



July 13, 2012

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

Re: Response to Review Comments
Standard Permit Application
New England Metal Recycling LLC
Madbury, New Hampshire
WMD Log #2011610, 2011660, 2011730

Dear Mr. Gildersleeve:

This letter presents our responses to comments provided in your December 29, 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. Gasoline is one of the End of Life Vehicle (ELV) wastes requiring management. In Section II, please include this waste and any other ELV wastes not regulated as a solid waste or exempted from the Rules.*

Response: End of Life Vehicles (ELVs) purchased for recycling may contain residual wastes including used oil, waste oil, gasoline for reuse or recycling, waste gasoline, usable antifreeze, waste antifreeze, windshield washer fluid, refrigerant, and mercury switches. If present in the ELVs when purchased, the aforementioned items are removed prior to crushing or shredding, and handled as universal or hazardous waste, as applicable. Section II has been updated to include these items. A revised copy of Section II is attached.

- 2. Section II (6) lists hazardous material/wastes as wastes not received by the facility; however, gasoline is one of the wastes in an ELV. Please explain.*

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



Response: Hazardous waste is not accepted at the facility for recycling. The processing of ELVs has the potential to generate residual wastes which cannot be reused or managed as universal waste, but rather must be managed as hazardous waste (i.e. waste gasoline and waste oil) upon removal at the time of processing the ELVs. In this case, the hazardous waste is generated as a result of processing, not as a direct result of receiving these materials as an acceptable waste. These items are then managed as indicated in Section 3.7.4 and 3.7.6 of the Operating Plan. A copy of Sections 3.7.4 and 3.7.6 are attached.

3. *Please verify that tonnages in Section II (7) include processed and unprocessed ELVs.*

Response: New England Metal Recycling LLC considers ELVs to be a feed stock or raw material for our shredder operations; therefore, the quantities of ELVs received and stored at this location are included in our capacity and storage estimates as an unprocessed ferrous scrap metal (unprocessed recyclable waste). Subsequently, the shredded metal produced upon shredding an ELV is considered a processed (market ready) recyclable as shredded ferrous or non-ferrous scrap metal.

4. *In Section V, 5.1, please include information relative to the observed frequency and estimated maximum elevation of flood events in the area designated as the special flood hazard zone.*

Response: Based on employee knowledge, there has only been one notable flood event in the last 31 years within the special flood hazard zone. Approximately nine years ago, after more than seven days of continuous rain, an estimated one foot of water ponded in the northwest portion of the site in the area immediately adjacent to Route 155 and the facility entrance drive. After roughly seven to ten days, the water dissipated and did not have any effect on the proposed operating areas. Section V, 5.1 has been revised to indicate the occurrence of this event. A copy of the revised text is attached.

Drawings

1. *On Drawing No. 1, where are the ELVs stored?*

Response: Prior to processing (removal of fluids, batteries, mercury switches, etc.), the ELV's handled at the referenced site will be stored in the areas identified by the label "Wet Car Staging Areas." Post processing for the removal of the aforementioned items, the ELVs will be stored in the area identified by the label "In-Feed Stock Area."

Design Report

1. *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. The use of sandbags could still allow water into the sandbagged area and might not be installed in time to protect the facility. Please include an engineered solution in the Flood Emergency Plan. Describe how these areas will be protected against the potential release of greasy/oily "leachate" emanating from any metal scrap pile impacted from the flood.*

Response: There are pre-existing earthen berms currently in place along the northeastern and northwestern perimeter of the current footprint (former operating area) and on either side of the entrance drive of the property. The conceptual design as identified in this application has been provided to indicate the approximate location of the proposed waste storage areas. These berms may be extended as necessary to ensure the prevention of flooding of the proposed storage areas; therefore, the prevention against the potential release of greasy/oily "leachate" emanating from any metal scrap pile. The detailed design of the earthen berms will be provided as part of the permit application for Alteration of Terrain; therefore, providing NH DES opportunity for further review and comment at that time.

Operating Plan

1. *In Section 3.7.6, it is stated that the majority of incoming metals leave the facility as products. After the fluids are drained from the ELVs, how is the car processed to become a product? Is it cut into pieces or is another method used?*

Response: Upon the removal of fluids, batteries, mercury switches, etc., ELVs will be crushed on site in an automobile crusher or tin logger, partially crushed (roof pressed in) with a loader, or shredded on site through the proposed shredder if it is installed. Crushed or partially crushed vehicles may be shredded on site through the proposed shredder, transloaded to an offsite company-owned facility for shredding, or sold to a domestic/international customer as outlined in Section 3.7.6 of the Operating Plan.

2. *While a letter from the Town granting permission to operate outside of the 6AM-6PM timeframe was submitted, and maintenance activities were stated as activities occurring after 4PM, Env-Sw 1105.08(b)(1)(b) has not been addressed. Please address Env-Sw 1105.08(b)(1)(b).*

Response: 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. *In Section 5.2, page 10, first paragraph, a parenthese symbol is used instead of a quote. Please revise. Also, an apostrophe symbol is used in the word ELV's to indicate the possessive when there is no possessive in End of Life Vehicles. Please revise throughout the Application where applicable.*

Response: The parenthesis symbol has been replaced in Section 5.2, page 10, first paragraph with a quotation mark. The apostrophe symbol has been removed from the references to "ELV's" and replaced with "ELVs" throughout the Application and associated documents. A revised copy of Section 5.2 is attached.

4. *Gasoline is not included in Section 3.7.6, Disposal description. Please explain.*

Response: Gasoline was inadvertently omitted from Section 3.7.6. Gasoline is removed from ELVs and is recycled at a licensed reclamation facility. Section 3.7.6 has been revised to include this updated language. A copy of Section 3.7.6 is attached.

5. *Section 8.1, second paragraph, lists operator certification certificates. Are these Solid Waste Operator Certificates? Please ensure Solid Waste Operator Certificates are stated in this section and other sections where applicable.*

Response: The aforementioned "operator certification certificates" are in reference to the NHDES Solid Waste Operator Certificates. Section 8.1, second paragraph, and other sections where applicable, have been updated to include the appropriate reference to Solid Waste Operator Certificates and/or Solid Waste Operator. A copy of Section 8.1 is attached.

6. *In the Operating Plan, Attachment 3 – Guidelines for Iron and Steel Scrap, Automobiles/Light Trucks, it is stated that, "All automobiles shall be drained of air conditioning refrigerant, mercury switches and fluids in accordance with Federal, State and Local regulations." Please include the actual steps, process, and methods of required Federal, State, and Local regulations to accomplish this management of automobile wastes.*

Response: The references to Federal, State and Local regulations outlined in the Operating Plan, Attachment 3 – Guidelines for Iron and Steel Scrap, have been incorporated in the document as our suppliers are expected to properly remove and dispose of the referenced items prior to delivery. New England Metal Recycling LLC is not obligated to provide instruction regarding the removal of these items to our suppliers, although recognizes there is an associated risk of liability in doing so. Therefore, the document has been revised to include references to the Code of Federal Regulations where appropriate,

rather than providing specific instructions. *Attachment 2 – Shredder In-feed Guidelines* has also been revised to reflect the same. Revised copies of Attachment 3 and Attachment 2 are attached.

Cost Estimate

1. *The closure cost estimate lists 30,000 tons under the post-processed, ferrous and non-ferrous metals line item. However, Section II(7)(c) of the Application, and Section 3.6 and Section 3.72 of the Operating Plan lists 35,000 tons. Please explain.*

Response: The cost estimates for the Closure Plan have been reviewed with the Preparer. Upon further review, it was determined that Quantity SPR listed for post-processed, ferrous and non-ferrous metals line was incorrectly stated as 30,000 tons in the March 1, 2011 to March 1, 2012 Cost Estimate form. The correct quantity is 35,000 tons. A revised copy of the Cost Estimate form for the period March 1, 2012 to February 1, 2013 is attached, and reflects this correction.

2. *End-of-Life Vehicles (ELVs) are listed as a separate type of waste under Section II(5) of the Application, but are listed as ferrous waste under Section 2.1, Authorized Wastes, of the Operating Plan. Please list ELVs as a separate line item in Section 2.1 of the Operating Plan and Section 3.1 of the Closure Plan. Please list unprocessed ELVs in the closure cost estimate.*

Response: ELVs have been added as a separate line item in Section 2.1 of the Operating Plan and Section 3.1 of the Closure Plan. Section 2.1 of the Operating Plan and Section 3.1 of the Closure Plan have been revised to include this updated language. A copy of the revised text for both sections is attached. The Closure Cost Estimate has been revised to include ELVs as a permitted material. A revised copy of the Cost Estimate form for the period March 1, 2012 to February 1, 2013 is attached, and reflects this correction.

Closure Plan

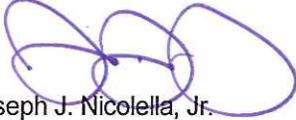
1. *No Closure Plan was submitted with this current application revision. Please ensure all changes to this application, including the acceptance of ELVs, are also revised in the Closure Plan where applicable, and resubmitted for review.*

Response: A Closure Plan was submitted with the original submission of the application in January 2011. However, a copy of the Closure Plan has not been submitted with subsequent comment responses provided by New England Metal Recycling LLC, as NH DES has not requested revisions to the Closure Plan other than those requested for the Closure Cost Estimate form. The Closure Plan has been revised to address the aforementioned comments. A copy of the Closure Plan, including all revisions to date, is attached.

Mr. Paul Gildersleeve
New Hampshire Department of Environmental Services
July 13, 2012
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I believe these responses address your comments as indicated in your letter of December 29, 2011, however, if you should 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 x1302303.

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
S. Shillaber, PE, Sanborn Head & Associates
Barry Keith, B.H. Keith Associates
Janet Bernardo, ESS Group, Inc.
Wayne Wheeler, PE, WMD-Solid Waste Bureau

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**REVISED SECTION II OF THE
SOLID WASTE PERMIT APPLICATION**



SECTION II. FACILITY DESCRIPTION

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

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

	<input type="checkbox"/>	Management of radioactive materials as defined and regulated by the New Hampshire Rules for the Control of Radiation, He-P 2000 and He-P 4000
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**REVISED SECTIONS 3.7.4 AND 3.7.6 OF THE
SOLID WASTE PERMIT APPLICATION (OPERATING PLAN)**



3.6 Storage Time and Capacity Limits Documentation

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

3.7 Methods and Procedures for Managing Waste

3.7.1 Collection

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

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

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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.

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3.7.3 Transfer

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

3.7.4 Processing

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



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

The processing of "wet" end-of-life vehicles (ELV's/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.

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

ELV Fluids and Mercury Switches: The fluids from ELV's/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.



**REVISED SECTION 5.1 OF THE
SOLID WASTE PERMIT APPLICATION (SITE REPORT)**



December 7, 2010

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~~20101115 Site Report (rev2 - 07-13-12).doc~~20101115 Site Report (rev1-01-25-11).doc

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5.0 POTENTIAL ENVIRONMENTAL RECEPTORS

5.1 Flood Hazard Zones

A Flood Insurance Rate Map (FIRM) for Madbury New Hampshire 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, a 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 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.

Based on employee knowledge, there has only been one notable flood event in the last 31 years within the special flood hazard zone. Approximately nine years ago, after more than seven days of continuous rain, an estimated one foot of water ponded in the northwest portion of the site in the area immediately adjacent to Route 155 and the facility entrance drive. After roughly seven to ten days, the water dissipated and did not have any effect on the proposed operating areas.

5.2 Wetlands

Wetlands were delineated at the site by KH Keith Associates of Freedom, New Hampshire (BHK) on June 4, 7 and 8, 2010. The wetlands were delineated in accordance with the "Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1." Wetlands were classified using the U.S. Fish and Wildlife Service Manual. Wetlands associated with the Bellamy River located along the northern property border east of the access road were also investigated but were not flagged. The locations of wetland areas delineated at the site are shown on Figure 5.2. BHK's report is provided in Appendix A.

All of the wetlands on site with the exception of those associated with the Bellamy River, are man induced as a result of previous activities associated with the extraction of sand and gravel from the site. The wetlands in the developed portion of the site likely formed when sufficient sand and gravel were removed from the site to bring the surface elevation down to a level where it intersects with the elevation of the seasonal groundwater table.

Wetlands in the northern portion of the property are isolated from the operating area by topographic constraints. Stormwater runoff can reach wetland areas in the southern portion of the property. NEMR has taken steps to greatly improve stormwater management at the site through construction of additional paved area, lined swales, a sediment trap, and oil water separators. Runoff passing through these measures discharges to constructed stormwater wetlands which provide additional treatment prior to discharge to wetlands in the southern portion of the site.



**REVISED SECTION 5.2 OF THE
OPERATING PLAN**



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-or "wet cars" or "ELV's" (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



**REVISED SECTION 8.1 OF THE
OPERATING PLAN**



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 ~~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.



**REVISED ATTACHMENT 3 AND ATTACHMENT 2 OF THE
OPERATING PLAN**



ATTACHMENT 3



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. 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/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 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.

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.

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, 1/4 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, 1/4 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 porcelainized 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 porcelainized 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.
- 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.



ATTACHMENT 2



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 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, 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.
- 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.



**REVISED COST ESTIMATE FORM FOR THE PERIOD
MARCH 1, 2012 TO FEBRUARY 1, 2013**

Cost Estimate Form for Closure of Solid Waste Collection/Storage/Transfer Facility

Facility Name: New England Metals Recycling
 Address: 290 Knox Marsh Avenue
 Madbury, NH 03823

State of New Hampshire
 Department of Environmental Services
 Waste Management Division
 29 Hazen Drive, PO Box 95 Concord, NH 03302-0095
 (603) 271-2925 FAX (603) 271-2456

DES Permit #: DES-SW-TP-94-001

Annual Cost Estimate for Time Period Beginning: March 1, 2012 to February 28, 2013.

Permitted Material	Quantity ¹ SPR ²	Quantity ¹ Non-SPR	Disposal Cost for Non-SPR Material		Loading Costs for Non-SPR Material		Transportation Costs for Non-SPR Material	Total Cost	Disposal Destination
			Non-SPR	SPR	Non-SPR Material	Non-SPR Material			
Metals (Ferrous & Non-Ferrous) (Pre-Processed)	45,000	5,000	\$140,000	\$20,000	\$50,000		\$210,000	Export Docks/Steel Mills/Refiners	
* Unprocessed ELVs - Qty and cost included in Metals (Pre-Processed) Non-SPR Quantity (above)								Various auto salvage recyclers	
Metals (Ferrous & Non-Ferrous) (Post-Processed)	35,000	12,000	\$336,000	\$28,000			\$484,000	Grimmel Industries, Portsmouth, NH Live Earth, Fostoria, OH	
Bypass/Residual Waste									
Site Clean-up (per approved closure plan)									
Labor								\$95,000	N/A
Equipment decommissioning								\$24,000	CYN Environmental, Dover, NH
Equipment Removal								\$60,000	United Rentals
Building cleaning								\$4,000	N/A
Other:								\$4,000	
Miscellaneous Closure Work									
Administrative								\$16,000	
Other:								\$38,000	
Subtotal								\$935,000	
10% Contingency								\$93,500	
Total Closure Costs								\$1,028,500	

¹ Note: The combined Quantity of SPR and Non-SPR must equal the maximum permitted storage capacity allowed.

² 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.

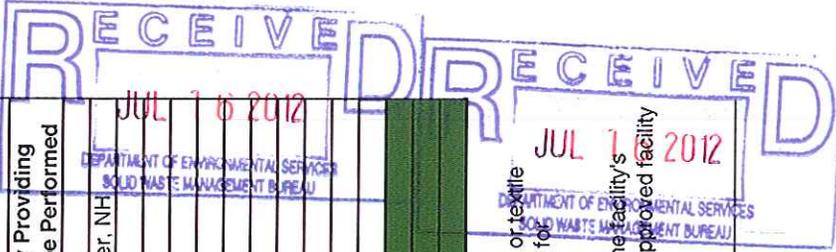
This closure cost estimate has been figured based on representative current market rates for having a third party perform all required closure and post-closure activities at the point in the facility's active life when the extent and manner of facility operations in compliance with permit conditions and applicable laws and rules makes closure the most expensive, as indicated by the approved facility closure plan.

Signature of Preparer: Daniel E. Furl

Date: 3/1/2012

Signature of Permittee: [Signature]

Date: 03/01/12





CLOSURE PLAN



CLOSURE PLAN

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

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

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

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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-_____

2.0 CLOSURE SCHEDULE

2.1 Notice of Intent

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 Closure Plan has been prepared to accompany a standard solid waste permit application for the facility and is based upon 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 improvements include the 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 Closure Plan will be implemented accordingly and in compliance with regulations at the time of closure.

At this time it is anticipated that the facility will be upgraded and maintained as necessary; therefore, the anticipated date of closure is not known. In any event, prior to commencing closure of the facility, a notice of intent to close will be filed as per the plan described below:

The notice of intent to close shall include:

- A. Facility Identification
- B. Date the facility intends to stop receiving materials
- C. A copy of the facility's approved closure plan or file reference thereto

2.2 Stockpiled Inventory Removal

Following the notice of intent the facility will no longer accept material and will process stockpiled inventory only. Depending on quantity of the existing inventory, removal of the stockpiled inventory should take approximately two to four weeks.

2.3 Stockpiled Non-Ferrous Raw/Bypass Residuals Removal

Non Ferrous Raw which consists of primarily glass, dirt and fibers, other non-metallics and a recoverable quantity of non-ferrous metals which remain after shredding and the mechanical and manual separation of material on-site is used as a raw material in a Non-Ferrous Recovery Plant. NEMR's permit allows for the stockpiling of up to 12,000 tons of bypass residuals. If a metal shredder is installed and operated, shredding operations are expected to produce approximately 190 tons of Non-Ferrous Raw per day and involve the removal of this residual as it is produced. Therefore, it is expected a small quantity (less than 1,000 tons) could be stockpiled pending disposition.

In the event of facility closure, remaining stockpiled Non-Ferrous Raw, if present, will be transloaded to a company-owned or third-party Non-Ferrous Recovery Plant for further processing and recovery of product within three to four weeks. Any bypass residuals not shipped to a Non-Ferrous Recovery Plant will be transloaded to an authorized facility for recycling or disposal.

2.4 Processing Equipment Removal

Equipment at the facility potentially includes a metal shredder system, conveyors, excavators, loaders, shears, non-ferrous baler, forklifts, skid-steers, torches, plasma cutters and other equipment customary to the scrap metals recycling industry. Following the end of inventory processing, NEMR will decommission and move all equipment off-site within 180 days.

2.5 Scrap and Trash Clean-up and Removal

NEMR will be responsible for the final clean-up and removal of scrap from the site. This will be accomplished by the remaining personnel or on site contractor. Visual inspection of the site, to confirm clean-up, will be performed prior to demobilizing.

3.0 AUTHORIZED AND PROHIBITED WASTE

3.1 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 requires no further processing
- B. Unprepared Steel – Material of miscellaneous size, thickness and quality requiring processing (shearing, cutting, baling, etc) into prepared steel (above)
- C. Mixed Steel – Material of miscellaneous size, thickness and quality requiring sorting and processing to create a marketable ferrous material
- D. Cast iron materials consisting of, but not limited to; boilers, radiators, obsolete machinery, etc., that are not steel
- E. Light iron – Material consisting of light gauge steel, white goods, appliances, roofing material and other sheet steel items generated from households, industrial sources, transfer stations and municipal solid waste
- F. Automobiles and obsolete vehicles
- 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)]

3.2 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

4.0 NOTIFICATIONS

Following the filing of the Notice of Intent (section 2.1), NEMR will contact its frequent suppliers in writing. The letter will inform them of the upcoming closure and include a copy of the Notice of Intent. Suppliers will be notified at least one week prior to closure.

Simultaneously with the notification to suppliers, a sign will be posted at the entrance gate to the facility notifying any infrequent suppliers of the upcoming closure.

5.0 CLOSURE REQUIREMENTS

To comply with Env-Sw 1006.02(b), all processed recyclable materials shall be removed from the facility to an authorized facility.

5.1 Removal of Stockpiled Inventory

Stockpiled inventory would likely not exist at the time of facility closure. However, in the event of an unplanned closure, the inventory would be removed by another metal recycling operation or authorized contractor.

5.2 Removal of Stockpiled Non-Ferrous Raw/Bypass Residuals

If present, stockpiled Non-Ferrous Raw would be removed from the site as a raw material 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 would be transloaded to an authorized facility for recycling or disposal.

5.3 Removal of Processing Equipment

Removal of processing equipment will be scheduled following the removal of any stockpiled inventory and Non-Ferrous Raw/Bypass Residuals has been completed.

5.4 Clean-up and Removal of Remaining Scrap and Trash

The clean-up will involve the removal of materials from the facility's ground surface, using a crane, grapple, magnet, mobile shear, dozer and/or screener, as necessary. Material would be removed to the existing ground surface and shipped off-site to an authorized processing facility. In addition, the clean-up will involve removing any trash, debris and other materials from the buildings. All buildings will be secured to restrict unauthorized access or damage thereto.

6.0 POST CLOSURE REQUIREMENTS

Post-closure monitoring and maintenance shall be undertaken as required to assure the facility is closed in a manner to not adversely effect the environment, public health or safety.

6.1 Post Closure Monitoring

Post-closure monitoring will include groundwater quality monitoring in accordance with the groundwater permit for the facility. Reporting will be performed as required by the permit and the permit will be recorded as required by the NHDES.

6.2 Inspections

Inspection for remaining metal scrap should be performed prior to any use for the safety of personnel and equipment. Other inspections would depend on future site use.

6.3 Maintenance

Maintenance will depend on future site use. If the facility area is left as an open space, no maintenance will be necessary.

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.

Formatted: Justified

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.

8.0 OTHER PERMITS

No other permits for closure are anticipated at this time.

9.0 CLOSURE COST ESTIMATES

The closure cost estimate for the facility will be prepared in accordance with the Closure Plan and the requirements of the NH Solid Waste Rules. The closure cost estimate is to be submitted to the NHDES as required (currently on an annual basis).

The facility's most recent cost estimate is included in Attachment 1. The estimate is based upon representative current market rates for a third party to perform the closure activities.

The cost estimate will be reviewed annually and updated as necessary along with the appropriate financial assurance documents.