Schnitzer

June 22, 2011

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

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

Dear Mr. Gildersleeve:

This letter presents our responses to comments provided in your March 4, 2011 letter regarding our application for a Standard Permit for our facility on Knox Marsh Road (Route 155) in Madbury. Comments from your letter are provided below in italics, followed by our response in standard type. We have attached the portions of the application documents that have been modified in response to the comments, with all master documents updated accordingly. Modified text is indicated in redline/strikeout mode to facilitate your review.

Application

1. *In Section II(7) the collection rate is 1820 tons per day. In Section IV, the abutter notification states 475,000 tons per year. The Operating Plan, Section 3.1, states the facility will be open 6 days a week. If the facility is open 52 weeks, the 1820 tons per day would equal 567,840 tons per year, not 475,000 tons per year. Please provide an approved design capacity (Env-Sw 102.09) expressed in tons per week.*

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

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

2. *Attachment I(3)(f)(iv) shows who manages the company, but it does not show the ownership of the company. Please explain.*

Response: New England Metal Recycling, LLC is a member managed limited liability company owned by its members, Proleride Transport Systems, Inc., a Delaware corporation, and TTS Recycling LLC, a Delaware limited liability company. Attachment I(3)(f)(iv) has been revised and is attached.

3. *The abutter notifications are included in Section IV, but the return receipts are missing. Please submit.*

Response: Return receipts are provided as an Attachment to this response and should be added to Section IV of the original application. Please note that notification to Harvest Broadcasting was made via certified mail to their Worthington, MA mailing address on January 26, 2011. This mailing was returned as unclaimed. Subsequent notification was made via certified mail to their Dover, NH mailing address and via regular mail to their Worthington, MA address on March 03, 2011. The notification to the Dover, NH address was returned, unclaimed.

4. *Please revise the Host Solid Waste Management District address listed in Section IV with the new address for the Lamprey Solid Waste Management District. The new address is: PO Box 299, Stratham, NH 03885. Please resend the abutter notification to this new address.*

Response: The notification to the Lamprey Solid Waste Management District has been made; however, as per conversations with Mr. Paul R. Deschaine, notification was made to: Mr. Paul R. Deschaine, Lamprey Solid Waste Management District, c/o Town of Stratham, 10 Bunker Hill Ave, Stratham, NH 03385. The address has been revised in the attached table. The table and the return receipt are included as attachments for inclusion in Section IV.

Site Drawings

1. *On Sheet 1, what does the label "CU/SS/Other" mean? Please explain.*

Response: The identified labels reference storage for the following non-ferrous metals:
"Cu" – Copper (derived as a finished product of the shredding process)
"SS" – Stainless Steel (derived as a finished product of the shredding process)
"Other" – other non-ferrous metals such as shredded electric motors, insulated wire, etc., (derived as a finished product of the shredding process)

2. *Please include on the Drawings an explanation of what the "Zorba Covered Storage Bins" means. What does the term "Zorba" mean and what is included in the bins?*

Response: The term "Zorba Covered Storage Bins" refers to three-sided concrete bunkers (with a fixed roof) built on the proposed concrete pad for the storage of "Zorba" or Shredded

Aluminum. The term "Zorba" is a scrap metal industry reference and defined as: shredded non-ferrous scrap (predominantly aluminum).

3. *In the "Ferrous Product" hatched area on Drawing 1, what apparatus does the "40'R" refer to?*

Response: The reference to the term "40'R" in the Ferrous Product area of drawing 1, identifies a radius of 40 feet for the proposed "stacking" conveyor utilized to stack (stockpile) the shredded ferrous material produced from the shredding processing. Utilizing a pivoting conveyor minimizes the need for portable equipment to stockpile material as it's produced by the shredder.

4. *Please describe on Drawing 1 which activities occur and which materials are accepted in the "wet" car processing building.*

Response: The "wet" car processing building is a "stand-alone" building established for the decontamination of motor vehicles prior to shredding. The building is equipped with fluids removal racks and self-contained apparatus for the safe and environmentally friendly removal of fuels, oils, fluids, batteries, mercury switches, etc. Prior to shredding a vehicle that has been identified upon inspection as containing the constituents identified in NHDOT form TDMV 13A, the vehicle is brought into the "wet" car processing building. Upon receipt of the vehicle in the building, the battery is removed (if equipped). The vehicle is then placed on the rack for the subsequent removal of the fluids (fuel, oils, coolant, etc) and mercury switches. Upon removal, the recovered materials and fluids are stored, recycled or disposed of within established guidelines as prescribed by local, state and federal agencies.

5. *Does the "N-F" designation on the plans mean "non-ferrous raw"? Please explain.*

Response: The designation "N-F" refers to "Non-Ferrous." Non-Ferrous is a general description for non-magnetic metals such as aluminum, copper, brass, stainless steel, etc. Any references to the terms "N-F" or "Non-Ferrous" throughout the Application, Design Plan, Operating Plan, Closure Plan or drawings refers to non-magnetic metals unless specifically referenced as "Non-Ferrous Raw" or "N-F Raw."

6. *Storage for the liquids from the wet-car process is not shown on the plans. Please explain.*

Response: The storage area for the liquids/fluids generated by the decontamination of motor vehicles through the wet-car process is located within an affixed structure located on the east side to the wet-car processing building. The fluids containment tanks are identified as aboveground storage tank (AST) #13, #14 and #15 in Table 1 of the Operating Plan included in Section VII of the Solid Waste Permit Application.

7. *Section 5.9 of the Operating Plan describes how the petroleum and fluids will be contained. Please show these above-ground storage tanks and other listed measures, on the site plans.*

Response: The Site Layout plan included in Section VI has been modified to include the location of all above-ground storage tanks. Please note that the mobile tanker truck and five (5) aboveground storage tanks referenced in Section 5.9 and Table 1 in the Operating Plan have been taken out of service since February 2011 and are no longer in use. A revised plan and a revised Table 1 are attached. The text of Section 5.9 of the Operating Plan has also been revised.

8. *Section 3.2 mentions signage is provided, but none is shown on the plans. Please explain.*

Response: The details of the signage to be provided are included in Attachment 4 of the Operating Plan. The Site Layout plan in Section VI has been revised to identify the approximate location of all entrances and perimeter signage. A revised plan is attached.

9. *On Drawing 1 please explain how the "Peddler Ferrous Area" and the vehicles exiting the facility are separated. What is the purpose of the dashed line that appears between the two areas? Please place this dashed line in the legend.*

Response: The "Peddler Ferrous Area" and vehicles exiting the facility will be separated through the use of staggered concrete barriers (dashed lines) and directional lines painted on the pavement as necessary to provide for controlled traffic and the safety of vehicles and pedestrians. The "Peddler Ferrous Area" will also be staffed to inspect incoming materials, as well as ensure the safety of suppliers and control of traffic. The Site Layout legend has been updated to define the dashed lines.

10. *Please place on the Drawings all the groundwater monitoring wells within and adjacent to the facility. Also include who is responsible for the repair or replacement of these wells when damaged, and who will contact the Department concerning this damage.*

Response: The drawing, Site Layout, Drawing No. 1 has been revised to show the locations of the monitoring wells and to include the following note.

"Monitoring wells have been established at various locations at the site. Care shall be taken to protect the wells from damage. In the event a well is damaged, the Facility and Operations Manager is to be made aware, an assessment of the damage is to be made and reported to NHDES with recommendations as to how the well will be repaired or replaced. No one is to attempt to repair or replace any damaged well or install any new well without first contacting NHDES for approval."

Section 5.11 has been added to the Operating Plan to address the presence of monitoring wells at the site and the responsibility to notify NHDES if wells are damaged and to repair or replace wells only with NHDES approval.

Wetland Report

1. *The area designation shown on the pictures cannot be found on the Wetland Overview Plan, as stated in the "Facility Area" portion of the Wetland Delineation letter. Please explain.*

Response: The wetland areas referenced in BH Keith's letter are shown on Figure 5.2, the Detailed Site Plan included in the Figures. The identifier for Area D of the Detailed Site Plan was inadvertently omitted from the original submittal. The Plan has been revised to include the identifier. A revised copy of the Plan is attached.

2. *The 100-year floodplain is mentioned in the "Un-Developed Area" portion of the Wetland Delineation letter, but not on the Wetland Overview Plan. Please explain.*

Response: The Flood Zone line is indicated on Figure 5.2 and labeled as "Approximate Flood Zone Line".

3. *Areas D and E in photos 5 and 6, respectively, show debris not actively managed within the facility. Please explain.*

Response: The debris shown in the photos was pre-existing to the site when NEMR acquired the facility. The clean-up and removal of obsolete equipment and equipment parts, debris and miscellaneous materials is an ongoing effort. The removal and associated timing of the removal of some items is being managed so as not to disturb active wetlands (i.e., clean-up/removal during winter and dry seasons). Areas D and E were re-examined in the months of February and March 2011, with the associated debris removed (including that shown in photos 5 and 6).

Design Report

1. *On page 2, it states hot loads are not expected and a hot load area is not shown in the Site Drawings. However, a hot load area is needed, per Env-Sw 404.03(a)(3). Please explain.*

Response: The receipt of "hot" loads is extremely uncommon in a scrap metal recycling operation; therefore, a "hot" load area has not been designated within the design of the facility. Considering the nature of the materials received and processed (primarily non-combustible metals), the availability, type and design of the handling equipment and large open areas of storage, in the event that a "hot" load is received, the material would simply be quarantined and spread out in the "in feed stock area" or "ferrous stockpile area" and extinguished as necessary. The proposed shredder is also equipped with a water injection system and dump valve to control potential combustion during the shredding process.

2. *In Section 5.1 a statement is made that the NEMR's current and proposed operations take place outside the special flood hazard zone, but Sheet 1 shows storage areas inside this area. Please explain.*

Response: With the exception of activities at the scale house, limited storage of metal and storm water treatment, current operations take place outside the flood hazard zone. This zone is defined as Zone A – No Base Flood Elevation determined, and is an area that is mapped as subject to inundation by the 1% annual chance flood. As such, these areas are not expected to be adversely affected by infrequent flooding of limited duration. Section 5.1 has been modified to reflect proposed development in the flood hazard zone. The revised text is provided.

3. *Env-Sw 1002.05(b) states that facilities and practices shall protect all waste storage, handling and disposal areas against impact from the 100-year flood. Please explain how these areas will be protected.*

Response: The proposed operating area of the New England Metal Recycling site predominantly falls outside of the 100-year floodplain as currently identified by FEMA. However, there is a small section of the proposed operation (northwest corner) that falls within the currently designated 100-year floodplain; the proposed scale house, scales and a small area of storage.

The current flood zone line is an approximate based upon the fact that previous floodplain studies have not been conducted beyond the Dover/Madbury town line. Risk of flooding to the site is from the western and northwesterly directions; however, there presently are no benchmarks established to indicate flood stage action levels for the Bellamy or Little Bellamy Rivers. New England Metal Recycling has a Flood Emergency Plan in accordance with the aforementioned requirements. A copy of the Plan is attached for your reference.

4. *Please review the proposed locations of each Stormwater Treatment Area and provide a narrative about whether or not the proposed stormwater upgrades will impact the quality of groundwater. If groundwater is impacted, please address the need for new groundwater monitoring wells.*

Response: The proposed stormwater treatment will include provisions for the management of suspended solids, oil, and metals which are the constituents of concern for scrap metal recycling facilities. Through proper operation of the treatment systems these constituents will be removed from stormwater, thereby limiting potential impacts to groundwater. The treatment systems will be protective of groundwater and will be demonstrated through compliance monitoring and/or the ongoing groundwater monitoring of existing wells taking place at the facility.

Operating Plan

1. *In Section 3.0, the operating hours are stated as 6AM-11PM. Per Env-Sw 1105.08(b), operating hours must be within the 6AM-6PM timeframe. Please explain.*

Response: The stated operating hours of 6:00 AM to 11:00 PM have been established to provide for adequate maintenance to mobile and stationary equipment and trucks located and housed at the facility. "Off hours" maintenance is required so as to not interfere with the logistics, production and operation taking place at or in support of the facility during the hours the facility accepts deliveries (7:00 AM to 4:00 PM). Activity occurring at the facility outside of the "acceptance" hours shall primarily consist of mechanical maintenance to equipment and trucks; taking place indoors when possible. After hours maintenance minimizes the safety risk to personnel performing the maintenance, as well as, ensures maintenance is performed as scheduled ensuring the safety of both personnel and visitors to the site.

2. *Section 4.4 mentions non-ferrous raw material. What material does this consist of? While an explanation is in Section 2.3 of the Closure Plan, it also needs to be in the Operating Plan.*

Response: As defined in section 4.1.1 of the Operating Plan, Non-Ferrous Raw is made up of the residuals from the process of shredding light iron, automobiles, and shreddable non-ferrous materials such as aluminum and stainless steel. These primarily include glass, dirt and fibers and other non-metallics and a recoverable quantity of non-ferrous metals which remain after shredding and mechanical/manual separation of material on site.

3. *Section 4.2 states that non-ferrous raw will be placed in bins on an imperious pavement. Please describe type of bin.*

Response: The proposed bins for the storage of non-ferrous raw shall be constructed on a concrete surface, with the side/back walls 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.

4. *Section 5.9 references Env-Wm 1402 for oil storage requirements. This designation is not an updated rule reference. Please explain.*

Response: As presented on the DES website, Part Env-Wm 1402 deals with Control of Aboveground Petroleum Storage Facilities. These rules address storage of petroleum and require Spill Prevention Control and Countermeasure Planning, which is discussed in Section 5.9.

5. *Please add asbestos contractor information to the Emergency Phone Numbers in Attachment 5, as well as the following information: the Federal Emergency Management Agency (FEMA)(Boston) at 617-223-9562, and FEMA Region 1 at 202-898-6189; and the Centers for Disease Control and Prevention (Atlanta, Georgia) at 404-639-3311.*

Response: A licensed New Hampshire asbestos contractor, LVI Environmental Services, Inc. of Everett, Massachusetts has been added to Attachment 5 as well as the contacts for FEMA and Centers for Disease Control referenced above. A copy of the revised matrix is attached for your review.

6. *Section 3.6 lists 35,000 tons of metal product stored at the facility. The closure cost estimate separates this 35,000-ton amount into 30,000 tons of select processed recyclables and 5,000 tons non-select processed recyclables. Please explain here in the Operating Plan the different materials that comprise these two amounts.*

Response: A select processed recyclable (SPR) is a recyclable material (a material comprised of one of the following materials: paper, cardboard, glass, plastic, ferrous metal, non-ferrous metal, or textile materials) which has been physically sorted and separated by material type, formed into bales or otherwise physically processed and packaged in a manner satisfying the specifications for transportation to and acceptance by a market that will use the material for the production of certified waste-derived products.

The majority of the scrap metal received at the facility falls into the category of a SPR recyclable material. A small fraction of the ferrous scrap metal accepted is considered non-SPR recyclable material because it requires further processing or sorting/preparation in order to meet current market conditions. Examples of ferrous materials which would be considered non-SPR materials include #1 HMS (heavy metal steel) unprepared, #2 HMS unprepared, plate and structural unprepared, unprepared busheling, and unprepared automobiles.

7. *Drawing 3 shows a processing section in the non-ferrous building. Please explain in Section 2.1 of the Operating Plan what type of processing activities occur.*

Response: The processing of material on site is identified and described in section 3.7.4 of the Operating Plan (Methods and Procedures for Managing Waste). The proposed processing within the Non-Ferrous Building may consist of physical sorting or separation of material by commodity or product; cutting by portable or stationary hydraulic shears, baling; wire chopping or other mechanical or manual means customary to the scrap metal recycling industry.

8. *Section 5.5 states no odors will be produced. However, please provide a plan of activities in case odors do occur.*

Response: We operate facilities all over the country and have not experienced odor complaints at those facilities. Nevertheless, we have modified section 5.5 of the Operating Plan to indicate that 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. The revised text is attached.

9. *Section 5.8 mentions safeguards for leachate spill prevention and lists bullet points. Please explain this bullet-pointed information in more detail.*

Response: The text of Section 5.8 has been revised to provide more information regarding the bullet-pointed items. A revised copy of the text is attached.

10. *Please include in the Operating Plan that during construction of the buildings and the construction of the paved/concrete areas, all monitoring wells need to be protected. Please state how the existing wells will be protected. Please also state that the Department will be contacted if one is damaged, per Env-Sw 1104.07, and will not attempt to repair or replace any damaged well, or install any new well, without first contacting the Department for approval. Please place this information on the Drawings as well.*

Response: As indicated in the aforementioned response to Site Drawings, NH DES comment 10, the Operating Plan and Site Layout, Drawing No. 1 have been revised to address repair and replacement of wells.

11. *Section 4.3 states that Non-Ferrous Raw and bypass residuals will be shipped offsite to a Non-Ferrous Recovery Plant and several landfills. Please give the address of the Non Ferrous Recovery Plant and at least 2 names and addresses of the landfills the Non- Ferrous Raw and bypass residuals will be sent to, and eliminate the phrase "References for acceptance are available upon request."*

Response: NEMR considers the facilities it uses for the recycling and disposal of Non-Ferrous Raw and residuals as confidential business information and has provided the list of facilities which may receive such materials in a separate attachment. We request this information not be published with these documents.

12. *Section 3.3 mentions the acceptance and rejection procedures of the facility. Please describe the locations non-metallic waste will be delivered to, in case this waste is accepted by the facility.*

Response: Non-metallic wastes unintentionally accepted at the facility will be disposed of or recycled in accordance with applicable rules and regulations, utilizing a vendor specializing in those wastes (C&D recycler, paper processor, plastic processor, etc.); otherwise those wastes will be disposed of through a licensed waste service provider or landfill. NEMR currently has relationships and contracts with several disposal vendors including, CYN Environmental; Universal Recycling Technologies, LLC; EQ, The Environmental Quality Company; and Waste Management to assist with handling these wastes.

13. *Changes to the operating plan and closure plan require updates to those plans and a corresponding submittal to the Department, per Env-Sw 315, Env-Sw 1105.11(b), and Env- Sw 1106.04(c). Please include language in Section 8.0 of the Operating Plan and Section 7.0 of the Closure Plan to include the language of this requirement.*

Response: Section 8.0 of the Operating Plan and Section 7.0 of the Closure Plan have been modified to include the requirement that changes to the documents require written approval from NHDES in accordance with the provisions of Env-Wm 315 and that once approved by NHDES, the amended pages are to be inserted in the Operating or Closure Plan as applicable.

Cost Estimate

In line 1, "Metals (Ferrous and Non-Ferrous)(Pre-Processed)", how is the amount $210,000 calculated?

Response: The metals received and processed by New England Metal Recycling have an intrinsic value; therefore, the amount identified of $210,000 is calculated based on the cost of freight to ship the materials to market; $50,000 for the non-SPR material and the remaining $160,000 is the cost to process/prepare the ferrous non-SPR material (including #1 HMS unprepared, #2 HMS unprepared, plate and structural unprepared, unprepared busheling, and unprepared automobiles) based upon an estimate received from an independent contractor.

I believe these responses address your comments as indicated; however, should you have further questions or require additional information, please feel free to contact me via e-mail at jnicolella@schn.com or phone at (603) 225-2267.

Sincerely,

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

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

S:\CONDATA\3100s\3140.00\Originals\SW Permit Application\Response to DES comments\NEMR Madbury Standard Permit Application Comment Responses 06-22-11.docx

REPLACEMENT PAGE
ATTACHMENT I(3)(F)(IV)

Attachment 1(3)(f)(iv)

May 9, 2011

NH Department of Environmental Services (DES)
Waste Management Division (WMD)
Permitting & Design Review Section (P&DRS)
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Regarding: Ownership
New England Metal Recycling, LLC
290 Knox Marsh Road,
Madbury, NH

To whom it may concern:

New England Metal Recycling, LLC is a member managed limited liability company owned by its members, Proleride Transport Systems, Inc., a Delaware corporation, and TTS Recycling LLC, a Delaware limited liability company.

Officers:
Officers of Proleride Transport Systems, Inc., are Donald Hamaker, Chairman, Richard Bettencourt, Vice President, and Patrick Christopher, Secretary. The sole officer of TTS Recycling LLC is Donald Hamaker, President and CEO.

Directors:
Sole director of Proleride Transport Systems, Inc. is Donald Hamaker. There are no directors for TTS Recycling LLC.

Please do not hesitate to contact this office if you have any questions.

Kind Regards,

Rhonda Sandstrom
Legal Assistant

SECTION IV REPLACEMENT PAGES
ABUTTERS AND NOTICE OF FILING LISTS

Abutters List
New England Metal Recycling, LLC
290 Knox Marsh Road
Manbury, New Hampshire

Applicant: New England Metal Recyclcing, LLC

Subject Parcel: Tax Map 9, Lot 5

Abutters:

Tax Map	Lot(s)	Property Owner (s)	Street Address	Mailing Address	Date Sent	Date Rec'd
3	49	State of New Hampshire	Knox Marsh Road Madbury, NH 03823	Div. of Public Works and Highways Concord Rd. Durham, NH 03824	1/26/2011	1/27/2011
3	50	Tana Properties Limited Partnership	Knox Marsh Road Madbury, NH 03823	20 Trafalgar Square Suite 602 Nashua, NH 03060	1/26/2011	1/27/2011
9	1	Cragin Living Revocable Trust Patrick J. Cragin,	256 Know Marsh Road Madbury, NH 03823	P.O. Box 250 Dover, NH 03820	1/26/2011	2/8/2011
9	2	Frank S. Davis and Betty L. Davis	278 Knox Marsh Road Madbury, NH 03823	278 Knox Marsh Road Madbury, NH 03823	1/26/2011	2/10/2011
9	3	Charles Street Holding LLC	282 Knox Marsh Road Madbury, NH 03823	282 Knox Marsh Road Madbury, NH 03823	1/26/2011	1/28/2011
9	4	Harvest Broadcasting	284 Knox Marsh Road Madbury, NH 03823	P.O. Box 84 Worthington, MA 01098	1/26/2011	Returned
9	4	Harvest Broadcasting	284 Knox Marsh Road Madbury, NH 03823	P.O. Box 69 Dover, NH 03820	3/3/2011	Returned
9	5A	Town of Madbury	24 Pudding Hill Road Madbury, NH 03823	13 Town Hall Road Madbury, NH 03823	1/26/2011	1/27/2011
9	6	Robert Garland	14 Pudding Hill Road Madbury, NH 03823	14 Pudding Hill Road Madbury, NH 03823	1/26/2011	1/27/2011
9	62	Fresh Pond Realty Trust	Bellamy River Madbury, NH 03823	P.O. Box 540 Wakefield, MA 01880	1/26/2011	1/28/2011
9	63A	Paul Martel and Lionel Martel	60 Pudding Hill Road Madbury, NH 03823	7 Drew Road Dover, NH 03820	1/26/2011	1/28/2011
7	15A	Temple Revocable Trust Jean Temple, TTEE	Knox Marsh Road Madbury, NH 03823	303 Knox Marsh Road Madbury, NH 03823	1/26/2011	1/27/2011
7	15	Temple Revocable Trust Jean Temple, TTEE	303 Knox Marsh Road Madbury, NH 03823	303 Knox Marsh Road Madbury, NH 03823	1/26/2011	1/27/2011
7	16	New England Metal Recycling	305 Knox Marsh Road Madbury, NH 03823	Legal Department 3200 NW Yeon Portland, OR 97210	1/26/2011	N/A

Notes:

1. The abutter information shown above was confirmed with information obtained from the Town of Madbury assessor's office on December 6, 2010.

Notice of Filing List
New England Metal Recycling, LLC
290 Knox Marsh Road
Manbury, New Hampshire

Applicant: New England Metal Recylcing, LLC

Subject Parcel: Tax Map 9, Lot 5

Other Parties Notified

Type	Party Notified	Adressed To	Mailing Address	Date Sent	Date Rec'd
Host Municipality	Town of Madbury	Town Clerk and Selectman	13 Town Hall Road Madbury, NH 03823	1/28/2011	1/31/2011
Host Solid Waste Management District	Lamprey Solid Waste Mangement District	District Chairperson	24 Fitch Road Dover, NH 03820-9564	1/28/2011	Returned
Host Solid Waste Management District	Lamprey Solid Waste Mangement District	District Chairperson	10 Bunker Hill Avenue Stratham, NH 03385	2/11/2011	2/14/2011
Affected Local Entity	City of Dover	J. Michael Joyal City Manager	City of Dover 288 Central Avenue Dover, NH 03820-4169	1/28/2011	1/31/2011

SECTION IV
NOTIFICATION RETURN RECEIPTS
(INCLUDING TWO ATTEMPTS TO NOTIFY HARVEST BROADCASTING)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Town Clerk and Town Selectman
Town of Madbury
13 Town Hall Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Colette Clickman ☐ Agent ☐ Addressee

B. Received by (Printed Name) Colette Clickman
C. Date of Delivery 1/31/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9627

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Paul R. Deschaine
Lamprey Solid Waste Mgmt. District
c/o Town of Stratham
10 Bunker Hill Avenue
Stratham NH 03385

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Joyce Holt ☐ Agent ☐ Addressee

B. Received by (Printed Name) Joyce Holt
C. Date of Delivery 2/14/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9658

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

J. Michael Joyal, City Manager
City of Dover
288 Central Avenue
Dover NH 03820-4169

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Jaime Leathers ☐ Agent ☐ Addressee

B. Received by (Printed Name) Jaime Leathers
C. Date of Delivery 1/31/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9641

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Douglas M. DePorter
State of New Hampshire
Division of Public Works and Highways
PO Box 740
Durham NH 03824-0740

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☑ Addressee

B. Received by (Printed Name) SIM DRIVER | C. Date of Delivery 1-27-11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9580

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tana Properties Limited Partnership
20 Trafalgar Square
Suite 602
Nashua NH 03060

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Kelly Moosa ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery 1-27-11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

NASHUA NH - DMU JAN 27 2011 USPS

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9597

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Cragin Living Revocable Trust
Patrick J. Cragin, TTSS
PO Box 250
Dover NH 03820

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) PATRICK CRAGIN | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

DOVER NH 03820 JAN 28 2011 USPS

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9528

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Frank S. Davis and Betty L. Davis
278 Knox Marsh Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery
2-10-11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9535

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Charles Street Holding LLC
282 Knox Marsh Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) AMY E. TRAFTON | C. Date of Delivery 11/28/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9511

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Kitty Cornwell, Town Clerk
Town of Madbury
13 Town Hall Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☒ Addressee

B. Received by (Printed Name) Katherine K Cornwell | C. Date of Delivery 11/27/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9610

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Robert Garland
14 Pudding Hill Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery 1/27/11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9559

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Fresh Pond Realty Trust
PO Box 540
Wakefield MA 01880

COMPLETE THIS SECTION ON DELIVERY

A. Signature
[signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) Maria Coscia C. Date of Delivery 1-28-11

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9542

[redacted] Domestic Return Receipt 102595-02-M-[illegible]

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Paul Martel and
Mr. Loinel Martel
7 Drew Road
Dover NH 03820

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) PAUL MARTEL C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

DOVER NH 03820 JAN 28 2011 USPS

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9573

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Temple Rovocable Trust
Jean Temple, TTEE
303 Knox Marsh Road
Madbury NH 03823

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Roger C. Temple ☐ Agent ☐ Addressee

B. Received by (Printed Name) Roger C. Temple C. Date of Delivery 1/27/17

D. Is delivery address different from item 1? ☑ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 1670 0000 4190 9603

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SCHNITZER STEEL INDUSTRIES, INC.
25 Sandquist Street Concord, New Hampshire 03301-3558
Phone: (603) 225-2267 Fax: (603) 225-0656

March 3, 2011

Re: Solid Waste Permit Application
New England Metal Recycling, LLC
Madbury, New Hampshire

Harvest Broadcasting
PO Box 84
Worthington, MA 01098

Dear Sir or Madam:

Please find enclosed for your review a copy of a letter I have sent to Harvest Broadcasting via Certified Mail, Return Receipt which has been returned to me as unclaimed. This letter pertains our application is being made to the New Hampshire Department of Environmental Services (NHDES) to obtain a Standard Permit to Construct and Operate a Solid Waste Collection/Storage/Transfer Facility for the New England Metal Recycling, LLC, facility located on Knox March Road (Route 155) in Madbury, New Hampshire. The Application was filed on January 28, 2011 and proposes improvements in the facility and its operation.

I have resent the original letter via Certified Mail, Return Receipt to your Dover, New Hampshire mailing address; however, I wanted to ensure that someone at your address on file with the Town of Madbury received duplicate notification.

If you should have any questions or would like additional information, please feel free to contact me at (603) 225-2267.

Joseph J. Nicolella, Jr.
General Manager – NH Operations

cc: NHDES

Encl: Permit Application Flow Chart

7010 1670 0000 4125 5941

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

DOVER NH 03820

OFFICIAL USE

Postage	$ $1.05	0301
Certified Fee	$2.80	13
Return Receipt Fee (Endorsement Required)	$2.30	Postmark Here
Restricted Delivery Fee (Endorsement Required)	$0.00	
Total Postage & Fees	$ $6.15	03/03/2011

MAR 03 2011

DOVER NH 03301

Sent To: Harvest Broadcasting

Street, Apt. No.; or PO Box No.: P.O. Box 69

City, State, ZIP+4: Dover, NH 03820

PS Form 3800, August 2006 — See Reverse for Instructions

CERTIFIED MAIL™

7010 1670 0000 4190 9566

SCHNITZER NORTHEAST

25 Sandquist St., Concord, NH 03301

UNITED STATES POSTAL SERVICE

1000

U.S. POSTAGE
PAID
CONCORD, NH
03301
JAN 26, 11
AMOUNT
$5.54

1/28

1st Notice 1-31
2nd Notice
Return

Harvest Broadcasting
PO Box 84
Worthington, MA 01098

1/28-C

RETURN RECEIPT REQUESTED

NIXIE 015 DE 1 00 02/19/11
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
BC: 03301944825 *1764-02039-25-46

010S[illegible]001

Joseph J. Nicolella, Jr.
Schnitzer Steel Industries, Inc.
25 Sandquist Street
Concord NH 03301

NAME _____
1st Notice _____
2nd Notice _____
Return _____

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™

7010 1670 0000 4175 5941

UNITED STATES POSTAL SERVICE

1000

03820

U.S. POSTAGE
PAID
CONCORD, NH
03301
MAR 03, 11
AMOUNT
$6.15
00021809-13

RETURN RECEIPT REQUESTED

1ST NOTICE _____
2ND NOTICE _____
RETURN _____

HARV069 038212118 1610 07 03/13/11
RETURN TO SENDER
:HARVEST BROADCASTING
PO BOX 84
WORTHINGTON MA 01098-0084

RETURN TO SENDER

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Harvest Broadcasting
PO Box 69
Dover NH 03820

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X
☐ Agent
☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service) 7010 1670 0000 4175 5941

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

REPLACEMENT PAGES
SECTION V – SITE REPORT

In accordance with NHDES requirements, studies[3,4] were performed to assess conditions related to these constituents. With respect to 1,4-dioxane, the study generally concluded that the very limited low-level detections of 1,4-dioxane in the monitoring wells in the current processing area at the facility suggest that recent metal recycling activities have not served as a source for the introduction of this constituent to the subsurface. The study concluded that the 1,4-dioxane in groundwater downgradient of the site resulted from releases from the historic storage of shredder residue in large piles on the ground surface and/or solvent residuals in metals arriving onsite during operation by the former Madbury Metals.

The MTBE study concluded that dissolution of MTBE from impacted soils, small fuel releases, and activities related to removal of shredder residue resulted in short-lived impacts to ground water within the processing area. Concentrations are such that advective transport of MTBE from the NEMR operations area to the monitoring wells located along the property line downgradient of the landfill does not appear to be a plausible explanation for the increased concentrations of MTBE observed in the groundwater samples from those locations.

Both the MTBE and 1,4-dioxane studies conclude that it is likely that groundwater has come in contact with the material within the unlined landfill in recent years as a result of a significant rise in the water table due to several years of above-average precipitation. In any event, even if direct contact between groundwater and landfilled material has not occurred, these studies conclude that leachate generated by decomposition processes within the landfill may have been released to groundwater and thus present a contributory source.

5.0 POTENTIAL ENVIRONMENTAL RECEPTORS

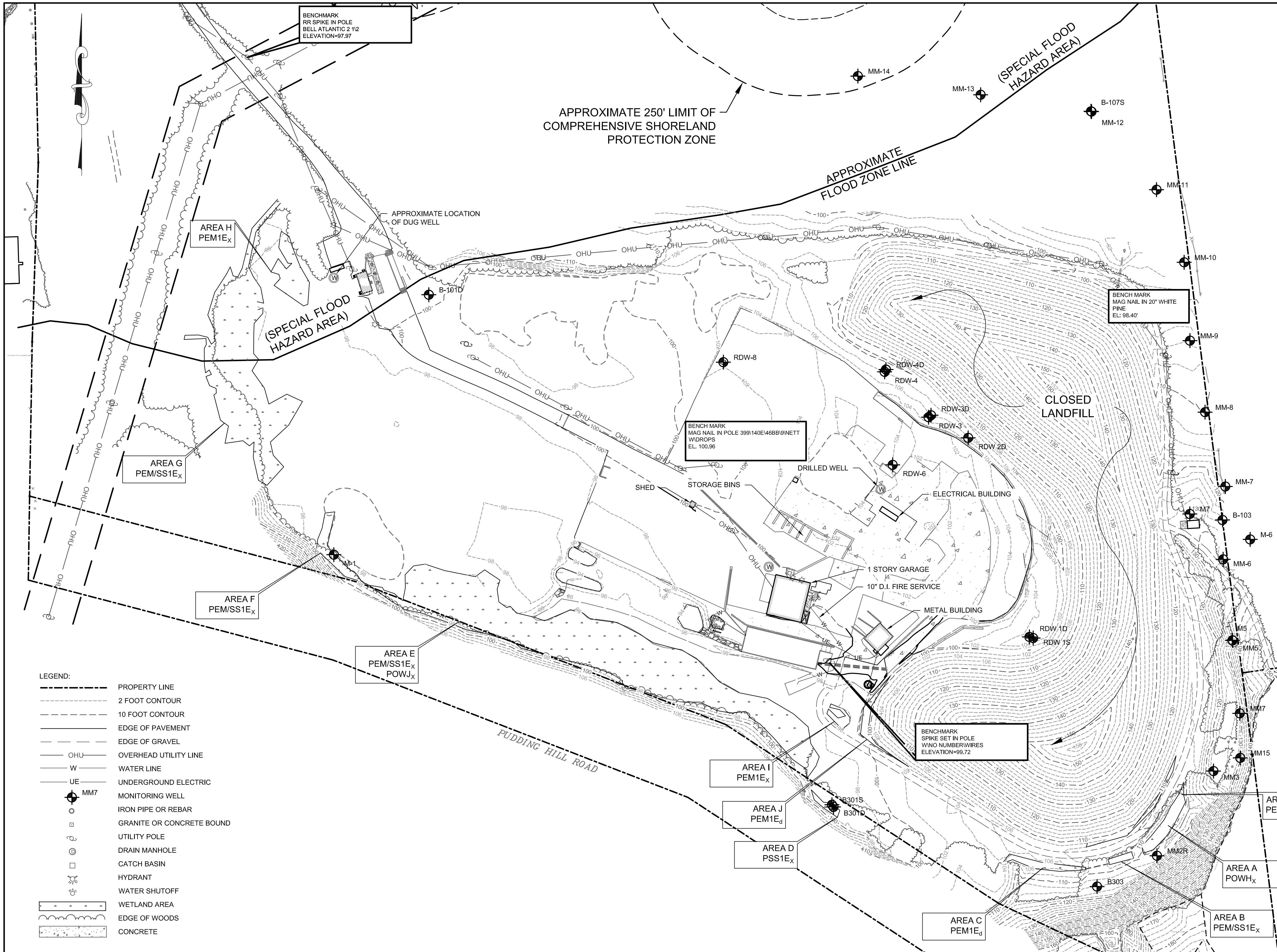
5.1 Flood Hazard Zones

The ~~A~~ Flood Insurance Rate Map (FIRM) for Strafford County~~Madbury~~ New Hampshire, which includes the area of the site, ~~was not available through the Federal Emergency Management Agency (FEMA) map services. However, according to the Federal Insurance Administration (FIA) map, dated January 17, 1975~~ indicates ~~,~~ an area in the northwest portion of ~~the northwest boundary of~~ the property is located in a special flood hazard zone. The limit of the zone is indicated on Figure 5.1. ~~NEMR's current and proposed operations take place outside this zone.~~

With the exception of the scale house, limited storage of metal and stormwater management, current operations take place outside the flood hazard zone. This zone is defined as Zone A- No Base Flood Elevation Determined, and is an area mapped as subject to inundation by the 1% annual chance flood. As such, these areas are not expected to be adversely affected by infrequent flooding of limited duration.

[3] "Supplemental Site Investigation Report, Off-site 1,4 Dioxane Delineation, New England Metal Recycling, LLC, Madbury, New Hampshire," prepared by EOS Research , LTD (EOS), December 2009.

[4] "Final Report, Investigation of MTBE and TBA Occurrence, New England Metal Recycling, LLC, Madbury, New Hampshire," prepared by EOS, June 2008.



NOTES:

1. THE BASE MAP WAS PREPARED FROM ELECTRONIC FILE ENTITLED "410135.dwg" DEVELOPED BY RICHARD D. BARTLETT & ASSOCIATES, LLC. NOTES IN THE DRAWING INDICATE THE BASE PLAN WAS DEVELOPED BASED ON A TOTAL STATION SURVEY PERFORMED BETWEEN MAY 2, 2010 AND MAY 27, 2010. HORIZONTAL DATUM IS BASED ON NEW HAMPSHIRE STATE PLAN COORDINATE SYSTEM NAD 1983. VERTICAL DATUM BASED ON NAVD 1988.

2. WETLAND DELINEATION CONDUCTED ON THE 4TH, 7TH, AND 8TH OF JUNE 2010 BY NEW HAMPSHIRE CERTIFIED WETLAND SCIENTIST, BARRY H. KEITH. WETLAND DELINEATION WAS CONDUCTED IN ACCORDANCE WITH CROPS OF ENGINEERS WETLAND DELINEATION MANUAL, TECHNICAL REPORT Y-87-1, JANUARY, 1987.

3. WETLAND CLASSIFICATION WAS DONE USING THE U.S. FISH AND WILDLIFE SERVICE MANUAL FWS/OBS/-79/31 CLASSIFICATION OF WETLANDS AND DEEPWATER HABITATS OF UNITED STATES, COWARDIN et al, 1979.

4. COMPREHENSIVE WETLAND DELINEATION AND CLASSIFICATION WAS CONDUCTED ONLY FOR THE AREAS ADJACENT TO THE EXISTING ACCESS ROAD, ACTIVE METALS RECYCLING FACILITY AND CLOSED LANDFILL.

5. A RECONNAISSANCE LEVEL WETLAND SITE REVIEW WAS CONDUCTED ON THE REMAINING PORTIONS OF THE PROPERTY LOCATED NORTH AND WEST OF THE FACILITY. NO COMPREHENSIVE WETLAND DELINEATION OR WETLAND BOUNDARY DETERMINATIONS WERE CONDUCTED WITHIN THESE AREAS.

WETLAND LEGEND:

PEM1E	PALUSTRINE PERSISTENT EMERGENT, SEASONALLY FLOODED/SATURATED
PEM/SS1E	PALUSTRINE PERSISTENT EMERGENT/BROAD-LEAVED DECIDUOUS SCRUB-SHRUB, SEASONALLY FLOODED/SATURATED
POWH	PALUSTRINE OPEN WATER, PERMANENTLY FLOODED
POWJ	PALUSTRINE OPEN WATER, INTERMITTENTLY FLOODED

SPECIAL MODIFIERS

d	PARTIALLY DRAINED/DITCHED
x	EXCAVATED

SANBORN | HEAD

GRAPHICAL SCALE
100' 50' 0 100' 200'

NO.	DATE	DESCRIPTION	BY
⚠	06/13/11	Added callout for wetland Area D	KMA

DRAWN BY: E. Wright
DESIGNED BY: R. Shillaber
REVIEWED BY: P. Rydel
PROJECT MGR: R. Shillaber
PIC: R. Shillaber
DATE: January 2011

NEW ENGLAND METAL RECYCLING, LLC
MADBURY, NEW HAMPSHIRE

DETAILED SITE PLAN

PROJECT NUMBER: 3140.00

FIGURE NUMBER: 5.2

REPLACEMENT PAGE AND DRAWING
SECTION VI – DESIGN REPORT

Hot Load Segregation and Control Area

The receipt of "hot" loads is extremely uncommon in a scrap metal recycling operation; therefore, a "hot" load area has not been designated on the drawings for the facility. Considering the nature of the materials received and processed (primarily non-combustible metals), the availability, type and design of the handling equipment and large open areas of storage, in the event that a "hot" load is received, the material would simply be quarantined and spread out in the "in feed stock area" or "ferrous stockpile area" and extinguished as necessary. ~~The material delivered to the facility will largely consist of scrap metal. Therefore, hot loads are not expected.~~

Material Storage Areas

Material will be separated and stored in various designated locations. Material handling areas will be located in areas underlain by concrete or asphalt pavement. The storage of metals will be maintained on an impervious surface in bulk stockpiles or bulk storage bins placed on an impervious surface throughout the facility as designated on Site Layouts Alternatives: Conceptual Drawing 4. 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. Materials are to be stored so they may remain suitable for intended use.

Equipment Required to Operate the Facility

Truck scales will be used to weigh incoming and outgoing bulk loads of material and platform scales will be used to weigh smaller quantities. Other equipment on site to operate the facility includes front end loaders, excavators with grapples to handle and sort metals, skid-steers, forklifts and other mobile equipment routinely associated with operating a scrap metal recycling operation. In addition, tractor (trucks) will be available to move trailers around on site. A metal shredder may be installed and operated at the facility. The shredder is proposed to be powered by an electric drive motor and equipped with an in feed conveyor and downstream ferrous and non ferrous sorting systems. Other processing equipment may consist of portable and stationary shears for the cutting of ferrous and non/ferrous metals, a non-ferrous baler, torches and plasma cutting equipment and other equipment routinely associated with operating a scrap metal recycling operation. Wet car processing will be conducted within an auxiliary building equipped with fluids removal racks and pneumatic systems for the draining and capture of fluids removed from unprocessed cars received at the site for on-site shredding or off-site shipment.

Equipment Storage and Cleaning Areas

Heavy equipment used in the operation will be parked outdoors on an impervious surface or within the maintenance area of the facility when the facility is closed and operations are not taking place. A maintenance building is proposed to be constructed at the facility as shown on Site Layout, Drawing 1. The building is proposed to have three bays and will allow maintenance to take place indoors. Equipment cleaning will occur in the maintenance area utilizing portable cleaning equipment with fluids containment mats; however, a wash bay with appropriate environmental controls may be added to the maintenance building at a future date.

FACILITY SIGN (AT ENTRANCE)

APPROXIMATE PERIMETER SIGN LOCATION

STORMWATER TREATMENT AREA

LIMIT OF NEW CLEARING AND GRADING

NON-FERROUS RAW STOCKPILE AREA (POSSIBLE EXPANSION)

60' x 60' NON-FERROUS RAW STORAGE PAD

KEY CARD SECURITY GATE

LIVE PARKING

24' BY-PASS LANE

SCALE BY-PASS

FERROUS STOCKPILE AREA

OFFICE BUILDING & EMPLOYEE LOCKER & BREAK ROOM

SCALE HOUSE

CONCRETE BARRIER (TYP.)

PEDDLER FERROUS AREA

N-F STOCKPILE AREA

OUTBOUND NF LOADING AREA

ZORBA COVERED BINS

CONTAINER LOADING AREA

CUSTOMER STORAGE BINS

ZORBA COVERED STORAGE BINS

30' ENTRANCE DRIVE

30' DRIVE AISLE

30' HAUL ROAD

RETAIL RECEIVING

NON-FERROUS BUILDING (150' x 500')

PROCESSING

WHOLESALE RECEIVING DOCKS

STORAGE

STAGING & LOADING

LOADING DOCKS

NON-FERROUS BULK STORAGE BINS

CONCRETE BARRIERS

PARKING FOR 11 TRAILERS

RDW-7 (Approx.)

75' x 150' Maintenance Bldg (3 Bays)

AST #4

FERROUS PRODUCT

MOTOR HOUSE

CRANE 150' DIA

RELOCATE BINS

IN-FEED STOCK AREA

50' CLEAR AREA

RDW-8

RDW-4D

FILL IN PIT & PAVE OVER

SPECIALTY SHREDDABLES BINS

RDW-3D

RDW-2D

RDW-6

PROPOSED SHREDDER (left-hand drive)

40'R

"WET" CAR PROCESSING

"WET" CAR STAGING AREAS

AST #13, 14, & 15

RDW-1D

RDW-1S

RDW-5

SHREDDER MAINTENANCE & BREAK ROOM

STORMWATER TREATMENT AREA

APPROXIMATE PERIMETER SIGN LOCATION

B-301S

B-301D

B-303

MM-14

MM-13

MM-12

B-107S

MM-11

MM10

MM9

MM-8

MM-7

B-103

M6

M5

MM-5

B-205A

MM-4

MM-15

MM-3

MM-2R

MM-2 (Approx.)

MM-1 (Approx.)

M1

M7

STATE OF NEW HAMPSHIRE
JANET C. BERNARDO
NO. 11888
LICENSED
PROFESSIONAL ENGINEER
6.2.11

NOTES:

1. ENGINEER'S CERTIFICATION IS FOR PERMITTING PURPOSES ONLY.
2. MONITORING WELLS HAVE BEEN ESTABLISHED AT VARIOUS LOCATIONS AT THE SITE. CARE SHALL BE TAKEN TO PROTECT THE WELLS FROM DAMAGE. IN THE EVENT A WELL IS DAMAGED, THE FACILITY AND OPERATIONS MANAGER IS TO BE MADE AWARE, AN ASSESSMENT OF THE DAMAGE IS TO BE MADE AND REPORTED TO NHDES WITH RECOMMENDATIONS AS TO HOW THE WELL WILL BE REPAIRED OR REPLACED. NO ONE IS TO ATTEMPT TO REPAIR OR REPLACE ANY DAMAGED WELL OR INSTALL ANY NEW WELL WITHOUT FIRST CONTACTING NHDES FOR APPROVAL.

0 80 160
SCALE IN FEET

LEGEND

- UNPREPARED PRODUCT
- PREPARED PRODUCT
- NON - FERROUS PRODUCT
- STORMWATER TREATMENT AREA
- MM-13 MONITORING WELL
- CONCRETE BARRIERS

CONCEPTUAL PLAN

ESS Group, Inc.
Engineers
Scientists
Consultants
888 Worcester Street, Suite 240
Wellesley, Massachusetts 02482
p 781.431.0500
f 781.431.7434
www.essgroup.com

No.	REVISION	DATE	APP BY
1	RESPONSE TO NHDES COMMENTS	06/16/11	JCB

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

NE Metals Recycling, LLC
MADBURY, NH
SITE IMPROVEMENTS

SITE LAYOUT

PROJECT No.: S432-000
DATE OF ISSUE: 1/26/11
SHEET No.:
SCALE: 1"=80'

DRAWING No.
1

REPLACEMENT PAGES
SECTION VII – OPERATING PLAN

3.0 ROUTINE OPERATIONS PLAN

3.1 Operating Hours

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

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

3.2 Access Control & On-Site Traffic Patterns

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

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

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

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

3.3 Waste Acceptance & Rejection Procedures

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

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

3.4 Quantity & Source of Incoming Waste Documentation

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

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

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

3.5.1 Metal Products

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

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

3.5.2 Non-Ferrous Raw and Bypass Residuals

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

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

3.6 Storage Time and Capacity Limits Documentation

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

3.7 Methods and Procedures for Managing Waste

3.7.1 Collection

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

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.

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.

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

4.0 RESIDUAL WASTE MANAGEMENT – NON-FERROUS RAW

4.1 Type and Estimated Quantity of Residual Waste

4.1.1 Non-Ferrous Raw

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

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

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

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

4.2 Non-Ferrous Raw Management Prior to Removal

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

4.3 Provisions to meet Env-Sw 1105.10

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

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

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

4.4 QA/QC for Non-Ferrous Raw

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

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

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

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

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

5.3 Vector Production

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

5.4 Generation of Methane, Hazardous and/or Explosive Gas

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

5.5 Odors

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

5.6 Dust

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

5.7 Windblown Litter

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

5.8 Leachate

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

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

- Inbound Material Control Program

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

- Outdoor Material and Product Stockpile Management

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

- Indoor Material and Stockpile Management

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

- Designated Scrap Processing Areas

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

- Spill Prevention and Response Procedures

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

- Stormwater Best Management Practices (BMPs)

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

5.9 Spills

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

Key features of the plan are:

- Petroleum and fluids at the facility are stored in ~~10~~ five (5) aboveground storage tanks (ASTs) and, small containers ~~and a mobile tanker truck~~. Table 1 provides detail of all fluid storage components in the facility, its volume, secondary containment and other containment when applicable.
- Identification of potential risks of oil contamination from on-site activities include leaks from ASTs, fueling activities, the operation of processing equipment including heavy machinery, and the storage of fluids such as motor oil, hydraulic fluid and diesel fuel.
- Spill Response and Notification Procedure - See section 6.1.3

5.10 Potential or Anticipated Hazards or Nuisance

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

5.11 Groundwater Monitoring

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

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

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

8.0 RECORDKEEPING AND REPORTING

8.1 Recordkeeping

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

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

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

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

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

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

8.2 Reporting

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

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

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

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

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

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 ~~car dismantling~~ 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 ~~car dismantling~~ 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 ~~car dismantling~~ 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 spill pallets or within bermed areas	Spill kit containing spill control and clean-up equipment and materials located in garage and "wet" car processing ~~car dismantling~~ building.

Revised: 6/15/2011 - kfb

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 Nicolella	(339) 224-8949 (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

Revised: 06/16/11 - jjn

REPLACEMENT PAGE
SECTION VIII – CLOSURE PLAN

7.0 RECORDKEEPING AND REPORTING

Prior to closure NEMR will identify a repository for storing all operational and closure activity records. All records will be marked according to their content and shipped to the repository chosen.

NEMR will report any changes that affect the closure requirements to NHDES. Upon approval or notification to NHDES, whichever is applicable, the affected pages of the Closure Plan will be amended. As such, this Closure Plan is prepared as a loose leaf document in accordance with Env-Sw 1106.04(C) to facilitate amendment as specified in Env-Sw 315.

7.1 Annual Report

Annual report for the inactive facility as described in Env-Sw 1105.14 will be filed only through closure.

The report shall include the following:

A. Facility name, location by street and municipality, and permit number;
B. Name and address of Permittee;
C. Name, address, certificate number and telephone number of all facility operators, if applicable;
D. Name, address, affiliation and telephone number of the person or persons responsible for managing all post-closure activities at the facility;
E. Facility status, including, as applicable:
    1) Date the facility discontinued receipt of waste;
    2) Commencement and completion dates for all construction activities at the facility related to the approved closure plan;
    3) Anticipated or scheduled date for completing all required post-closure monitoring and maintenance activities.

Post-closure monitoring and reporting will be performed in accordance with the requirements of the groundwater permit for the facility; however, post-closure monitoring is not anticipated at this time.

FLOOD EMERGENCY PLAN
NEW ENGLAND METALS RECYCLING
KNOX MARCH ROAD
MADBURY, NEW HAMPSHIRE

SCHNITZER STEEL INDUSTRIES, INC.
25 Sandquist Street Concord, New Hampshire 03301-3558
Phone: (603) 225-2267 Fax: (603) 225-0656

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

Pre-Flood Levels

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

Water levels reach surface area

1. Start moving contents and equipment to higher levels (higher ground, on pallets, or higher up in racks, or loft areas).
2. Place sandbags at all entrances to buildings at risk of flooding.
3. Secure any outside storage or equipment that cannot be moved.
4. Fill or secure empty storage tanks (propane, 55-gallon drums, or other storage containers) to prevent them from floating away.

Water levels rise above building foundations

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

Post Flood

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

Emergency Contacts and Resources:

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