



SCHNITZER STEEL INDUSTRIES, INC.

25 Sandquist Street Concord, New Hampshire 03301-3558
Phone: (603) 225-2267 Fax: (603) 225-0656

October 31, 2013

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, 2011660, 2011730, 10779, and 12731

Dear Mr. Gildersleeve:

This letter presents our responses to comments provided in your October 9, 2013 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.

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 berms contour lines, and the elevation of the 100-year floodplain.*

Response:

The limit of the 100-year floodplain shown in previous submittals was digitized from the effective Flood Insurance Rate Map (FIRM) for Madbury (Map No. 33017C03200, May 17, 2005). This FIRM notes that no detailed study of the Bellamy River floodplain was performed south of the Dover Madbury Town Line. At the Town Line, the 100-year flood elevation is shown as being EL. 90 FT NGVD29, and decreases moving to the east.

The enclosed plan shows existing 2-foot contour information for the area surrounding the New England Metal Recycling (NEMR) facility that were obtained from the University of New Hampshire's Earth Systems Research Center. This data is more detailed than the topographic information NEMR has previously been able to use. For purposes of this plan, and without detailed information available from FEMA, the 100-year floodplain elevation at the NEMR facility has been assumed to be EL. 90. Areas with elevations below EL. 90 are shaded on the enclosed plan. The existing ground elevations on the northern edge of the proposed facility is greater than EL. 90, and therefore would not be exposed to the potential for flooding, even if the 100-year flood elevation is several feet higher than the assumed 100-year floodplain elevation of 90 FT. The enclosed plan also shows conceptual proposed elevations for the

transition between the facility and the surrounding topography on the northern side of the facility. A site plan insert is also attached to illustrate these details.

2. *Please provide a site plan showing all the abutters. Please also include an updated abutter list.*

Response:

A Plan showing abutting lots and an updated abutters list developed based on a review of Town of Madbury records completed on September 16, 2013 are attached.

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.

Response:

Due to an error in a tracking database entry, the June 15, 2013 submittal of the scope of work was missed. The error was identified in September 2013 and the scope of work to investigate and characterize the extent of the PCE was submitted to NHDES via email on October 8, 2013 and electronically via One-Stop on October 9, 2013. The scope of work was subsequently approved on October 24, 2013 and the investigation is schedule to begin on November 13, 2013.

New England Metal Recycling understands the importance of retaining the monitoring well network at the site. In the event that minor modifications to the specialty shredder bin cannot be made during construction to avoid monitoring well RDW_6, there are several options available to protect the well. The most common approaches include adding a standpipe to the well and protecting the well with barriers or recessing the well slightly below grade within an accessible vault or manhole. The method for protecting this well will ultimately be determined by conditions encountered during construction.

New England Metal Recycling does not believe any additional monitoring wells will be impacted as a result of the proposed operations. All reasonable attempts will be made to preserve groundwater monitoring wells required to be monitored under the Groundwater Management Permit. In the event any of the required monitoring wells are damaged, NEMR will obtain approval from the HWRB to install an acceptable replacement.

Application

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

Mr. Paul Gildersleeve
New Hampshire Department of Environmental Services
October 31, 2013
Page 3 of 3

Response:

Sodium azide has been added to the Iron and Steel Scrap Acceptance Guidelines. A revised copy of Attachment 3, Page 1 is attached.

2. *In "Shredder In-Feed Guidelines: Preparation Required for Vehicle," it is stated that "All vehicles shall be drained ofmercury switches." Please explain how mercury switches are drained.*

Response:

There is a typographical error. The sentence should read "All vehicles shall be drained of fluids including air condition refrigerant. Mercury switches, the battery, and battery terminal connectors must be removed...". A revised copy of Attachment 3, Page 2 is attached

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 or last owner of record or settlement of an insurance claim."

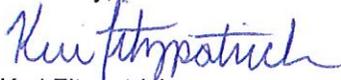
Please explain the difference between an end-of-life vehicle, automobile, and obsolete vehicle. If they are the same please eliminate "automobile" and obsolete vehicle" in the authorized waste description.

Response

In Section 2.1 of the Operating Plan "Authorized Waste" the terms automobile and obsolete vehicle are industry terms that have the same meaning as end-of life vehicle. As requested, "automobiles and obsolete vehicles" have been removed. A revised copy of Section 2.1 is attached.

We believe these responses address your comments as indicated in your letter of October 9, 2013, however, if you should you have further questions or require additional information, please feel free to contact Keri Fitzpatrick at kfitzpatrick@schm.com or (781) 706-7003.

Sincerely,

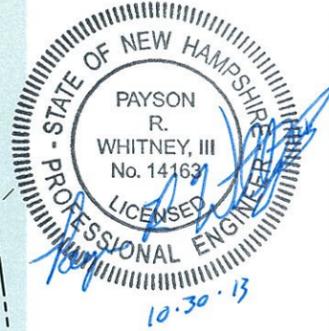


Keri Fitzpatrick
Regional Environmental Manager

cc: Kitty Cornwell, Town of Madbury
J. Michael Joyal, City of Dover
S. Shillaber, PE, Sanborn Head & Associates
Barry Keith, B.H. Keith Associates
Payson Whitney, ESS Group, Inc.
Wayne Wheeler, PE, WMD-Solid Waste Bureau

SITE PLAN

(Prepared by ESS Group, Inc.)



NOTE:
 Source data of existing condition contours were compiled from:

1. Earth Systems Research Center, University of New Hampshire
 Publication Date: 20130531
 Title: Two Foot Contours - Bellamy River (010600030903) - raw
 Geospatial Data Presentation Form: vector digital data
2. Earth Systems Research Center, University of New Hampshire
 Publication Date: 20130531
 Title: Two Foot Contours - Oyster River (010600030902) - raw
 Geospatial Data Presentation Form: vector digital data

NOTE: ENGINEER'S CERTIFICATION IS FOR PERMITTING PURPOSES ONLY.



CONCEPTUAL PLAN



Engineers
 Scientists
 Consultants

888 Worcester Street, Suite 240
 Wellesley, Massachusetts 02482
 p 781.431.0500
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 www.essgroup.com

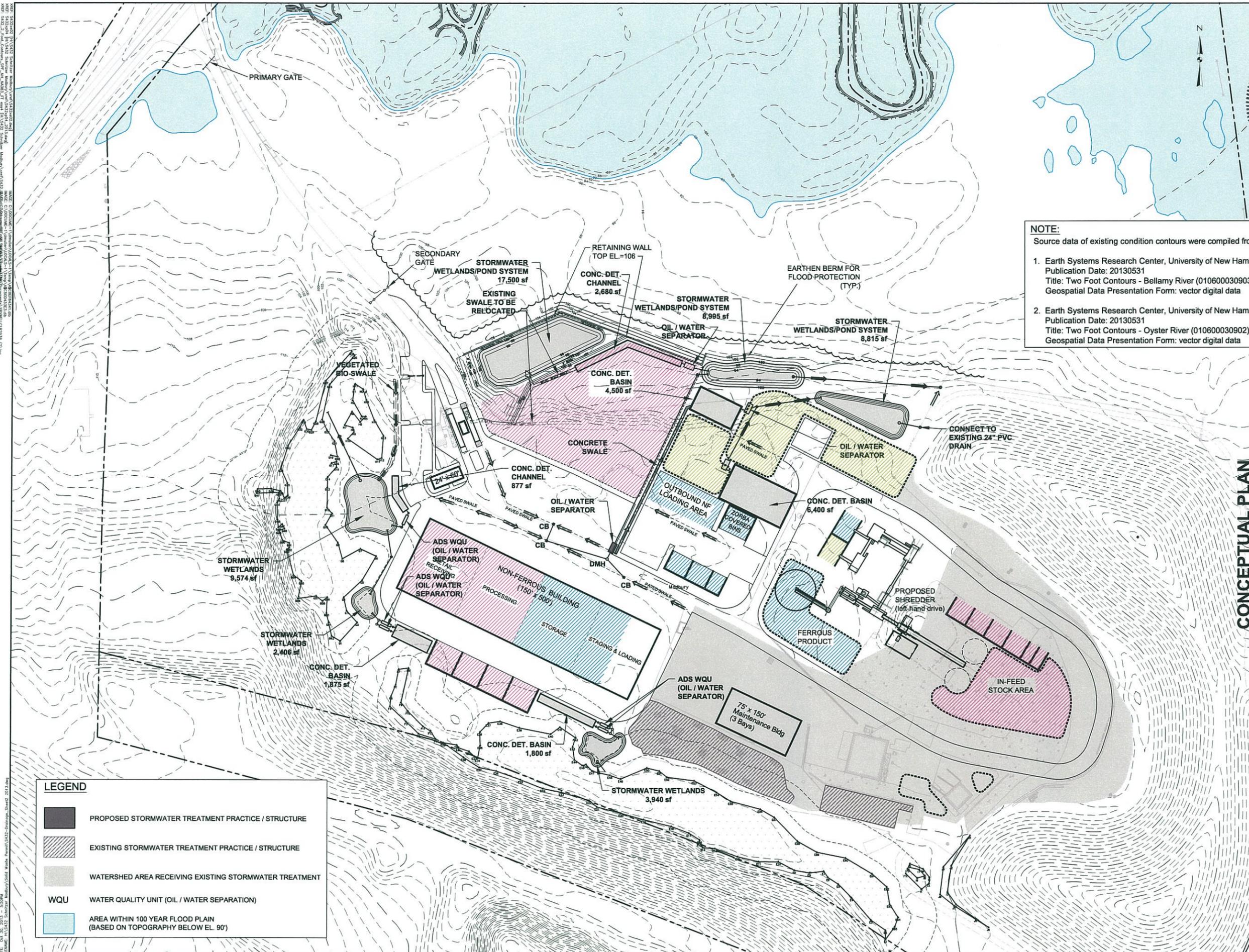
No.	REVISION	DATE	APP BY
2	RESPONSE TO NHDES COMMENTS	10/30/13	PRW
1	RESPONSE TO NHDES COMMENTS	02/05/13	JCB

DRAWN BY: _____ CHECKED BY: _____
 DESIGNED BY: _____ APPROVED BY: _____

NE Metals Recycling, LLC
 MADBURY, NH
 SITE IMPROVEMENTS

CONCEPTUAL
 DRAINAGE PLAN

PROJECT No.: 5432-000	DRAWING No.
DATE OF ISSUE: 1/26/11	2
SHEET No.:	
SCALE: 1"=80'	



LEGEND

	PROPOSED STORMWATER TREATMENT PRACTICE / STRUCTURE
	EXISTING STORMWATER TREATMENT PRACTICE / STRUCTURE
	WATERSHED AREA RECEIVING EXISTING STORMWATER TREATMENT
	WQU WATER QUALITY UNIT (OIL / WATER SEPARATION)
	AREA WITHIN 100 YEAR FLOOD PLAIN (BASED ON TOPOGRAPHY BELOW EL. 90')

DATE: 01/20/2013 10:53AM
 FILENAME: I:\5432_Schneider_Madbury\Solid Works\Drawings\5432_Drainage_Sheet2.dwg
 PROJECT: NE Metals Recycling, LLC - Madbury, NH
 DRAWN BY: JCB
 CHECKED BY: PRW
 DESIGNED BY: JCB
 APPROVED BY: PRW
 Copyright © ESS Group, Inc., 2010

TAX MAP

Figure 5.3

Tax Map

Solid Waste Facility
Permit Application

New England Metal Recycling, LLC
Madbury, New Hampshire

Drawn By: L. Damiano
Designed By: L. Damiano
Reviewed By: S. Shillaber
Project No: 3140.00
Date: January 2011

Notes

1. The base map was drawn from tax maps obtained from the Town of Madbury. Additional parcel information was compiled from Town of Madbury Tax Map Nos. 3, 7, and 9, obtained from the the Town Assessor's Office on December 6, 2010.
2. Abutting properties were identified based on the Standard Permit Application for Solid Waste Collection/Storage/Transfer Facility's definition of an abutter which states "Abutters, meaning any person who owns property adjacent to, or across a road, or stream from the property on which a solid waste facility may be permitted."
3. Refer to the abutter list for ownership information.

Legend

- 9/62 Tax Map/Lot
- - - Boundary Between Lots
- +++++ Railroad Tracks
-  Project Property Location
-  Abutter Property Locations



ABUTTERS LIST

**Abutters List
Madbury Metals
290 Knox Marsh Road
Manbury, New Hampshire**

Applicant: New England Metal Recycling, LLC

Subject Parcel: Tax Map 9, Lot 5

Abutter

Tax Map	Lot(s)	Property Owner (s)	Street Address	Mailing Address
3	49	State of New Hampshire	Knox Marsh Road Madbury, NH 03823	Div. of Public Works and Highways Concord Rd. Durham, NH 03824
3	50	Tana Properties Limited Partnership	Knox Marsh Road Madbury, NH 03823	20 Trafalgar Square Suite 602 Nashua, NH 03060
9	1	Cragin Living Revocable Trust Patrick J. Cragin, TTSS	256 Knox Marsh Road Madbury, NH 03823	P.O. Box 250 Dover, NH 03820
9	2	Frank S. Davis and Betty L. Davis	278 Knox Marsh Road Madbury, NH 03823	278 Knox Marsh Road Madbury, NH 03823
9	3	Charles Street Holding LLC	282 Knox Marsh Road Madbury, NH 03823	282 Knox Marsh Road Madbury, NH 03823
9	4	284 Knox Marsh LLC	284 Knox Marsh Road Madbury, NH 03823	282 Knox Marsh Road Madbury, NH 03823
9	5A	Town of Madbury	24 Pudding Hill Road Madbury, NH 03823	13 Town Hall Road Madbury, NH 03823
9	6	Robert Garland	14 Pudding Hill Road Madbury, NH 03823	14 Pudding Hill Road Madbury, NH 03823
9	62	Fresh Pond Realty Trust	Bellamy River Madbury, NH 03823	P.O. Box 540 Wakefield, MA 01880
9	63A	Paul Martel and Lionel Martel	60 Pudding Hill Road Madbury, NH 03823	92 Old Mill Lane Rollinsford, NH 03869
7	15A	Temple Revocable Trust Jean Temple, TTEE	Knox Marsh Road Madbury, NH 03823	303 Knox Marsh Road Madbury, NH 03823
7	15	Temple Revocable Trust Jean Temple, TTEE	303 Knox Marsh Road Madbury, NH 03823	303 Knox Marsh Road Madbury, NH 03823
7	16	New England Metal Recycling	305 Knox Marsh Road Madbury, NH 03823	Legal Department 3200 NW Yeon Portland, OR 97210

Notes:

1. The abutter information shown above was confirmed with information obtained from the Town of Madbury assessor's office on September 16, 2013.

IRON AND STEEL SCRAP ACCEPTANCE GUIDELINES

(Replacement Page 1)



Iron and Steel Scrap Acceptance Guidelines

This document clarifies our general guidelines for accepting iron and steel scrap. These requirements reflect our commitment to responsible environmental management.

Please be aware that many of our guidelines are controlled by state and federal environmental regulations which apply both to us and our suppliers.

This list is not inclusive; other items not listed may be inappropriate for recycling as scrap metal. Please read these guidelines carefully and contact your supervisor or buyer if you have questions about specific items.

Remember that any load may be rejected at the supplier's expense if these guidelines are not followed.

The following materials will NOT be accepted at our facility:

- Refrigerants (including CFCs and HCFCs) in refrigerators and air conditioners. Please note that Clean Air Act regulations (§608(b)(1) and (§608(c)) prohibit any release of refrigerants to the atmosphere, and require persons handling refrigerants to follow specific procedures. Our suppliers are required to sign a statement certifying that all refrigerants have been properly removed (40 CFR §82).
- Asbestos or asbestos containing materials, such as pipe insulation, acetylene tanks and surfacing material commonly found on I-beams, tanks, and other structural and demolition debris (40 CFR §61.150).
- Oils, gasoline, other petroleum products and antifreeze, with the exception of residual quantities that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle. This includes hydraulic fluids, gear oils and grease. Hydraulic equipment must have hydraulic hoses removed and cylinders cut open and drained.
- Lead-acid or NiCad batteries or battery parts, including automobile batteries (40 CFR §273), unless sold as a separate commodity (lead-acid batteries) or contained within an ELV purchased as a "wet" vehicle for recycling.
- Sodium azide from air bags
- Items that contain or have contained PCBs, including small capacitors, fluorescent light ballasts and electrical transformers or transformer components and paint (TSCA and 40 CFR §258 and §258). Transformers and transformer components may be accepted if properly drained and documented as "certified clean."
- Paint cans or other paint containers.
- Fluorescent lights, neon, high intensity mercury vapor lights, high pressure sodium, metal halide and associated ballasts.
- Circuit boards (unless sold as electronic scrap).
- Any material containing hazardous or toxic substances, with the exception of residual quantities of gasoline, petroleum products and anti-freeze that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle.
- Military scrap of any kind, unless approved in advance.
- Explosives or explosive residues, with the exception of residual quantities of gasoline and petroleum products that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle.
- Radioactive material of any kind.
- Tires, wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.
- Computers, televisions, computer monitors, CRT, LCD. (Computers may be accepted if previously approved for purchase as electronic scrap)

SHREDDER IN-FEED GUIDELINES

(Replacement Page 2)



Preparation Required for Vehicles

All vehicles shall be drained of **fluids including** air conditioning refrigerant, ~~and~~ **Mercury switches, and fluids.** ~~The~~ battery and battery terminal connectors must be removed, and automobiles may not contain heavy scrap, excess dirt, tires, wire rope, steel cable, fencing, large balls of wire or other non-shreddable items.

For the locations that accept "wet" or end of life vehicles, air conditioning refrigerant, mercury switches and fluids will be accepted in quantities up to the vehicles manufacturer's specifications; however, vehicles may not be leaking refrigerant or fluids upon arrival.

All flattened and semi-flattened cars must be color-coded. If your load is not color-coded your trucks could experience delays at our yard while we inspect your load. No load will be allowed over our scale without a color code, unless the load can be inspected prior to your departure from our yard.

WE RESERVE THE RIGHT, AT OUR DISCRETION, TO REJECT, PROPERLY REMOVE OR DISPOSE OF ANY PROHIBITED ITEMS AT THE SUPPLIER'S EXPENSE.

Metal Theft

In an effort to curtail the rising incidence of metal theft, Schnitzer Steel's operations refuse to accept the following materials unless ownership is clearly established:

- New production scrap or new materials that are part of a manufacturing process that are being sold by an individual, not a company.
- Items used only by governments, utilities, railroads or for very specific purposes. This includes guardrails, manhole covers, storm drain covers and grates, certain cables used only in high voltage transmission lines, historic markers, cemetery plaques and artwork.
- Full-sized, new materials such as those used in construction, or equipment tools used by contractors.
- Materials that may not be new, but are clearly suspect, such as bleachers from an athletic field or traffic signs.
- Beer kegs, soda cylinders and shopping carts.
- End-of-life vehicles from an unknown supplier unless a written record of title is presented.
- Per State of New Hampshire requirement, the purchase/acceptance of Automobiles/Light Trucks/ELVs requires the completion and submission of a State of New Hampshire Junk Vehicle End-of-Life Form (TDMV13A) by the owner of the vehicle for all vehicles purchased, and the transfer of ownership/surrender of a Motor Vehicle Title for any vehicle purchased that is 15 years old or newer. Completed forms/titles are submitted to the State of New Hampshire, and VIN numbers are reported to the National Motor Vehicle Title Information System (NMVTIS) for validation of ownership and retire of VIN numbers.
- Materials that have been reported stolen.

Schnitzer Steel maintains records of all transactions and cooperates fully with local, state and federal law enforcement in the prosecution of metal theft.

OPERATING PLAN
(Revised Section 2.1, Page 2)

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 and obsolete vehicles and e~~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

End-of-Life Vehicles (ELVs) [may contain residual wastes (fluids, refrigerant and mercury switches)]

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.