



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL

October 9, 2013

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 Knox Marsh Road
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, and 12731, respectively

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:

Site Plan

1. While the berm shown extends around the northern perimeter of the site, it does not stop the floodplain from encroaching into the west side of the site. Therefore, the site within the floodplain line still appears unprotected from the 100-year flood. Please show how the site is protected from the 100-year floodplain per Env-Sw 1002.05(b). Please show the existing contour lines and elevations that connect into the berm, the proposed site contours and elevations, the proposed elevations of the berm contour lines, and the elevation of the 100-year floodplain.
2. Please provide a site plan showing all the abutters. Please also include an updated abutter list.
3. On April 25, 2013, the Groundwater Release Detection and Management Permit **GWP-198705022-M-005** for the site was revised. As part of this revision, Special Condition # 16 required the permittee to submit a scope of work to investigate and characterize the extent of the tetrachloroethylene (PCE) source in the vicinity of monitoring well RDW-6 on or before June 15, 2013. Prolerized New England Company, LLC (the permittee) (aka Schnitzer) has not provided the required scope of work and is therefore not in compliance with their groundwater permit. Please explain.

The proposed plans show RDW-6 within one of the specialty shredder bins. What accommodation is to be made to preserve this well?

It is unclear if any of the other monitoring wells will be impacted. All wells currently required to be monitored under the Groundwater Permit for the site must either be protected or an acceptable replacement well proposed and approved by the HWRB.

Application

1. In "Iron and Steel Scrap Acceptance Guidelines: the following materials will NOT be accepted at our facility," please add sodium azide from air bags as a material.

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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2. In "Shredder In-Feed Guidelines: Preparation Required for Vehicles," it is stated that "All vehicles shall be drained of....mercury switches." Please explain how mercury switches are drained.
3. "End of life vehicles," "automobiles," and "obsolete vehicles" are all listed as authorized wastes in Section 2.1 of the Operating Plan. According to Statute RSA 149-M:4, VIII(b), the definition of an end-of-life motor vehicle is

"a wrecked, worn-out, junk, or other motor vehicle that is no longer intended for use according to its original purpose and is destined for final disposal. The term does not include a motor vehicle that is being kept for repair or restoration, or that is temporarily impounded pending identification of last owner of record or settlement of an insurance claim."

Please explain the difference between an end-of-life motor vehicle, automobile, and obsolete vehicle. If they are the same, please eliminate "automobile" and "obsolete vehicle" in the authorized waste description.

Note that temporary permit DES-SW-TP-94-001 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

cc: 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
Paul Deschaine, Lamprey Solid Waste Management District c/o Town of Stratham; Email: pdeschaine@strathamnh.gov
Wayne Wheeler, PE, NHDES; Email: wayne.wheeler@des.nh.gov
Keri Fitzpatrick, Schnitzer Steel Industries, Inc.; Email: kfitzpatrick@schn.com
Peter Beblowski, PG, NHDES; Email: pbeblowski@des.nh.gov