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Solid Waste Management Bureau
New Hampshire Department of Environmental Services (NHDES)
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

November 9, 2015
File No. 3140.01

Re: Response to Comments
Best Management Practices Compliance Inspection Report and Scrap Metal
Collection/Storage/Transfer Facility Inspection
New England Metal Recycling, LLC
Madbury, New Hampshire

Dear Paul:

On behalf of Schnitzer Steel Industries, Inc., Sanborn, Head & Associates, Inc. submits the enclosed revised Operating Plan for the New England Metal Recycling, LLC Facility, in response to the recommendations presented in Section G, specifically B.4 and E.1(1) of NHDES's June 8, 2015 Best Management Practices Compliance Inspection Report and Scrap Metal Collection/Storage/Transfer Facility Inspection. Furthermore, revisions submitted to NHDES on January 20, 2015 are included along with minor revisions to contact information.

Modified text is indicated in redline/strikeout mode to facilitate your review. Please let us know if you require additional information.

Sincerely,
SANBORN, HEAD & ASSOCIATES, INC.



Lisa Damiano, P.E.
Project Manager



Eric S. Steinhauser, P.E., CPESC, CPSWQ
Senior Project Director/Senior Associate Principal

LLD/ESS: lld

Encl. Revised Operating Plan

cc: Rich Carmosino, Schnitzer Steel Industries, Inc.
Kate Emma A. Schlosser, Sanborn Head

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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:

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Attachment 2 – Shredder In-feed Guidelines

Attachment 3 – Guidelines for Iron and Steel Scrap

Attachment 4 – Facility Signage Requirements

Attachment 5 – Emergency Contacts

1.0 FACILITY IDENTIFICATION

Facility Name: New England Metal Recycling, LLC (NEMR)

Mailing Address: PO Box 40
Dover, New Hampshire 03821-0040
(603)749-3314

Location Address: 290 Knox Marsh Road
Madbury, New Hampshire 03823

Permit Number: DES-SW-SP-_____

Facility Type: Collection/Storage/Transfer (Commercial Metal Recycling)

Facility Capacity: 475,000 tons/year

Facility Service Type: Unlimited Service Area Facility

Facility Service Area: Material delivered to the facility will generally be from individuals and businesses located within 75 miles

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

The New England Metal Recycling (NEMR) facility, located on Knox Marsh Road (Route 155) in Madbury, New Hampshire, is an existing collection, storage, and transfer facility, operating under a temporary solid waste permit (DES-SW-TP-94-001). This Operating Plan has been prepared to accompany a standard solid waste permit application for the facility and is based upon potential installation/construction of improvements to the facility.

The improvements identified in the application are presently conceptual in nature and may occur as a single project or in individual phases over time. These potential improvements include installation of a shredder, construction of a non-ferrous building, construction of a maintenance facility and an office building. There is no guarantee any or all improvements identified in the application would be implemented due to both business and economic conditions; however, should any improvement(s) occur, the corresponding Operations Plan will be implemented accordingly and in compliance with regulations at the time of installation.

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. End of life vehicles (ELVs)
- 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

Please note that the disposal of mercury-added products is prohibited at the facility.

* 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.

New England Metal Recycling LLC has an extensive Health and Safety, and Environmental program consisting of: written policies and standard operating procedures, introductory and ongoing training for all personnel, personal protective equipment (PPE), certification of equipment operators, daily/weekly safety toolbox talks, monthly safety committee meetings, and a progressive discipline policy for all employees. After hours activities will be conducted in accordance with the Company's written Health and Safety and Environmental requirements by teams of personnel; [each team will be comprised of (a minimum) crew of two persons.] Operating in teams minimizes the safety risk to personnel, as well as, provides for oversight of all activities. Stationary and portable lighting will also be provided to ensure personnel are able to perform activities with adequate lighting in assigned work areas during times of low light/visibility or inclement weather.

Access control to the site during the hours in which the facility will not be accepting deliveries will be restricted as defined in Section 3.2 of the Operating Plan, and by means of securing a primary gate (located on the frontage of Knox Marsh Road) as well as a secondary gate (on the roadway within the confines of the facility).

After hours activities will be conducted in manner as to not create a nuisance as defined by NHDES or local requirements. Complaints made by abutters or other third parties shall be maintained in a log within in the Operations Manual. Complaints made by abutters or other third parties that involve operating conditions or practices having the potential to adversely affect human health, safety, or the environment or which involve a recurring or persistent nuisance situation shall be reported to the NHDES in writing.

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, US Ecology~~~~The Environmental Quality Company~~; and Waste Management to assist with handling these wastes.

New England Metals Recycling, LLC provides periodic written notification to the facility's customers regarding their acceptance and rejection policies. These notices include information about prohibited wastes, including mercury, as well as information about collection programs or facilities that are permitted to accept mercury-added products for recycling or disposal as hazardous waste. Customers are required to sign a Hazardous Materials Removal Compliance Contract (HMCC) to certify that all refrigerants, polychlorinated biphenyls (PCBs), and mercury switches will be removed before delivery to the facility. The customer must renew the HMCC every 2 years. Additionally, customers are required to provide a signed mercury certification verifying that all mercury components have been removed for all shipments of light iron and/or ELVs at the facility. Additionally, NEMR completes periodic inspections of loads for mercury containing devices.

A prohibited materials sign is posted at the entrance to the facility and includes the prohibition against disposal of mercury-added products at the facility.

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 35,000 tons and the total quantity of bypass residuals will not exceed 12,000 tons.

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.

Periodic sweeping of the impervious surfaces at the facility may result in the formation and storage of sweeping materials piles. The metal components will be removed from the sweeping materials and recycled to the extent practical. The soil portion of the piles will be managed in a manner to limit the potential for soil to be eroded and transported by wind or water (e.g., implementation of erosion and sediment control measures).

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 (ELVs) 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.

Sweeping Materials: A waste determination will be performed, as required/requested by the licensed transporter, transfer, storage, and disposal facility. Waste determinations may require laboratory analysis, which may include assessment for arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver (i.e., the Resource Conservation and Recovery Act [RCRA] 8 metals). Laboratory data will be maintained at the facility and soils will be disposed of accordingly using a licensed transporter, transfer, storage, and disposal facility.

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 ELVs 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; gasoline is shipped to, and recycled at a licensed reclamation facility; 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.

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.

5.0 FACILITY MAINTENANCE, INSPECTION & MONITORING PLAN

5.1 Spontaneous Combustion

Spontaneous combustion is not likely to occur in the material, metal products and proposed bypass residuals to be generated at the site. NEMR does not maintain compost piles or wood waste, and flammable and combustible materials are generally prohibited. Nonetheless, the facility does employ practices to minimize the potential for fires.

The potential for fire in the stockpiled materials is low due to the integrated material acceptance and rejection procedures, segregation of material and limited and segregated storage of Non-Ferrous Raw. Stockpiled inventory will be examined daily for visual signs of fire (hot spots, smoke, flames, etc.) by NEMR personnel. Flammables are stored in a secure location away from the piles (in the proposed Maintenance and Shredder Maintenance buildings, etc.).

Employees, property, and the general public are at low risk. Employees have Hazard Communication training and fire suppression equipment is located in multiple locations throughout the 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.

5.2 Fire Hazards

Fire hazards could exist in the following areas, due to the presence of papers, fuels, heat and human activities:

- Maintenance Building
- Shredder Maintenance and Break Room Building
- Wet Car Processing Building
- Scale House
- Office Building and Employee Locker & Break Room

All of these locations are, or would be, equipped with fire extinguishers. Fire extinguishers are inspected on a regular basis and employees have Hazard Communication training, which addresses potential fire hazards and procedures for preventing fires.

- Proposed Shredder

Fire and explosions are a risk with scrap metal shredding. Although scrap is generally prepared for shredding and examined on receipt, undetected combustible materials may potentially enter the shredder as sealed units or residual fuel vapor in automobiles. Explosive events are contained within the high strength steel box of the shredder; however, the escaping energy release may result in a percussion of the gases.

Fire and explosion risk are minimized by Scrap Acceptance Policies, Shredder In-feed Guidelines, examination of scrap as it is received, as well as, subsequent inspection as the material is loaded into the shredder. The majority of shredder in-feed and autos received at the facility would be prepared for shredding from

reputable wholesale dealers and processors. Automobiles received as whole, “wet cars” or “ELVs” 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. The existing engineered stormwater system was installed in 2009 and consists of a concrete sedimentation basin, a sluice gate, two (2) 6,000-gallon oil water separators and a constructed wetland. Stormwater sheets flows to the concrete sedimentation basin via overland flow or concrete lined swales on the eastern and southeastern perimeters of the operating area. Flow from the sedimentation basin is controlled through the operation of a sluice gate. The sluice gate is closed during storm events to allow suspended solids to settle. After settling period, the sluice gate is manually opened and the stormwater flow is split to pass through one of two (2) 6,000-gallon oil water separators and then a constructed wetland.

The oil/water separators are designed to remove free oils and grease to no visible sheen. Each oil-water separator is made up of three chambers. The first chamber settles solids prior to passing through a baffle into the second chamber to an oil/floatables chamber. The third and last chamber is the outlet chamber. Each chamber can be accessed from the surface via a manhole cover. Each chamber has a manhole opening to allow for visual inspections and access to the inside of the oil/water separator.

The sedimentation basin and oil water separators are inspected monthly for the presence of floating solids and accumulated oil, and annually for the build-up of accumulated sediment. The structures are also inspected as soon as practical in the event of a spill of oil or hazardous material or after a storm event greater than 2.0 inches in a 24 hour period. The sedimentation basin is cleaned when there is greater than six inches, on average, of sediment. The oil water separators are skimmed and/or cleaned when there is greater than one inch of oil accumulated or one foot of accumulated sediment. Accumulated oil and sediment are removed using a licensed vacuum truck company. Floating solids are removed by hand or with a vacuum truck as needed.

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 five (5) aboveground storage tanks (ASTs) and, small containers. 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.

6.0 CONTINGENCY PLAN

6.1 Emergency Scenarios – Immediate Actions

Immediate actions to follow by any responsible party, in an event of emergency are detailed below.

6.1.1 Fire & Explosion

- Assess the situation and evaluate fire, health and safety hazards;
- Take any action necessary to prevent risk to employees.
- If necessary, activate fire alarm;
- If necessary, dial 911 to notify the Madbury Fire Department

6.1.2 Injury

- Assess the situation and evaluate health and safety hazards;
- Take any action necessary to prevent additional risk to employees; (evacuate the facility, shut off machines, etc.)
- If trained, administer first aid and make efforts to stabilize the condition;
- If necessary, dial 911 to notify Emergency Services or evacuate to the nearest emergency room

6.1.3 Spill Response Procedure (As described in the SPCC)

In an event of a spill or oil discharge the following procedure will be followed immediately by facility personnel:

- Assess the situation and evaluate fire, health and safety hazards;
- Stop the discharge;
- Notify your immediate supervisor via two-way radio or phone. Follow up with notification to the Facility and Operations Manager and General Manager.
- Contain and remove all discharged oil and oil-contaminated debris;
- Small spills (less than 25 gallons) that are readily cleaned-up with the on-site spill kits, spill response will likely be handled by NEMR personnel;
- Larger spills, that require additional equipment (vacuum truck, excavator, roll-offs, booms, etc.), and spills that reach surface water, will be handled by an emergency response contractor. The emergency response contractor for NEMR-Madbury is **Cyn Environmental 1-800-622-6365**;
- Stockpile and/or dispose discharged oil and oil-contaminated materials in accordance with all applicable local, state and federal regulations;
- Monitor and mitigate fire, health and safety hazards and notify Emergency Services as necessary by dialing 911;
- Take any action necessary to prevent environmental damage from the discharge; and
- Investigate to determine the possible presence of free product.

6.2 Incidents Notification

- Incidents involving injuries and other health and safety issues are reported according to OSHA requirement.
- All incidents or situations at the facility which involve an imminent and substantial risk to human health, safety or the environment and/or which constitute a violation of the solid waste rules or the facility permit shall be reported to the NHDES.
- A verbal report should be made as soon as practicable.
- A written report shall be submitted within 5 working days of the time the facility operator becomes aware of the incident or situation and include information as:

- Facility name, location by street and municipality, and permit number;
- Permittee name, mailing address and telephone number;
- Identification of all persons involved in the incident or situation, including name, title and affiliation;
- A description of the incident or situation, including:
 - The date and time the incident or situation occurred;
 - The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities;
 - Measures employed to contain releases caused by the incident or situation; and
 - An assessment of actual or potential hazards to the environment, safety and human health related to the incident; and
 - Measures the Permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation.

6.2.1 Nuisance Situation

Complaints made by abutters or other third parties that involve operating conditions or practices having the potential to adversely effect human health, safety or the environment or which involve a recurring or persistent nuisance situation shall be reported to the NHDES, in writing.

6.2.2 Oil Spill

If an oil spill occurs which exceeds the requirements of Env-Or 604.06 verbal notification shall be made directly to the NHDES during normal working hours or to the NH State Police after normal working hours.

Please refer to Attachment 5 for Emergency Phone Numbers.

7.0 EMPLOYEE TRAINING PROGRAM

7.1 Certified Operators Requirements

According to Env-Sw 1005.07 the facility shall be staffed with persons qualified by reason of education, experience and performance history to operate the facility in accordance with all applicable requirements of the solid waste rules and the permit.

NEMR Madbury is a level IV facility, as specified by Env-Sw 1602.08 so the requirements for facility staffing are:

- All persons who operate the facility shall be certified by either issued certification or interim certification in accordance with Env-Sw 1600;
- There shall be at least one supervisor who shall be certified as a level III or level IV operator in accordance with Env-Sw 1600 for every one to 5 operators; and
- During the hours of operation, no less than 50 percent of the on-site personnel directly involved with the management of solid waste shall be operators certified by issued certification in accordance with Env-Sw 1600.

The NHDES administers an operator training program and written examination for operator certification on an annual basis. It is NEMR's policy that all personnel will renew their certificate on time by attending those training programs or qualified company training as approved by NHDES.

7.2 New Employees

NEMR's orientation and training program for new employees includes:

- Hazard Communication;
- Introduction to NEMR's Operating Plan;
- Introduction to NEMR's SPCC Plan

7.3 Refresher

Annual refresher of NEMR's programs is scheduled every year and attended by all employees. The refresher includes review of the following:

- Hazard Communication;
- Changes in regulations and requirements;
- Operating Plan;
- SPCC Plan

7.4 Weekly Meetings

The Facility & Operations Manager or Supervisor and/or Departmental Supervisor conducts weekly meetings to discuss safety issues, facility plans (SPCC, etc.), and inform employees of any changes to the facility's plans. A record of each meeting's agenda and attendance is maintained at NEMR's Madbury Office and off-site records storage facility in accordance with Company retention policies.

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 NHDES Solid Waste Operator 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.

S:\CONDATA\3100s\3140.00\Originals\Final Operating Plan (12-13-13)\NEMR Operating Plan (12-13-13).doc

TABLE 1
Petroleum and Fluids Storage



SCHNITZER STEEL INDUSTRIES, INC.

69 Rover Street PO Box 490905 Everett, Massachusetts 02149
 Phone: (617) 389-8300 Fax: (617) 389-8030

Table 1

New England Metal Recycling, LLC Madbury, NH

Petroleum and Fluids Storage

SOURCE	TOTAL QUANTITY (gals)	SECONDARY CONTAINMENT	OTHER CONTROLS
Heating oil in AST #2 Office	275	Yes	Spill kit containing spill control and clean-up equipment and materials located in basement.
Heating oil in AST #4 In garage	275	Yes	Spill kit containing spill control and clean-up equipment and materials located in the garage
Used Gasoline in AST #13	500	Yes	Automatic high level alarms. Spill kit containing spill control and clean-up equipment and materials located in adjacent "wet" car processing building.
Waste Oil in AST #14	500	Yes	Automatic high level alarms. Spill kit containing spill control and clean-up equipment and materials located in adjacent "wet" car processing building.
Waste Antifreeze in AST #15	500	Yes	Automatic high level alarms. Spill kit containing spill control and clean-up equipment and materials located in adjacent "wet" car processing building.
Small containers of lubricating oil, hydraulic oil, windshield washer fluid and gasoline located in the garage and car dismantling building	Maximum is 100 gallons	Located on s pill pallets or within bermed areas	Spill kit containing spill control and clean-up equipment and materials located in garage and "wet" car processing building.

ATTACHMENT 1

Scrap Acceptance Guidelines



SCHNITZER STEEL INDUSTRIES, INC.

69 Rover Street P.O. Box 490905 Everett, Massachusetts 02149
Phone: (617) 389-8300 Fax: (617) 389-8030

Scrap Acceptance Guidelines

This document clarifies our general guidelines for accepting recyclable metals. 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. 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) for recycling.
- 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.
- Military scrap of any kind, unless approved in advance.
- Explosives or explosive residues.
- 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)

The following items will be accepted ONLY if prepared as described:

- Appliances: ALL fluids, including refrigerants, must be drained.
- Automobiles: Refer to Shredder In-Feed Guidelines and Procedures. Automobiles containing fluids may only be accepted if sold and processed as a "wet car."
- Air conditioning compressors: MUST be removed from item, cut in half, and drained
- Drums, barrels and other containers: MUST be thoroughly cleaned and the entire top removed and open for inspection. Gas cylinders, including air bottles, propane and other gas tanks, must be cut in half.
- Storage tanks must be clean and purged of all fluids/gases, as well as, free of plastic, fiberglass or asbestos coatings/liners. Tanks that held hazardous chemicals must be certified clean and free of hazardous material by competent authority. We must be able to inspect the inside of tanks; therefore all tanks must have the access panel removed or a "basketball" sized section removed for inspection purposes.
- Cable and wire: Must be cut in 3-foot lengths, or coiled and banded with 3/4 inch steel banding in at least four (4) places.
- Chain-link fencing: Must be cut in sections no larger than 18 feet by 4 feet.
- Aerosol cans: MUST be empty and crushed or punctured. Plastic caps must be removed.

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 clear 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.
- 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.

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ATTACHMENT 2

Shredder In-feed Guidelines



Shredder In-feed Acceptance Guidelines

This document clarifies our general guidelines for accepting recyclable metals as in-feed material for the purposes of shredding. These requirements reflect our commitment to responsible environmental and safety 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.

The following items ("Prohibited Items") will not be accepted at our facilities as shredder in-feed material and **MUST BE REMOVED** from cars, tin/light iron, white goods or any load of in-feed material prior to delivery to our facilities.

The following materials will NOT be accepted at our facility as shredder in-feed:

- Oils, gasoline, other petroleum products and antifreeze. This includes hydraulic fluids, gear oils and grease. Hydraulic equipment must have hydraulic hoses removed and cylinders cut open and drained.
- 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).
- Lead-acid or NiCad batteries or battery parts, including automobile batteries (40 CFR §273).
- Mercury switches.
- Fuel tanks, propane bottles, gas cylinders, pressurized vessels or closed containers.
- Fuel tanks must be removed and flattened or evacuated of all fluids utilizing industry and environmentally safe practices to be accepted with autos. **Failure to properly process fuel tanks may result in rejection of entire load.**
- Fluorescent lights, neon, high intensity mercury vapor lights, high pressure sodium, metal halide and associated ballasts.
- 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).
- Chain link fencing: Must be cut into sections no larger than 18 feet by 4 feet.
- Cable, wire rope, wire and heavy un-shreddable scrap.
- Sealed barrels, drums, paint cans or other paint containers.
- Steel or cast iron borings or turnings.
- Sealed compressor motors.
- Any material containing hazardous or toxic substances.
- Military scrap of any kind, unless approved in advance.
- Explosives or explosive residues
- Wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.
- Radioactive material of any kind.

* Note: We will only accept a maximum of 4 tires and one spare per vehicle. ALL tires must be on rims and "bolted" to the vehicle. Bolted means to the axle and spare tire storage area/rack only. We will NOT accept any loose tires. Loose tires shipped in any vehicle or load will result in a MINIMUM deduction of \$10.00/NT for the entire load. Repeat instances of loose tires in shipments will result in the rejection of the affected load(s).



Preparation Required for Vehicles

All vehicles shall be drained of fluids including air conditioning refrigerant. Mercury switches, 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.

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ATTACHMENT 3

Guidelines for Iron and Steel Scrap



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.
- 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 sodium azide from air bags, 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)



The following items will be accepted ONLY if prepared as described:

- Appliances: ALL fluids, including refrigerants, must be drained.
- Automobiles/Light Trucks: Refer to Shredder In-Feed Guidelines. Vehicles containing fluids may only be accepted if sold and processed as a "wet car."
- Air conditioning compressors: MUST be removed from item, cut in half, and drained
- Drums, barrels and other containers: MUST be thoroughly cleaned and the entire top removed and open for inspection. Gas cylinders, including air bottles, propane and other gas tanks, must be cut in half.
- Storage tanks must be clean and purged of all fluids/gases, as well as, free of plastic, fiberglass or asbestos coatings/liners. Tanks that held hazardous chemicals must be certified clean and free of hazardous material by competent authority. We must be able to inspect the inside of tanks; therefore all tanks must have the access panel removed or a "basketball" sized section removed for inspection purposes.
- Cable and wire: Must be cut in 3-foot lengths, or coiled and banded with ¾ inch steel banding in at least four (4) places.
- Chain-link fencing: Must be cut in sections no larger than 18 feet by 4 feet.
- Aerosol cans: MUST be empty and crushed or punctured. Plastic caps must be removed.

Automobiles/Light Trucks

All vehicles shall be drained of air conditioning refrigerant, mercury switches and fluids. The battery and battery terminal connectors must be removed, and automobiles may not contain heavy scrap, excess dirt, wire rope, steel cable, fencing, large balls of wire or other non-shreddable items. Please refer to Schnitzer's Shredder In-feed Guidelines for a complete listing of acceptance requirements. Automobiles/Light Trucks accepted as ELVs will be processed in accordance with the Best Management Practices as discussed in the New Hampshire DES Motor Vehicle Salvage Yard Environmental Compliance Manual & Self-Audit Checklist.

Light Iron

Light metal 1/8 inch and under in thickness - (includes items such as lawn mowers, bicycles, swing sets, water heaters, tin sheds, metal shelving, steel desks, appliances, etc.). Appliances must be free from all capacitors, CFC's and HCFC's. We will not accept refrigerators or air conditioners unless they have been properly drained of refrigerant, with all capacitors removed. No microwaves, computers, televisions or other household electronics. Please refer to Schnitzer's Shredder In-feed Guidelines for a complete listing of acceptance requirements.

Motor Blocks

Automobile and light truck motors from which steel and non-ferrous fittings may or may not be removed. Motor Blocks shall be drained of all fluids and free of drive shafts, frame parts, hoses or excessive contaminants. We will not accept large motors from heavy equipment, large trucks or marine equipment unless approved in advance.

#1 HMS, Prepared

Wrought iron and/or steel scrap, ¼ inch and over in thickness. Individual pieces may not exceed 60 x 18 inches in size and must be prepared in a manner to insure compact charging. (Material exceeding one inch in thickness may not exceed 36 x 24 inches in size.) May not include automobile/light truck body scrap, galvanized material, sheet iron or thin-gauged material. Gas cylinders, including air bottles, propane and other gaseous tanks, must be cut in half.



#1 HMS, Unprepared; Torch Unprepared and Heavy Torch Unprepared

Material that exceeds above measurements for #1 HMS, Prepared and requires preparation by shearing or torching. Heavy machinery or equipment, hydraulic cylinders, fork-lifts, boiler tube assemblies, transformers or material once containing fluids must have hoses removed and cylinders cut opened and drained. Storage tanks must clean and purged of all fluids/gases, as well as, free of plastic, fiberglass or asbestos coatings/liners. Tanks that held hazardous chemicals must be certified clean and free of hazardous material by competent authority. We must be able to inspect the inside of tanks; therefore, all tanks must have the access panel removed or a “basketball” sized section removed for inspection purposes.

#2 HMS, Prepared

Wrought iron and/or steel scrap, black and/or galvanized, 1/8 inch and over in thickness. Individual pieces may not exceed 36 x 18 inches in size. May not include cable over 36 inches in length. Sealed containers must be opened (cut) and drained of any fluids/gases, with valves removed.

#2 HMS, Unprepared

Material that exceeds above measurements for #2 HMS, Prepared and requires preparation.

Plate & Structural

Clean open-hearth steel plates, structural shapes, crop ends and shearings scrap, ¼ inch and over in thickness. Individual pieces may not exceed 60 x 24 inches in size and must be prepared in a manner to insure compact charging. (Material exceeding one inch in thickness may not exceed 36 x 24 inches in size.) May not include pipe or reinforcing bar (rebar).

Plate & Structural, Unprepared

Material that exceeds P&S, Prepared sizing requirements and requires preparation by mechanical shearing or torching, dependent upon material size and shape. Storage tanks must clean and purged of all fluids/gases, as well as, free of plastic, fiberglass or asbestos coatings/liners. Tanks that held hazardous chemicals must be certified clean and free of hazardous material by competent authority. We must be able to inspect the inside of tanks; therefore, all tanks must have the access panel removed or a “basketball” sized section removed for inspection purposes.

Mixed Cast

May include all grades of cast iron except burnt iron, sash weights or foreign material. Sizing may not exceed 24 inches x 30 inches or any one piece over 150 lbs in weight.

Busheling

Clean, uncoated and unpainted new production scrap, not exceeding 2 ft x 3 ft in size. Must be alloy free. Must be free of non-ferrous metals and non-metallics of any kind, including but not limited to, excessive dirt, loose turnings, oil, grease, excessive rust, tin plate, galvanized metal, stainless steel, chrome or porcelinized coatings (such as appliance coatings), etc. Must lay reasonably flat in a truck/railcar.

Unprepared Busheling

Consists of clean, uncoated and unpainted new production scrap, not exceeding 5 ft x 10 ft in size. Must be alloy free. Must be free of non-metallics of any kind, including but not limited to, excessive dirt, loose turnings, oil, grease, excessive rust, tin plate, chrome or porcelinized coatings (such as appliance coatings), etc.



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.

S:\CONDATA\3100s\3140.00\Originals\Final Operating Plan (12-13-13)\Attachment 3 - SNE Guidelines - Iron and Steel Scrap 12-10-13.doc

ATTACHMENT 4

Minimum Requirements for Facility Signage



SCHNITZER STEEL INDUSTRIES, INC.

69 Rover Street P.O. Box 490905 Everett, Massachusetts 02149
Phone: (617) 389-8300 Fax: (617) 389-8030

New England Metal Recycling, LLC Madbury, NH

Minimum Requirements for Facility Signage

Entrance Signage:

Facility Name and Permit Number:

New England Metal Recycling, LLC
Permit Number: DES-SW-TP-94-001

Name, address and telephone number
of Permittee:

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

Hours during which wastes are received
at the facility:

Scale Hours:
Monday through Friday
7:00 am – 4:00 pm

Saturday
7:00 am – 12:00 pm

The type of wastes accepted:

Accepting:
Ferrous/Non-Ferrous Metals

The type of wastes prohibited:

Prohibited:
The disposal of mercury-added products

A statement that unauthorized dumping
shall be subject to fine and prosecution:

**Unauthorized dumping shall be subject
to fine and prosecution.**

Perimeter Signage:

Warning Notice:

**Private Property
No Trespassing**

Facility Name and Permit Number:

New England Metal Recycling, LLC
Permit Number: DES-SW-TP-94-001

A statement that unauthorized dumping
shall be subject to fine and prosecution:

**Unauthorized dumping shall be subject
to fine and prosecution.**

ATTACHMENT 5

Emergency Contacts



SCHNITZER STEEL INDUSTRIES, INC.

69 Rover Street P.O. Box 490905 Everett, Massachusetts 02149
 Phone: (617) 389-8300 Fax: (617) 389-8030

New England Metal Recycling, LLC Madbury, NH

Emergency Contacts

Company Emergency Contacts		
Facility & Operations Supervisor	David Mattocks	(603) 765-7406 (mobile)
General Manager – NH/ME Operations	Joe Nicoletta John Silva	(339) 224-8949 (781) 605-7438 (mobile)
Safety Engineer	Patricia Gaudet	(603) 717-1058 (mobile)
Regional Environmental Manager	Rich Carmosino	(617) 593-0149 (mobile)
Emergency Spill Response	Cyn Environmental	(800) 622-6365
Asbestos Removal and Disposal	LVI Environmental Services, Inc.	(617) 389-8880
Local Emergency Contacts		
Fire/Police/Ambulance	Emergency Operator	911
Madbury Fire Department	Non-Emergency	(603) 742-1164
Madbury Police Department	Non-Emergency	(603) 742-5566
Hospital	Non-Emergency	(603) 742-5252
Northern NE Poison Control Center	Emergency	(800) 222-1222
New Hampshire Emergency Contacts		
State Police (Headquarters)	Emergency	(800) 525-5555 or (603) 271-3636
State Police (Troop A)	Non-Emergency	(603) 679-3333
Department of Environmental Services (NHDES)	Emergency Response	(603) 271-3899 (day) (603) 271-3636 (night)
Department of Environmental Services	Solid Waste Management	(603) 271-2925
NH Homeland Security and Emergency Management	Non-Emergency	(603) 271-2231
Federal Emergency Contacts		
OSHA Area Office	Non-Emergency	(603) 225-1629
U.S. Environmental Protection Agency (Region 1 – Boston)	Non-Emergency	(888) 372-7341
U.S. Environmental Protection Agency (Region 1 – Boston)	Emergency Response	(800) 424-8802
Federal Emergency Management Agency (FEMA)	FEMA - Boston FEMA - Region 1	(617) 956-7506 (202) 646-2500
Centers for Disease Control and Prevention	Atlanta, GA	(404) 639-3311