. to 11:00 p.m. hours of operation.

Sincerely,


Joseph B. Moriarty, Chairman
Board of Selectmen

**REVISED COST ESTIMATE FORM
FOR CLOSURE OF SOLID WASTE
COLLECTION/STORAGE/TRANSFER FACILITY**

**ORIGINAL SIGNED COST ESTIMATE FORM
FOR CLOSURE OF SOLID WASTE
COLLECTION/STORAGE/TRANSFER FACILITY**

