

STORMWATER POLLUTION PREVENTION PLAN

**wTe Recycling, Inc.
75 Southern Avenue
Greenfield, MA 01301**

August 18, 2015

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1. SWPPP OVERVIEW

A. Introduction

In 1972, the Clean Water Act was amended to prohibit the discharge of any pollutant to waters of the United States from any point source, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The NPDES program was designed to track single identifiable sources (point sources) that discharge pollutants into the environment and to require the implementation of controls necessary to minimize the discharge of pollutants. The NPDES program did not address non-point sources such as runoff from agricultural and forestry operations, and stormwater runoff.

The Clean Water Act was amended in 1987 to include the framework for the EPA to issue NPDES permits for stormwater associated with industrial activity. EPA subsequently published the permit regulations in 1990. The regulations presented two permit application options for stormwater discharges associated with industrial activity. The first option was to submit an individual application. The second option was to become a participant in a group application with coverage under a general permit.

To facilitate the process of developing permit conditions for each of the 1,200 group applications submitted, in 1995 EPA created twenty nine industrial sectors where the nature of industrial activity, type of materials handled and material management practices employed were sufficiently similar for the purposes of developing permit conditions. The EPA also further divided some of the these sectors into subsectors in order to establish more specific and appropriate permit conditions, including best management practices and monitoring requirements. wTe Recycling falls under Sector N, Subsector 1 – Scrap Recycling and Waste Recycling Facilities.

The initial MSGP was issued on September 29, 1995 and was subsequently amended numerous times. A key component of the 2015 permit is the requirement for industrial facilities which discharge stormwater to update their existing Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is intended to document the selection, design, installation and maintenance of measures for controlling the discharge of pollutants into surface waters.

This August 2015 version is an update of the one prepared for and used under the 2008 MSGP. All reports and certifications that are made as part of this SWPPP have been signed by a responsible corporate officer or duly authorized representative who has responsibility for the overall facility operations of environmental matters. The signed SWPPP will be retained on-site at all times and for at least one year after coverage under this Permit expires. A copy of the SWPPP will be made available to any EPA, state, or local municipal authorized representative, upon request. This SWPPP is also published on line at <http://www.wte.com/2015SWPPP.pdf>.

B. General Facility Information

This SWPPP covers the operations of wTe Recycling, Inc. located at 75 Southern Avenue in Greenfield, MA. This plan was prepared in accordance with the requirements of Sector N of the

2015 Federal NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (2015 MSGP). General facility information is summarized in Table 1-1.

Table 1-1. General Facility Information

Name of Facility:	wTe Recycling, Inc.
Facility Address:	75 Southern Avenue Greenfield, MA 01301-3913
Telephone	(413) 772-2200
Fax	(413) 774-7369
County	Franklin
Site Contact:	Chris Pichette, General Manager
Baseline Permit Effective Dates:	August 30, 1996
Baseline Permit Number:	MAR05B674
Current Permit Number:	MAR05CY84
Standard Industrial Classification (SIC) Code:	5093 (Scrap and Waste Materials)
Number of Stormwater Outfalls:	one (1)
Facility Latitude:	42.57305 degrees N
Facility Longitude:	72.58027 degrees W
Determined using EPA's EnviroMapper web site	
Industrial Area Size:	17 acres
Receiving Water:	Deerfield River

2. STORMWATER POLLUTION PREVENTION TEAM

A. Team Members

The Stormwater Pollution Prevention Team is responsible for developing, implementing, maintaining, and revising this SWPPP. It is comprised of wTe Recycling, Inc. employees who are familiar with the management and operations of the facility. Table 2-1 lists the members of the Stormwater Pollution Prevention Team.

Table 2-1. Stormwater Pollution Prevention Team Members

Name	Team Position	Home Telephone
Christopher Pichette	Leader	(413) 773-1899
Kevin Howard	Alt. Leader, Fe Area	(413) 522-8213
Gary Keel	Shredder Area	(413) 326-1734
Dan Abbott	Non-Fe Area	(413) 824-0213
Charles Faulstich (wTe Corporation)	Adjunct Member	(781) 665-1516

B. SWPP Team Responsibilities

The SWPP Team will have the following responsibilities.

- Conducting the Routine Facility Inspections and preparing the documentation
- Conducting the Quarterly Inspections and preparing the documentation
- Preparing and submitting the Annual Report
- Conducting the Quarterly Visual Assessment of stormwater discharges
- Revising the SWPPP when needed
- Compiling all necessary records
- Arranging for the required stormwater monitoring
- Submitting the results of the stormwater analysis
- Modifying the SWPPP when necessary

C. Specific Team Member Responsibilities

The Team Leader will:

- Organize the annual SWPPP Team meeting with wTe's consultant
- Perform the stormwater sampling and arrange for the sample analysis
- Report to the National Response Center if necessary
- Perform the quarterly visual stormwater assessments
- Certify the stormwater analysis data for submittal to the EPA
- Delegate the work assignments to the appropriate team member

The Alternate Leader will:

- Perform all duties of the Leader in his absence
- Collect and compile all necessary reports dealing with the SWPP
- Conduct training as needed

- Provide immediate response to any spill event

The Fe Area Team Member will:

- Conduct the Quarterly Routine Facility Inspections for the Fe Area and prepare the documentation
- Provide immediate response to any spill event
- Monitor activities so to prevent possible events

The Shredder Area Team Member will:

- Conduct the Quarterly Routine Facility Inspections for the Shredder Area and prepare the documentation
- Provide immediate response to any spill event
- Monitor activities so to prevent possible events
-

The NonFe Area Team Member will:

- Conduct the Quarterly Routine Facility Inspections for the Non-Fe Area and prepare the documentation
- Provide immediate response to any spill event
- Monitor activities so to prevent possible events

The Adjunct Team Member will:

- Revise the SWPPP as needed
- Prepare and submit all monitoring data and reports to the EPA and state authorities
- Post previous year's documentation online

3. SITE DESCRIPTION

A. Industrial Activity Description

wTe Recycling receives, processes, and ships recycled metals via rail car and truck. A variety of materials are processed at the wTe site. The specific material storage, handling, and processing methods employed are determined by the characteristics of the material. Material processing can consist of any of the following: separation into various grades of material either manually or mechanically, mechanical or manual primary size reduction, and processing through the shredding system. Each grade of material has a designated storage area on the site. Materials not requiring processing through the shredding system are processed in place and loaded into truck or rail cars.

Incoming scrap is brought to the facility by truck, and processed scrap is shipped by rail car and truck. Materials requiring processing through the shredding system are transported to the shredder feed area on the north side of the shredder as needed. The stacking area at the south end of the process line is reserved for the finished ferrous product. All ferrous product produced by the facility is temporarily stacked in this area or other areas if needed. Outgoing product is loaded into rail cars by front end loader. Non-magnetic materials (Non-Ferrous Concentrate, NFC) remaining from the material processed through the shredding system are temporarily stored in a concrete bunker on the east side of the process line. These materials are moved to a storage area adjacent to the Upper Sort Building. The NFC is processed in the Upper Sort Building to further concentrate the non-ferrous metals by removing extraneous materials.

Supporting industrial activities include mobile vehicle refueling and maintenance and process equipment maintenance. Process equipment maintenance is generally performed in place. Component maintenance may be performed indoors if the component can be removed. Maintenance of small vehicles is performed indoors when possible in the Maintenance Garage. Other vehicular maintenance is performed outdoors on a concrete pad between the Garage and the Warehouse if possible, or at the vehicle's location if it cannot be moved.

B. Facility

wTe Recycling, Inc.'s Southern Avenue facility is located in a residential/commercial section of Greenfield adjacent to the Deerfield River. The site consists of impervious concrete pads and roadways, hard packed dirt surfaces, and other pervious surfaces. The facility is roughly divided into three general areas: the upper ferrous yard, the lower ferrous yard, and the non-ferrous area. Stormwater runoff is collected by fifteen (15) catch basins. A storm sewer system transports the surface runoff to an outfall (Outfall 001) which discharges into an open channel on the northeast side of the property. The drainage channel runs several hundred feet to the Deerfield River. Stormwater from the majority of the upper ferrous yard is collected by catch basins CB-0, 1, 2, 7, and 8, and stormwater from the lower ferrous yard is collected by catch basins CB-9, 10, 11, 12, 13, 14, and 15. Stormwater from the non-ferrous area is collected by catch basins CB-3, 4, and 5 and is conveyed to the lower ferrous yard where it flows overland to catch basin CB-9. Catch basin CB-6 collects

water from the railroad right-of-way between the non-ferrous area and the upper ferrous yard. This water joins the non-ferrous area discharge.

A site vicinity map is provided as Figure C-1 in Appendix C, and a site plan is provided in Appendix C as Figure C-2. This figure shows the following features, where appropriate:

- Size of the property in acres
- Significant structures and impervious surfaces
- Direction of stormwater flow
- Existing structural control measures
- Receiving waters in the immediate vicinity of the facility
- Stormwater conveyances
- Location where significant spills or leaks have occurred
- Stormwater monitoring points
- Stormwater inlets and outfalls
- Fueling stations
- Vehicle and equipment maintenance and/or cleaning areas
- Loading and unloading areas
- Waste storage
- Liquid storage tanks
- Processing and storage areas
- Immediate access roads and rail lines
- Bulk transfer areas
- Machinery

A below ground diesel fuel tank and pump is located on the north side of the Shredder Maintenance Building. Two above ground diesel fuel tanks are located south of the Maintenance Building. One tank is portable and is used to refuel the cranes and other mobile equipment.

C. Materials Received, Stored, and Processed

Automobile/Truck Bodies

Automobile and truck bodies are stacked in designated unpaved areas in both the upper and lower ferrous yards. The bodies are moved to the feed area and are fed into the shredding system as needed.

White Goods (Appliances)

Large quantity suppliers of white goods sign a white goods purchase contract (see Appendix E) that requires the removal of all mercury switches, capacitors and refrigerants and the severing of the refrigerant tubing. White goods are inspected upon delivery, and improperly prepared units will either be rejected or set aside for mercury switch, and/or refrigerant removal by wTe Recycling. Items containing capacitors will be rejected. White goods are stockpiled and fed into the shredding system upon demand.

Various Ferrous Metals

The following ferrous grades are accepted and processed by wTe Recycling: Mixed Cast Iron, Machine Cast, Dirty Motors, No. 1 Steel, No. 2 Steel, Unprepared Steel, Mixed Iron, Light Iron Baling, Light Iron Shred, and No. 2 Shred. Generally speaking, all grades of ferrous metals are stored in segregated piles, undergo some form of processing, and are loaded onto trucks or rail cars for delivery to market. Processing can consist of the manual removal of unwanted materials, size reduction by shearing or breaking, baling, and size reduction and cleanup by processing through the shredding system. These materials are stored directly on the ground or on concrete paving.

Various Non-Ferrous Metals

Non-Ferrous Metals are typically stored and processed inside the Non-Ferrous Building in the southwest corner of the site. Both covered and uncovered storage is provided for these materials.

Muni-Ferrous

Muni-Ferrous is the pre-burn ferrous stream produced by waste-to-energy facilities utilizing the refuse-derived fuel (RDF) technology. Normal handling and processing procedures require that all Muni-Ferrous material be processed on the day that it is received, and that all residue is to be removed from the site the same day or stored in a covered trailer. Thus this material is not stockpiled on the site for any significant time. The material is dumped in the feed area and fed into the shredding system. At the conclusion of the process run, the residue from the shredding system is returned to the source of the Muni-Ferrous.

Post Incinerated Ferrous (PIF)

PIF is the ferrous stream removed from the ash stream at the back end of waste-to-energy facilities utilizing the mass burn technology. This material is stockpiled in a designated area of the site, and fed to the shredding system as needed.

Non-Ferrous Concentrate (NFC)

NFC is generated as a by-product of the shredding system and is discharged by a process conveyor into a concrete bin on the east side of the process line. This material is moved to a storage area near the Upper Sort Building and fed into the Upper Sort process. The Upper Sort process produces ferrous metals, mixed non-ferrous metals, fines, and residue. The ferrous metals, fines, and residue are discharged into open containers, and non-ferrous metals are discharged into covered bunkers

Auto Shredder Residue (ASR)

ASR is discharged into a covered concrete bin for temporary storage. When the bin is full, the ASR is moved to the ASR screening area on the south side of the site where it is stored on a concrete slab in uncovered piles until removed for off-site disposal. The ASR has received a Beneficial Use Determination from the Massachusetts Department of Environmental Protection.

Processed Iron and Steel

These materials are stockpiled by the stacking conveyor at the south end of the shredding system and loaded into rail car for transportation to market.

Baled Tin Cans

These bales are combined with the Muni-ferrous feedstock for shredding.

Tires

Tires are stockpiled in a designated area of the site. Tires are not processed on site.

Empty Drums

WTe Recycling maintains an inventory of clean empty drums for use as storage containers. These drums are piled on their sides to the east of the Non-Ferrous Building. Storage in this manner prevents water from accumulating in the drums.

Batteries

Batteries collected at the shredder area are stored under cover next to the light iron pile. They are stored until a sufficient quantity has accumulated and then are moved to the Non-ferrous Building for shipment to a battery processor. Batteries are not processed on site.

Waste Materials

Used anti-freeze is stored inside the Maintenance Building in containers until a sufficient quantity is collected. At that time it is removed and disposed of off-site. Waste engine oil generated on-site is burned on site in a waste oil burner. No waste oil generated off-site is consumed by the waste oil burner. Solid waste is combined with muni-ferrous and processed through the shredder system.

4. POTENTIAL POLLUTANT SOURCES

This section provides information on potential stormwater pollutants that may be generated by the industrial activities taking place on the site. The site is roughly divided into three general areas, and each general area is discussed separately. Table 4-1 lists the general industrial activities taking place on the site, the potential pollutants, and the probable sources of these pollutants.

A. Upper Ferrous Yard

The industrial activities performed in the upper ferrous yard that are exposed to stormwater are listed below:

- Truck weighing
- Raw material receiving
- Material storage
- Power shearing
- Baling
- Torch cutting
- Vehicle maintenance
- Vehicle refueling
- Material screening

B. Lower Ferrous Yard

The industrial activities performed in the lower ferrous yard that are exposed to stormwater are listed below.

- Raw material receiving
- Ferrous metal processing including shredding, magnetic separation, and air classification
- Material storage
- Equipment maintenance
- Non-ferrous processing including screening, magnetic separation, sorting
- Rail car loading

C. Non-Ferrous Area

The industrial activities performed in the non-ferrous area that are exposed to stormwater are listed below.

- Raw material receiving
- Material storage
- Equipment maintenance
- Material sizing
- Shearing
- Product loadout

Table 4-1. Industrial Activities, Sources and Potential Pollutants

Activity	Source	Potential Pollutants
Material Receiving	Trucks	Lubricants, vehicle fluids
Loading and Unloading	Trucks, Loader	Lubricants, vehicle fluids
Outdoor Storage	Automobile/Truck Bodies	Fuels, oils, miscellaneous fluids, metals
	White Goods	PCBs, oils, lubricants, metals
	Light Iron	Metals
	Empty Drums	Chemical residues, oils, fuels, metals
	PIF	Metals
	PIF Residue	Metals
	NFC	Various pollutants
	ASR	Various pollutants
	Auto Frag	Metals
	Refuse-Derived Fuel	Metals
	Mixed Iron	Metals
	Baled Iron	Metals
	Baled Tin Cans	Metals
Empty Propane Cylinders	Metals	
Unshreddable Materials	Metals	
Rail Cars	Fuels, lubricants, other fluids	
Outdoor Processing	Mobile Equipment	Lubricants, fuels, hydraulic, fluids
	Fixed Process Equipment	Lubricants, fluids, metals, particulate
	Metal Feedstock	Metals
Equipment Maintenance	Process/Mobile Equip	Lubricants, fuels
Refueling	Mobile Equipment	Lubricants, fuels

D. Location of Potential Spills or Leaks

Because of the prominent use of mobile vehicles equipped with hydraulic actuators, and the use of a portable tank for re-fueling, a potential spill or leak could occur nearly anywhere on the site.

E. List of Significant Spills or Leaks

The Permit requires a listing of significant spills or leaks of toxic or hazardous pollutants that have occurred in areas exposed to stormwater within three years prior to the date of preparation or amendment of the SWPPP. A significant spill or leak include, but are not limited to, releases of oil of hazardous substances in excess of quantities that are reportable under CWA section 311 or section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). No significant spills or leaks of toxic or hazardous pollutants have occurred in this time period in an area exposed to stormwater.

F. Evaluation of Unauthorized Non-Stormwater Discharges

The Permit requires that wTe Recycling evaluate the facility for the presence of non-stormwater discharges, eliminate all unauthorized discharges, and document the results. The facility was

evaluated for the presence of non-stormwater discharges on July 9, 2015 during the annual site inspection and consultant visit. All catch basins were inspected as was outfall 001. The evaluators searched for any unauthorized sources of non-stormwater discharge including the following:

- Floor drains, sinks, and other waste discharged to the ground surface
- Boiler blow-down
- Vehicle and equipment wash water
- Steam cleaning wastes
- Contact or non-contact cooling water
- Process wastewater
- Spills and leaks

No unauthorized discharges from the stormwater drainage system were observed. The certification of the evaluation of non-stormwater discharges is included in Section 8.1.

G. Previously Collected Stormwater Quality Data

Stormwater quality data collected during the previous permit term are contained in Appendix D. All stormwater samples were collected at outfall 001.

5. CONTROL MEASURES

A. Control Measure Considerations

The Permit lists seven control measure considerations in Part 2.1.1 and requires the SWPPP to describe how these considerations were addressed. Each consideration is discussed below:

Minimize Exposure

Preventing the contact of precipitation and products is generally more effective and less costly than treating stormwater to remove contaminants. wTe Recycling has constructed over 5,000 square feet of covered storage bins, and additional covered storage is provided in the Non-ferrous Building and the PIF Trommel Building. Batteries, lead, zinc, clean and used lubricants, and hydraulic oil are all stored under cover. PIF ash is stored under cover to the extent possible. Various non-ferrous metal products are also stored in covered bins. Liquid wastes are stored under cover in materially compatible and non-leaking containers and are disposed of or recycled in accordance with RCRA and other applicable state and local requirements.

Good Housekeeping

Good housekeeping measures include the immediate control of spills and any free liquid that may drain from stored material, controlling litter on an as-needed basis, and regular inspection of equipment for leaks, spills, malfunctioning, worn or corroded parts. All mobile equipment is inspected daily, and the process equipment is inspected each morning prior to start-up, and again each afternoon during daily cleanup.

Cracked, broken, or leaking lead-acid batteries are not accepted at wTe Recycling, Inc. In the event that a battery develops a leak while in storage or while being loaded out of the facility, the following procedures have been established to contain and clean up the battery acid:

All workers handling lead-acid battery spills will wear heavy rubber gloves, clothing that covers exposed skin, eye protection, and an appropriate respirator. Spills shall be neutralized carefully with an appropriate base such as agricultural lime or baking soda. The neutralized spill will then be swept or scraped up, stored in a sealed plastic container, and disposed of as a hazardous waste. The battery casing will be placed in a 5 gallon plastic bucket until removed from the site by the battery recycler.

The fence line along the Deerfield River is checked periodically to ensure that any wind-blown refuse is contained on the site. During dry weather periods, the roadways are cleaned daily to remove dust and dirt and a mixture of calcium chloride and water is applied to suppress dust. Dry absorbents and/or wet vacuuming are used to control any residual liquids from scrap materials.

Drip pans are used under any leaking piece of stationary equipment until the leak is repaired. Periodic inspection of the drip pans is performed and regular emptying is practiced to prevent overflow. All liquids are disposed of in accordance with RCRA requirements.

Should a significant spill or leak occur resulting in a release containing a hazardous substance in an amount equal to or in excess of a reporting quantity established by either 40 CFR 110, 40 CFR 117, or 40 CFR 302, the facility will notify the National Response Center (800-424-8802) orally as soon as facility personnel become aware of the discharge.

Paved surfaces are swept daily during dry weather to remove accumulated silt and dust. The process area is cleaned daily to remove any spilled material.

Maintenance

All process and mobile equipment are inspected daily in order to avoid failures and leaks and spills. The oil-water separators are inspected quarterly and cleaned bi-annually. The catch basin inserts are inspected after every storm event and replaced as necessary. The hay bales surrounding selected catch basins are inspected daily and replaced as needed. Catch basin moats are inspected after each storm event and cleaned as required.

Combine Control Measures

Using control measures in combination is more effective than using control measures in isolation for minimizing pollutants in stormwater discharge. A combination of control measures are employed by wTe Recycling. They are: good housekeeping, inbound material quality control, covered storage areas, catch basin moats and filters, and oil-water separators.

Assess Pollutants

Assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective measures. Knowing whether the pollutants are in the form of suspended solids or in the dissolved state will determine which control measures can be used to minimize the pollutants. wTe Recycling previously conducted both settling and filtering tests to determine if the metal pollutants aluminum, iron, lead, and zinc were in soluble or solid form. While settling was effective in removing TSS, Al, Cu, Pb, and COD (at times of 20 to 100 minutes), neither settling nor filtering was effective in reducing Fe and Zn to a level below the benchmark concentrations. Providing up to 100 minutes of settling for the volume of stormwater generated by the site is impractical, and thus the most effective measure for controlling pollutants will be to prevent precipitation from contacting the stored metals.

Minimize Impervious Areas

Minimizing impervious areas and infiltrating runoff onsite can reduce runoff and improve groundwater recharge and stream base flows in local streams. All active areas of the site are either bare earth or paved with concrete. General storage areas and certain process areas in the upper yard are unpaved. Much of the lower process area has been paved with concrete to keep finished materials clean from mud contamination and to aid in daily housekeeping. All roadways have been paved with

concrete. To the extent possible, any currently unpaved areas will remain unpaved in order to minimize any future increase in runoff.

Attenuate Flow

Attenuating flow using open vegetated swales can reduce erosive flows. Outfall 001 discharges at the bottom of an embankment and flows in a cascading open channel to the Deerfield River. There is no opportunity to direct the stormwater to an open vegetated swale.

Conserve Riparian Buffers

Conserving and/or restoring riparian buffers will help protect streams from stormwater runoff and thus improve water quality. wTe Recycling is located adjacent to the Deerfield River with a buffer separating the two. The only stormwater that is discharged from the active portion of the wTe Recycling property exits the site via outfall 001, and flows in an open channel to the Deerfield River. Hence the riparian buffer zone on the north and east sides of the site cannot be taken advantage of.

Use Treatment Interceptors

Using treatment interceptors such as swirl separators and sand filters may be appropriate to minimize the discharge of pollutants. wTe Recycling uses fabric filter treatment interceptors in all catch basins to trap large solids. Catch basins CB-7 and CB-14 are surrounded by hay bales to provide additional filtering of solids.

B. Inbound Material Quality Control

Quality control of inbound materials is achieved through the publishing of material specifications and through enacting an inbound inspection program during receiving operations. wTe Recycling publishes and distributes several documents to its suppliers regarding incoming material quality control. These documents are described below and are included as Appendix E.

Homeowner's Guide to Metal Recycling at wTe Recycling - This document provides a general guide to the metal grades common to homeowners and small businesses.

Auto Specifications - This document specifies the degree of preparation required for scrap automobiles, vans, and pick-up trucks 3/4 ton and under. It requires that the gas tank, battery, catalytic converter, tires, trash, mercury switches, and any potentially explosive or hazardous material be removed prior to delivery.

Policy on Hazardous and Unknown Substances - This document describes wTe Recycling's policy regarding various hazardous substances. wTe Recycling reserves the right to reject at the time of delivery any material which wTe suspects may contain either asbestos, PCBs, radioactive materials, or any other hazardous or suspicious substance be it fluid, solid, residue or dust.

Drum and Tank Policy - This document is intended for large suppliers of scrap drums and tanks. It states that all liquid, sludge, residue, or any other visible substance must be removed from all drums and tanks before delivery to the facility. Some small scale suppliers of tanks are not

capable of complying with this policy. For these occasional items, wTe Recycling will, for a price, remove and dispose of any residual oil in a controlled and responsible manner.

White Goods Agreement - This document defines which appliances will and will not be accepted by wTe Recycling from large quantity suppliers. It specifies that all capacitors and lighting ballast boxes must be removed and that components which may contain PCBs will be rejected. Specific terms and conditions for refrigeration units specify that all appliances having unopened or undrained refrigeration units which may contain CFCs or HCFCs will be rejected. The refrigerant lines must be visibly severed. White goods will only be accepted from large suppliers who have signed and executed the White Goods Agreement. wTe Recycling does have the capability to properly remove and dispose mercury switches and refrigerants from small quantity suppliers.

wTe Recycling's *Inbound Inspection Program* consists of a two-tier load inspection. The scale operator visually checks all incoming loads to determine which grade of material is being received and whether or not it appears to meet the established material quality requirements. If it appears acceptable, the truck is directed to the proper unloading area. An inspector in the unloading area visually inspects the load before it is discharged, and if it appears acceptable, the truck is allowed to unload. After unloading, any materials that are found to be unacceptable for that grade of material are either loaded back on the truck and removed from the site or transported to another unloading area where the material can be accepted. All personnel involved with the inbound inspection program are fully knowledgeable of the inbound material quality requirements prior to assuming the position of inspector.

C. Erosion and Sediment Controls

Catch basins 7, 8, 9, 12, and 14 are equipped with moats for collecting and settling sediment. Catch basin 11 is scheduled to be retrofitted with a moat in late 2015.

D. Management of Runoff

Much of the Upper Yard and the Non-Ferrous Area are unpaved, and as such allow stormwater to infiltrate into the soil.

E. Salt Storage

Calcium chloride is used to de-ice roadways. This salt is purchased in bags and is stored outside on shrink-wrapped pallets.

F. Dust Generation and Vehicle Tracking of Industrial Materials

A mixture of calcium chloride and water is applied to paved surfaces to aid in controlling dust. The roadways are swept daily.

G. Control Measure Summary

Table 5-1 summarizes the measures and controls use by wTe Recycling.

Table 5-1. Stormwater Pollution Control Measures

Measure	Where Applied	Controls
Quality Control Documents	Suppliers	Unwanted Materials
Inbound Material Inspection	Receiving Points	Unwanted Materials
Good Housekeeping	As Needed	Leaks and Spills
Dry Absorbents	As Needed	Leaks and Spills
Speedy Spill Cleanup	As Needed	Leaks and Spills
Temporary Drip Pans	As Needed	Leaks
Oil/Water Separator	Catch Basins	Grease, Oils
Catch Basin Filters	Catch Basins	Solids
Hay Bales	Selected Catch Basins	Solids
Pavement Sweeping	All Paved Surfaces	Various Pollutants
Covered Storage	Batteries, Lead, Zinc, Oils	Various Pollutants
Equipment Inspection	All Process and Mobile Equipment	Leaks and Spills
Preventive Maintenance	All Process and Mobile Equipment	Leaks and Spills

6. SCHEDULES AND PROCEDURES

A. Good Housekeeping

Paved surfaces are swept daily during dry weather to remove accumulated silt and dust. The process area is cleaned daily to remove any spilled material.

B. Maintenance

All process and mobile equipment are inspected daily in order to avoid failures and leaks and spills. The oil-water separators are inspected quarterly and cleaned bi-annually. The catch basin inserts are inspected after every storm event and replaced as necessary. The hay bales surrounding selected catch basins are inspected daily and replaced as needed. Catch basin moats are inspected after each storm event and cleaned as required.

C. Spill Prevention and Response

wte Recycling has a Spill Prevention, Containment, and Countermeasure plan, which provides substantial detail on this subject. A general inspection is performed daily, and a thorough facility inspection is performed monthly. The SPCC plan includes individual checklists to guide the inspector and for recording the monthly inspection results. Spill kits are readily available on the site.

D. Erosion and Sediment Control

A mixture of calcium chloride and water is applied as needed to aid in dust control on roadways.

E. Employee Training

The facility staff must be aware of the conditions that may cause stormwater pollution, and they must be knowledgeable on the proper use of the control measures used by wTe Recycling. All employees with the exception of certain administrative personnel receive stormwater pollution prevention training. Employee training will be conducted on at least an annual basis. The following subjects will be addressed in the training program:

- General requirements of the SWPPP
- Proper scrap inspection
- Good housekeeping practices
- Handling and storage procedures
- Procedures to follow in the event of a spill, leak, or break in any structural control measure
- Location and maintenance of stormwater controls
- When and how to conduct inspections, record the findings, and take corrective actions

Training will be performed as part of the Facility Safety Program. Safety Meetings are held monthly with the entire facility staff. One session per year will be dedicated to SWPPP training. Additional training and education will be developed for employees and suppliers if it is found to be necessary for the successful implementation of the SWPPP.

F. Benchmark Monitoring

The Permit requires wTe Recycling to conduct quarterly benchmark monitoring. The benchmark concentrations are not effluent limitations, and so an exceedance is not a permit violation. Benchmarks are primarily used for self-evaluating the overall effectiveness of the control measures used to reduce the pollutants in stormwater. Instructions for collecting stormwater samples are included in Appendix L.

Location

The stormwater sampling location designated as Outfall 001. This consists of a culvert which discharges into an open channel on the northeast side of the property. The open channel flows toward the Deerfield River. The sampling location is just upstream of where the open channel leaves wTe Recycling's property.

Monitoring Schedule and Subsequent Action

Stormwater monitoring is to be conducted quarterly, beginning in the first full quarter following either September 2, 2015 or the actual date of discharge authorization. The quarterly monitoring periods are January to March, April to June, July to September, and October to December.

After collection of four quarterly samples, if the average of the four monitoring values for any parameter does not exceed the benchmark, then the monitoring requirements for that parameter have been satisfied for the permit term. After collecting four quarterly samples, if the average of the four monitoring values for any parameter exceeds the benchmark, the selection, design, installation, and implementation of the control measures will be reviewed to determine if modifications are necessary to meet the effluent limits in the permit. If modifications are deemed necessary, then they are to be made and the quarterly monitoring is to continue until four additional quarters have been completed for which the average does not exceed the benchmark. Alternatively, a determination may be made that no further pollutant reductions are technically available and economically practicable and achievable in light of best industry practice. If this decision is made, monitoring must continue on an annual basis and the rationale for this decision must be documented in the SWPPP and reported to EPA in the next scheduled benchmark monitoring report.

It is not acceptable to wait four full quarters to decide on a course of action if a projected four quarter average exceedance is mathematically certain. In this case the control measures are to be reviewed immediately, and a course of action decided upon.

This pattern is to be repeated until the benchmarks have been met or the decision is made that there are no technically valid, economically practicable control methods available. While the failure of a sample result to meet its corresponding benchmark is not a permit violation, the failure to respond to an exceedance is a permit violation.

Parameters to be Monitored

The sector-specific benchmarks for Sector N, Subsector 1 are presented in Table 6-1 and 6-2. The Deerfield River water was sampled on May 29, 2012, and the hardness was found to be 76 mg/l.

**Table 6-1. Benchmarks for Sector N, Subsector 1:
Scrap Recycling and Waste Recycling Facilities**

Parameter	Benchmark Concentration, mg/L
Chemical Oxygen Demand (COD)	120
Total Suspended Solids (TSS)	100
Total Recoverable Aluminum	0.75
Total Recoverable Copper*	0.0123
Total Recoverable Iron	1.0
Total Recoverable Lead*	0.069
Total Recoverable Zinc*	0.11

*Hardness Dependent

**Table 6-2 Benchmarks for Hardness Dependent Metals
Sector N, Subsector 1: Scrap Recycling and Waste Recycling Facilities**

Hardness Range	Copper	Lead	Zinc
0 - 25	0.0038	0.014	0.04
25 - 50	0.0056	0.023	0.05
50 - 75	0.0090	0.045	0.08
→ 75 - 100	0.0123	0.069	0.11
100 - 125	0.0156	0.095	0.13
125 - 150	0.0189	0.122	0.16
150 - 175	0.0221	0.151	0.18
175 - 200	0.0253	0.182	0.20
200 - 225	0.0285	0.213	0.23
225 - 250	0.0316	0.246	0.25
250 +	0.0332	0.262	0.26

All values in mg/l

G. Measureable Storm Event

The monitoring must be performed on a storm event that results in an actual discharge from the site and that follows the preceding measurable storm event by at least 72 hours.

H. Sample Type

A minimum of one grab sample shall be taken from a discharge resulting from a measurable storm event. The grab sample shall be taken during the first 30 minutes of the discharge. If the collection of a grab sample during the first 30 minutes is impracticable, a grab sample can be

taken as soon as practicable, and documentation must be kept with the SWPPP describing why it was not possible to take a grab sample during the first 30 minutes of the storm event.

For each monitoring event, except snowmelt monitoring, the following information must be recorded: date and duration in hours of the rainfall event, rainfall total in inches for that rainfall event, and time in days since the previous measurable storm event. Only the sampling date need be recorded for snowmelt monitoring.

I. Benchmark Monitoring Reporting

All benchmark monitoring data must be submitted to EPA using EPA's online reporting system at www.water.epa.gov/netdmr no later than 30 days (email date or postmark date) after the complete laboratory results have been received.

If multiple samples are collected in a single quarter, all results shall be submitted to EPA within 30 days of receipt. A copy of each quarterly stormwater analysis report should be added to Appendix I.

J. Routine Facility Inspection

Routine inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits of the permit will be conducted quarterly. The quarterly examination periods are January to March, April to June, July to September, and October to December. The Facility has been subdivided into several sub-areas, and a member of the Stormwater Pollution Prevention Team has been assigned to each area for the purpose of conducting the routine inspections. This is described in Section 2. A minimum of one of the four quarterly routine inspections will be conducted during a storm event. Thorough monthly inspections are also conducted as part of the SPCCC plan as described in Section 6.C.

The objective of the quarterly inspection is to identify any corroded or leaking containers, corroded or leaking pipes, leaking or improperly closed valves and valve fittings, leaking pumps, and/or hose connections and deterioration in diversion or containment structures. Structural control measures will be visually inspected for signs of washout, breakage, deterioration, damage, or overflowing. Spills, leaks, or other conditions identified shall be addressed immediately or as soon as possible.

The findings of the routine inspection will be documented on the Routine Facility Inspection Form, included in Appendix F. Completed forms will be added to Appendix F of the SWPPP and will be kept for a period of at least three years from the date that coverage under this permit expires or is terminated. They do not have to be submitted to EPA unless specifically requested to do so.

This SWPPP will be updated to include any new potential sources of stormwater contamination identified during the routine inspections, as well as any additional control measures needed to control new or existing sources.

All previous year SWPPP modification, records, and other reporting documents will be posted at the same URL as was used to post the SWPPP. These documents will be posted within 45 days of completing the final Routine Facility Inspection for the year.

K. Quarterly Visual Examination of Stormwater Quality

A visual examination of a representative stormwater discharge sample must be made at least once each quarter. The quarterly examination periods are January to March, April to June, July to September, and October to December. The Team Leader or the Alternate Team Leader will conduct the visual inspections.

The sample to be examined should be collected within the first 30 minutes (or as soon thereafter as practical) of when the runoff or snowmelt begins discharging. The sample shall be examined for color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution. All samples are to be collected from the discharge resulting from a storm event that occurs at least 72 hours from the previously measurable storm vent. Where practicable, the same person should collect and examine the samples for the entire permit term.

The results are to be documented in a Visual Examination Report form. A blank Visual Examination Report form is included in Appendix J. Completed reports are to be added to Appendix J as they are generated and they shall be kept for a period of at least three years from the date that coverage under this permit expires or is terminated. If adverse climatic conditions prevent the discharge examination from occurring, the reason for not performing the examination will be documented in a Visual Examination Report.

L. Corrective Actions

Corrective action is required when any of the following conditions are discovered during an inspection, are noted by the EPA, or upon receipt of the water quality monitoring results:

- An unauthorized release or discharge occurs
- A discharge violates a numeric effluent limit
- It becomes apparent that the control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits of this permit
- A required control measure was never installed, was installed incorrectly, or not in accordance with the permit, or it is not being maintained properly
- Whenever a visual assessment shows evidence of stormwater pollution

If any of the following conditions occur, the SWPPP must be reviewed in order to determine if modifications are necessary:

- Construction or a change in design, operation, or maintenance significantly changes the nature of pollutants discharged in the stormwater, or significantly increases the quantity of pollutants discharged
- The average of four quarterly sampling results exceeds an applicable benchmark. If less than four benchmark samples have been taken, but the results are such that an exceedence of the four quarter average is mathematically certain, this is considered a benchmark exceedance.

Corrective action consists of taking immediate reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, reviewing and revising, as appropriate, the SWPPP so that the permit's effluent limits are met and pollutant discharges are minimized, and completing subsequent permanent solutions if needed. If subsequent actions are required, they must be implemented before the next storm event if possible, and within 14 calendar days from the time of discovery of the issue requiring corrective action. If it is infeasible to comply with the 14 day time limit, the reason for the delay will be documented, as will the schedule for completing the action. The work is to be done as soon as possible but not more than 45 days from the date of the discovery.

M. Corrective Action Documentation

The existence of any items requiring corrective action is to be documented within 24 hours of the discovery of the condition. The following information shall be documented:

- Identification of the condition triggering the need for corrective action review
- Description of immediate actions taken to minimize or prevent the discharge of pollutants
- Date the problem was identified
- A statement signed and certified by a responsible corporate officer

Within 14 days of discovery, the following information shall be documented:

- Summary of the corrective action taken or to be taken, or the basis for determining that corrective action is not necessary (if appropriate)
- Date corrective action initiated and completed or expected to be completed
- If applicable, the reasons it is infeasible to complete the necessary work within the 14 day time frame, and the schedule for completing the work
- The rationale for requiring and extension of the 45 day time frame, if applicable.

Corrective Action Reports will be added to Appendix H as they are generated.

6.10 Annual Report

An annual report is to be submitted to the EPA electronically, by January 30, for the previous year of permit coverage. The annual report is to include the following:

- A summary of the past year's routine facility inspection documentation
- A summary of the past year's quarterly visual assessment documentation
- A summary of the past year's corrective action documentation
- The status of any outstanding corrective actions
- A description of any incidents of noncompliance in the past year
- A statement, if appropriate, that the facility is in compliance with the permit.

All previous year SWPPP modification, records, and other reporting documents will be posted at the same URL as was used to post the SWPPP. These documents will be posted within 45 days or completing the final Routine Facility Inspection for the year.

7. ELIGIBILITY DOCUMENTATION

A. Documentation of Permit Eligibility Regarding Endangered and Threatened Species and Critical Habitat Protection

wTe Recycling requested an on-line IPaC Trust Resource Report from the US Fish & Wildlife Service, and a US Department of the Interior species list. These reports indicated that the Northern Long-eared Bat is a threatened mammal in the site's action area. No critical habitat has been designated for this species.

The Massachusetts Division of Fisheries and Wildlife maintains a listing of endangered, threatened, and special concern species by city or town. The only federally listed species on this list in the vicinity of Greenfield is the endangered Shortnose Sturgeon. The Connecticut River Coordinator's Office has published a fact sheet on the Shortnose Sturgeon indicating there is a partially landlocked population in the Connecticut River between the Holyoke Dam and the Turner's Falls Dam (near the confluence of the Deerfield and the Connecticut Rivers). It also states that these fish rarely venture into the Connecticut's larger tributaries and usually restrict their movement to the mainstream Connecticut River. wTe Recycling's stormwater discharges into the Deerfield River, which flows approximately one half mile to the Connecticut River, where the Shortnose Sturgeon are reportedly found.

According to the U.S. Department of Commerce's "Final Recovery Plan for the Shortnose Sturgeon", published in December 1998, there have not been any studies to assess the impact of contaminants on this fish. So to assess the potential effects of contaminants in wTe Recycling's stormwater on the Shortnose Sturgeon, contaminant concentrations in the Deerfield River were estimated and compared to the 2015 MSGP benchmarks. No further dilution with the Connecticut River was considered.

To accomplish this, rainfall and flow data for 18 storms in 2006 were evaluated. The data were obtained from an automatic sampler, rainfall and flow monitor located at the wTe Recycling stormwater outfall. Total rainfall for these eighteen events ranged from 0.07" to 2.44". From these data the average stormwater discharge was determined to be 135,366 gallons per inch of rainfall. Published records indicate that the annual rainfall in central Massachusetts is approximately 45 inches. This annual rainfall value was multiplied by the average stormwater discharge per inch of rain to yield the volume of stormwater discharged from wTe Recycling (45 inches x 135,366 gallons/inch x 3.78 liters/gallon = 23,025,776 liters per year).

USGS surface-water annual data for the Deerfield River were obtained for the years 1941 through 2007. From these data, the average discharge of the Deerfield River is 1,332 cubic feet per second. The average annual Deerfield River flow was calculated (1,332 cfs x 60 seconds/minute x 60 minutes/hour x 24 hours/day x 365 days/year x 7.48 gallons/cubic foot x 3.78 liters/gallon = 1.1877 E+12 liters per year).

Average contaminant concentrations were calculated from the past four quarters of stormwater data. The averages for all but copper and iron were below the benchmarks. For copper and iron, the average annual discharge from the wTe Recycling outfall was multiplied by the average contaminant concentrations to produce annual loadings in milligrams per year. The average Deerfield River concentrations were calculated using the average river flow and these loadings. These concentrations were 0.00000033 mg/l for copper and 0.000087 mg/l for iron. These concentrations are many orders of magnitude lower than the benchmarks, and they will be significantly reduced further by the Connecticut River which flows at a rate many times that of the Deerfield. Hence wTe Recycling's stormwater discharge is not expected to have any adverse effect on the Shortnose Sturgeon and wTe Recycling qualifies for MSGP coverage under Criterion C with regard to endangered species protection.

B. Documentation of Permit Eligibility Regarding Historic Properties

The stormwater discharged from wTe Recycling's outfall 001 does not have the potential to have an effect on historic properties, and previous construction has not uncovered any historic properties. The Greenfield Historical Commission has provided written verification that there are no above ground historic resources near wTe Recycling's site. Hence wTe Recycling claims eligibility with regard to historic property preservation under Criterion B.

8. CERTIFICATIONS

A. Certification of the SWPPP

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Charles Faulstich

Sr. Engineer

Name

Title



Signature

8/18/2015

Date

APPENDIX A

Notice of Intent for Stormwater Discharges Associated with Industrial Activity Under the NPDES
Multi-Sector General Permit

APPENDIX B

Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity From Scrap Recycling and Waste Recycling Facilities

For the 2015 Multi-Sector Group Permit, please go to:

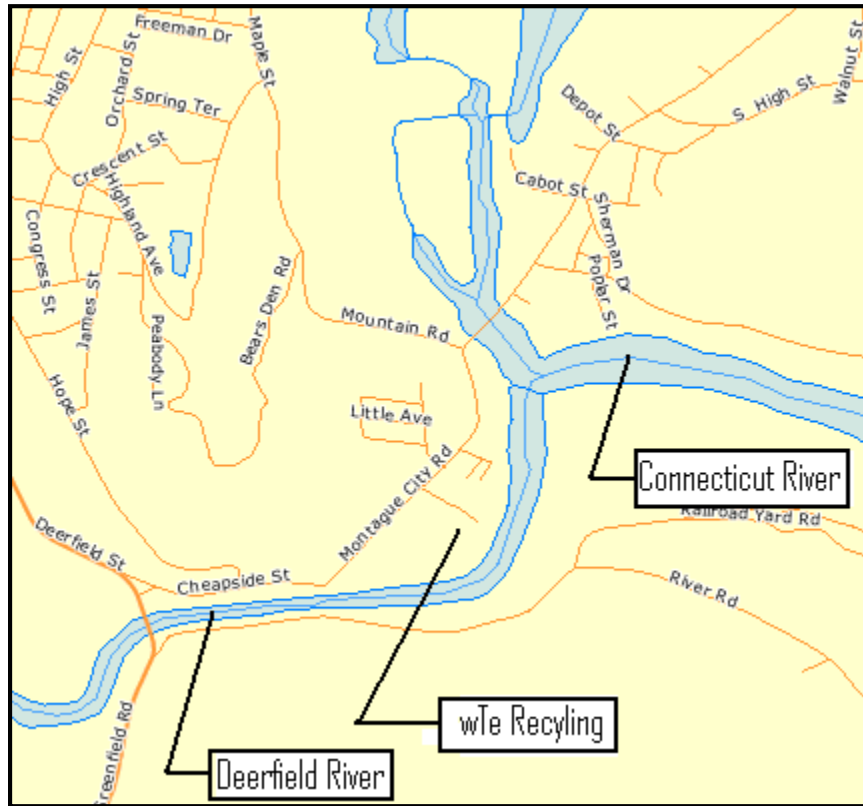
<http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm>

APPENDIX C

Site Vicinity Map C-1

Site Plan C-2

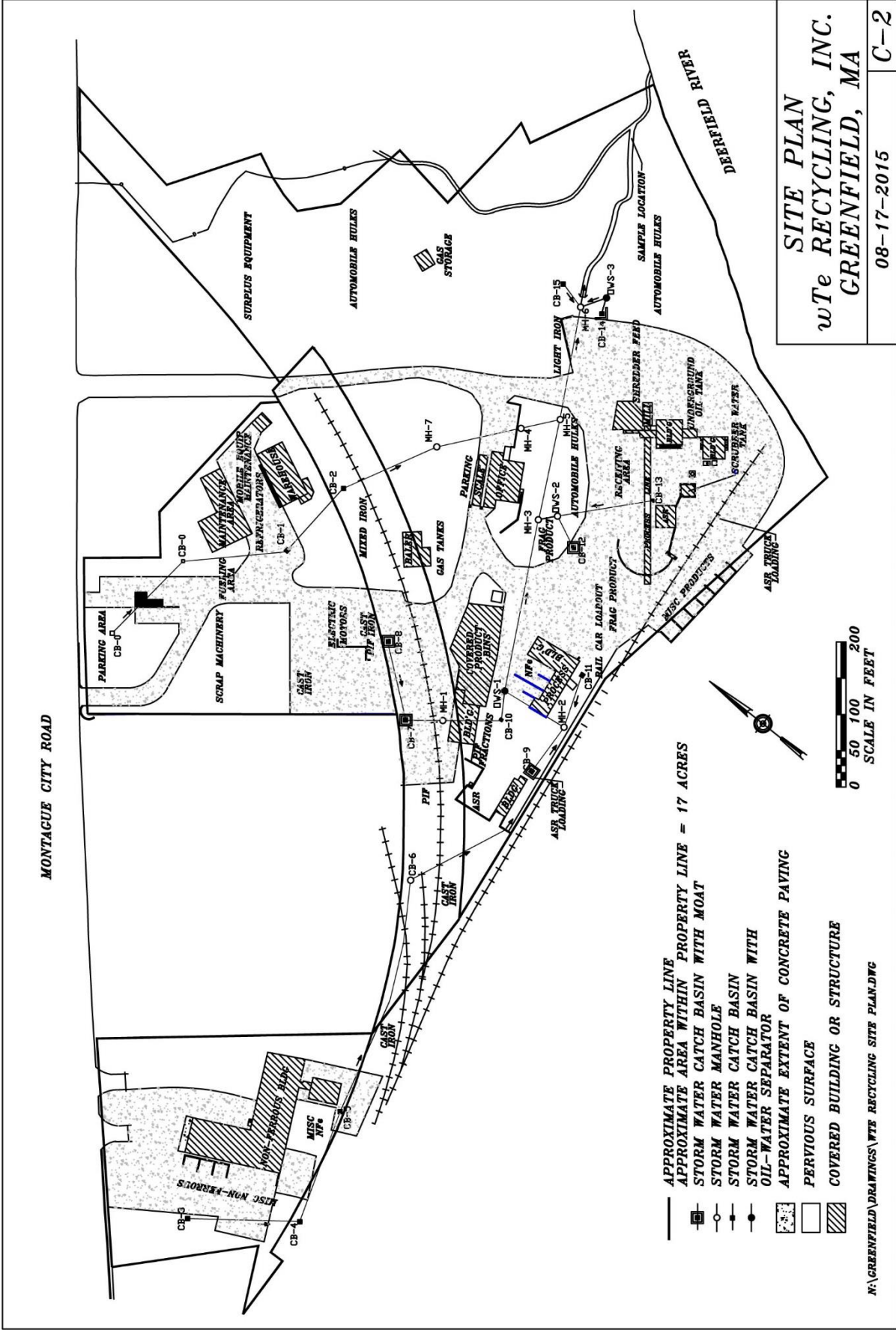
Figure C-1 – Site Vicinity Map



Facility latitude = 42 degrees, 34 minutes, 23 seconds

Facility longitude = -72 degrees, 34 minutes, 49 seconds

Determined using EPA's EnviroMapper web site



N:\GREENFIELD\DRAWINGS\WTE RECYCLING SITE PLAN.DWG

APPENDIX D

Stormwater Analysis Data

wTe Recycling Stormwater Analysis Data

Date	Sample #	TSS	Aluminum	Copper	Iron	Lead	Zinc	COD
11/13/2008		160	4.4	0.4	30	0.54	1.8	270
6/09/2009		730	20	2	100	2	9.1	730
9/28/2009		24	1.2	0.16	3.8	0.053	0.74	260
11/14/2009		69	0.39	0.082	19	0.053	0.33	290
3/23/2010		140	4.3	0.49	21	0.51	2.1	480
6/10/2010		64	0.4	0.093	26	0.05	0.36	519
9/16/2010		24	0.05	0.02	15	0.01	0.11	287
2/7/2011 (snowmelt)		240	5.3	1	17	0.47	3.6	2390
3/16/2011		36	0.29	0.089	14	0.023	0.29	259
6/9/2011		320	8.4	0.77	26	0.79	2.8	440
8/6/2011		48	0.069	0.02	24	0.011	0.076	72
11/10/2011		72	0.82	0.049	23	0.054	0.23	63
3/13/2012		42	0.069	0.009	20	0.020	0.078	29
5/1/2012		64	1.4	0.15	12	0.1	0.52	234
6/12/2012		44	0.5	0.009	32	0.020	0.03	114
9/5/2012		3	0.095	0.013	0.62	0.02	0.037	48
10/29/2012		5	0.17	0.009	0.74	0.02	0.039	49
3/31/2013		6	0.059	0.011	3.5	0.02	0.059	72
5/15/2013		28	0.55	0.008	4.9	0.005	0.27	47
9/10/2013		6	0.53	0.006	1.3	0.02	0.026	64
10/31/2013		1	0.37	0.009	0.12	0.02	0.03	22
3/12/2014		23	0.16	0.11	8.1	0.02	0.26	879
5/27/2014		4	0.057	0.006	1.4	0.02	0.026	15
9/6/14		3	0.026	0.009	0.58	0.02	0.04	32
11/6/2014		26	0.02	0.044	14	0.02	0.073	148
3/25/2015		5	0.032	0.009	2	0.02	0.037	53
6/20/2015		2	0.02	0.007	0.93	0.02	0.02	72

All concentrations are in mg/l

APPENDIX E

wTe Recycling Infeed Material Quality Control Documents



75 Southern Avenue
Greenfield, Massachusetts 01301-3913

HOMEOWNER'S GUIDE TO METAL RECYCLING

November, 2008

The following is a general guide for metal grades common to homeowners and some small businesses. If you have a large amount or a steady supply of scrap metal please call our office (413-772-2200) during normal business hours and talk to our buyer.

Scrap metals are divided into two main categories: ferrous and non-ferrous. Ferrous literally means "containing iron." A magnet will stick to ferrous material, and will not stick to most non-ferrous material. These two main categories are broken down further into grades, some of which are explained below.

Ferrous grades of less than 500 pounds will be graded as Mixed Iron (see below). Non-ferrous grades do not have any weight minimum. Pricing will depend on the type of material you have, and on current market conditions. **Please note: we will not issue payment for loads valued under \$1.00.**

All material must be delivered to our yard. The ferrous yard is open from 7:30 AM to 4:00 PM, Monday through Friday. The non-ferrous warehouse is open from 7:00 AM to 4:00 PM, Monday through Friday, and from 8:00 AM to 12:00 noon on Saturday on occasion – call in advance.

All final grading decisions rest with the Plant Manager or the Plant Superintendent.

Unacceptable Material

Due to strict environmental regulations and safety considerations, we must be very careful about what comes into our yard. The following items are completely unacceptable in any grade:

- capacitors
- ballast boxes
- transformers or any item which may contain PCBs
- radioactive items
- explosives
- asbestos-laden material
- safes
- vaults and safe doors
- hazardous or potentially hazardous substances
- paint and stain cans
- non-metallic materials of any kind

Other items, including tanks, drums, and appliances have certain restrictions. Please call and ask about these items before you bring them in.

Ferrous Grades

Ferrous grades are divided by the type of material, or by the size and thickness of the steel. Cast iron should be separated from tin and steel. There are three main cast iron grades: mixed cast iron, machine cast or scrap machines, and dirty motors.

Cast Iron

Mixed Cast Iron

This grade includes cast iron bath tubs and sinks (a thin porcelain coating is acceptable), cast iron radiators (old steam or water radiators), cast iron soil pipe, etc.

Machine Cast or Scrap Machines

These include cast iron machine bases and gears, and scrap machines that are primarily cast iron. All oil must be drained prior to delivery.

Dirty Motors

Dirty motors consist of automobile and truck engines with all wires and hoses removed. The transmission can remain attached. Clean heads and blocks can also go with this grade. Aluminum transmissions are a separate grade if they are removed from the engine.

Other types of automobile cast iron items such as brake drums and rotors, and transmissions with a cast iron core, generally are categorized as Number 2 Shred.

Steel

Steel is graded by thickness and by size. Heavy steel generally has more value than light iron, but light iron is more common. The following grades are listed with the most valuable grade first.

Number 1 Steel

Number 1 Steel must be at least ¼ inch thick. We have two Number 1 Steel grades: Prepared and Unprepared. Number 1 Prepared Steel must be cut to 5 feet by 18 inches or smaller. If it is larger than 5 feet by 18 inches, it will be graded as Unprepared #1 Steel. This grade may contain items such as I-beams, angle iron, reinforcing steel (re-rod) and steel plate at least ¼" thick. It may also contain leaf springs, coil springs, pieces of truck frames (1 Ton and larger) or other heavy machinery. This grade may not contain any galvanized material, automobile parts (except leaf and coil springs), or any steel less than ¼" thick.

Number 2 Steel

Number 2 Steel consists of material thicker than 1/8" but less than ¼". We buy this grade as Number 2 Shred. Please refer to the Shredder grades for more information.

Unprepared Steel

Unprepared Steel is a mix of Number 1 Steel and Number 2 Steel (Number 2 Shred). All items in this category must be 1/8" thick or thicker, and at least half of the load must be over ¼" thick. This grade is useful for homeowners who do not have enough heavy steel for a separate weight of Number 1 Steel and Number 2 Shred.

Mixed Iron

This is a mix of two or more grades. It is a common grade for homeowners who do not have enough scrap to meet the 500 pound minimum weight for separate grades. Mixed Iron may contain any items which are acceptable in our main yard of non-ferrous yard, however, any mixed load which has more than 25% of light iron may be graded as Light Iron for Baling.

Miscellaneous Iron and Steel

Light Iron for Baling

Light Iron for Baling is a common grade for homeowners. This grade consists of material less than 1/8" thick and may include any items acceptable as Light Iron Shred (see Shredder Grades). It may also include items which are unacceptable at the Shredder such as gas tanks, exhaust systems, fencing or cable, or a few pieces of heavy steel. Any load which has more than 25% of Light Iron for Baling mixed in may be graded as Light Iron for Baling. Any Shredder load which contains unacceptable material may be downgraded to Light Iron for Baling.

Appliances

Appliances, or "White Goods", are only accepted from contracted suppliers. This is because of strict environmental regulation that requires the removal of hazardous materials from these appliances prior to them being recycled. Some individuals and businesses do take appliances, usually for a fee – call your local Department of Public Works for more information.

Non-Ferrous Grades

We buy all types of non-ferrous metals. Items for this category which you are likely to have in your garage or basement may include:

- copper pipe and wire
- aluminum windows and siding
- brass fittings or fixtures
- automobile batteries
- lead wheel weights
- automobile radiators
- heater cores
- small electric motors

If you separate non-ferrous metals according to their type we will weigh each grade at our Non-Ferrous Warehouse. **Please note: the 500 pound minimum does not apply to non-ferrous grades.**

We buy many other non-ferrous grades – please call and ask!

Shredder Grades

Due to environmental and safety considerations, there are certain items which are completely unacceptable at our shredder. If any of these items are included in Shredder loads the entire load will be rejected or downgraded. **Please note: items marked with an asterisk (*) are acceptable in other, Non-Shredder grades.**

Unacceptable Shredder Material

This material includes the following items:

- batteries*
- gas tanks*
- loose exhaust pipes and mufflers*
- tires
- catalytic converters*
- unspent air bag canisters
- closed containers and other potentially explosive material
- barrels, drums, tanks, buckets and pails
- heavy unshreddable scrap* (non-automotive steel over 1/4" thick)

- cable, wire, and fencing*
- trash or non-metallic debris

Autos

Autos are accepted if the gas tank, tires, battery, catalytic converter, mercury switches, and any trash are removed prior to delivery. The automobile must be delivered on a flatbed or trailer. We cannot accept automobiles that are towed or driven into our yard, and we cannot allow dismantling of any kind in our yard.

If you have access to a trailer and would like to bring the automobile in yourself, you must complete a bill of sale. Forms are available at the Scale Office. Please pick up the form and complete it before you come onto the scale. A title is required if the vehicle is ten years old or newer.

Pick-up trucks $\frac{3}{4}$ ton and under are graded as autos and must be prepared in the same manner. Trucks larger than $\frac{3}{4}$ ton should be prepared in the same manner as autos. These larger trucks are usually graded as Mixed Iron or Unprepared #1 Steel, depending on the amount of light iron left on the truck.

Light Iron Shred

The Light Iron Shred grade is material that is less than 10 feet long and generally 1/8" thick or less. It cannot include any of the items listed above as Unacceptable Shredder Material. This grade may include material such as:

- automobile body parts
- metal cabinets, shelving and lawn furniture
- metal sheds and siding
- metal from above-ground swimming pools
- clean stove pipe
- roofing (free of tar, etc.)
- lawn mowers (gas tank and tires removed)
- other similar materials

This grade may also include Number 2 Shred.

Number 2 Shred

This grade includes items thicker than 1/8" but less than 1/4" thick, and under 10' long. It cannot include any of the items listed above as Unacceptable Shredder material. This grade may include:

- pipes (less than 1/8" thick and less than 3" in diameter)
- automobile bumpers, rims, frames, transmissions (aluminum or cast iron core)
- other heavy automobile parts
- other steel or angle iron less than 1/4" thick



75 Southern Avenue
Greenfield, Massachusetts 01301-3913

AUTO SPECIFICATIONS

November, 2008

The Auto grade of scrap consists of properly prepared automobiles, vans, and pick-up trucks $\frac{3}{4}$ ton and under.

Pieces of automobiles ("clips") will not be considered to be Auto grade material, and will be graded at the scale.

A small percentage of Light Iron is allowed on a load of Auto grade material, provided it does not interfere with inspection of the load.

Preparation:

All vehicles in this grade must have the following items removed **before delivery**:

- gas tank
- battery
- catalytic converter
- tires
- trash
- any potentially explosive or hazardous material
- mercury switches per the Massachusetts ELVS program requirements

Customized vehicles will be rejected if they contain an excessive amount of non-metallic materials such as wood, carpet, upholstery, etc.

No vehicle may be towed or driven into the yard for delivery. No vehicle dismantling of any type is allowed in the yard.



75 Southern Avenue
Greenfield, Massachusetts 01301-3913

POLICY ON HAZARDOUS AND UNKNOWN SUBSTANCES

November, 2008

It is the policy of wTe Recycling, Inc. (wTe) that, with a few limited exceptions, hazardous substances, or any substances of unknown or suspicious origins, are totally unacceptable in our plant at any time.

Under warranty provisions incorporated in all of our contracts with our scrap suppliers, wTe reserves the right to reject at the time of delivery any material which wTe **suspects** may contain asbestos, PCBs, radioactive materials, or any other hazardous substance. Any suspicious material – be it a fluid, solid, residue, or dust – is also subject to immediate rejection.

In order to help you comply with the warranty, we are providing the following list of hazardous substances which cannot be included in your shipments to wTe Recycling, Inc. and some common sources of these substances:

Asbestos:

Asbestos is frequently found in industrial and commercial insulating applications, including pipes, boilers, or tanks.

PCBs:

PCBs (polychlorinated biphenyls) are commonly found in transformers, large capacitors, hydraulic systems, ballast boxes in fluorescent light fixtures, and small capacitors in some small appliances. Items manufactured before 1980 are particularly likely to contain PCBs.

Please note that wTe will accept no transformer unless (1) it has been broken open, drained and dried prior to delivery, and (2) it is accompanied by a certificate from an independent consultant certifying that the transformer did not contain more than 500 parts per million PCBs when removed from service and presently contains no detectable concentration of PCBs. Delivery of any transformer must be cleared by the appropriate wTe personnel, and delivered by appointment only.

All other sources of PCBs are totally unacceptable for delivery at any time, under any circumstances, unless specifically agreed to, and in conformance with wTe's White Goods Policy.

Radioactive Materials:

These may be found in hospital scrap and power station scrap. In addition, many industrial plants contain radioactive sensing devices to measure thickness, fullness and similar product qualities.

Other Hazardous Substances:

Section 101(14) of the Federal Comprehensive Environmental Response, Compensation and Liability Act of 1980 defines a large number of chemical substances as hazardous substances which can result in cleanup costs if released into the environment. A complete listing of these substances appears at 40 CFR Part 300. Such chemicals may often be found in demolition scrap from industrial plants and in "empty" drums, tanks and other containers.

Under our contract terms, violation of this policy will result in immediate rejection of the subject material **regardless of when the violation is detected**. It then becomes the responsibility of the supplier to promptly and completely remove from the property of wTe Recycling, Inc. any and all materials which wTe, in its sole judgment, deems hazardous or potentially hazardous to the lives and health of our employees. The supplier will also be responsible for any and all costs or liabilities, including reasonable attorneys' fees which wTe incurs as a result of the supplier's violation of this policy.

Failure to comply will result in prompt legal action.



75 Southern Avenue
Greenfield, Massachusetts 01301-3913

DRUM AND TANK POLICY

November, 2008

It is the policy of wTe Recycling, Inc. (wTe), as set forth in warranty language incorporated in all of our contracts with our suppliers, that drums and tanks containing any type of residue are totally unacceptable in our plant. The following procedures must be followed in order to comply with federal and state hazardous waste regulations:

Drums:

One end of each drum must be removed and completely opened so that the interior can be inspected. Flattened drums are not acceptable.

All liquid, sludge, residue or any other visible substance must be removed before delivery to our yard. The drum must be clean and dry upon delivery. If the drum ever contained an acutely hazardous waste listed in 40 CFR Section 261.31, 261.32, or 261.33(e), then it must be triple rinsed with a solvent capable of removing such waste before delivery to wTe.

Tanks:

Tanks 275 gallons and up must be brought into our yard in halves or quarters. The maximum allowable dimension is ten feet.

All liquid, sludge, residue or any other visible substance must be removed before delivery. The tank sections must be clean and dry inside and out.

If the tank ever contained an acutely hazardous substance listed in 40 CFR Section 261.31, 261.32, or 261.33(e), then it must be triple rinsed with a solvent capable of removing such waste before delivery to wTe.

Automotive gas tanks and vehicular diesel tanks must be emptied prior to delivery and are acceptable only as Light Iron for Baling.

A signed certificate of indemnification will be required before any drum or tank is accepted.

Under our contract terms, violation of this policy will result in immediate rejection of the subject material regardless of when the violation is detected. It then becomes the responsibility of the supplier to promptly and completely remove from the property of wTe Recycling, Inc. any and all materials which wTe, in its sole judgment, deems hazardous or potentially hazardous to the lives and health of our employees. The supplier will also be responsible for any and all costs or liabilities, including reasonable attorneys' fees, which wTe incurs as a result of the supplier's violation of this policy.

Failure to comply will result in prompt legal action.

Final decisions regarding this policy rest with the General Manager.

WHITE GOODS AGREEMENT

between

wTe RECYCLING, INC (“wTe”)

and

_____ (“Supplier”)

(Name of Company)

Effective as of the date of execution of this agreement, agree that Supplier may deliver loads of scrap appliances and fluorescent light fixtures/housings to wTe only in accordance with all of the following terms and conditions:

- A. wTe will accept the following scrap metal appliances subject to the terms and conditions of **Sections I and III** of this agreement.
 - 1. Stoves
 - 2. Washing machines
 - 3. Dryers
 - 4. Dishwashers
 - 5. Toasters
 - 6. Hot food and beverage vending machines

- B. wTe will accept the following scrap metal appliances subject to the terms and conditions of **Sections I, II, and III** of this agreement
 - 1. refrigerators
 - 2. freezers
 - 3. air conditioners
 - 4. cold food and beverage vending machines
 - 5. any commercial, industrial or household device that contains or did contain a refrigeration unit.

- C. wTe will **not accept televisions or computer monitors** regardless of type.

- D. wTe will not accept the following materials unless **presented for inspection and determined by wTe to be acceptable metallic content**. If accepted, these items are subject to the terms and conditions of **Sections I and III** of this agreement.
 - 1. Microwave ovens
 - 2. Vacuum cleaners

3. Light fixtures or lamps
4. Toaster ovens
5. Coffee machines or coffee makers
6. Stereo or hi-fidelity electronic equipment
7. Video cassette recorder

SECTION I. GENERAL TERMS AND CONDITIONS FOR ALL SCRAP ACCEPTED.

- E. All loads will be inspected at time of delivery.
- F. Acceptable appliances may be delivered whole or crushed. All attached or loose non-metallic components must be removed prior to delivery. Any hoses must be cut at the clamp and removed.
- G. All PCB capacitors and lighting ballast boxes must be removed prior to delivery. Any appliances determined to contain components which may contain polychlorinated biphenyls ("**PCBs**") **will be rejected and must be promptly removed from the wTe premises.**

Rejections

- H. wTe reserves the right to reject any load or part of any load at its discretion. The Massachusetts Department of Environmental Protection requires that rejections be reported to it, including the name of the supplier. Loads will be rejected, among other reasons, for any of the following:
1. Appliances or devices having components which may contain PCBs.
 2. Delivery by or on behalf of persons or entities without a signed supplier agreement.
 3. Appliances or devices having unopened or undrained refrigeration units (see Section II).
 4. Loose non-metallics in load
 5. Failure to pay fee or lack of established credit should markets warrant fees paid.
 6. Inclusion in load of unacceptable appliances as set forth in paragraphs C and D above.
- I. In the event **three loads from Supplier are rejected** within any twelve (12) month period, Supplier will be **prohibited from delivery for a one-year period** commencing on the date of the third such rejection.
- J. In the event three loads from Supplier are rejected during any twelve month period following the one-year prohibition set forth in paragraph I, above, Supplier will be forbidden from delivery **permanently.**
- K. Under certain market conditions Supplier shall pay a per net ton drop-off charge to wTe at the time of delivery, with a \$5.00 minimum charge per load. Payment must be made by check at the time of delivery unless credit arrangements acceptable to wTe have been established prior to delivery. Under other market conditions, wTe may pay supplier on a per net ton basis or the

material may be accepted at no value. All prices and/or charges are subject to change with prior notice.

- L. Supplier understands that capacitors, lighting ballasts and other items in appliances may contain PCBs; that PCBs are regulated as hazardous materials under federal and state law; that there are significant criminal and civil penalties for improper handling and disposal of PCBs; and that, under federal and state law, Supplier may be held jointly and severally liable for costs associated with investigation and cleanup of contamination and harm to natural resources, property, and persons caused by PCB containing appliances, fluorescent lights, and any other materials provided by Supplier.

SECTION II. TERMS AND CONDITIONS FOR REFRIGERATION UNITS

Supplier may deliver scrap metal appliances which contain or have contained refrigeration units to wTe only in accordance with all of the following terms and conditions:

- M. Section I of this agreement also applies to all refrigeration units as well as other types of scrap. Section II of this agreement applies to refrigeration units listed in paragraph B, above.
- N. Supplier understands that chlorofluorocarbons (“CFCs”) and hydrochlorofluorocarbons (“HCFCs”) used in appliances and industrial refrigeration units are regulated Class I and Class II substances under the Clean Air Act; that Section 608(c) of the Clean Air Act makes it unlawful as of July 1, 1992 for any person in the course of maintaining or disposing of an appliance to knowingly vent or otherwise knowingly release or dispose of any Class I or Class II substances in a manner that permits such substance to enter the environment; that there are significant criminal and civil penalties for improper handling and disposal of CFCs and HCFCs; and that, under federal and state law, Supplier may be held jointly and severally liable for costs associated with investigation and cleanup of contamination and harm to natural resources, property and persons caused by CFC or HCHC containing appliances and any other materials provided by the supplier.

Rejections

- O. As stated in Section I, paragraph I, loads will be rejected if they include appliances having unopened or undrained refrigeration units which may contain CFCs or HCFCs at the time of delivery. Lines to these units must be visibly severed.

SECTION III. ADDITIONAL TERMS AND CONDITIONS FOR ALL SCRAP ACCEPTED INCLUDING REFRIGERATION UNITS.

- P. By signing below and/or delivery to wTe, Supplier warrants and agrees as follows:

1. Supplier will inspect each appliance and fluorescent light and remove all capacitors, and lighting ballasts, and any other components which may contain PCBs **prior to delivery** to wTe and shall not deliver any hazardous waste, hazardous material, or hazardous substance to wTe.
 2. Supplier accepts **full responsibility** for removal of all capacitors, and lighting ballasts, and any other components which may contain PCBs from each appliance and fluorescent light **prior to delivery to wTe.**
 3. Supplier will inspect **each appliance** which contains or has contained a refrigeration unit and **remove all CFCs and HCFCs** prior to delivery to wTe and shall not deliver any Class I or Class II substance (as defined by the Clean Air Act) to wTe.
 4. Supplier accepts **full responsibility** for removal of all CFCs and HCFCs from each appliance **prior to delivery to wTe.**
 5. Supplier will **hold harmless and indemnify wTe** of and from any and all claims, demands and liabilities, including reasonable attorney's fees, arising in connection with or in any way resulting from Suppliers' breach of this Agreement or each warranty made hereunder.
- Q. Supplier acknowledges that wTe may, in its discretion, amend, revoke, or modify this agreement at any time.
- R. By signing below, Supplier represents that it has full competence and authority to enter the Agreement, and has had the opportunity to review the Agreement with legal counsel before signing. This signatory on behalf of Supplier represents that he or she has full competence and authority to bind Supplier and execute this Agreement on behalf of Supplier.
- S. This Agreement shall be governed by the laws of the Commonwealth of Massachusetts.

AGREED BY

Supplier Name: _____

Signature: _____

Print Name: _____

Its Duly Authorized (Title): _____

Date: _____

APPENDIX F

Routine Facility Inspection Reports

ROUTINE FACILITY INSPECTION REPORT

wTe Recycling, Inc. - Greenfield, MA

Date: _____ Inspected by: _____

Time: _____ Weather: _____

Areas Inspected:	All Outdoor Processing Areas	_____	All Material Unloading Areas	_____
	All Material Loading Areas	_____	Material Storage Piles/Areas	_____
	Maintenance Shop	_____	Baler Area	_____
	Welding Shop	_____	Storage Bins	_____
	Fuel Transfer Area	_____	All Catch Basins	_____
	Stormwater Outfall 001	_____	Site Perimeter	_____
	Non-Ferrous Area	_____	Parking Area/Access Roads	_____

Discharges at Time of Inspection: _____

Previously Unidentified Discharges: _____

Evidence of Pollutants Entering Drainage System: _____

Physical Condition of Outfall: _____

Incidents of Noncompliance Observed: _____

Additional Control Measures Needed: _____

Any Incidents of Non-compliance: _____

APPENDIX G

Quarterly Visual Examination Report Forms

QUARTERLY VISUAL EXAMINATION REPORT
wTe Recycling, Inc. - Greenfield, MA

Sample:

Location: _____ Date: _____ Time: _____

Assessment: Date: _____ Time: _____

Sampler: _____ **Examiner:** _____

Reason Samples > 30 Minutes, if Appropriate: _____

Previous Event - End Date/Time: _____

Current Event - Start Date/Time: _____

End Date/Time: _____

Sample Time: _____

Observations: Color: _____

Odor: _____

Clarity: _____

Floating Solids: _____

Settled Solids: _____

Suspended Solids: _____

Foam: _____

Oil Sheen: _____

Probable Sources of Any Observed Contamination and Other Comments:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Date

APPENDIX H

Corrective Action Documentation

CORRECTIVE ACTION DOCUMENTATION
wTe Recycling, Inc. - Greenfield, MA

Date Condition Identified: _____

Condition Triggering the Need for Corrective Action Review:

Immediate Actions Taken to Minimize or Prevent the Discharge of Pollutants:

Subsequent Corrective Action Taken:	Date Completed*:
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*Complete before next storm event and within 14 calendar days

If 14 Day Completion is Infeasible, Reason Why:	Expected Completion*:
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*Complete within 45 calendar days if possible. If not, notify the EPA Region 1 Office of the intention to exceed 45 days, the rationale for an extension, and the expected completion date.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Date

APPENDIX I

Discharge Monitoring Report Forms

APPENDIX J

Instructions for Collecting Stormwater Samples

Instructions for Collecting Stormwater Samples

A sample bucket or scoop can be used to collect the water sample from the sampling location and transfer it to the sample containers. Excess solid materials that may be floating on the surface or that may be deposited at the bottom of the channel usually are not representative and should be avoided. Record the pH and the temperature of the stormwater.

The sample shall be transferred to three sample bottles provided by EAI Analytical Labs. These bottles are labeled "Metals", "TSS", and "COD" and include any required preservative. The samples should be immediately cooled to a maximum temperature of 40 degrees F using ice or refrigeration. The samples should be maintained at this temperature until analyzed.

One Stormwater Sampling/Chain of Custody form must be completed for each stormwater discharge that is sampled. One copy of the form must be sent to the laboratory with the samples, and one copy should remain in the custody of the sampling team.

Call Kelly Crosby at EAI Analytical Labs at 800-760-4246 to arrange for the pickup of the sample. EAI will label the containers before removing them from the site.

The following equipment is recommended for the collection of stormwater samples.

1. Sample scoop or bucket
2. Sample containers (3) labeled: Metals, TSS, COD containing the required preservative
3. Portable pH meter
4. Thermometer
5. Disposable latex gloves
6. Chain of Custody forms
7. Flashlight
8. Watch

APPENDIX K

Annual Report Forms