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Attorneys for Intervenor
SCHNITZER STEEL HAWAII CORP.

BEFORE THE PLANNING COMMISSION
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAII

In the Matter of the Application of DEPARTMENT OF ENVIRONMENTAL SERVICES, CITY AND COUNTY OF HONOLULU Application to Modify SUP No. 2008/SUP-2 (SP09-403) by Modifying (1) Condition No. 1 of the Planning Commission's Findings of Fact, Conclusions of Law, and Decision and Order, dated June 10, 2019, and (2) Condition No. 5 of the LUC's Findings of Fact, Conclusions of Law, and Decision and Order Approving with Modifications the City and County of Honolulu Planning Commission's Recommendation to Approve Special Use Permit, certified on November 1, 2019	FILE NO. 2008/SUP-2 LUC DOCKET NO. SP09-403 INTERVENOR SCHNITZER STEEL HAWAII CORP.'S **LIST OF EXHIBITS**; CERTIFICATE OF SERVICE HEARING: Date: August 9, 2023 Time: 1:30 p.m.

INTERVENOR SCHNITZER STEEL HAWAII CORP.'S EXHIBIT LIST

Comes now, Schnitzer Steel Hawaii Corp. ("Schnitzer"), by and through its attorneys, Watanabe Ing LLP, and hereby submits its List of Exhibits regarding Applicant's application to modify special use permit in the above-captioned proceeding.

The List of Exhibits is a list of exhibits that may be used in support of Schnitzer's case pursuant to the contested case hearing to be held on August 9, 2023. Schnitzer reserves the right to amend its List of Exhibits and identify any additional exhibits not expressly identified above for rebuttal purposes in response to any pleadings, arguments, exhibits, issues, and witnesses identified by any party pursuant to the Rules of Planning Commission Section 2-71(c).

For the purpose of identification of its exhibits, Schnitzer will be using the identification letter "S" before each exhibit number.

Exhibit No.	Description
S-1	Solid Waste Management Permit (Permit Number RY-0013-20) issued by Director of Health, State of Hawai'I on December 30, 2021, to Schnitzer Steel Hawaii Corp.
S-2	Renewal Application for Solid Waste Management Permit for the Schnitzer Steel Hawaii Corp Facility, to Director of Health, State of Hawai'I, dated March 13, 2020.
S-3	Schnitzer Steel Hawaii Corp Yearly ASR Totals for 2020 – 2023
S-4	Schnitzer Steel's 48C Tax Credit Program Round 1 Draft Concept Paper
S-5	Department of Energy Qualifying Advanced Energy Project Credit (48C) Program Webpage Printout, printed July 27, 2023

DATED: Honolulu, Hawaii, July 27, 2023.

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SCHNITZER STEEL HAWAII CORP.

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GOVERNOR OF HAWAII

ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

December 30, 2021 S1204LM

CERTIFIED MAIL NO. 7020 3160 0000 0117 5795
RETURN RECEIPT REQUESTED

Mr. Nick Garofalo, General Manager
Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, Hawaii 96707

Dear Mr. Garofalo:

SUBJECT: Solid Waste Management Permit No. RY-0013-20
Recycling and Salvage Facility
Schnitzer Steel Hawaii Corp.
Located at: 91-056 Hanua Street, Kapolei, Hawaii
TMK Nos. (1) 9-1-026:025 and 9-1-026:020

The Department of Health (DOH), Solid and Hazardous Waste Branch, Solid Waste Section (SWS) received your solid waste management permit renewal with modification application form, Attachments P-1 through P-6, and filing fee on March 17, 2020. During a site visit to the facility on December 8, 2020, the DOH personnel were informed that Schnitzer had purchased an adjacent parcel to conduct wet processing of end of life vehicles and white goods and as such was in the process of revising the submitted permit application. On December 26, 2020, Schnitzer requested the DOH to disregard the March 2020 application, since Schnitzer would be submitting a revised application to include the newly purchased parcel.

On February 16, 2021, an amended solid waste management permit renewal with modification application form, Attachments P-1 through P-4, and Attachment P-6 were received. The amended application included an additional parcel, located on 91-060 Hanua Street [TMK (1) 9-1-026:020], that would be used for waste vehicle and white goods processing. The signed Attachment P-5 was received electronically, followed by hard copies received on September 17, 2021 via US mail. Between April 9, 2021 and October 19, 2021, revised/updated Operations Manuals and additional information/clarifications were received. On November 26, 2021, another filing fee was received.

The amended application and subsequent submissions have been reviewed and the enclosed permit is issued under the provisions of Hawaii Revised Statutes (HRS), Chapter 342H, and the Hawaii Administrative Rules, Title 11, Chapter 58.1, *Solid Waste Management Control*.

Please be aware that your application was reviewed and considered with respect to solid waste management permitting requirements only. We noted that Appendix E, ASR Sampling Protocols, included procedures for making a hazardous waste determination for Shredder Residue generated at the facility. Issuance of this permit does not reflect upon any hazardous waste-related issues and may not be used to imply compliance with hazardous waste rules.

Also please be aware that the ash residue that may be on the scrap metal, received from H-Power, contains metal contaminants that exceed the DOH commercial/industrial environmental action levels.

The permittee may appeal to the Director of Health any of the conditions to the subject permit. The appeal must be in writing and submitted to the Director of Health within 20 days after the receipt of this notice.

HRS 342H-14 states that unless the submitted documents and other information secured by the DOH from the permittee contain confidential information, such as secret processes or methods of manufacture, they shall be made available for inspection by the public. Please notify the Solid and Hazardous Waste Branch within 20 days of the receipt of this letter if you would like to make a claim of confidentiality. Otherwise, your entire application will be available for public inspection.

Your application filing fee receipt is included with this permit. If you have any questions regarding this letter, please contact Ms. Lenora Mau of the Solid and Hazardous Waste Branch at (808) 586-4226.

Sincerely,

For JOANNA L. SETO, P.E., CHIEF
Environmental Management Division

Enclosures: Solid Waste Management Permit No. RY-0013-20
Filing fee receipts (2)

PERMITTEE:		**Permit Number:**	RY-0013-20
Schnitzer Steel Hawaii Corp.		**Date of Issuance:**	December 30, 2021
91-056 Hanua Street		**Date of Expiration:**	September 17, 2026
Kapolei, Hawaii 96707		**Page:**	1 of 21

SOLID WASTE MANAGEMENT PERMIT

This permit is issued under the provisions of Hawaii Revised Statutes (HRS), Chapter 342H, *Solid Waste Pollution*, and Hawaii Administrative Rules (HAR), Title 11, Chapter 58.1, *Solid Waste Management Control*. The above-named permittee is hereby authorized to operate the facility shown on the submitted amended application and supporting documents received on February 16, 2021, revised Operations Manual (Updated: October 2021) received October 19, 2021, additional information and supporting documents received between April 9, 2021 and November 26, 2021, and other documents on file with the Department of Health (DOH).

To Construct and Operate: A recycling and materials recovery/salvage facility for cutting, shearing, baling, and shredding scrap metals, including processed junk vehicles, processed white goods, empty propane cylinders, heavy melting steel, light iron, non-ferrous metal, and fish nets. The facility may accept and process End of Life Vehicles (ELVs) and End of Life white (ELW) goods. The facility may also accept, store, and consolidate for shipping (no processing) batteries and electronic waste (e-waste). The operation shall be consistent with the amended application and supporting documents received February 16, 2021, revised Operations Manual (Updated: October 2021) received October 19, 2021, additional information received between April 9, 2021 and November 26, 2021, and any subsequent submissions. Should there be any discrepancies between the submitted materials and permit conditions, the permit conditions shall take precedence.

Location: 91-056 Hanua Street, Kapolei, Hawaii
TMK Nos. (1) 9-1-026:025 and 9-1-026:020

Subject to: HRS Chapter 342H, HAR 11-58.1, Part I - Standard Conditions, and Part II - Special Conditions.

Acceptance of this permit constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the DOH and the conditions precedent to the granting of this permit.

This permit supersedes Solid Waste Management Permit No. RY-0018-15 in its entirety.

(For) Director of Health
State of Hawaii

The solid waste management facility is subject to HRS Chapter 342H, *Solid Waste Pollution,* HRS Chapter 342I, *Special Wastes Recycling,* HAR Chapter 11-58.1, *Solid Waste Management Control*, and the following conditions:

PART I - STANDARD CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable, pursuant to the authority of HRS §342H. The DOH will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, representatives, contractors, or subcontractors. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid.

2. This permit:

    a. shall not in any manner affect the title of the premises upon which the facility is or will be located;
    b. does not release the permittee from any liability for any loss due to personal injury or property damage caused by, resulting from, or arising out of the design, installation, construction, operation, maintenance, or closure of the facility;
    c. does not release the permittee from compliance with other applicable statutes and regulations of the state of Hawaii or with applicable federal or local laws, regulations, or ordinances;
    d. in no way implies or suggests that the state of Hawaii, or its officers, agents, or employees assumes any liability, directly or indirectly, for any losses due to personal injury or property damage caused by, resulting from, or arising out of the design, construction, operation or maintenance of the facility; and
    e. shall not constitute nor be construed to be an approval of the design, construction, operation, maintenance, closure and post-closure of the facility beyond the regulatory requirements mandated by HRS §342H and HAR §11-58.1.

3. Issuance of this permit does not preclude the responsibility of the permittee to obtain any and all necessary approvals and permits from the appropriate federal, state, and local agencies, including zoning clearances, prior to the start of operations. If there are any discrepancies between these permit conditions and other federal, state, or local laws, regulations, ordinances, or requirements, the permittee shall notify the DOH in writing.

4. Unless the submitted documents and other information secured by the DOH from the permittee contain confidential information, such as secret processes or methods of manufacture, they shall be made available for inspection by the public

(HRS §342H-14). The permittee shall be responsible for identifying, in writing, the specific information asserted to be confidential. The DOH shall review the assertion made by the permittee and determine if confidentiality is indeed warranted.

5. This permit is valid only for the specific processes and operations applied for and indicated in the submitted application and supporting documents. Any unauthorized deviation that affects the facility's design, operations or procedures, or which could threaten human health and the environment, from the submitted application, and supporting documents, submitted drawings, operations manual, and additional submissions or conditions of this permit may constitute grounds for revocation of this permit, and/or enforcement action by the DOH. Should there be any discrepancies between the submitted documents and the permit conditions, the permit conditions shall take precedence. A copy of the submitted application and supporting subsequent documents and additional submissions shall be maintained at the facility.

6. This permit is non-transferable whether by operation of law or otherwise, either from one location to another, from one solid waste disposal operation to another, or from one person to another without the written approval of the director [HAR §11-58.1-04(e)(2)].

7. This permit, or a copy of the permit, shall be kept at or near the construction and operation site for which the permit is issued and shall be available upon request [HAR 11-58.1-04(f)]. A request for a duplicate permit shall be made in writing to the director within ten (10) days after the destruction, loss, or defacement of this permit. A fee of $50.00 shall be charged and submitted with the request [HAR §11-58.1-04(h)(3)].

8. The permittee shall at all times properly operate and maintain the facility and systems of treatment, process and control (and related appurtenances), as applicable to the facility, that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by the DOH rules. The facility shall be designed, constructed, and equipped in accordance with best practicable technology so as to operate without causing a violation of applicable rules and regulations.

9. Incident Notification Requirements. The permittee shall notify the DOH, in writing or fax, whenever there are incidents such as fire, explosion, or release of regulated material/waste, which could threaten human health or the environment (i.e., air, soil, or surface and subsurface waters). Initial notification may be by phone or fax and reported within eight (8) hours, whenever possible, and no more than 24 hours.
The notification report shall be completed and submitted by an Environmental Compliance Officer or other responsible official within seven (7) calendar days (three [3] calendar days for waste disposal facilities, such as landfills and incinerators) and shall include:

a. name, address, and telephone number of the owner and operator;
b. name, address, and telephone number of the facility at which the incident occurred;
c. date, time, and type of incident (i.e., fire, explosion, release, etc.);
d. name and quantity of material(s) involved;
e. the extent of injuries, if any;
f. an assessment of actual or potential hazards to human health or the environment, where this is applicable;
g. estimated quantity and disposition of recovered and unrecovered material that resulted from the incident;
h. evaluation of the circumstances that led to the incident;
i. steps being taken to reduce, eliminate, and prevent recurrence, including and implementation schedule; and
j. other information or monitoring as required by the DOH.

Notification requirements for releases only apply to releases of a quantity equal or exceeding the reportable quantity listed in HAR §11-451.

10. Noncompliance Notification Requirements. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in the permit, the permittee shall notify the DOH verbally within 24 hours followed by a written report within seven (7) calendar days (three [3] calendar days for waste disposal facilities, such as landfills and incinerators) of the verbal notification. The written report shall be completed and submitted by an Environmental Compliance Officer or other responsible official and contain the following information:

a. description and cause of noncompliance;
b. period of noncompliance, including exact dates and times; and, if not corrected, the anticipated duration that the noncompliance is expected to continue;
c. steps that will be taken to correct the area of the noncompliance;
d. steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance, including an implementation schedule; and
e. other information or monitoring as required by the DOH.

The permittee may be subject to enforcement action by the DOH, penalties, or revocation of this permit. The use of a fax for notifications is acceptable. Any data transmission or detailed explanations transmitted shall be accompanied by regular mail submittals. Failure to notify in accordance with this requirement may initiate enforcement action.

11. Monitoring and Recordkeeping Requirements. The permittee shall comply with the following monitoring and recordkeeping requirements:

a. Upon request, the permittee shall furnish all records (e.g., transaction reports, disposal receipts, sampling, and testing results) and plans required by the DOH. The retention period for all records shall be a minimum of five (5) years; unless otherwise specified in Standard Condition No. 11.b; however, there shall be an indefinite retention period for all records associated with any unresolved enforcement action as determined by the DOH.

b. The permittee shall retain at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original recordings of monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The retention period shall be a minimum of five (5) years, or longer, as may be specified in the Special Conditions, from the date of the sample, measurement, report, or application unless otherwise specified by the DOH rule. The retention period shall be for the life of the facility, through closure and post-closure periods, for waste disposal facilities (such as landfills and incinerators).

c. Records of monitoring information, if applicable, shall include:
   - the date, exact location, and time of sampling or measurements;
   - the person responsible for performing the sampling or measurements;
   - the date(s) analyses were performed;
   - the person responsible for performing the analyses;
   - analytical techniques or methods used; and
   - results of such analyses.

12. The permittee shall submit complete and detailed plans and reports on existing solid waste management systems and of any proposed addition to, modification of, or alteration of any such systems that affect the facility's operations or procedures, or which could threaten human health and the environment and contain the information requested by the DOH in the form prescribed by the DOH. Any submission for permit modification shall be submitted in accordance with Standard Condition No. 13. The plans and reports shall be prepared by a competent person acceptable to the DOH, and at the expense of the permittee.

13. Should the permittee decide to modify or continue operation of the solid waste facility beyond the expiration date of the permit, the permittee shall submit a complete permit modification or renewal application at least 180 days (one [1] year for municipal solid waste landfills) prior to the modification or the date of permit expirations. Any submission for permit modification does not affect these permit conditions until such modification becomes final in accordance with HAR §11-58.1-04, or as approved by the DOH.

14. Should the permittee decide to terminate the facility operation (or face lease termination or eviction), the permittee shall perform necessary closure activities including, but not limited to, the removal of all remaining solid waste and performing appropriate site assessments and remedial activities. Prior to the termination of the operation, the

permittee shall also notify the DOH in writing at least 90 calendar days of the facility's closure [HAR §11-58.1-04(e)(3)]. The written notification shall include an updated closure plan, which should accomplish the following objectives:

a. Provide an assessment of the site's present and future threat to public health and the environment due to contaminants possibly left on-site from the facility's operation, including the areas on which solid waste from the facility has impacted and has not yet been evaluated.
b. Provide a plan of action to minimize or mitigate any threats to public health and the environment due to contaminants possibly left on-site by the facility's operation.
c. Provide a schedule to implement the plan of action.

Upon the DOH approval of the closure plan, the permittee shall implement the plan in accordance with the approved implementation schedule.

15. The director may, in accordance with HRS §342H-6, enter and inspect the facility for the purpose of:

a. investigating an actual or suspected source of solid waste or other pollution;
b. ascertaining compliance or noncompliance with any rule, regulation, permit condition, or standard promulgated by the DOH; and
c. conducting tests in connection therewith (including collecting soil, water, air, ash, and any other material or samples).

The permittee, by accepting this permit, specifically agrees to allow authorized DOH personnel, upon presentation of credentials or other documents as may be required by law, access to the premises.

16. The DOH may require the permittee to conduct sampling and testing to determine the degree of pollution, if any, from the solid waste facility (including soil, water, air, ash, and any other materials or samples). If contamination is identified, the permittee shall remediate to ensure protection of human health and the environment.

17. When requested by the DOH, the permittee shall within a reasonable time, as specified by the DOH, furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the DOH, such facts or information shall be submitted or corrected promptly. Upon the written request of the permittee, the deadline for submission of information may be extended, if the DOH determines that reasonable justification exists for the extension

18. If the DOH determines that the permittee has violated or is violating any provision of HRS §342H, HAR §11-58.1, or these permit conditions, the DOH may pursue

enforcement action in accordance with HRS §342H-7, *Enforcement;* §342H-9, *Penalties;* §342H-10, *Administrative Penalties;* §342H-11, *Injunctive and other relief,* or any other pertinent rules.

19. The DOH may, on its own motion, modify, suspend, or revoke a permit if, after affording the applicant a hearing in accordance with HRS Chapter 91, the DOH determines that any permit condition, rule, or provision of HRS §342H has been violated or that such is in the public interest [HAR §11-58.1-04(d)].

20. If the governor or the director determines that an imminent peril to the public health and safety is, or will be, caused by the disposal of solid waste or any combination of discharges of other waste that requires immediate action, the governor or the director, without a public hearing, may order the permittee to immediately reduce or stop the disposal, discharge, or process, and may take any and all other actions as may be necessary (HRS §342H-8).

PART II - SPECIAL CONDITIONS

Section A

General Facility Conditions

1. The permittee shall operate and maintain this facility in accordance with HAR 11-58.1-32, *Recycling and materials recovery facilities* and HAR 11-58.1-33, *Solid waste salvage facilities.* The permittee shall comply with the facility's operations procedures as provided in the amended application and supporting documents received on February 16, 2021, Operations Manual (Updated: October 2021) received on October 19, 2021, additional information received between April 9, 2021 and November 26, 2021, and any subsequent submissions. Should there be any discrepancies between the submitted materials, permit conditions and applicable statues and regulations, the permit conditions and applicable statues and regulations shall take precedence. If there are discrepancies among the permit conditions and other applicable statues and regulations, please notify the DOH immediately.

2. The facility is divided into two main areas with a Shredder Yard (parcel 25) located on the south end of the facility and a Wet Car/Appliance Processing Area (parcel 20) located on the north end of the facility.

3. In accordance with the submitted application, the permittee may only receive the listed materials and perform the following activities at the Shredder Yard (parcel 25):

    a. Receive, store, and process (cut, shear, bale, and/or shred) the following:
        i. light Iron - processed automobile shells, processed white goods, light gauge sheet metal and other light gauge items;
        ii. unprepared and prepared heavy melting steel;

iii. non-ferrous metal (aluminum, brass, copper, stainless steel and alloys of these metals);
iv. empty propane cylinders; and
v. fish nets.

b. Receive batteries (lead acid, nickel cadmium, lithium-ion) and transfer batteries to Parcel 20 for storage by the end of the workday.
c. Receive, store, and containerized for shipment electronic waste (e-waste).

4. In accordance with submitted application, the permittee may only receive the listed materials and perform the following activities at the Wet Car/Appliance Processing Area (parcel 20):

a. Receive, store and process waste vehicles (e.g., accident, unwanted, derelict and/or abandoned vehicles as defined in accordance with HRS Chapter 290, Abandoned Vehicles) and other mobile equipment.
b. Receive, store and process waste white goods units.
c. Store, consolidate and prepare for shipment the following:
i. whole vehicle tires;
ii. batteries (lead acid, nickel cadmium, lithium-ion);
iii. wheels and wheel weights; and
iv. catalytic converters.

5. All individual waste streams shall be stored separately. Waste streams shall not be commingled or mixed with other solid waste or other materials, such as dirt, rocks, and vegetation. Other waste, such as plastic, paper, and other debris, shall be containerized.

6. No hazardous waste, except batteries and electronic waste, may be accepted at this facility. Hazardous waste shall be managed in accordance with state hazardous waste laws and regulations.

7. No radioactive wastes shall be accepted at this facility.

8. No infectious waste, in accordance with HAR Chapter 11-104.1, shall be accepted at this facility.

9. All incoming material shall be screened to maintain compliance with Special Conditions, Section A, Nos. 1 and 3 through 8. The permittee shall conduct inspections of loads that enter the facility (parcels 20 and 25) in accordance with the Operations Manual (Updated: October 2021), Appendix F Scrap Acceptance. The permittee shall document and maintain findings of rejected material on the facility's rejection log.

10. Should unacceptable material inadvertently enter the facility (including by-products or contaminants removed during sorting and processing), this material shall be properly stored, managed, and disposed of at appropriate DOH-permitted disposal facilities prior

to causing or creating a nuisance condition, health, safety, or environmental hazard. If any of this waste or waste generated at the facility is determined to be hazardous, the waste shall be properly managed and disposed of in accordance with state hazardous waste laws and regulations. If propane-containing cylinders are inadvertently accepted, additional requirements are detailed in Special Conditions, Section B, No. 36.

11. Accepted materials shall be processed and managed in accordance with the Operations Manual (Updated: October 2021) and approved subsequent submissions, unless otherwise specified in the permit conditions. Accepted material shall be processed as soon as practicable to prevent a litter, fire, vector, or nuisance situation.

12. The facility shall be supervised, secured by gates, fences, walls, locked buildings, or other measures to control unauthorized access to the facility.

13. The facility shall have a permanent readable and weatherproof sign posted at the facility entrances identifying the facility, the name and address of the operator, the hours and days of operation, and a contact in case of an emergency.

14. The facility shall be designed, constructed, and maintained to withstand the proposed expected loads, storage and processing activities.

15. The entire facility shall be paved with concrete/asphalt and maintained in good, intact condition such that the concrete or asphalt will act as a preventive measure against surface and subsurface contamination. Maintenance of the concrete/asphalt paved surfaces and perimeter walls shall include regular inspections and repairs to the concrete/asphalt, as needed to be an effective preventive measure.

16. In the event, the concrete/asphalt is not maintained in accordance with Special Conditions, Section A, Nos. 14 and 15, the permittee shall conduct soil sampling to demonstrate an area is not contaminated prior to resurfacing the area with concrete/asphalt. Soil sampling shall be conducted just prior to concrete/asphalt placement and no waste shall be stored after sampling and prior to concrete/asphalt placement. If resurfacing is warranted, the permittee shall submit a sampling plan and analytical results for review and approval. If contamination is found, the permittee shall submit a remediation plan for review and approval by the DOH. Concrete/asphalt placement shall not occur without approval by the DOH. All waste storage and operations shall be on concrete/asphalt surfaced areas and only the activities identified in the application, specific to those areas, may be performed.

17. Suitable means shall be employed to control nuisances, including, but not limited to, preventing solid waste from scattering, controlling litter, controlling odor, and minimizing vectors (such as rodents and insects). At a minimum, the nuisance control measures, as described in the Operation Manual (Updated: October 2021) shall be employed and maintained at the facility. In addition, litter from the facility that has blown to locations outside the facility shall be collected as soon as practicable and no later than by the end

of the operating day and properly recycled or disposed. If nuisance controls are found to be inadequate, the DOH may require additional controls be implemented.

18. The facility shall maintain a neat and orderly appearance and must be screened and buffered to minimize nuisances to neighboring properties.

19. The permittee shall maintain the six (6) feet high concrete walls and chain link fences along its boundaries to prevent debris from the permittee's operation to spill or be blown into neighboring properties and into the adjacent drainage channels along the western and southern boundaries of the facility.

20. The permittee shall implement dust control measures to minimize dust. At minimum, operational controls, such as daily facility sweeping, and water spraying shall be implemented. Dust control measures are required for the shredding operations, pre-and post-combustion H-Power scrap handling, and other areas where dust may exist or be created. If dust control measures are found to be inadequate, the DOH may require that additional controls be implemented.

21. Adequate measures shall be taken to prevent fluids and spills from being discharged or allowed to enter into sewers, drainage systems, surface or groundwater, water courses, marine waters, or onto the ground. Measures may include, but are not limited to, the use of spill pans, berms, structural catchment systems, and/or absorbent materials.

22. Adequate drainage, measures, or operational controls shall be provided to prevent standing water from accumulating inside the facility. Any discharges from the site shall be in accordance with applicable federal, state, and local laws and regulations.

23. Storage of unprocessed and processed materials shall be done in a safe and nuisance free manner and in accordance with the Operations Manual (Updated: October 2021) and these permit conditions. Stockpiles shall be stable and shall not be allowed to spill or overflow onto adjacent properties or cause any damage to existing containment/retaining structures.

24. Suitable means shall be provided to prevent and control fires and shall comply with the facility's Emergency Action Plan - Fire Response received August 24, 2021. Access lanes shall be provided to allow for fire response or vector control, as needed.

25. Scavenging at the facility by the general public is prohibited.

26. Any illegal dumping, especially of putrescible or combustible material, shall be removed immediately to DOH-permitted waste management facilities.

27. If contamination of the environment resulting from the facility's operations are suspected or detected, appropriate measures including sampling and analysis and/or remediation

shall be taken to assess and mitigate the contamination. In addition, information related to the incident and/or remediation shall be included in the facility's closure plan.

28. The permittee shall notify the DOH, in writing, of any operational changes (i.e., use of different processing equipment, relocation of operations, environmental controls, storage capacity, etc.) that differs from the submitted application and Operational Manual (Updated: October 2021). A revised operations manual reflecting these changes shall be submitted for the DOH's review and approval prior to implementation. Depending on the extent of the proposed changes, a modification to this permit may be required.

Section B

Operational, Storage, and Processing Requirements for Shredder Yard (Parcel 25)

29. The facility may only receive, store, and process scrap metal (including empty propane cylinders) and fish nets; receive, store and palletize/containerize batteries and e-waste; and shred vehicle shells with tires at parcel 25 in accordance with Special Conditions, Section A, No. 3, and Sections B, C, E, and F.

30. Except when there are shipping interruptions due to port closures, the maximum on-site storage shall be limited to areas shown in the Operations Manual (Updated: October 2021) Plot Plan and the following capacity limits:

    a. 5,000 tons of raw shreddable material;
    b. 30,000 tons of shredded ferrous metals;
    c. 800 tons of shredded non-ferrous metals; and
    d. 15,000 tons of heavy melting steel.

31. In the event of a shipping interruption due to a port closure, and the permittee is unable to comply with the maximum on-site storage capacity limits, the permittee may request for a temporary exceedance provided:

    a. Verbal request is made to DOH at least three (3) calendar days in advance of such event or anticipated event;
    b. notification (verbal and written) includes identification of the type and quantity of materials, and estimated schedule for correction;
    c. the permittee rectifies the exceedance within 30 calendar days of the exceedance;
    d. the storage conditions comply with Special Conditions Nos. 33 and 35; and
    e. submits a written report shall follow the procedures specified in Standard Conditions No. 10.

32. The permittee may cut, shear, and/or shred scrap metal in accordance with the Operations Manual (Updated: October 2021). Prior to being cut, sheared, and/or shredded, scrap metals shall be free of all but residual amounts of liquids, including, but

not limited to, fluids (for example, brake fluid, transmission fluid, antifreeze), oils, petroleum products, and petroleum by-products. Scrap metals that contain prohibited items, or that are not certified in accordance with the Guidelines, shall not be accepted for storage and processing.

33. The permittee shall store shredded scrap metal in such a manner to prevent stockpiled materials from spilling over the top of any perimeter walls. For material piles which are stockpiled adjacent to a chain link fence or gate, the permittee shall maintain a 5-foot lateral buffer from such barrier. The permittee shall conduct weekly visual inspections to ensure that solid walls are structurally sound, that shredded scrap materials are within the confines of the property boundary, and that stockpiles are not present within a lateral distance of 5-feet from chain link fences or gates. If the storage procedures and setbacks are insufficient for containing scrap metal within the facility boundary, additional controls may be required.

34. The maximum on-site storage capacity for fishing nets is 30 tons, or two (2) 40-foot containers. The permittee may cut or shred fish nets and shall transport fish nets to a permitted solid waste management facility allowed and willing to accept the fish nets within 60 calendar days of acceptance.

35. Non-ferrous metals (unprocessed and processed) shall be stored in designated areas as identified in the Operations Manual (Updated: October 2021).

36. Accepted empty propane cylinders shall be cut in half or contain a hole, to allow for inspection by the permittee, in accordance with the Scrap Acceptance Guidelines in the Operations Manual (Updated: October 2021) prior to shredding. Should propane-containing cylinders, not meeting the facility's Acceptance Guidelines be inadvertently received, no decommissioning or processing shall occur. The permittee shall transport the propane-containing cylinders to a permitted solid waste management facility allowed and willing to accept the cylinders within three (3) calendar days. Propane-containing cylinders, awaiting removal, shall be stored upright, in an open and well-ventilated area of the facility. Stacking of cylinders is not allowed. Proper precautions shall be taken to reduce fire, explosion and or safety concerns. After the cylinders have been decommissioned, they may be re-accepted as scrap metal at the Shredder Yard for shredding.

37. Shredder Residue (SR) shall be removed from the facility at least once per week to minimize the duration and quantity of on-site storage. The maximum on-site storage of SR shall be limited to 200 tons. In accordance with the application, the permittee shall install, maintain, and operate a water suppression system on the SR stockpile. The water suppression system shall be operated at least on an hourly basis. The DOH may require more frequent use of the water suppression system for dust control. The permittee shall require that trucking firms hired to remove the SR shall be capable to fully containerized or cover the load to prevent the scattering of the SR as they leave the facility. Appropriate controls shall be instituted and implemented to prevent the

scattering of dust during loading of SR. The permittee shall comply with Special Conditions, Section E.

Section C

H-Power Scrap Metal:

38. The permittee may accept pre- and post-combustion H-Power scrap metal (ferrous and non-ferrous). The permittee shall manage pre- and post-combustion H-Power scrap metal in accordance with the Operations Manual (Updated: October 2021) and additional information received on October 6, 2021, and the conditions of this permit.

39. The permittee shall provide appropriate dust control methods during loading, unloading, storage, and shredding of H-Power scrap metal.

40. The permittee shall notify H-Power that scrap metal transported to the facility shall be fully containerized or covered to prevent the scattering of residue and ash. The transferring operation of post-combustion scrap metal with ash shall not be performed during windy and/or rainy conditions.

41. H-Power scrap metal shall be unloaded into the designated storage areas. The designated storage and loading/unloading areas for H-Power scrap metal shall be on concrete paved areas in accordance with the Operation Manual (Updated: October 2021) Plot Plan. Pre-combustion and post-combustion scrap metal shall be stored separately.

42. H-Power scrap metal may be shredded or reloaded into shipping containers. Pre- combustion H-Power scrap metal, not requiring processing, shall be stored in the Shredded Scrap Storage Area until loaded into truck containers and transported for shipment. Post-combustion H-Power scrap metal with ash shall be processed on the same day that it is received unless the facility is not processing scrap metal on the day of its receipt. Scrap metal with ash shall be temporarily stored in containers or piles under cover until the facility resumes processing and shall be considered priority when processing resumes.

43. The permittee shall sweep ash and residue off the paved surface and place ash/residue into a covered container at the end of each day. Any ash, residue, or leachate from the H-Power scrap metal shall be collected, managed, and disposed of in accordance with applicable laws and regulations.

Section D

Operational, Storage, and Processing Requirements for ELW Goods and ELVs (Parcel 20)

44. The facility may only receive, store, and process ELW goods and ELVs at parcel 20. For the purposes of Special Conditions, Section D, "Processing" means preparing ELW goods units and vehicles for recycling by removing parts and items, including those identified in Special Conditions, Section D, Nos. 50 through 62 before shredding the vehicle and white goods unit in accordance with Special Conditions, Section A, Nos. 1 and 3 and Section B.

45. The processing areas for ELW goods and ELVs shall be under cover, on a concrete or impermeable surface. Mobile fluid extraction devices shall be used to drain the fluids from ELVs. The extraction devices shall capture the fluids and transfer the fluids via the plumbed connection, located inside the "Wet Car Processing" building, to the fixed piping leading to the outside storage tanks. The extraction collection devices shall be situated in such a manner to create a contained system. There shall be adequate spill response materials and protocols in place, in the ELV processing area, to response and contain any accidental release of fluids and other contaminants. The processing area for ELW goods shall have adequate secondary containment. The processing areas shall also be protected from rain entering the work area.

46. The maximum storage capacity of unprocessed ELW good units shall be limited to 200 units, at any time. Stacking of unprocessed ELW good units is not allowed.

    a. All accepted unprocessed white good units shall be delivered to the Appliance Processing Building for inspection, storage, and processing.
    b. A limited quantity of unprocessed white goods may be temporarily stored outside the Appliance Processing Building, on concrete/asphalt paved or impermeable surface for short periods of time, not to exceed 14 calendar days, while awaiting processing.
    c. All unprocessed white good units shall be stored in an upright position.
    d. The permittee shall ensure that each white good unit has completed processing (removal of refrigerant, compressor oil and other fluids, mercury switches, polychlorinated biphenyl [PCB] containing capacitors) prior to removal from the processing area.
    e. Processed white good units shall be stored in a 40-cubic yard storage container located outside the Appliance Processing Building until transferred to the shreddable raw material storage area located in the Shredder Yard by the end of each workday for shredding.

47. The maximum storage capacity of unprocessed ELV, including other mobile equipment that contain fluids, such as forklifts, front end loaders, small cranes, excavators, etc., shall be limited to a combined total of 100 units, at any time. Stacking of unprocessed vehicles and mobile equipment is not allowed.

a. All vehicles and mobile equipment accepted at the facility shall be delivered to the outdoor concrete paved "Auto Storage Area" for inspection and storage until sent to the "Wet Car Processing Area" for processing.
b. Vehicles with fluid-containing parts that are not intact, or leaking shall be stored over portable secondary containment pans until sent to the processing building. If fluid or rainwater is found in the secondary containment pans or in other containment measures, the fluid/rainwater shall be removed and properly disposed of in accordance with applicable rules and regulations.
c. All vehicles shall be sent to the "Wet Car Processing" building. Vehicles shall be placed on the vehicle rack for removal of tires, rims, mercury switches, batteries, refrigerants, fluids, PCB capacitors, wheel weights, catalytic converters, and non-ferrous parts.
d. The permittee shall ensure that each vehicle has been drained and processed completely prior to removal from the vehicle processing building. The vehicle shell maybe be transferred to the shreddable raw material storage area in the Shredder Yard for shredding.

48. The following materials shall be removed from the ELW and ELV and transported to a DOH approved or permitted waste facility: used motor oil, brake fluid, radiator fluid, transmission fluid, power steering fluid, compressor oil, refrigerants, batteries, tires, coolant/antifreeze, gasoline, diesel, PCB capacitors and mercury-containing switches. Should any of these materials become hazardous waste, the permittee shall properly manage and dispose of in accordance with applicable hazardous waste rules.

49. The maximum on-site storage of removed materials shall be limited to the following capacity limits. These materials shall be stored inside the building or under cover protected from the weather as identified in the facility Operations Manual (Updated: October 2021):

a.	Waste gasoline	Three (3) 1,000 gallon doubled-walled aboveground storage tanks (ASTs)
b.	Waste diesel/used oil/brake	Two (2) 1,000-gallon double-walled ASTs /transmission/power steering fluids
c.	Waste antifreeze/windshield	One (1) 550-gallon double walled AST wiper fluid
d.	Used compressor oil	500 gallons
e.	Refrigerant/Freon	1,000 pounds
f.	Mercury switches	12 pounds
g.	PCB capacitors	500 pounds
h.	Tires	2,500 waste tires (see Special Conditions No. 58)
i.	Catalytic converters	3,000 units
j.	Wheels	5,000 units
k.	Wheel weights	1,000 pounds

50. Fluids shall be stored in containers. Containers of fluids shall be clearly labeled with their contents. Containers shall always be closed, except when it is necessary to add or remove fluids. A container holding fluids shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

51. Containers used to store used oil must be labeled or marked clearly with the words, "Used Oil" (HAR 11-279, *Standards for the Management of Used Oil*). Storage area shall also comply with other applicable requirements of HAR 11-279 Subchapter C.

52. Containers of used oil and other waste fluids shall be placed in a secondary containment that is capable of holding more than the contents of the largest container in the containment area. Such secondary containment may include dikes, berms, or retaining walls, and a liner or impervious floor, such as concrete. The secondary containment system shall not be used as fluid storage. The storage area shall be covered and prevent rainwater from accumulating in the secondary containment system. If fluid is found in the secondary containment system, the fluid shall be removed, properly disposed of and the source of the fluid or leak determined and corrected. The storage area shall also comply with the other applicable requirements, which may include but is not limited to HAR 279.1, *Standards for the Management of Used Oil*, and state hazardous waste regulations.

53. Oil filters shall be subjected to a proper oil removal step (i.e., 24-hour draining prior crushing to release the oil). The recovered used oil shall be managed in accordance with Special Conditions, Section D Nos. 51 and 52. The drained oil filter should be recycled for metal.

54. The permittee shall implement the facility's *Spill Prevention Control and Countermeasure Plan*. Compliance with this condition does not relieve the permittee to comply with any other applicable laws or regulations. Should there be a discrepancy between the various regulations, the permittee shall contact the DOH immediately.

55. Motor vehicle air conditioners and other types of refrigerant units (including but not limited to refrigerators, freezers, chillers, and air conditioning units) that enter the waste stream with the charge intact may be subject to "safe disposal requirements" under the U.S. Environmental Protection Agency's (EPA's) Refrigerant Recycling rule. The permittee shall be responsible for ensuring that the refrigerant is recovered using EPA-approved recycling/recovery equipment with a certified technician before final disposal to a permitted scrap metal recycler. Federal regulations prohibit venting of refrigerants into the atmosphere.

56. The permittee shall comply with the disposal, collection, storage and recycling requirements specified under HRS 342I, *Lead Acid Battery Recycling*, and HAR 11-273, *Standards for Universal Waste Batteries* and 40 CFR §273.13, as incorporated and amended in chapter 11-273.1-1, HAR.

a. Batteries (lead acid, nickel cadmium and lithium-ion) may only be accepted, sorted, consolidated, palletized, and/or containerized for shipment.
b. On-site storage shall be limited to a total of 1,500 batteries, at any one time.
c. Batteries shall be managed and stored in the battery storage area located in the storage crib area of the automobile processing building in parcel 20. Batteries shall be stored on pallets and wrapped in plastic.
d. Releases that occur shall be removed immediately and disposed of according. Cracked and leaking batteries must be managed as hazardous waste, in accordance with state hazardous waste regulations.
e. Batteries received at the Shredder Yard shall be transferred to the battery storage area located in parcel 20, no later than the end of the workday
f. Batteries ready to be shipped shall be placed in a 40-foot enclosed lockable shipping container. Batteries that are intact shall be transported to authorized facilities identified in HRS 342I and HAR 11-273.1.

57. The permittee shall comply with the disposal, collection, storage, and recycling requirements for mercury switches as specified under 40 CFR §273.13, as incorporated and amended in chapter 11-273.1-1, HAR.

a. Mercury containing switches shall be managed and stored in the designated Waste Storage area located in the vehicle maintenance shop building in parcel 20.
b. Mercury switches shall be stored in a non-leaking closed container.
c. Releases that occur shall be removed immediately, stored in a closed container compatible with the waste and disposed of accordingly. Cracked and leaking switches must be managed as hazardous waste, in accordance with state hazardous waste regulations.
d. Mercury switches shall be transported to authorized facilities identified in HAR 11-273.1.

58. The permittee shall comply with the tire disposal requirements specified under HRS 342I, *Used Motor Vehicle Tire Recovery*. On-site storage shall be limited to 2,500 waste tires and shall meet all the relevant requirements of the local county fire code.

a. Tires shall be stored in the designated covered and concrete/asphalt paved tire storage area located in the vehicle maintenance building.
b. Tire piles must be free of all contaminants such as oil, grease, gasoline, diesel, etc. that could create fire hazards. Tires must be stored so that they minimize the accumulation of water in the tires and the creation of a vector problem.
c. Metal rims shall be transferred to the Shredder Yard for recycling.
d. Tires shall be disposed only at a DOH-permitted recycling facility allowed to accept waste tires or out-of-state recycling facility.
e. In the event, DOH-permitted or out-of-state recycling facilities, or end markets no longer accept whole tires, the permittee may be allowed to shred the processed vehicle with the tires and rims intact provided:

i. it is for a limited duration only until recycling facilities or end markets resume accepting whole tires;
ii. wheel weights are removed;
iii. the number of vehicles with tires and rims shall be limited to 100 ELVs as allowed by Special Conditions, Section C No. 47; and
iv. records are maintained as part of Special Conditions Section G No. 74.

The permittee shall not dispose of whole motor vehicle tires in mixed municipal solid waste facilities. No whole or cut tires shall be delivered to any person with the knowledge that the tires will be improperly disposed.

59. Used antifreeze/windshield wiper fluid, gasoline and diesel drained from vehicles shall be stored in separate double-walled above ground storage tanks, protected from the weather, and on a concrete pad with secondary containment adjacent to the vehicle processing building. Used antifreeze, gasoline and diesel shall be properly managed and recycled/disposed. Good gasoline and diesel may be re-used on site.

60. Wheels, wheel weights, and catalytic converters removed from vehicles shall be stored in containers, under cover and shipped to permitted recycling facilities.

61. PCB-containing capacitors shall be removed, managed, stored in a closed container, and disposed in accordance with applicable rules and regulations, including the Toxic Substances Control Act.

62. Air bag modules that remain in the vehicle, are considered part of the vehicle, when the vehicle is recycled as scrap metal. During cutting, baling, shredding operations, the permittee shall ensure the protection of human health and the environment from the reactivity or release of the air bag contents. If the permittee removes the undeployed air bag modules from the vehicles, as required by the vehicle or metal receiving facility, the permittee shall manage and dispose of the removed air bag modules in accordance with 40 CFR section 261.4(j), as incorporated and amended in chapter 11-261.1, HAR.

Section E

Management of Processed Waste Materials and Shredder Residues

63. Processed materials shall be transported to DOH-permitted recycling facilities, out-of-state recycling facilities, or end-markets. If processed materials will no longer be accepted by these recycling facilities or end-markets, then no associated incoming waste stream shall be accepted.

64. Non-recyclable material, including SR (with tires and without tires), shall be characterized, stored, and managed in accordance with hazardous waste rules, as applicable.

65. Non-hazardous, non-recyclable materials (waste materials and SR with tires and without tires) shall be properly disposed of at a DOH-permitted solid waste disposal facility or out-of-state disposal facilities, unless the permittee obtains written approval from the DOH to recycle or reuse the waste.

66. The permittee shall obtain the DOH approval, in writing, prior to recycling or reusing SR. At a minimum, the permittee request shall include a description of the proposal and an assessment of human health and ecological impacts. The DOH may request additional information to evaluate the proposal.

Section F

Universal Waste Electronic Items (e-waste)

67. The permittee may accept and store e-waste in the Shredder Yard. The permittee shall provide written notification to DOH prior to accepting e-waste.

68. The permittee shall comply with all applicable regulations, including but not limited to sections of HAR 11-273.1, *Standards for Universal Waste Management, including 40 CFR part 273 subpart C, as incorporated and amended in chapter 11-273.1, HAR, Standards for Large Quantity Handler of Universal Waste.*

69. Accepted e-waste may only be sorted, consolidated, palletized, and/or containerized for shipment in accordance with HAR 11-273.1, *Standards for Universal Waste Management.*

70. E-waste shall be stored in locked containers or in a locked covered area/building at the end of each workday. E-waste shall not be dismantled, crushed, or baled at the facility. Electronic items with cracked leaded glass, broken cathode ray tubes, broken LCDs, or other e-waste that is not intact, shall be stored in a leak-proof closed container compatible with its contents and managed and transported in accordance with state hazardous waste laws and regulations.

71. If any portion or entire piece of e-waste is to be disposed, a hazardous waste determination in accordance with hazardous waste rules is required. Based on the determination, the e-waste shall be properly managed and disposed.

72. The maximum storage shall be limited to two (2) 40-foot shipping containers of e-waste. E-waste shall be removed within one (1) year of receipt at the facility and sent to a permitted universal waste handler, a destination facility or to a foreign destination allowed to accept such waste, and in accordance with state hazardous waste laws and regulations. Storage and transport of e-waste shall be done in a safe and nuisance free manner and in accordance with these permit conditions. If e-waste will no longer be accepted by recycling facilities, then no associated incoming e-waste shall be accepted.

Section G

Recordkeeping and Reporting Requirements:

73. In addition to requirements in Standard Condition No. 11, records of screening and all transactions shall be kept a minimum of five (5) years. Copies shall be made available to the DOH for its use upon request. Information shall include, but is not limited to:

    a. Description of materials received, date of receipt, quantity received, and rejection determination.
    b. Type and quantity of material processed on a monthly basis.
    c. Weekly total number/volume/tonnage of light steel, heavy melting steel, pre- and post-combustion H-Power scrap metal, ELVs, ELW goods, batteries, e-waste, tires, used oil, refrigerants, and other fluids on site.
    d. ELV, ELW, and e-waste acceptance dates, quantities, hauler/purchaser, and source.
    e. Quantity of SR generated on a monthly basis.
    f. Date, quantity, and description of final disposition of waste streams.
    g. Disposal and/or transaction receipts.

74. The permittee shall comply with the recordkeeping requirements relating to used motor vehicle tires as provided under the HRS Chapter 342I. The statute requires facilities that accept used tires to submit a summary of the following information by July 31 of each year:

    a. name, phone number, and address of the person, company, business, source, or entity from whom the used tires were received, if receiving used tires from entities other than the general public, such as tire retailers, wholesalers, transporters, collectors, and recyclers;
    b. date of receipt of used tires;
    c. quantity of used tires received;
    d. record of shipment indicating: and
        i. ultimate destination of the used tires;
        ii. identification of the transporter;
        iii. date of shipment; and
        iv. quantity of tires shipped.
    e. record of tires and rims shredded with scrap vehicles, including other mobile equipment:
        i. date(s) and reason for shredding;
        ii. number vehicles shredded; and
        iii. date of shipment, quantity and disposal destination.

75. An annual report shall be prepared and submitted to the DOH reviewing the past fiscal year's (July 1 to June 30) operations, detailing:

a. Total tonnage of each type of material received, processed, rejected, recycled, and disposed;
b. total tonnage of SR generated with and without tires;
c. destination of each type of material/waste leaving the site; and
d. a summary of incidents outside of normal operations.

Reports shall be submitted to the following address by July 31 of each year.

Department of Health
Environmental Management Division
Solid and Hazardous Waste Branch
2827 Waimano Home Rd. #100
Pearl City, Hawaii 96782

Solid and Hazardous Waste Branch
Department of Health
2827 Waimano Home Road #100
Pearl City, Hawaii 96782
Department or Agency

STATE OF HAWAII
OFFICIAL RECEIPT

No. 50996

DATE: June 9, 20 20

RECEIVED from Watanabe ING, LLP

Fifty dollars and NO cents .00/100 DOLLARS

Solid Waste Renewal w/Mod. (App# RY-0013-20)

$ 50.00

Check # 114511

Authorized Signature

Solid and Hazardous Waste Branch
Department of Health
2827 Waimano Home Road #100
Pearl City, Hawaii 96782
Department or Agency

STATE OF HAWAII
OFFICIAL RECEIPT

No 66284

DATE: November 30, 20 21

RECEIVED from Watanabe Ing, LLP (Schnitzer Steel Hawaii Corp.)

Fifty dollars and NO cents .00/100 DOLLARS

SW Filing Fee App # (RY-0013-20)

$ 50.00

Check # 116500

Authorized Signature

STATE ACCOUNTING FORM B-24
July 1, 1999 (Revised)

Watanabe Ing LLP
A Limited Liability Law Partnership

Joyce W.Y. Tam-Sugiyama
(808) 544-8358
jtam@wik.com

March 13, 2020

VIA U.S. MAIL

Department of Health
Environmental Management Division
Solid and Hazardous Waste Branch
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Re: Renewal Application for Schnitzer Steel Hawaii Corp.
Recycling and Materials Recovery Facility
Kapolei, Oahu

Enclosed please find the application for renewal of the Solid Waste Management Permit for the Schnitzer Steel Hawaii Corp. ("**SSHC**") facility in Kapolei, Oahu. Also enclosed is the application fee of $50.00, together with the P-5 zoning clearance form from the City and County of Honolulu.

The Operations Manual contains information of a confidential nature concerning SSHC's operations. SSHC respectfully requests that the Department of Health treat the Operations Manual, including its appendices and attachments, as confidential business information pursuant to Hawai'i Revised Statutes Chapters 342H and 92F.

Should you have any questions, please do not hesitate to contact me at (808) 544-8358 or jtam@wik.com.

Very truly yours,

WATANABE ING LLP

Joyce W.Y. Tam-Sugiyama
Ian L. Sandison

Enclosures

First Hawaiian Center, 999 Bishop Street, Suite 1250, Honolulu, Hawaii 96813 Phone: 808-544-8300 Fax: 808-544-8399

STATE OF HAWAII
DEPARTMENT OF HEALTH
ENVIRONMENTAL MANAGEMENT DIVISION
SOLID AND HAZARDOUS WASTE BRANCH

PERMIT APPLICATION FOR SOLID WASTE MANAGEMENT FACILITY (NOT FOR PERMIT BY RULE)

This permit application was developed in accordance with the requirements of Hawaii Administrative Rules (HAR), Title 11, Chapter 58.1. **In order for this application to be considered complete, completed Attachments P-1 through P-6 and filing fee must accompany this application form.** Please read the general instructions before completing.

I. Type of Application (check all that apply)

A. _____ Permit to establish a new facility
B. _____ Permit to modify an existing facility
C. _____ Permit renewal with no modification
D. ___x___ Permit renewal with modification
E. _____ Change in ownership
F. _____ Other
Describe Updated Operations Manual

II. Existing pollution control permits and/or variances issued to facility:
State of Hawaii Department of Health Solid Waste Management Permit No. RY-0018-15

III. General Information

A. Name and address of the owner of the solid waste facility:
Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, HI 96707 Telephone: (808) 682-5810

B. Name and address of the operator of the solid waste facility:
Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, HI 96707 Telephone: (808) 682-5810

C. Name and address of individual authorized to act for the owner and operator:
Nick Garofalo
91-056 Hanua Street
Kapolei, HI 96707 Telephone: (808) 682-5810

D. Name and address of landowner (If landowner is other than the owner/operator of the solid waste facility, include Attachment P-6):
Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, HI 96707 Telephone: (808) 682-5810

E. Name and address of lessee, if appropriate:

N/A

Telephone:

F. Facility Name and Location:

Name: Schnitzer Steel Hawaii Corp.

Address: 91-056 Hanua Street

Kapolei, HI 96707

Tax Map Key: 1-9-1-026:025

(if appropriate)

Latitude: 21 ° 17 ' 45 " N

Longitude: 158 ° 06 ' 25 " W

UTM Coordinates: Zone East North

G. Type of Facility (check all that apply)

1.	Landfill	
	MSW (daily tonnage)	
	C&D (daily tonnage)	
2.	Incinerator (daily tonnage)	
3.	Solid Waste Processing	
	Transfer Station (daily tonnage)	
	Recycling/materials recovery	x
	Salvage	
4.	Reclamation Facility	
	Composting	
	Remediation	
5.	Special Waste	
	Special waste landfill	
	Medical waste	
	Foreign waste	
	Other Non-Specified Technology	
	Please briefly explain	
6.	Waste Treatment/Processing/Storage for Disposal	

IV. Normal Operating Schedule

A. Shifts Worked:

		HOURS OF DAY		
1.	From: 07:30	To: 16:00	M-F
2.	From: 07:30	To: 11:00	Sat.
3.	From:	To:	

B. Days per week: 6

C. Weeks per year: 52

D. Operation is seasonal or irregular, describe:

N/A

V. For Permit Renewals and Modifications: Is the existing facility in compliance with Hawaii Revised Statutes (HRS) 342G, 342H and 342I; and Hawaii Administrative Rules (HAR), Title 11, Chapter 58.1, "Solid Waste Management Control"?

Yes X No_____

If the existing facility is not in compliance with HRS 342G, H and/or I; and/or HAR, Title 11, Chapter 58.1, "Solid Waste Management Control", provide a detailed implementation plan as an attachment to the application. The implementation plan should include but is not limited to areas of noncompliance, reason for noncompliance, proposed actions towards achieving compliance, and implementation schedule, as an attachment to the application.

VI. Certification by owner and operator:

We, Nick Garofalo (name), General Manager (title) (owner)

and Nick Garofalo (name), General Manager (title) (operator)

certify that we have knowledge of the facts hereby submitted and that the same are true and correct to the best of our knowledge and belief, and that all information not identified as confidential in nature shall be treated by the Department of Health as public record. We further state that we will assume responsibility for the construction, modification, operation, maintenance, closure and post-closure of the facility in accordance with Hawaii Revised Statutes, 342G, H and I; and Hawaii Administrative Rules, Title 11, Chapter 58.1, and any permit issued thereof. As co-permittees, we understand that we share joint and several liability for compliance with aforementioned statutes, regulations, and permits.

If the owner/operator is a partnership or group other than a corporation or a county, one individual who is a member of the group shall sign the application. If the applicant is a corporation or a county, an officer of the corporation, general manager of the facility, or an authorized representative of the county shall sign the application.

Date: 3/12/20 Owner:
Signature: _____
Title: General Manager
Company Name: Schnitzer Steel Hawaii Corp.
Address: 91-056 Hanua Street
Telephone: (808) 682-5810

Date: 3/12/20 Operator:
Signature: _____
Title: General Manager
Company Name: Schnitzer Steel Hawaii Corp.
Address: 91-056 Hanua Street
Telephone: (808) 682-5810

DO NOT WRITE BELOW ----- FOR AGENCY USE ONLY

VII. Date application received:_____

VIII. Received by:_____

IX. Application number:_____

X. Evaluating Official:_____

XI. Filing fee attached: Yes_____ No_____

XII. Plans and specifications attached: Yes_____ No_____

Attachment P-1	Yes_____	No_____
Attachment P-2	Yes_____	No_____
Attachment P-3	Yes_____	No_____
Attachment P-4	Yes_____	No_____
Attachment P-5	Yes_____	No_____
Attachment P-6	Yes_____	No_____

XIII. Action on application: Approved:_____
Disapproved:_____
Conditional Approved:_____

XIV. Date of action on application:_____

XV. Permit number:_____

ATTACHMENT P-1
LOCATION DRAWING AND SITE PLAN
RECYCLING AND SALVAGE FACILITIES
SOLID WASTE PERMIT APPLICATION

The following facility drawings shall be submitted, drawn to a reasonable scale and include the following information (show north arrow and scale of drawing):

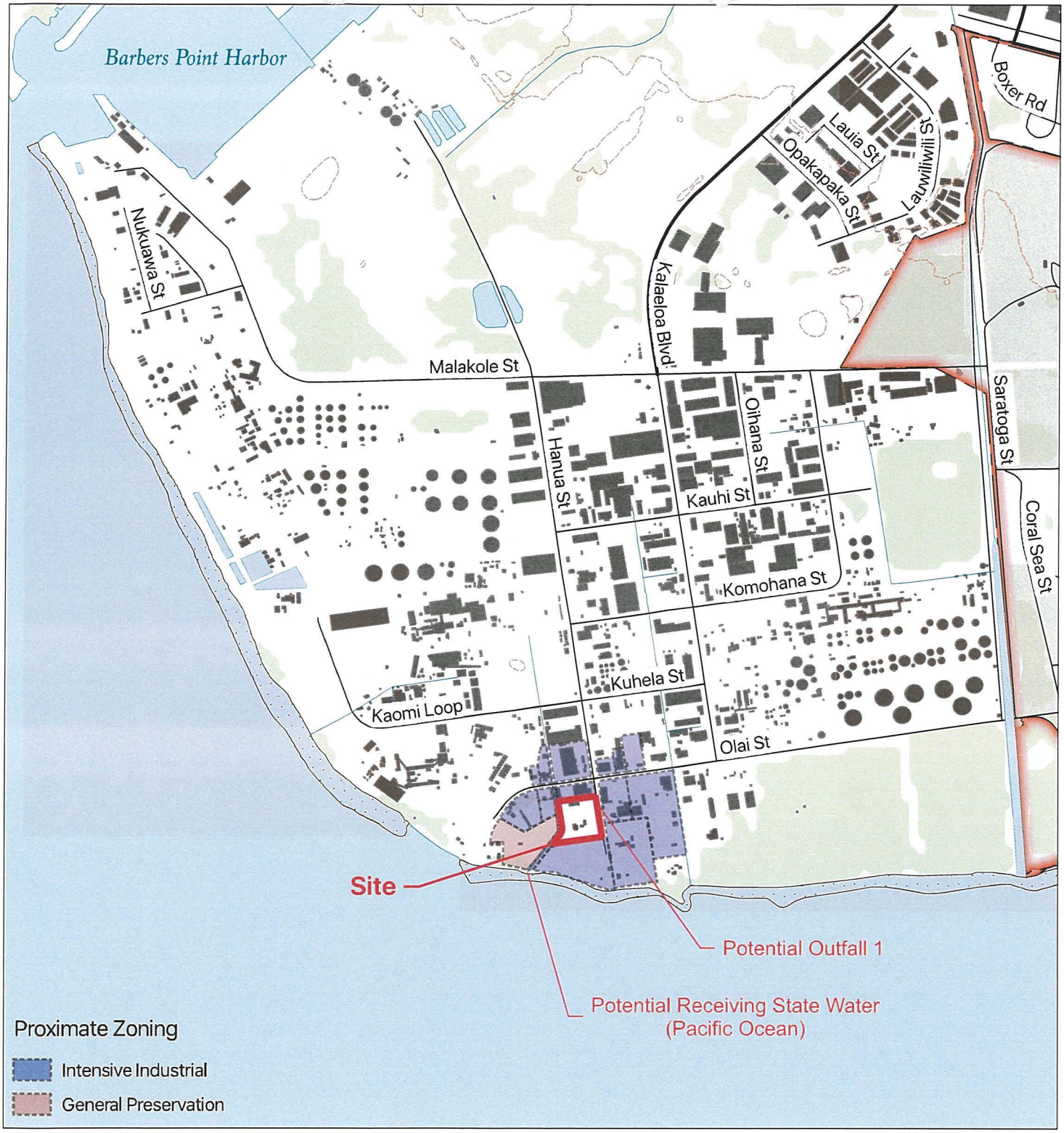
1. Location Drawing(s)

Provide location drawing(s) indicating the property involved, topographic data, the zoning of the property, and the outline of all structures, access, and fences. Identify property lines plainly. Indicate the location of the property and equipment in relation to nearby streets and all adjacent properties. The location drawing should also identify the name, nature of business, and zoning of all properties adjacent to the applicant's property lines (Private residences may be identifies as residences, unless they are also used as a place of business).

Using USGS Quadrangle Maps, identify all drainage systems and bodies of surface or marine waters, or other sensitive environmental areas within 500 feet of the property lines; and the location of any active groundwater resources within 1000 feet of the facility.

2. Site Plan

Provide a site plan detailing the sizes and locations of all storage and processing activities, structures, and equipment on the property. Locate waste receiving area; processing areas; unprocessed and processed material storage areas; environmental control systems, including berms, ditches, and basins; and maintenance area. Specify holding capacity for each storage area and/or container. Identify the equipment with unit numbers corresponding to the process flow diagram and the manufacturer's performance data sheets (as required in Attachment P-3). Indicate any containment structures to control the release of liquids; and direction, controls, and containment for surface water flow. Describe measures, such as fencing, gates, or natural barriers, to restrict and control public access onto the facility; vehicular traffic flow in and around the facility; and fire access lanes.



Neptune & Company, Inc.		Site Location Map	Figure 1
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 03/13/2020	Reviewed by: MCC	Client: Watanabe Ing LLP	

USGS
science for a changing world

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map
US Topo

'EWA QUADRANGLE
HAWAII - HONOLULU COUNTY
7.5-MINUTE SERIES

Produced by the United States Geological Survey

SCALE 1:24 000

CONTOUR INTERVAL 40 FEET
DATUMS IS LOCAL MEAN SEA LEVEL

This map was produced to conform with the National Geospatial Program US Topo Product Standard, 2011.

ROAD CLASSIFICATION

Expressway
Secondary Hwy
Ramp
Local Connector
Local Road
4WD
Interstate Route
US Route
State Route

1 Waianae
2 Schofield Barracks
3 Waipahu
4 Pearl Harbor

ADJOINING QUADRANGLES

'EWA, HI
2017

ATTACHMENT P-1
LOCATION DRAWING AND SITE PLAN
RECYCLING AND SALVAGE FACILITIES
SOLID WASTE PERMIT APPLICATION

SCHNITZER STEEL HAWAII CORP.
KAPOLEI, OAHU
(SEE OPERATIONS MANUAL)

ATTACHMENT P-2
PUBLIC INTEREST
SOLID WASTE PERMIT APPLICATION

Hawaii Revised Statutes (HRS), Chapter 342H, Section 4(c), *Solid Waste Pollution*, requires that the Director of Health approve permits only for those facilities that are in the public interest. This is in addition to those conditions for permit approval as contained in Hawaii Administrative Rules Chapter 11-58.1, *Solid Waste Management Control*. Therefore, the applicant shall submit information regarding the environmental implications of the proposed action, which shall include all relevant and feasible consequences of that action. This information must be submitted by the applicant in the form of a written discussion addressing each of the following major topics:

1. **Environmental impact of the proposed action.** Explain why the facility is in the public interest in terms of the need for the service; the population and area to be served; the characteristics, quantity and source of materials to be processed; the use and distribution of the processed materials and the method of processed residue disposal. Include discussions of the current waste management system, the environmental cost/benefits of the proposed action and the impacts on current and future land use.

2. **Any adverse environmental effects, which cannot be avoided, should the proposed action be implemented.** Discuss any potential impacts the facility may have on public health and the environment from items such as air emissions, leachate, drainage, vector attraction, fires, waste storage and processed residue disposal. Discuss how and to what extent those impacts on public health and the environment will be mitigated through the design and operation of the facility. Discuss plans for emergency operating procedures to protect public health and the environment from unplanned releases.

3. **Alternatives to the proposed action.** Discuss other known alternatives that could feasibly attain the same objective. Explain why they were rejected. Explain why the proposed action represents the Best Practical Technology (BPT). Particular attention must be focused on alternative actions that would reduce or avoid adverse environmental risk and provide a greater cost/benefit to the community. The analysis shall represent a comparative evaluation of the environmental benefits, costs and risks of the proposed action and support the conclusion that it represents BPT.

4. **The relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity.** Discuss the effect the operation will have on the site and on the environment on a long-term basis. Discuss the ultimate use of land and surrounding areas as indicated by local zoning codes. Discuss how plans for emergency procedures, final site closure or other steps may mitigate the long-term effects of pollutants. Discuss the long-term impacts the project may have on other waste management alternatives.

5. **Any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.** Identify unavoidable impacts and the extent to which the proposed action makes use of non-renewable resources.

6. **Optimum balance between economic development and environmental quality.** Discuss whether the proposed action promotes the optimum balance between economic development and environmental quality.

7. **Consistency with the State Integrated Solid Waste Management Act (HRS 342G) and the County's Approved Integrated Solid Waste Management (ISWM) Plan.** Address the project's conformance with the State waste diversion goals and hierarchy. Discuss the project's impact on the State's current or proposed waste diversion efforts, and the County's overall integrated solid waste management plan.

8. **Public input relating to the impact of the facility on public health and the environment.** Address any requirements for public comment period or hearing under HRS Chapter 343 (Environmental Impact Statement) or local land use ordinances. The applicant should solicit public input on the proposed project. Public input may be solicited through the use public hearings, public informational meetings coordinated with the appropriate community boards or associations or other approved mechanisms. The location of the meetings should be held in the district in which the project will be located. A copy of the meeting minutes should be submitted to the Department as part of this solid waste permit application.

   For municipal solid waste management facilities, a minimum a 30-day public notice is required.

ATTACHMENT P-2
PUBLIC INTEREST
SOLID WASTE PERMIT APPLICATION

SCHNITZER STEEL HAWAII CORP.
KAPOLEI, OAHU

PUBLIC INTEREST- P2

1.0 Environmental Impacts

Schnitzer Steel Hawaii Corporation (SSHIC) continues to operate the leading scrap metal recycling facility on Oahu. SSHIC provides a permitted recycling facility for the hundreds of auto wreckers, demolition contractors, and other scrap metal generators in Hawaii.

SSHIC is one of the few scrap metal recycling facilities that is able to effectively manage the consistent volumes of all types of commercial scrap metal from construction, retired heavy equipment, and demolition projects around Oahu and neighboring islands.

SSHIC's facility profile and vast operation provides a positive impact on the environment by shredding and exporting various types of scrap metals which would otherwise potentially be disposed of in the landfill or illegally dumped. SSHIC prides itself on being an industry leader through the implementation of environmental best management practices. SSHIC is active in educating the community on recycling practices and preserving Hawaii's sensitive ecosystem. Through the use of best available technology, SSHIC is always researching various techniques that will allow the facility to remain on the cutting edge of technical recycling advancement. SSHIC remains focused on reducing the carbon footprint and the overall environmental impacts of scrap metal operations.

The State's leading (revenue) industry remains tourism and it is essential that Hawaii's beautiful vistas and landscape be maintained and protected. If not addressed, illegal dumping of metallic debris throughout the islands would eventually threaten the traveling public's perception of Hawaii as a premier vacation destination. SSHIC remains an ambassador of Hawaii and a committed partner of the State by providing a safe, legal outlet for the disposal of the island's

metallic waste. SSHIC is the oldest and largest recycling company in Hawaii. On average SSHIC exports approximately 100,000 net tons of scrap metal annually.

The Island of Oahu has an approximate population of 975,000 people. Oahu is home to approximately 72% of the entire state's population. 81% of Oahu's population lives in the "city". This means the opportunity for illegally dumped, abandoned and derelict metallic bearing items is likely to be more prevalent in the rural outer areas of Oahu. SSHIC is located in Campbell Industrial Park and has more than adequate resources to service the entire island, and scrap shipments from neighboring islands.

The entire 5.89-acre SSHIC property is covered with a concrete cap. Asphalt covers the customer and employee parking areas. The cap is a minimum of eight inches in thickness throughout most of the facility and increases to twelve inches within the vicinity of the shredder and joint product foundations. The cap has been constructed with its lowest elevation located near the shredder's downstream processing system.

SSHIC completed a storm water improvement project that allows the facility to become a zero discharge facility. The improvement includes a larger holding tank and will allow for captured storm water to be reused in various dust suppression and recycling operations around the facility.

As previously mentioned, SSHIC utilizes "best available technology" within its processing techniques; this technology includes damp shredding technology. The benefits from damp shredding includes: more efficient use of recycled and potable water, water is metered based on shredder revolutions per minute (RPMs) and injected directly to shredder chamber, damp technology greatly reduces and mitigates airborne particulates that are generated from shredding automobiles, appliances and other metallic debris when compared to using dry shredding technology. SSHIC also uses foam additives for additional dust suppression in its metal shredding activities.

The SSHIC facility provides both significant environmental and economic benefits to the public. SSHIC promotes expeditious, competent and permissible removal of end of life vehicles, appliances and other metallic bearing items from back roads and vacant lots. This practice reduces the potential for illegal waste disposal practices.

Besides reducing illegal dumping, SSHIC's operations help to protect the environment in other ways. For example, SSHIC participates in the Fishing for Energy Program, through which obsolete fishing gear is sorted for metals recycling by SSHIC, and non-recyclable material is converted to energy at third-party locations. SSHIC also shreds large ocean plastics so they can be more easily transported. SSHIC supports the Aloha Aina Recycling Drives in Oahu in partnership with the Kokua Hawaii Foundation, a non-profit specializing in community-based recycling and education programs. SSHIC donates all proceeds from the drives to local schools. The proceeds from the scrap drives are used to purchase school classroom supplies, school garden supplies, and food at student club meetings.

Per the facility plot plan and facility layout, the bordering facilities include other industrial operations and a neighboring community park. It should be noted that in 2013 SSHIC formally adopted the Barbers Point Beach Park and routinely cleans and maintains the park. The facility's impacts on land use, if any, continue to be minimal. Existing neighboring activities include: construction, light to heavy industrial, manufacturing, end of life vehicle storage, waste management, and recycling operations.

2.0 Adverse Environmental Effects

Through the processing of various scrap metal commodities, material containing residual petroleum fluids and other pollutant sources has the potential for a release into the environment. However, SSHIC employs industry recognized best management practices using processing systems and protocols currently implemented in California. These systems and protocols include an all-encompassing scrap acceptance policy, secondary containment, spill cleanup and disposal techniques, and an extensive environmental, health and safety training program (among others).

SSHIC has over 100 years of combined industry experience in the receipt and processing of scrap metal. SSHIC has a proven track record of compliance and is dedicated to maintaining its proven reputation as an industry leader. SSHIC continuously maintains a stringent response and clean-up protocol with regard to release prevention and spills (should they occur).

3.0 Alternatives to the Proposed Action

The primary alternatives to the proposed action would be the development of a similar operation at another location, dispose of valuable scrap commodities in the landfill, or to ship recyclable scrap metal off island unprocessed for processing (shredding) on the main land.

As stated before, SSHIC is an industry leader with over 100 years of experience in the metals recycling business. What makes SSHIC unique is its shredding operation. SSHIC has an adequate staff of engineers and maintenance personnel who are dedicated to ensuring the shredding operation is compliant, efficient and produces little to no impacts to the environment. Another facility potentially looking to operate a facility similar to SSHIC would need to ensure the same. It is unlikely that another facility on Oahu has the means or experience to efficiently and effectively operate a metal shredding operation in a fully compliant manner.

The alternative as mentioned above, transporting miscellaneous scrap material off island and back to the mainland for shredding is totally unacceptable both environmentally and economically. Without a properly permitted and operating shredding facility on Oahu, the mounting volumes of end of life vehicles, appliances, and shreddable scrap metal will cause immeasurable environmental damage and result in a major blow to the island's tourist based economy.

Likewise, disposing of valuable scrap material in the local landfill would unnecessarily consume landfill capacity, fail to recognize the economic benefit of scrap metal's inherent value, cause increased greenhouse gas emissions to replace the utility of the disposed metal through

mining and smelting of virgin iron ore, and promote illegal dumping as a means of avoiding landfill tipping fees.

The only other possible alternative would be developing some form of manufacturer / importer / retailer responsibility, and requiring all businesses and individuals that bring vehicles and scrap on to the island to simply ship them back off. Attempting to place the sole responsibility for removal on the importer is not feasible, either politically or economically.

4.0 Local Short-Term Uses / Enhancement of Long-Term Productivity

The current activity is deemed appropriate for the site, and the property has obtained the required zoning for the parcel. The establishment of a scrap metal recycling operation in Campbell Industrial Park has enhanced the productivity of adjacent businesses. SSHIC acts as an outlet for scrap metal collected at neighboring properties.

Looking at the larger island-wide perspective, the operation has increased the economic productivity of the community by reducing the costs to the public and to businesses of managing their scrap, while enhancing the local environment and improving the tourist experience.

The facility maintains an Emergency Contingency Plan in the event of a critical equipment failure or unforeseen interruption in service to ensure continued operations. The facility Closure Plan guarantees that should the facility cease operations in the future, any facility-related environmental effects will be appropriately remediated, with the property returned in its original condition.

5.0 Irreversible Commitment of Resources

While the facility requires a commitment of space and expenditure of energy, these impacts are unavoidable since the volumes of scrap metal on Oahu and the neighboring islands must be properly managed. The current operation has resulted in a reduction in spatial requirements, energy consumption and overall environmental impacts when compared to the haphazard,

inefficient, and environmentally unsatisfactory manner in which scrap metal and end of life vehicles were being handled previously and/or by other scrap metal facilities.

6.0 Optimum Balance between Environment and Economy

SSHIC's presence in Oahu has resulted in a win-win situation for the environment and the economy (including tourism). The facility, by expediting the processing and removal of end of life vehicles and scrap metal has assisted in minimizing what had previously been a major environmental blight to the islands. SSHIC's function in shredding and removing end of life vehicles, scrap metal and old appliances from the state has helped to promote a more sustainable culture for the Hawaiian Islands as a whole. At the same time, by utilizing the best available technology and maximizing market value of the processed material, SSHIC is providing residents and local businesses with the lowest cost solution to a previous economic problem.

7.0 Consistency with the County Integrated Solid Waste Management Plan

SSHIC is consistent with the State Integrated Solid Waste Management Act (HRS Chapter 342G) and the County's Integrated Solid Waste Management Plan. SSHIC is currently the only known recycling facility of its kind in the State. It is highly unlikely that the State of Hawaii will ban the sale of new automobiles, appliances, and other items made from steel, which would be one alternative that could be implemented to attain the same objective, i.e., the diversion of metallic bearing items from the State's solid waste stream.

SSHIC is essential to the State of Hawaii in that SSHIC provides a recycling service for metallic bearing items that have reached the end of their useful life.

Through the well-executed and sustained partnership of SSHIC and the State of Hawaii, there has been a noticeable achievement made in the diversion of ferrous and non-ferrous scrap metal from illegal dumping or landfill disposal. This partnership has thoroughly assisted in the efforts to meet and exceed the solid waste diversion goals. SSHIC continues to meet the need for an environmentally sound operation to appropriately manage valuable wastes generated through the collection of scrap metal.

8.0 Public Input Relating to Impact of Facility

The requirement for public review and comment under HRS Chapter 343 is not implicated by SSHIC's permit renewal.

ATTACHMENT P-3
SITE ANALYSIS, FACILITY DESIGN, AND OPERATIONS PLAN
RECYCLING AND SALVAGE FACILITIES
SOLID WASTE PERMIT APPLICATION

Submit a Site Analysis, Design, and Operations Plan for the facility. Any information requested below that is not applicable should be justified.

1. **Site Analysis.** Submit a site analysis of the facility that includes at a minimum the following:

   a. Location and operations of all structures including receiving, storage and processing areas on the site (listing storage and processing capacities for each material type received), offices, maintenance areas, planned areas for expansion, and property boundaries. Discuss adequacy of the land available for the proposed activity, including turnaround areas for vehicular traffic.

   b. Impacts on neighboring properties and measures taken to mitigate interference with those existing or anticipated uses. This evaluation should include the identification of any nearby surface waters, wetlands, or other sensitive environmental areas.

2. **Facility Design and Operation Plan.** Submit a written operation plan for the facility that includes at a minimum the following:

   a. Identification and qualifications of the individuals in charge of the facility operations, individuals that are trained to operate the equipment at the facility, and individuals requiring specific licenses or certificates (i.e. refrigerant removal).

   b. A general description of the facility including relevant design concepts and construction drawings. The description should discuss facility capacity in terms of throughput and storage, contingency plans in the event of equipment failure, inability to dispose of or distribute the processed material and regular maintenance requirements.

   c. Description of the sources and types of recoverable materials to be collected, stored, treated, and/or disposed; and expected volumes/tonnages. Describe the method of collection and transportation of recoverable materials to the facility. Identify any tests or screening methods that will be utilized to determine that the material is acceptable. Describe any voucher/transaction system used to provide a record of solid waste transactions as it applies to your operation. All records of testing and transactions are required to kept for a period of five years.

   d. Description of how all accepted waste, rejected or bypass waste, residue, and recovered recyclables will be weighed or measured.

   e. Description of the operational procedures involved. Provide a step-by-step description of the process from receipt of waste through screening, processing, storage, and disposal/recycling. Include a process flow diagram detailing this process, with equipment identification numbers, and specifying storage and processing capacities for each type of recyclable accepted, and any residuals resulting from the process or storage.

   f. Description of the type and number of equipment and storage containers to be used at the facility. Describe how the equipment will be used in the operation of the facility. Include the manufacture's performance data for each process equipment unit, fixed or mobile, including: type of device (loader, baler, shredder, screener, etc.), process flow diagram number, material process (type of material, amount, end product, residual), and design rated capacity. Describe the type and number of storage containers used,

material that will be stored in the container, storage capacity (weight [tons or pounds] and volume [cubic yards]) and spill catchment/leachate collection system.

g. Description of the final disposition of recyclables and waste. All solid waste passing through the facility shall be recycled, or disposed of at a permitted solid waste management facility. Recyclables may be sold to end markets. Discuss the frequency of removal of each type of recyclable, rejected/by pass waste, or residual, and its destination.

h. Discussion of all environmental controls. The discussion should include the facility design and operational procedures to be used to prevent contamination of soil, groundwater and surface waters (including description of ground surfacing). Discuss how leachate will be collected and managed. Include response procedures and sampling plan in the event of an unplanned release of a contaminant into the environment. The sampling plan may be revised, depending on the nature of the suspected release to the environment.

i. Description of the facility's drainage system to prevent standing water and to control "run-on" and "run-off" of rainwater.

j. Discussion of the design and operational procedures to minimize and control vectors, odors, litter, dust and other nuisances. The facility shall maintain a neat and orderly appearance and design elements must be included to screen and buffer the operations to minimize nuisances to neighboring properties.

k. A fire prevention and response plan to mitigate fire hazards (i.e. design and operational controls) and detail responses should a fire occur (i.e. fire control devices, access for fire department personnel and equipment).

l. The design for access control, and fencing. Describe measures, such as fencing, gates or natural barriers to restrict and control public access onto the facility.

m. A copy of a posted sign that displays owner or operator of the facility, the hours of operation and a contact in case of emergency. The sign shall clearly state which wastes are or are not acceptable at the site.

n. Discussion on the types of operational records to be maintained. At a minimum, operational records shall be maintained and shall include a daily log of the volume or weight of each type of materials received, rejected, processed, recycled and/or disposed; and the final destination of each material. An annual report shall be submitted to the Department reporting the quantities and types of waste received and processed; the origin and transporter of the solid waste and the ultimate disposal/recycling site.

ATTACHMENT P-3
SITE ANALYSIS, FACILITY DESIGN, AND OPERATIONS PLAN
RECYCLING AND SALVAGE FACILITIES
SOLID WASTE PERMIT APPLICATION

SCHNITZER STEEL HAWAII CORP.
KAPOLEI, OAHU

OPERATIONS MANUAL

Schnitzer Steel Hawaii Corporation,
91-056 Hanua Street
Kapolei, Hawaii 96707

Updated: March 2020

TABLE OF CONTENTS

Appendices & Attachments

Attachments

1.0 General Description

1.1 OWNER & OPERATOR

Schnitzer Steel Hawaii Corporation (SSHIC) is a Delaware Corporation. SSHIC's principal office is located at:

Schnitzer Steel Hawaii Corp.
91 - 056 Hanua Street
Kapolei, Hawaii 96707
Telephone (808) 682-5810
Facsimile (808) 682-0604

Key Personnel:

Name	Title	Years of Service
Nick Garofalo	General Manager	8
Drew Coats	Facilities & Operations Supervisor	6
Bryan Graham	Regional Environmental Manager	10
Scott Sloan	Environmental Vice President	12

1.2 TAX MAP KEY

a. The tax map key for the facility is: (1) 9-1-26:25
b. The USGS quad is: Ewa Quad

1.3 SITE INFORMATION

The facility is located at 91-056 Hanua Street, Kapolei, Hawaii 96707. The site topography is relatively flat with the Pacific Ocean approximately 500 feet to the south. The site encompasses approximately six (6) nearly level acres of land which is located within Campbell Industrial Park. The entire facility is paved with concrete and/or asphalt. Drainage channels run along the western and southern boundaries of the property. Due to the close proximity to the ocean, groundwater is brackish and there are no drinking water wells on or near the property. First encountered groundwater is at approximately six (6) to seven (7) feet below ground surface. Access to the facility is from a public roadway off of Hanua Street.

The facility consists of five (5) buildings. The first building, located at the front entrance to the site houses the office and maintenance shop.

The second building, which is of concrete block construction, houses the compressors and Motor Control Center (MCC) for the Joint Products (JP) Production Line.

The third building, which is located in the southwest area of the yard, is the shredder, shredder maintenance tool room, the shredder MCC, the 4,000hp electric motor, hydraulic room, and shredder operator cab.

The fourth building, which is located in the extreme northwest corner of the property, is of hollow tile construction and houses the employee lunchroom, shower and rest room facilities.

The fifth building which is of concrete block construction, houses the spare 3,000hp motor and mobile equipment filters. It is located on the north side of the yard.

1.4 PLOT PLAN

A plot plan is found at Appendix A of this manual.

1.5 GENERAL FACILITY DESCRIPTION

SSHIC purchases scrap metals (ferrous and non-ferrous) materials in the form of automobiles, appliances, white goods, cast steel and other metals which are brought to the facility by truck. The transport vehicle is weighed and unloaded. The metal is sorted and processed on-site where it is shredded, prepared, stockpiled or loaded into shipping containers. SSHIC is typically open Monday through Friday 7:00 AM to 3:00 PM. The facility is generally closed on Sundays, but also with operations on select Saturdays from 7:30 AM to 11:00 AM.

Ferrous scrap metal is generally stored in piles near the central portion of the facility. Non-ferrous metals are stored and organized by commodity type in the non-ferrous area which is located in the northwestern portion of the yard.

On-site activities, which are several, include the processing and movement of scrap metal, storage and use of petroleum lubricants and fuels in mobile equipment (i.e., yard equipment and vehicles).

Regular maintenance on equipment and vehicles is conducted within an on-site maintenance bay that is attached to the main building.

SSHIC was previously approved for modifications to the existing solid waste management permit from the Hawaii Department of Health (DOH). These modifications allow SSHIC to begin purchasing Electronic Scrap (E-Scrap), begin processing vehicles and equipment with fluids (wet cars), and begin processing whole appliances (white goods). Each item specified has been operationally outlined within this plan. The activities described above have not yet started. When these activities do commence Schnitzer Steel will remain committed to operating in a safe and environmentally friendly manner.

2.0 Operations

2.1 OPERATION PROCEDURES

Scrap metal, including processed automobiles and other obsolete metallic items are delivered to SSHIC's scale by the City & County of Honolulu, State of Hawaii, independent demolition contractors, automobile dismantlers, and the general public. Each truckload of scrap delivered to the facility is inspected by an employee (inspector) prior to acceptance. The standard the inspector uses to determine if metallic items can be accepted for recycling is detailed at Appendix F. The scrap inspector reports directly to the stockpiling supervisor and has full authority to reject any load that does not meet SSHIC's quality standards. If a truckload of scrap metal is determined to be unacceptable, because it does not meet the Company's quality standards, the load is rejected. The driver is given the reason for the rejection and is asked to remove the scrap from the premises. Truckloads of scrap that are accepted for recycling are directed to the appropriate area within the facility for unloading. Acceptable material is generally grouped into five categories: 1) Shreddable Material, 2) Unprepared Heavy Melting Steel, 3) Prepared Heavy Melting Steel, 4) Non-ferrous Metal and 5) E-Scrap.

SSHIC conducts ship loading operations once per quarter at Barbers Point shipping terminal. Flatbed trucks with bins are loaded with ferrous scrap metal. The scrap metal is hauled to Barbers Point, where the metal is loaded by crane onto ocean going bulk cargo ship carriers for export to foreign steel mills. Non-ferrous scrap metal is loaded into land sea containers and is shipped overseas per the requesting customer's specifications. Potential E-Scrap received by the facility is loaded into

land sea containers and shipped to downstream facilities for eventual processing. No E-Scrap processing will be conducted on SSHIC premises.

2.2 SHREDDABLE MATERIAL

Scrap metal accepted in this category is defined as processed automobile shells, appliances, white goods, light gauge sheet metal and any other metallic bearing items whose metal is less than one-quarter (1/4) of an inch in thickness. Shreddable material is unloaded in the area designated on the Plot Plan map (See Appendix A) as shreddable raw material storage area.

Shreddable material is hoisted from the raw material storage areas onto a steel conveyor with either one of two Sennebogen 840 Material Handlers, or a Caterpillar 345/or 349 Excavator equipped with a scrap grapple. The steel conveyor then transports the shreddable material up to an elevated steel infeed chute. The shreddable material slides down the infeed chute and is introduced into the shredder, where it is shredded into fist-sized pieces of recycled steel scrap, known in the industry as Shredded Scrap.

A mixture of shredded scrap, non-ferrous metal (i.e., aluminum, brass, copper, stainless steel, etc.) and waste, (i.e., upholstery fabric, rubber, plastic, glass, etc.) - commonly referred to as Shredder Residue (SR) is sized within the shredder's internal chamber and falls from the bottom of the shredder through grates and onto a vibrating pan located beneath the shredder. This mixture shakes off of the vibrating pan onto an elevating conveyor to the Ferrous downstream where the separation process begins.

The Ferrous downstream houses the ferrous steel and non-ferrous separation equipment. The mixture of shredded scrap, non-ferrous metal, and SR (mixture) is conveyed from the shredder into the Z-box, which is designed to split the ferrous and non-ferrous fractions from the SR fraction.

Gravity forces the material to drop through the Z-box, which is a rectangular steel box, with steel liner plates bolted onto the sides of the box, and a series of deflector plates welded at 45 degree angles inside the chamber. The mixture deflects off each plate as it drops through the Z-box and passes through a forced air stream, generated by a 250 horsepower fan. The fan produces airflow of 34,000 cfm from the fan to the bottom of the Z-box. This flow combined with approx. 11,000 cfm of air from the atmosphere, results in an air flow of approx. 45,000 cfm on the top side of the Z-box – and creates a suction system which removes the SR from the mixture as it falls through the Z-box. The SR fraction is

drawn off the top of the Z-box. The metallic fractions (i.e., ferrous and non-ferrous metal), drop through the air stream, and fall to the bottom of the Z-box onto a vibrating conveyor. The vibrating pan conveys the metallic fraction to the first of two ninety-six (96) inch rotary magnets.

Both magnet drums spin in a counter clock-wise rotation. The first magnet magnetizes the steel portion of the metallic fraction carrying the ferrous scrap over the top of the magnet, where it is dropped onto a small vibrating pan located between the two magnets. The non-metallic fraction drops beneath the magnet onto a transfer conveyor located beneath both magnets and the vibrating pan. The vibrating pan conveys the steel to a second rotary magnet where the magnetizing process is repeated, i.e. the ferrous fraction is carried over the top of the magnet and any tramp non-ferrous material drops beneath the magnet and onto the transfer conveyor. After passing over the second magnet, the ferrous fraction is dropped onto a picking conveyor. The picking conveyor is designed with four picking stations, where tramp non-metallic debris, insulated copper wire and small electric motor armatures are removed by hand.

The picking conveyor transports the steel scrap to the radial stacking conveyor, where it is dropped into the shredded scrap storage area detailed on the Plot Plan map at Appendix A. A Caterpillar D6 track dozer is used to trim the shredded scrap into the shredded stockpile for eventual loading onto ocean going bulk carriers for export to foreign steel mills.

The non-ferrous fraction consisting of non-ferrous metal and non-metallic materials (Non-Ferrous Raw or NFR), drops beneath the two magnets and onto the non-ferrous transfer conveyor, is conveyed to the north side of the downstream building over to a Bivi-Tech Shaker Conveyor where a magnet separates and sends off the stray ferrous metals to the ferrous bunker, and drops the remaining non-ferrous fraction into the non-ferrous bunker below (detailed on the Plot Plan map at Appendix A).

The SR which has been separated from the metallic streams in the Z-box and is conveyed into the air cyclone. Gravity drops the SR to the bottom of the cyclone, where it passes through an air lock and is dropped onto a transfer conveyor.

Offline processing of non-ferrous residue normally takes place when the shredder is down for maintenance and on Monday's when the shredder is normally not in operation.

NFR is picked up from the non-ferrous storage bunker with a Front End Loader (Volvo L220F or Cat 980), and dumped into the Hustler hopper conveyor positioned adjacent to the storage bunker. The non-ferrous residue drops onto a transfer conveyor where it is conveyed to the Joint Products Plant (JPP). The JPP separates metallic and non-metallic fractions of the NFR into an SR fraction and a clean non-ferrous metal product. The SR is conveyed into the Waste Bunker and the clean non-ferrous metal fractions are conveyed to the Non-Ferrous Storage Bunker. After weighing, the metallic non-ferrous fractions are transported to the Non-Ferrous Storage Bunkers detailed on the Stationary Equipment Location and Plot Plan maps, for eventual loading into shipping containers and export to foreign and domestic smelters.

2.3 UNPREPARED HEAVY MELTING STEEL - SHEARING

Scrap metal graded by the Inspector as Unprepared Heavy Melting Steel, is defined as ferrous scrap steel which is one-quarter (1/4) of an inch or greater in thickness, is greater than 2' in width and/or more than 5' in length.

A Sennebogen 850 Hydraulic material handler equipped with a MSD 4500 Hydraulic Shear cuts the unprepared HMS scrap into prepared pieces that have a maximum width of 2' wide and a maximum length of 5' to conform to the industries specifications for No.1 Heavy Melting Steel (No.1 HMS).

After shearing, the recycled steel is then stockpiled in the No. 1 HMS Storage area (as detailed on the Plot Plan map) for eventual export via ocean going bulk carriers to foreign steel mills.

2.4 UNPREPARED HEAVY MELTING STEEL - TORCHING

Scrap metal graded by the Inspector as Unprepared Heavy Melting Steel-Torching, is defined as ferrous scrap steel which is greater than 1" thick or steel cable.

Scrap metal greater than 1" thick or cable is directed by the inspector to the south side torch cutting area (as detailed on the Plot Plan Map, Attachments A). Trained employees will use oxygen/acetylene torches to cut the material into prepared pieces that have a maximum width of 2' wide and a maximum length of 5' to conform to the industry's specifications for No. 1 Heavy Melting Steel (No. 1 HMS). The Steel will then be transported to the No. 1 HMS Storage Area on the east side of the yard.

After torching, the recycled steel is then stockpiled in the No. 1 HMS Storage area (as detailed on the Plot Plan map) for eventual export via ocean going bulk carriers to foreign steel mills.

2.5 PREPARED HEAVY MELTING STEEL

Scrap metal graded by the Inspector as Prepared Heavy Melting Steel has a minimum thickness of one-quarter (1/4) of an inch and has been processed by others to meet the international standard for No. 1 Heavy Melting Steel (i.e., 2' wide by 5' long). This type of scrap metal is directed by the Inspector to the No. 1 HMS Storage area where it is stockpiled for eventual export to foreign steel mills via ocean going bulk carriers.

2.6 NON-FERROUS METAL

Non-ferrous material, such as brass, aluminum, copper, batteries, E-Scrap, and stainless steel, are brought to the facility and are first inspected on the inbound customer scale. Once the Inspector has verified the material is acceptable, the customer proceeds to the non-ferrous collection and sorting area located in the northwest portion of the facility where the materials are sorted by type and grade. Next, the non-ferrous metals are weighed by the non-ferrous scale operator in the non-ferrous area. The material is sorted immediately. Batteries are palletized and stored in a secure and enclosed container. Non-ferrous containing materials are cut to size, placed in either Gaylord boxes or are baled and stockpiled. Prepared aluminum rims are stockpiled in a non-ferrous bunker. Once the facility has accumulated enough non-ferrous metal, it is packaged into land/sea containers and shipped overseas to the requesting customer.

2.7 JOINT PRODUCTS

The process begins with the Joint Product material being fed onto the Taper-Slot Screen which separates undersize non-ferrous material (0"- 1 ¾") from oversize non-ferrous material (1 ¾" +). The undersize material is then fed onto the Vibra-Snap Screen which has 5/8" holes where the material is separated further. Material that falls through the 5/8" holes is conveyed over a magnetic head pulley where residual ferrous is removed. The non-ferrous content proceeds to an Eddy Current Separator (ECS) where the aluminum and copper is then recovered, and waste material (also described as SR) is separated. Material that does not pass through the 5/8" holes continues on to the Dual Magnetic Separator (DMS) where ferrous metal is removed by a magnetic drum and a magnetic head pulley. Material that doesn't react to the DMS proceeds to an ECS where the aluminum and copper is recovered and conveyed on to a Poly Finder (PF) recovery unit where the stainless steel

and insulated copper wire are extracted. After the PF recovery process is performed any residual SR is discarded as waste.

The material that is separated at the Taper-Slot to become oversized is conveyed to the MOR (ferrous separator unit) which removes ferrous material with the use of a magnetic drum. Material that is non-reactive to the magnetic drum is fed onto another ECS where the aluminum and copper is again recovered. Once the aluminum and copper is removed from the oversized material, it's then fed onto the PF unit where the stainless and insulated copper wire is then extracted. The residual material from the over-sized process is now waste.

2.8 ELECTRONIC SCRAP

Only acceptable E-Scrap will be received by SSHIC (computer equipment including CPU's, printers, laptops, mainframes, routers, computer equipment including cable boxes; telecommunication equipment including desk and cell phone appurtenances, fax machines, transceivers, telecommunications electronics, and other equipment with electronic operation systems). Once verified, these materials will be sorted by type and grade. Next, the various E-Scrap components will be palletized and shrink wrapped or placed into plastic lined Gaylord boxes. All E-Scrap materials will be labeled, contained and stored under cover in forty-foot land/sea containers in preparation for a sale; to be sold within one year of purchase receipt at the facility. Once sold, the E-scrap will be shipped to the requesting customer. No E-scrap processing will be conducted on SSHIC premises. SSHIC is currently permitted to accept e-scrap; however, e-scrap is not currently accepted at the facility.

2.9 WASTE VEHICLE & EQUIPMENT PROCESSING

SSHIC currently accepts only processed vehicles and equipment from which all fluids and other hazardous components have been removed. SSHIC has been approved for modifications to the existing solid waste management permit to begin on-site processing of vehicles and equipment with fluids (wet cars). When SSHIC begins processing wet cars it will remove, sort and manage materials as defined under HRS Chapter 290, *Abandoned Vehicles*. SSHIC will recover waste fluids and solids to include gasoline, diesel fuel, waste oils and hydraulic fluids, lead acid batteries, mercury switches, Freon and waste tires. All regulated hazardous waste generated from processing waste vehicles and equipment as defined under 40 CFR section 261 will be handled in accordance with federal, state and local regulations according to whichever is most stringent. Unprocessed ELV's received by the facility would be stored unstacked adjacent to the non-ferrous entrance. The proposed storage area for unprocessed ELV's is 70 feet by 50 feet (3,500

square feet). Processing of ELVs and equipment would be done under cover and on a paved secondarily contained structure in the northern portion of the facility to prevent and/or mitigate the potential for inadvertent releases of regulated waste materials. Once ELVs and equipment have been processed and inspected, vehicles and equipment will be staged in the appropriate section of the facility in preparation for recycling. SSHIC can adequately store, sufficiently contain and appropriately manage a combination of up to 30 unprocessed vehicles and equipment at any time.

2.10 WHITE GOODS/SPECIAL WASTE PROCESSING

SSHIC currently accepts only processed white goods (refrigerators, freezers, air conditioners, clothes washers, dryers, gas ranges, stoves, and water heaters) as defined in HAR Chapter 11-58.1-03. SSHIC has been approved for modifications to the existing solid waste management permit to begin preparing unprocessed white goods for recycling. When SSHIC begins preparing unprocessed white goods it will recover special waste, chlorofluorocarbons (CFC's) and hydro-chlorofluorocarbons (HCFCs), mercury (Hg) switches, polychlorinated biphenyls (PCBs) and regulated hazardous waste (collectively Regulated Materials). These wastes will be properly stored, managed and disposed of in accordance with applicable federal, state, and local regulations following whichever requirement is most stringent.

White goods will be processed under cover and on a paved secondarily contained surface. A designated white goods processing area will be identified in the central portion of the facility near the unprocessed shred feed pile. The proposed storage area for unprocessed white goods is 20 feet by 25 feet (500 square feet). Each white good after being inspected and weighed will be unloaded in the designated area. Designated and trained employee(s) will remove Regulated Materials prior to the white goods being shred and recycled. SSHIC can adequately store, sufficiently contain and handle up to 200 unprocessed white goods at any one time.

2.11 SCRAP METAL STORAGE CAPACITIES

The facility as it is currently permitted, has the capability of storing 3,000 tons of raw shreddable material, 30,000 tons of shredded ferrous metals, 800 tons of shredded non-ferrous metals, and 15,000 tons of heavy melting steel.

2.12 STORAGE & PROCESSING AREAS

An 8 to 12 inch thick asphalt-concrete cap covers the entire surface of the facility. Storage areas for raw and finished products are eight inches thick, and the shredder processing areas are twelve inches thick. The Employee and guest parking areas are capped with an asphalt surface.

In order to prevent the incidental release of shredded scrap material on to adjacent neighboring property, SSHIC has implemented a setback requirement for the shredded scrap material pile. Shredded scrap metal will not be stored within 18 inches from the top of the southern property boundary wall. Also, material piles which are stockpiled adjacent to a fence or gate that contains a permeable structure will be kept 5 feet away from the described barrier. Visual inspections to the wall will be conducted periodically to ensure the wall is structurally sound to prevent the release of shredded scrap metal. Should deficiencies or damage to the wall be observed, corrective action to make repairs will be taken to abate the damage.

Permitted maximum storage quantities for other materials are as follows:

- Fishing Nets – 30 tons or approximately (2) 40-foot containers
- Lead Acid Batteries – 2000 units
- Propane Cylinders – 75 units
- Shredder Residue (SR) – 200 tons
- Waste diesel/gasoline – 800 gallons
- Used oil/brake/transmission/power steering fluids –1000 gallons
- Anti-freeze/radiator fluid –500 gallons
- Freon –1500 pounds
- E-Scrap –2 forty-foot land sea containers via a combination of pallets and Gaylord boxes
- Tires – 1,000 waste tires

2.13 EQUIPMENT LIST

1. SENNEBOGEN 840 MATERIAL HANDLER/GRAPPLE-Unit #HK 10
2. SENNEBOGEN 840 MATERIAL HANDLER/MAGNET- Unit #HK 12

3. SENNEBOGEN 850 MATERIAL HANDLER/SHEAR- Unit #HK 11
4. VOLVO L220F FRONT END LOADER- Unit #HK L-1
5. BOBCAT MT52 MINI LOADER- Unit #HK-180
6. CATERPILLAR 980H FRONT END LOADER
7. TAYLOR T52 FORKLIFT- Unit #HK F-1
8. CATERPILLAR DP-40-K 4-TON FORKLIFT-Unit #HK F-2
9. CATERPILLAR DP-50 FORKLIFT- Unit # HK F-4
10. CATERPILLAR D-6 DOZER
11. INTERNATIONAL 4900 WATER TRUCK-Unit #HK59
12. 60 YARD END DUMP GLOBE-Unit #HK-DUMP1
13. LABOUNTY MSD 175 & 4500 HYDRAULIC SHEAR ATTACHMENTS
14. LABOUNTY HDR 160 HYDRAULIC GRAPPLE ATTACHMENTS 4EA.
15. NEWELL 8104 SUPER HEAVY DUTY SHREDDER Unit # HK-S-1
16. 2 YARD ROTOBEC 4 TINE ORANGE PEEL GRAPPLE (2)
17. ALJON BALER Unit #309
18. BUFFALO TURBINE (2) –Dust Suppression Unit# BL0720 & BL0736
19. OTTAWA YARD TRUCK Unit # HK-150
20. 30 TON CRANE Unit #HK 175
21. GENIE ELECTRIC SCISSOR LIFT - Unit # GS3126
22. GENIE MAN LIFT – Unit # S-85
23. GODWIN PUMP – Unit # HK-152
24. YALE PROPANE FORKLIFT – Unit # FL571L
25. CATERPILLAR 345 TRACKED EXCAVATOR – Unit # SJ30
26. CATERPILLAR 980 FRONT END LOADER – Unit #LW2316
27. CATERPILLAR 246 SKID STEER – Unit # SS2247
28. CATERPILLAR 246 SKID STEER – Unit # SS0440

Sennebogan and Caterpillar Hydraulic Excavators (Items No. 1-3, 25)

These machines are mobile hydraulic cranes, which can be equipped with either a LaBounty MSD 175 or 4500 Hydraulic Shear attachments, or a Rotobec 2 yard Hydraulic Grapple attachment. This equipment is used to load scrap onto the shredder's infeed conveyor, or shear unprepared heavy melting steel scrap into specifically sized pieces.

Taylor, Caterpillar and Yale Forklifts (Items No. 7-9, 24)

These machines are primarily used to unload/load bins and/or palletized scrap metal.

Caterpillar, Volvo and Komatsu Front End Loaders (Items No. 4-6, & 26)

These machines are used primarily to load trucks with either steel during ship loading events or SR during waste hauling events.

Caterpillar Bulldozer (Item No. 10)

The bulldozer is primarily used to stockpile shred material.

LaBounty MSD 175 & 4500 Hydraulic Shear Attachment (Item No. 13)

These attachments are fixed to either of the Sennabogan or Caterpillar Hydraulic Excavators (Items No. 1-6) and are used to shear unprepared heavy melting steel into a specifically sized product (i.e., No. 1 Heavy Melting Steel).

Caterpillar 246 Skid Steer Loaders (Items No. 27-28)

These machines are small rubber tired front-end loaders and are used for utility functions within the facility (sweeping, loading containers, etc.).

International 4900 Water Truck (Item No. 11)

The water truck is used to manage dust generated from processing, handling and storing scrap metal. The water truck can also be used as a means of fire suppression by way of the devoted water cannon.

LaBounty HDR 160 Hydraulic Grapple Attachments (Item No. 14)

These attachments can be mounted on any of the hydraulic excavators (Items No. 1-3) and are used to load scrap onto the shredder's infeed conveyor and load/unload trucks delivering or hauling scrap out of the facility.

Newell 8104 Super Heavy Duty Shredder (Item No. 15)

This 4,000 horsepower electric driven machine shreds whole automobiles, and other light gauge metallic bearing items into fist sized pieces of steel scrap, known in the industry as shredded scrap. The machine has an average throughput capacity of 170 gross tons per hour with an out range of 80 gross tons to 120 gross tons per hour.

Aljon Baler (Item No. 17)

This machine is used to compress processed nonferrous scrap metal into compact bales that are easy to handle, transport and store.

Buffalo Turbine (Item No. 18)

These dust suppression units apply water to material stockpiles to control any possible fugitive dust.

Ottawa Yard Truck (Item No. 19)

Facility truck with a fifth-wheel attachment used for moving containers, trailers, and other wheeled attachments.

30 Ton Crane (Item No. 20)

This machine is used for moving heavy objects, typically by suspending them from a projecting arm.

3 Control Plans

3.1 FACILITY ACCESS

The western, eastern, and southern property lines are fenced with a custom designed concrete paneled wall. The northern property line is fenced with a traditional chain link fence. All office entrances are alarmed which is provided by Alert Alarm of Hawaii. The facility is monitored with security cameras and recorded on a hard drive.

3.2 DRAINAGE

The topography of the entire facility has been designed to capture and convey all storm water runoff for use on site in controlling fugitive dust. The concrete areas in the facility are graded toward the shredder downstream building (see Appendix A for location) and a berm was installed in August of 2009 at the entrance of Gate #2. A large above ground storage tank in the southwestern corner of the property is used for water storage capacity. No water runoff from finished product storage areas leaves the premises.

SSHIC completed an upgrade to its existing stormwater infrastructure. The completed stormwater project captures potential outfall discharge at gate 1 through installation of an asphalt berm at the gate 1 entrance. Stormwater collected near the Gate 1 area is pumped along the North Side wall, cornering the West side wall, reaching the new water storage tank located at the southwest corner of the yard. In addition, the existing sumps were upgraded with an underground piping system. The new piping pumps the stormwater to the third sump located in between the shredder and joint product plant. The final underground piping connects sump 3 to the separator and filter (sediment basin equipped with a

backwash sediment basin) where the clean water is then pumped into the water storage tank.

Also, reclaimed stormwater is used as a control measure for dust suppression via the water truck and torch cutting emergency fire suppression.

3.3 FIRE PREVENTION AND RESPONSE

The Fire Control and Response Plan is found at Appendix C.

3.4 DUST, ODOR, AND VECTOR CONTROL

Normally there is no fugitive dust generated during processing operations. The facility is swept daily with a mechanical sweeper. A water truck is used when needed to control fugitive dust within the facility during normal processing operations. Two Buffalo Turbine Dust Suppression Systems have been employed for ship loading events to control and mitigate fugitive dust which may be generated from handling of material stockpiles. Best Management Practices are implemented to maintain a clean facility. Vectors, odors, and other such nuisances have not been noted since the facility began operation.

3.5 EMERGENCY ACTION PLAN

The facility's Emergency Action Plan is found at Appendix C for Fires and at Appendix D for General Emergencies and Tsunamis.

3.6 GROUNDWATER CONTAMINATION CONTROL PLAN

Since the entire facility is capped with concrete and asphalt, ground water contamination from facility operations is unlikely.

In the event that there is a suggested breach or preliminary evidence resulting from cracking or wear, and/or there is a strong indication that contaminants may present a risk to groundwater, appropriate sampling and analysis will be conducted in accordance with applicable regulations to evaluate the potential for a groundwater impact. Samples will be analyzed for appropriate constituents in order to evaluate the potential for an impact to groundwater. Samples will be analyzed, at a minimum, for lead, cadmium, PCBs and TPH. If warranted by sampling results corrective action measures will be employed in accordance with applicable regulations.

The concrete cap beneath finished product stockpiles is visually inspected periodically. Visual inspection to raw product stockpile

surface areas are made as the areas are exposed. Piles are shifted regularly to visually inspect the underlying surface.

3.7 STORM WATER POLLUTION CONTROL PLAN (SWPCP)

The SWPCP is found as Attachment C.

4 Waste Sampling and Analysis

4.1 WASTE SAMPLING

Sampling, analysis, and data review protocols for SR (Shredder Residue) were developed by W. Z. Baumgartner & Associates.

Since 1991, SSHIC dba Hawaii Metal Recyclers has analyzed its SR for various constituents in connection with the disposal of its SR. An analysis of these test results, some of which are on file with the DOH, shows that:

a. Concentrations of TPH in the SR are below the 30,000 mg/kg level specified in SSHIC's Solid Waste Management Permit.

b. Concentrations of the eight metals tested using TCLP are below thresholds which would designate the material as a characteristic hazardous waste under RCRA.

c. Concentrations of PCBs in the SR are below applicable EPA and TSCA regulatory limits.

Since historical records indicate that the SR generated by SSHIC from its recycling process have been consistently below applicable EPA, RCRA, and TSCA action levels, a quarterly sampling and testing regime has been established for SSHIC in consultation with operators of the Waimanalo Gulch Sanitary Landfill.

SR sampling and analysis protocols are found at Appendix E.

5 Reporting and Record Keeping

5.1 ANNUAL REPORT

An annual report will be submitted to the Department of Health, Solid Waste Branch and will conform to the format established by the DOH. A sample of the DOH data form is located at Appendix G.

5.2 RECORD KEEPING

Records of all monitoring and related requirements as outlined in the Solid Waste Management Permit shall be maintained for a minimum of 5 years.

6 Closure Plan

The Preliminary Closure Plan provides basic guidelines for actions to be taken at the time of facility closure. In accordance with the terms of the solid waste permit, SSHIC will conduct an assessment of the site in order to determine the potential presence of contaminants that may pose a threat to public health and the environment. The Closure Plan will be submitted to the Director at least ninety days prior to the closure of the facility.

The Closure plan will consist of, at a minimum, the following elements:

1. Initial inspection of facility: The facility will be assessed to determine potential areas of concern, such as cracked concrete, the above ground water holding tank areas, and vehicle and equipment maintenance area(s).

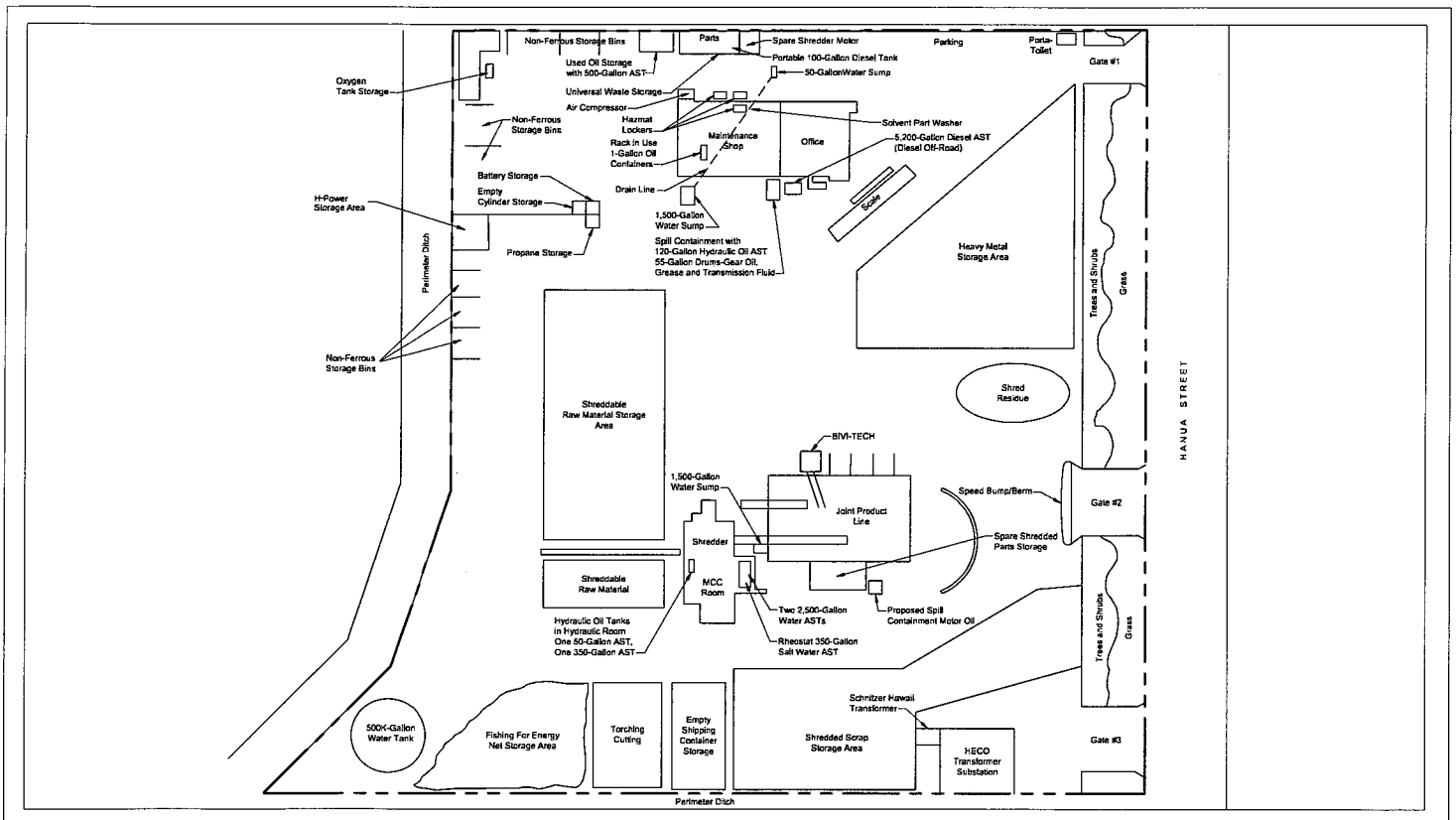
2. Soil and groundwater sampling: Soil and groundwater samples will be collected from areas where it is determined that a potential for contamination exists. For example, soil samples will be collected from the area of the neighboring drainage canal at the southern end of the facility due to a previous release of a small amount of shredded steel to this area (March 2015). Samples will be analyzed, at a minimum, for total lead, total cadmium, total PCBs and TPH. Additional sampling will be conducted as necessary to determine the extent of contamination exceeding applicable screening levels, if any.

3. Plan of Action: If it is determined that contamination does exist at the facility, and it is determined that the source of the contamination is the responsibility of SSHIC, a Corrective Action Plan will be developed that will address remediation options consistent with applicable regulations in effect at the time of closure.

4. SSHIC is deeply committed to Hawaii and the preservation of the sensitive environment. The company intends to maintain operations at its present location for the foreseeable future. SSHIC is a company whose partners have over 100 years of combined experience in the recycling business, and coupled with its financial

strength, has adequate resources to address closure requirements. It should be noted that if a closure of the facility takes place, any advances in technology could dictate changes in this plan.

APPENDIX A
PLOT PLAN



Legend:

Site Boundary

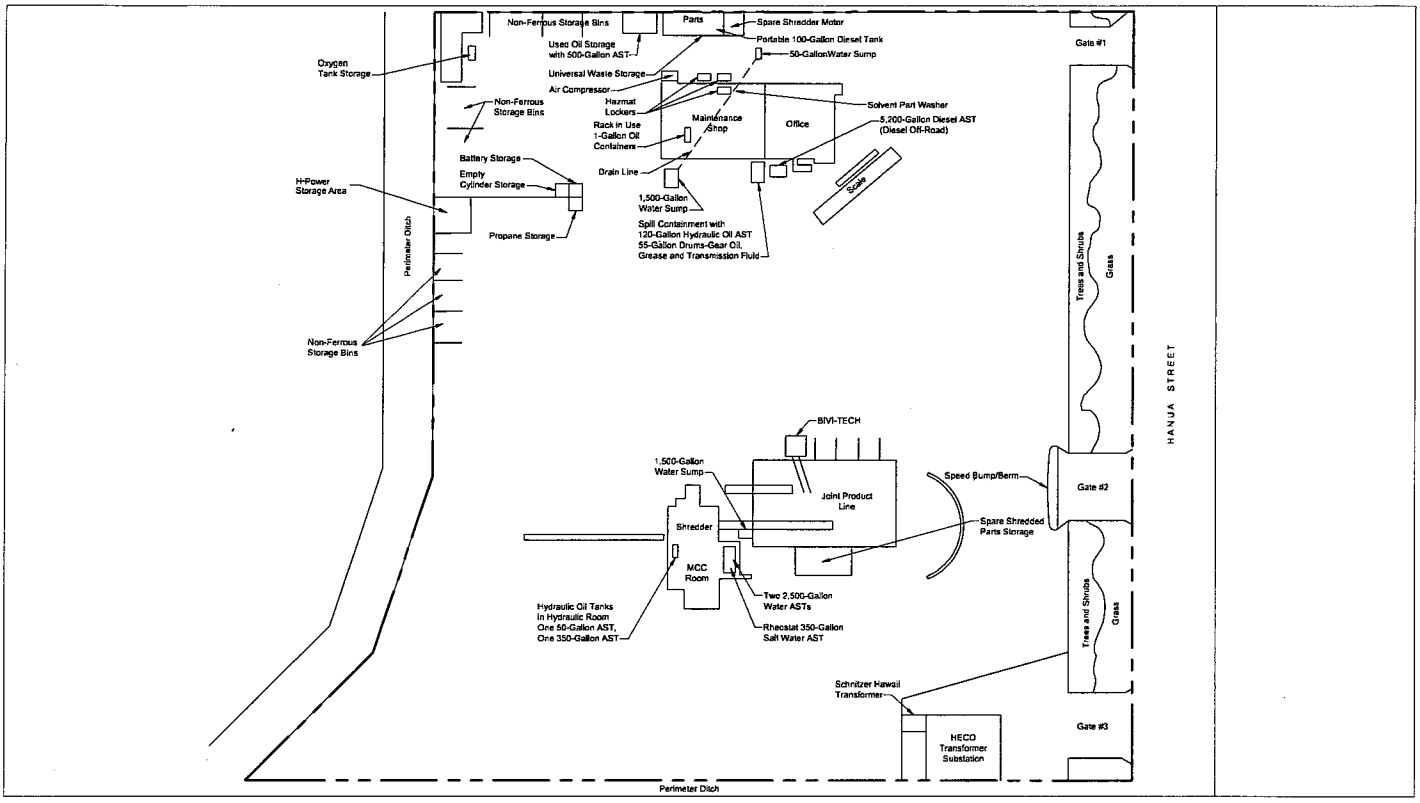
0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.		Plot Plan	Figure A
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/27/2020	Reviewed By: MCC	Client: Watanabe Ing LLP	

APPENDIX B
STATIONARY EQUIPMENT MAP



Legend:

Site Boundary

0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.		Stationary Equipment Map	Figure B
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/27/2020	Reviewed By: MCC	Client: Watanabe Ing LLP	

APPENDIX C
EMERGENCY ACTION PLAN – FIRE RESPONSE

EMERGENCY ACTION PLAN – FIRE PREVENTION PLAN

Purpose

The Fire Prevention Plan (FPP) aims to identify, control, and prevent the loss of life, property, and harm to the environment due to fire related incidents. The purpose of the FPP is to comply with applicable Federal, State, and Local standards pertaining to fire prevention. The FPP also provides guidelines for the safe control of incipient stage fires. Any fire beyond the incipient stage must adhere to the Emergency Evacuation Plan procedures.

Objective

The Fire Prevention Plan aims to address the following:

- Survey the workplace for potential fire hazards, sources of ignition, and implement control measures.
- Identify hazardous materials and storage procedures.
- Develop specific work procedures to control and combat incipient stage fires.
- Identify regular maintenance practices to safeguard fire prevention equipment.
- Specify qualified individuals responsible for maintaining fire prevention equipment.
- Specify qualified individuals responsible controlling incipient stage fires & training.

Responsibilities

General Manager and/or Facility & Operations Supervisor shall be:

- Responsible for the implementation of the FPP & immediately notifying the local fire or police department in the event of a fire affecting the facility (beyond the incipient stage).
- Responsible for the determination and initiation of the "Emergency Action Plan" for fire related events.
- Reviewing the plan as necessary and providing copies of the plan at the request of an employee or regulatory official.
- Designating an alternate emergency coordinator in the event of absent from location & coordinating fire safety training.
- Providing copies of the written FPP to employees (by request).
- Assign Names or regular job titles of those responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires.

Employees shall:

- Be responsible for reporting any known fire related hazard in the workplace.
- Follow FPP related protocols.
- Never engage in any type of fire prevention and/or control without proper training, sufficient equipment, communication measures, and the necessary personnel.

Technical Responder shall be:

- A qualified, (by Schnitzer Steel) trained employee, in the principals of fire prevention safety and demonstrate physical skills in the control of incipient stage fires.

Procedures

1) Fire Prevention Survey

- A fire prevention survey is to be conducted to determine potential fire hazards and their associated controls in the event of a fire
- The survey may be conducted by an individual who has completed the training requirements within this plan

2) Potential Incipient Stage Fire Hazards (Awareness)

- Scrap Piles (Ferrous and Non-Ferrous) - Scrap piles have the potential to combust and produce a fire due to the combustible nature of motor oils, residual fuels, friction, and the combination of various metal compositions, which can be (potentially) mixed into a scrap pile.
- Automobile/Vehicle Storage - All vehicles received into the facility must be decanted to mitigate fuel and ignition sources, such as motor oils, fuels, batteries, etc. If a vehicle is processed without proper decanting, the potential for a "wet" auto body related fire becomes inherently realized.
- Specific Job Activities – Those that include open flame work and/or metal grinding are more susceptible to produce a fire due to the immediate source(s) of ignition. Typical job activities that produce open flames or source of ignition include welding (arc, plasma, etc.), burning/cutting, soldering, and grinding.
- Electrical Equipment (Office and/or Facility equipment) - Electrical system failures and the misuse of electrical equipment may lead to workplace fires. Fires can result from lose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets.
- Industrial Mobile Equipment – Includes material loaders, excavators, cranes (fixed and mobile), forklifts, and skid-steers. If mobile equipment is neglected or routine maintenance is not performed there is the potential for mechanical, electrical, and/or fire hazards that may result in severe loss and damage. In addition, neglect of industrial mobile washing and equipment cleaning may allow for the build-up of residue. This residue has the potential to ignite causing a fire or other potential hazard.
- Fueling and related maintenance of industrial mobile equipment can also lead to a fire related incident if not properly grounded, and if there is no available quick-disconnects to prevent spills.
- Ensure proper grounding and bonding.
- Designated Smoking Locations - Smoking is prohibited in all operational processes, except for those locations which have been approved as designated smoking locations.
- House Keeping & Chemical Storage - Controlling the accumulation of flammable materials (product and waste) in the workplace is the key to preventing and/or minimizing potential fire hazards. The following items below have been identified as potential fire hazards in the workplace:

  Oil/fuel Soaked Rags
  Weeds, Wood, Paper and Trash
  Tires
  Floors Contaminated with Residue Oils or Combustible
  Flammable/Combustible Safety Storage Cabinets Materials
  Production Fuel Inventories (e.g. Gasoline, Diesel, Motor Lubricants)

Compressed gas cylinders (e.g. Propane and acetylene)

3) Fire Suppression

- Fire Suppression Equipment - The facility contains various fire suppression equipment Fire suppression equipment includes the following:

  Portable Fire Extinguisher – ABC Dry Chemical, Halogen, Water
  6" wet stand pipes (Water)
  Fire boxes (sand)
  Fire hydrants, hoses and nozzles

- Maintenance of Fire Suppression Equipment and Systems – Regular maintenance of fire suppression equipment and systems must be conducted routinely.

  Portable fire extinguishers – Equipment must be visually inspected and documented monthly to assure effective function, accessibility, pressure, mechanical damage and/or tampering.

  Hose Systems – Hose systems which are used for specific fire prevention must be inspected monthly and after each use to assure hoses are in place and ready to use.

- Inspections of Fire Suppression Equipment

  Authorized employees may perform monthly visual inspections, provided training on the inspection process that has been conducted.

  Fire Suppression Contractor will perform specific maintenance, recharge (refill), and hydrostatic testing on affected fire suppression equipment.

4) Storage of Hazardous Materials

- Combustible and Flammable: The safe storage of hazardous materials depends on several physical and chemical factors. Two of which include the combustibility and flammability of a substance

- Combustibles: Liquids have a flash point at or above 100 °F and are subdivided into categories – Class II, Class III-A, and Class III-B

- Flammables: Liquids have a flash point below 100° F and a vapor pressure not exceeding 40 pounds per square inch (absolute) at 100° F. They are subdivided into Class I-A, Class I-B, and Class I-C (examples include acetone, benzene, toluene)

5) Indoor Flammable and Combustible Material Storage Types & Capacity

- Safety Cabinets: Cabinets are enclosed containers with shelving used to store various industrial materials. They help to safely contain hazardous chemicals in the workplace when chemical inventories are generated. Cabinets must meet regulatory standards with regard to construction & design.

- Safety Cans: A can is a portable container used for storing one to five gallons of

flammable or combustible liquids. When equipment requires liquid fuel and a transport container is required a safety container must be used. Approved containers have a maximum 5 gallons capacity and are designed with a spring closing lid and spout cover in order to safely relieve internal pressure when subjected to fire exposure. A safety can, shall either be Factory Mutual (FM) or Underwriter Laboratory (UL) approved.

6) Maximum Indoor Storage

- Containers over 30 gallons capacity storing Class I or Class II liquids shall not be stacked one upon the other.
- Flammable or combustible liquids shall not be stored so as to limit use of exits, stairways, or areas normally used for the safe egress of people.

7) Out-door Flammable and Combustible Material Storage Types & Capacity

- Fixed and portable tanks or containers which are used to store Petroleum Fuels such as Conventional Gasoline, Diesel, and/or Motor Oils must either select one of the following storage types listed and be designed in a manner to divert possible spills away from buildings, congregating areas and/or similar

8) Tank Storage Types

- Above Ground Fixed Horizontal Tanks
- Trailer Mounted Portable Tanks
- Portable Totes: Must meet an ANSI, UL, and or FM safety standard
- Other Outdoor Storage Types:

  Safety Cabinets
  Hazardous Material Storage Lockers

*** Note: Ground area around buildings and unit operating areas shall be kept free of weeds, trash or other unnecessary combustible materials***

9) Specific Flammable and Combustible Fire Controls

- At a minimum one portable fire extinguisher with a rating of 10lbs and Class B must be located:

  Outside of but not more than 10 feet from, the door opening into any room used for storage

  Not less than 10 feet, or more than 25 feet, from any Class I or Class II liquid storage area located outside of a storage room but inside a building

  Open flames and smoking shall not be permitted in flammable or combustible liquid storage areas

10) Industrial Equipment Preventative Maintenance

- Industrial equipment is a critical aspect to business operations and to ensure efficiency. A routine preventative maintenance schedule must be established to prevent the failure of equipment which may contribute to potential fire related incident.

11) Training

The authorized FPP trainer is the individual who has been deemed competent through practical fire prevention training and assessment methods. The authorized trainer is qualified to provide training for each employee who is required to use fire suppression equipment, Flammable and Combustible Materials Principles. The individual performing the hands on training may either be an authorized Health & Safety Training Representative and/or Certified Fire Prevention Contractor.

Fire Prevention Principles: An annual hands-on and classroom educational program is provided to designated employees to familiarize themselves with the general principles of fire extinguisher use and the hazards involved with incipient stage fire-fighting. Employees are not permitted to use fire protection equipment without training.

The authorized FPP trainer will certify in writing that each designated employee has received and understands the FPP training. Employees must demonstrate understanding, and the ability to use fire suppression equipment before they are allowed to perform work which may require response to a possible incipient fire.

APPENDIX D
EMERGENCY ACTION PLAN – GENERAL & TSUNAMI

Schnitzer

SCHNITZER STEEL HAWAII CORPORATION
EMERGENCY ACTION PLAN
TSUNAMIS RESPONSE

Section I

General

This Emergency Action Plan (EAP) shall be available for all employees, visitor and contractors for copying and inspection.

A tsunami is a series of traveling ocean waves generated by disturbances associated with earthquakes, landslides or volcanism in oceanic and coastal regions. These waves may continue to arrive for several hours and are capable of causing destruction in coastal areas of Oahu. Generally, all coastal areas of Oahu are vulnerable. A tsunami greater than one meter may be expected to result in additional emergencies such as fires, explosions and hazardous materials incidents. A tsunami may also result in the disruption of utility services and damage to emergency response facilities and transportation routes. Civil and political emergencies such as looting may also occur.

A. The EAP – Tsunamis Response shall be included as part of the Company's EAP and shall become a part of the facility Operations Manual.

B. Training shall be held on a regular basis, at a minimum of once a year.

C. Reviews of this plan shall take place at a minimum of once a year.

D. Contractors and visitors will be required to submit a signed acknowledgment form that they have reviewed the EAP – Tsunamis Response.

E. The EAP shall be reviewed yearly and amended as necessary.

Plan Outline

The EAP consists of the following:

1. Personnel roles, lines of authority, and communication.

2. Emergency alerting and response procedures.

3. Evacuation routes and procedures.

4. Background.

5. Distribution.

Section II

1. Personnel Roles, Lines of Authority and Communication

   a. The General Manager shall be designated the Emergency Coordinator (EC) in the event of a Tsunami.
   b. The EC shall have the duty and authority to implement emergency procedures to ensure oversight, control, and security over an emergency incident.

   c. Communications will be done by two way radio and/or cellular telephone. All personnel shall be instructed to keep the radio clear of unnecessary conversation.

2. Emergency Notification and Response Procedures

   a. The EC (or designee) will monitor the status of tsunamis by listening to radio and/or television to determine if the notification is an "Advisory" or a "Warning". The EC will initiate the Tsunami Checklist per the notification provided by the Pacific Tsunami Warning Center (PTWC).

   b. The EC (or designee) will evaluate the situation and will initiate The Tsunami Warning Checklist when the island wide "Tsunami Warning" siren system is activated. It is understood that the system is periodically tested (usually the first business day of each month @ 11:45 AM), and that an evacuation notice is not needed during these tests.

   c. If the EC (or designee) determines that an evacuation is required for the safety of the employees, and order of evacuation (OOE) shall be given by advising all employees over its two way radio system to "EVACUATE!"

d. Upon notification to evacuate, all employees are to stop work immediately.

e. All machinery is to be shut down immediately and staged. All power to the facility is to be shut off. All doors and gates are to be secured.

f. All personnel are to leave the facility and proceed to the local public shelter/refuge area which is Makakilo Elementary School.

g. All reasonable measures must be taken by the EC to ensure that fires, explosions, and/or releases do not occur. Reasonable measures include halting receipt of scrap, shut down of shredding operations and evacuation of the facility, as appropriate.

h. The EC must record the time, date, and details of the incident and submit a full written report. The incident report must include the following:

1. The date, time, and type of incident.

2. Complete incident description.

3. Extent and nature of injuries, damages, or property losses if any.

4. An assessment of potential hazards to human health or the environment if applicable.

3. Evacuation Routes and Procedures

a. A map of the facility identifying entrances, exits, and evacuation routes is provided.

b. This map shall be made available to each employee and/or anyone entering the facility. The distribution shall be revised, as appropriate to take into account other relevant agencies or contractors.

4. Background

Tsunamis, although infrequent, are of concern to Schnitzer Steel Hawaii Corporation (SSHIC) because the facility is within the mandatory Tsunamis evacuation boundaries. Tsunamis pose a threat to human life due to a series of destructive ocean waves that can affect all shorelines.

Pacific Tsunami Warning Center (PTWC) stations situated throughout the Pacific Basin monitor earth tremors to determine the existence and magnitude of tsunamis in the region.

A tsunami "watch" is issued to the Oahu Civil Defense Agency (OCDA) when PTWC receives information that an earthquake has occurred and the development of a tsunami becomes probable. Once confirmation is made that a tsunami has been generated, the PTWC issues a tsunami "warning." OCDA will notify the public via radio and television stations over the Emergency Broadcast System.

An island-wide siren system is activated at three (3), two (2), one (1), and ½ hour prior to the earliest estimated time of arrival of a tsunami. The signal is recognized by a steady tone held for a period of three (3) minutes. An earthquake whose epicenter is within the Hawaiian archipelago can generate localized tsunamis that may reach the shoreline within as little as twenty (20) minutes. Because there may be little or public advisories via radio or television, before the siren system is activated, it is generally recommended that the one heed the siren warning system. Upon hearing the distinct three minute siren, personnel within the potential flood zone should proceed to higher ground immediately.

All personnel are to wait for the all clear signal before returning to the facility.

It should be noted that a test of the emergency warning signal is conducted at 11:45 a.m. on the first workday of each month.

5. Distribution

The following shall receive a copy of this document:

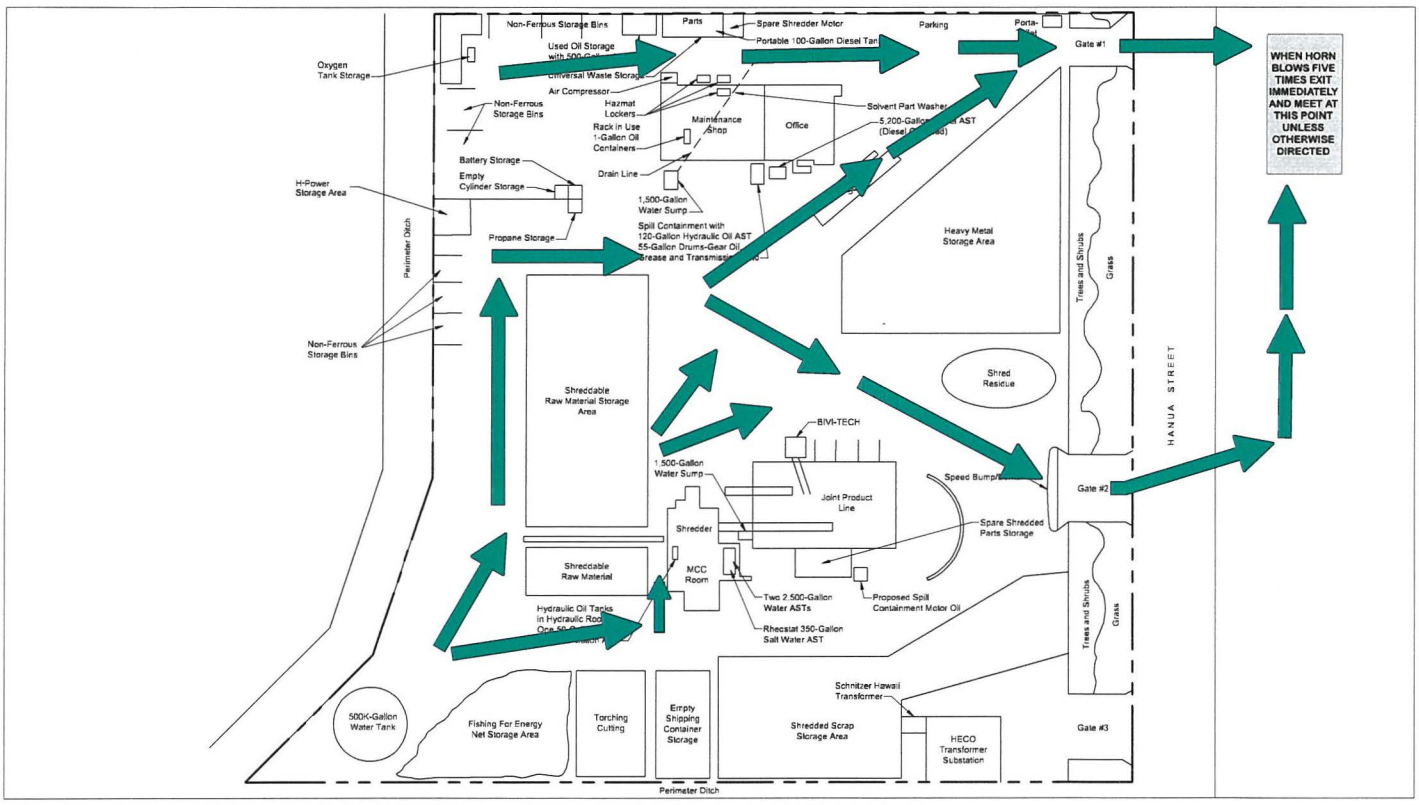
1. Kapolei Fire Department
2. Kapolei Police Department

Section III

Post flood and Clean Up

Utility	Name	Phone Number
Gas Co.:	N/A	N/A
Electric Co.:	HECO	(808) 447-9507
Police/ Fire	Kapolei	911
Water/Sewer:	City of Honolulu -HBWS	(503) 748-5000

Vendor	Name	Phone Number
General Contractor:	Unitek	(808) 682-8284
Plumbing:	Action Plumbing	(808) 672-3758
Structural Engineering:	SMG	(503) 643-8595
Sprinkler Systems:	Pacific Fire Protection	(808) 456-4521
Catch Basin Cleaning:	Unitek	(888) 682-8284



Legend:

Site Boundary

0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.		Evacuation Routes	Figure D
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/27/2020	Reviewed By: MCC	Client: Watanabe Ing LLP	

Schnitzer Steel Hawaii Corporation

CALL UP ROSTER
EMERGENCY PROCESURES-POST NEAR TELEPHONE

In case of a fire, serious medical, spill or other emergency involving hazardous chemicals or waste, do the following:

Major Emergency

- ☑ Evacuate the affected areas per the facility Evacuation Plan
- ☑ **Call 911** and report the emergency; be sure to indicate any injuries and/or the nature of the emergency i.e., fire, spill, etc…
- ☑ Report the emergency to the facility Emergency Coordinator

Minor Emergency

- ☑ Try to control the emergency if you are trained to do so and can do it safely (keys to assessing a minor emergency include: personnel, equipment, and training)
- ☑ Report the emergency to the facility Emergency Coordinator (EC)

For Release Reporting only Emergency Contacts below will make required reports to agency personnel

Facility Emergency coordinators	NAME	WORK PHONE	CELLPHONE	HOME PHONE
Primary	Nick Garofalo	(808) 682-8751	(808) 214-2125	TBD
Alternate #1	Drew Coats	(808) 682-8754	(808) 265-5617	TBD
Alternate #2	Bryan Graham	(808) 682-5810	(253) 254-4310	TBD

EMERGENCY CONTACTS

AGENCY	Telephone Number
Fire Department, Ambulance, (Major Emergency)	9 1 1
Honolulu Police Department (Kapolei)	(808) 723-8488
Hawaii Office of Emergency Management	(808) 723-8960
Medical Facility – (**First Medical**)	(808) 692-6331

NOTE: Ensure that employees are familiar with these emergency and evacuation procedures. An emergency coordinator must be available 24-hours to assist emergency response personnel.

MRB Emergency Notification Guidel s: S h tz r S l Haw Co p.

Type of Incident	G n ral Ma ag r Nick Garofalo (808) 214-2125	Site EHS R p B y n Grah m (253) 254-4310	O s Ma ag r D w C s (808) 265-5617	VP, H al h & af u s Raj s (03) 78 -2230	R k Ma ag m J L c (503) 321-26 0
Y d Ev u	YE	V / ma l	Vo / ma l	YE	Vo / ma l
A Eva a	YE	Vo / ma l	Vo / ma l	YE	Vo / ma l
Yar h ow	YE	YE	Vo / ma l	YE	YE
C v l D or r or Thr a (Bomb, .)	YE	YE	YE	YE	YE
M or /A , F D ar m R o	YE	YE	Vo / ma l	Vo / ma l	Vo / ma l
A , l j r , Amb Fr D . or P Em rg (l gh a r)	YE	YE	YE	YE	Vo / ma l
Fa al , r o l j r , mor ha wo m lo ho al z	YE	YE	YE	YE	YE
B Co Cr ar o	YE	YE	YE	YE	YE

I forma o rov ho l l h follow g:

- W ha , wh a wh r ?
- Wa a o j r ?
- E ma amag (f o bl)
- If ro o wa m a ? To wha x a ma of r ar (f ava labl)?
- Who o o a for a o al forma o or a ?
- Yar af g r m r o o h ar

791071_1

Emergency Contact Numbers	Site EHS Rep: Bryan Graham General Manager: Nick Garofalo Maintenance Manager: Drew Coats Vice President, Health & Safety: Suresh Rajapakse Risk Management: Jennifer Lynch	(253) 254-4310 (808) 214-2125 (808) 265-5617 (503) 784-2230 (503) 321-2640
Emergency Services	9 1 1	
Police, Fire, Ambulance	9 1 1	
Occupational Clinic & Hours Drug Testing After Hours-Occupational Clinic & Drug Testing (after 6:30pm)	First Medical 590 Farrington Hwy. Kapolei, HI 96707 (808) 692-6331 www.firstmedicalhawaii.com same as above	
Environmental Emergency	Nick Garofalo Bryan Graham Scott Sloan	(808) 214-2125 (253) 254-4310 (253) 404-6686
Staff Emergency Contacts	General Manager: Nick Garofalo Office Manager: Tracy Hayakawa	(808) 214-2125 (808) 682-5810
911- First Aid Kit Locations	Downstream Coordinator's Control Room/Safety Office/1st Floor-Bottom of Stairs in Main Office/1st Floor Manger's Office/MCC/Mechanic's Shop/Break Bldg.	
AED Location	Mechanic's Shop-left of Safety Office door/Downstream Coordinator's Control Room/Main Office-top of stairs straight ahead	
Media and Public Relations Do not speak with any media, please contact Jennifer Hudson immediately if media is present.	Jennifer Hudson	(503) 708-9714

FATALITY

Dial 9 1 1

Secure the site:
Close all gates and/or doors after assuring all personnel needing to evacuate have done so

Assign personnel to watch entrances:
This person has the authority to refuse entry to anyone

Admit only authorized personnel on site – such as, designated employees, police, fire, ambulance, medical examiner

DO NOT allow media onsite

Call the following personnel below:

Name/Title	**Telephone Numbers**
Nick Garofalo/General Manager	(808) 214-2125
Bryan Graham/EHS Rep	(253) 254-4310
Drew Coats/Ops Manager	(808) 265-5617
Scott Jacoby/MRB Director, Health & Safety	(781) 690-8739
Jennifer Lynch/Insurance & Claims Manager	(503) 321-2640
Stephanie Roe/Corporate Worker's Compensation	(503) 323-2812
Jennifer Hudson/Public Relations & Media	(503) 708-9714

APPENDIX E
ASR SAMPLING PROTOCOLS

Date: March 10, 2015

Schnitzer Steel Hawaii Corporation
Attn: Eric Hildenbrand & James M. Wright
91-056 Hanua Street
Kapolei, Hawaii 96707

SUBJECT: SCHNITZER STEEL HAWAII (SR) PROTOCOL ADDENDUM

Samples were collected, processed and analyzed in general accordance with industry standards and site specific requirements.

1.0 SAMPLING AND ANALYSIS METHODOLOGIES

1.2 Sample Preparation

Upon receipt, each of the ten 2,000 gram samples was processed by hand or mechanical grinder until all particles passed through a 9.5 mm screen. After preparation of the material, the samples were immediately placed on ice and delivered by overnight courier to ESC Lab Sciences (ESC) in Mt. Juliet, Tennessee to perform analytical testing. ESC is certified by multiple federal and state licensing boards to conduct environmental analyses of samples collected in Hawaii and other states of the US (Lab certifications include: A2LA - 1461-01, and AIHA - 100789).

1.3 Analytical Procedures

One randomly selected sample was analyzed for the Toxicity Characteristic Leaching Potential (TCLP) Resource Conservation and Recovery Act (RCRA) 8 metals per Environmental Protection Agency (EPA) methods 1311 and 6010B and 7470A. Two additional randomly selected samples were analyzed for TCLP lead and cadmium only using EPA methods 1311 and 6010B. Additionally, all ten samples were analyzed for total PCBs in accordance with EPA method 8082, and Total Solids in accordance with EPA Method 2540G.

If you have any questions or need additional information, please contact me at 480-784-4621.

Sincerely,

G. L. Twaddell.

Graham L. Twaddell, MS
Director, Industrial EHS Compliance & Sustainability
Envirosure Solutions, LLC

1979 east broadway road, tempe, arizona 85282
ph: 480-784-4621 fax: 480-784-2207
www.envirosure.com

PROTOCOLS FOR

SAMPLING, ANALYSIS AND DATA REVIEW

OF SHREDDER RESIDUE

PREPARED FOR

HAWAII METAL RECYCLING COMPANY
KAPOLEI, HAWAII

MAY 2001

W. Z. BAUMGARTNER & ASSOCIATES, INC.
Environmental Engineers & Consultants
Franklin, Tennessee
615-595-0025

91069

PROTOCOLS FOR

SAMPLING, ANALYSIS AND DATA REVIEW

OF SHREDDER RESIDUE

TABLE OF CONTENTS

FIGURES

PROTOCOLS FOR

SAMPLING, ANALYSIS AND DATA REVIEW

OF SHREDDER RESIDUE

A. PURPOSE OF SAMPLING PROTOCOL

Shredder residue which is produced by the shredding of automobiles and scrap light iron is inherently non-homogeneous in nature. Because of the nature of the waste material and a basic lack of understanding of its properties by inexperienced investigators, improper characterization is a common problem.

This sampling *Protocol* has been developed by W. Z. Baumgartner & Associates, Inc. and is based on over 18 years extensive experience of the waste. The basic *Protocol* has been adopted by several state regulatory agencies and has been recognized by most of the major solid waste management firms.

B. GENERAL SAMPLING PROCEDURE

During sampling events, appropriate health and safety equipment should be worn. Minimum personal safety equipment should include steel-toed boots, sturdy gloves, hardhat, and safety glasses. A fully stocked first-aid kit should be on-site and readily available.

All samples are to be collected by an independent, qualified technician familiar with the shredding process and the characteristics of shredder residue.

When sampling contemporaneously generated shredder residue, normal plant operation should be confirmed with management prior to initiation of sample collection to ensure all equipment is in working order, and the infeed material should be representative of the facility's normal operation.

Heavy duty, one (1) gallon, "ziplock" plastic freezer bags may be normally used for individual shredder residue sample collection. Five (5) to six (6) gallon buckets may be used for larger composite samples. It is understood that while there could be a slight possibility of low level intrusion of phthalates into a sample from the plastic containers, the high concentration of phthalates in the shredder residue negate any concern. Detailed decontamination of heavy equipment is not normally necessary because of the volume of material being handled and the fact that the material is mixed by the same equipment during normal daily operation.

Any individual sampling equipment, such as shovels, etc., should be wiped with clean paper towels or washed (as appropriate) after each use.

If complete QA/QC documentation is to be supplied or if special samples or sample containers (ie: glass with teflon lids for PCB or volatile organics analysis) are required, these requests are to be made to W. Z. Baumgartner & Associates, Inc. at least one (1) week before the proposed sample event. All sample preservation, temperature and holding time provisions of EPA *SW 846 (latest edition)* shall be observed.

WZB

C. CONTEMPORANEOUS GENERATION SAMPLING PROCEDURES

Contemporaneous sampling as the waste is being generated is the most representative type of sampling. This method is preferable to the waste pile sampling and should be used unless there are compelling reasons for using a different method.

During routine sampling events sturdy five to six gallon plastic containers may be used for sample storage and shipping. The containers should have sealing, one-piece lids that cannot be opened without obvious damage to the integrity of the lid. During the sampling events, normal shredding operation should be maintained. Sampling will continue over a period of approximately one hundred twenty (120) to two hundred forty (240) minutes. Because of the high volume of the material generated this period has been demonstrated to be adequate to produce representative samples. Residue generated in the shredding process is sampled every ten (10) to twelve (12) minutes, generating ten (10) discrete composite samples. Approximately two thousand (2,000) grams of residue should be collected for each sample.

The samples are to be carefully collected so that they include both large and small particles in approximate proportion of generation. The sampler is to be familiar with the process generating the waste, the composition of shredder residue in general, and shall be able, by experience, to avoid weighting the sample

inappropriately by particle size, density, or constituency.

The collection of the samples is best done by hand. The sampler shall wear sturdy gloves for protection against any broken glass and scrap metal that may be encountered. Disposable over gloves, which are changed between each sample, should be worn.

EXHIBIT B

D. WASTE PILE SAMPLING PROCEDURES

In the event contemporaneous sampling is not selected, the following alternative procedure may be used.

Characterization of waste piles presents certain challenges to the sampling team. The procedures presented in this Protocol are consistent with Environmental Protection Agency *Samples and Sampling Procedures for Hazardous Waste Streams (600/2-80-018)* and *Test Methods for Evaluating Solid Waste (SW 846 - latest edition)*. Sampling points are selected after an inspection of the pile. A blade-equipped front-end loader, backhoe, or dozer should be made available to the sampling team so that the pile can be properly configured for sampling.

For waste pile sampling, a pile of shredder residue equal to at least one-half (1/2) day of normal shredding operation should be accumulated. The pile should be configured by squaring the edges and top. Waste piles can be characterized by selecting evenly distributed sampling points as shown in Figure No. 1. For larger piles (greater than 100 ft. by 100 ft.) the number of sampling points should be increased. Surface sampling points are selected and diagonals established that terminate at the base of the pile opposite the surface point. Collection of center-of-pile samples is facilitated by opening one (1) or more trenches selected so the diagonal middle sampling points pass through each trench. The sampler shall not violate confined space regulations.

Figure No. 1 presents a typical waste pile characterized by establishing three (3) diagonal sample lines and one trench. Samples would be collected from the top of the pile at major surface points A-1, B-1, and C-1. Approximately two thousand (2,000) grams of representative material is collected at point A-1, B-1, and C-1. Using the blade loader or backhoe, an opening is made at the base of the pile at diagonal points A-3, B-3, and C-3. These openings will be approximately three (3) to five (5) feet high and penetrate one (1) to three (3) feet into the pile. To facilitate midpoint sampling, an opening is made midway through the shorter cross-section of the pile. The opening should penetrate approximately one-half to two-thirds through the pile. Samples A-2, B-2, and C-2 are collected at the appropriate midway points on both walls diagonally from the initiation points. Sampling Points D-1, D-2, and D-3 are selected at the discretion of the sampling team.

Sampling should be performed so each sample location is representative of that general area of the pile. Samples are collected by "picking" many small aliquots (20-40) from each selected sample point on the pile and combining these individual aliquots into the specific location sample. Each sample should contain approximately two thousand (2,000) grams of material. If a shovel or other utensil is used to gain access to a location, it is to be cleaned between each sample location.

This sample Protocol should generate a minimum of twelve (12) discrete samples available for analysis from a normal pile. For larger piles (greater than 100 ft. by 100 ft.) additional discrete composite samples will be generated. As previously stated, all aspects of the sample collection, processing, preservation and analysis shall be conducted in accordance with *SW 846 (latest edition)*.

E. SAMPLE CONTAINERS AND CHAIN-OF-CUSTODY PROCEDURES

As described in Section A, heavy duty plastic bags normally may be used for individual samples. The bags are to be placed in a larger plastic bucket for secure transport. Each individual sample container is to be labeled as follows:

Sample Location:

Identifying Sample Code and Description:

Time:

Date:

Sampler:

The individual samples are to be carefully packaged in the shipping container. The container is to be sealed for transport to the laboratory. Larger composite samples could be collected using the six (6) gallon containers. As required, samples may be shipped in rigid, high-impact plastic ice chests. When using commercial carriers, dry ice is not to be used to cool samples. Crushed or cubed ice in plastic bags is preferable for this purpose.

The procedure for sample security and Chain-of-Custody documentation shall follow Environmental Protection Agency document *SW 846 (latest edition)* as a minimum. Each sample container is to be marked, coded, and sealed.

F. SAMPLE PROCESSING AND ANALYSIS

Shredder residue normally consists of 55-60%, by weight, of material less than two inches in diameter, while material larger than two inches in diameter may make up 55-60% of the uncompressed volume. Great care, based upon experience with this waste, must be employed to avoid weighting individual aliquots inappropriately by weight, volume, or size and to insure that aliquots are representative of the stream generated.

1. Once the samples are received in the laboratory, a clean work area is selected and the samples processed. Each sample is first mixed and then spread out to a uniform depth. The sample is then divided into four (4) equal quarters and a sub sample of one (100) to two (200) hundred grams is taken from each of the four (4) quarters. All material is hand cut until it will pass through a 9.5 mm screen. From each quarter, ten (10) to fifteen (15) grams are taken from each quarter to make up individual aliquots for PCB analysis. Aliquots for PCB analysis should contain approximately fifty (50) grams of material.

   Twenty-five (25) grams of material is taken from each of the four (4) quarters to make up the aliquot for the TCLP extraction for cadmium and lead. A five (5) gram aliquot of the sub sample is prepared for determination of extraction fluid (No. 1 or No. 2) following EPA

Method 1311.

2. PCB determinations are to be performed by individuals familiar with shredder residue and experienced in determinations performed on samples containing multiple interferences. Analysis shall be performed according to EPA Method 8082, with Method 3550 for extraction, solid sonification, and electron capture. External standardization shall be employed. The moisture content shall be measured. PCB concentrations will be adjusted to a "dry weight" basis using the moisture determination.

3. A 100 gram aliquot (taken from the material processed in Item #1) is to be used for Method 1311 "Toxicity Characteristic Leaching Procedures (TCLP)" as described in *40 CFR 261, Appendix 2* and EPA *SW 846 (latest edition)* for extractable heavy metals and semi-volatile organic compound. If TCLP Method 1311 is to be performed on a sample, strict conformity to the methods and procedures described in *SW 846 (latest edition)* must be exercised. A separate log entry shall be prepared for each application of the procedure and this log shall be maintained by the laboratory. The log and all other necessary data required for proper completion of the analysis procedure shall be retained for a minimum of three (3) years.

WZB

4. Protocols for zero head space extraction, ZHE, for extractable volatile organic compounds are to conform to EPA Method 1311.

G. DATA REVIEW - CONTEMPORANEOUS GENERATION

The normal procedure for contemporaneous sampling is to analyze a progressive number of samples from a sampling event. The following procedures describe the method for data evaluation for both TCLP extractable heavy metals analyses and PCB determinations:

1. Using the procedures described in Section C, ten samples are collected.

2. Four of the ten samples, selected using a random number generator, are analyzed. The samples are processed and analyzed for extractable cadmium and lead. Cadmium and lead are the only heavy metals routinely found in the extract. Aliquots from the same four samples are analyzed for total PCB concentration.

3. If the results of the confidence interval developed by the statistical evaluation of the four analyzes for E.P.A. T.C.L.P. extractable heavy metals limit and/or TSCA limit for PCB's (50 mg/kg), the waste shall be considered non-hazardous and non-toxic. The statistical method shall be determined by use of the attached Figure No. 2. The single analysis for the remaining six heavy metals will be reported.

4. If any of the four samples exceeds the EPA limit for any constituent but the confidence interval of the results of the four analyzes are below EPA limits, then the waste will be considered nonhazardous and/or non-toxic.

If any of the four samples exceeds the EPA limit for any constituent and the confidence interval of the data set exceeds the EPA limit, the generator will be notified and an aliquot from the original sample(s) analyzed for confirmation. The mean of the original and confirmation results of the sample(s) is calculated and this combined mean is used to recalculate the new data set CI of the ten sample analyses. If the recalculated CI of the event is below EPA limit(s), the waste will be handled as nonhazardous and/or non-toxic. According to discussions with the EPA and *SW 846*, the exceedence by one sample in a population does not determine the characteristics of the waste.

5. a. There will be two frequency sampling aspects to the shredder waste monitoring program:

   i. a Standard Frequency Cycle, and

   ii. an Accelerated Frequency Cycle.

b. Accelerated Frequency Cycle.

   i. In the Accelerated Frequency Cycle, one sampling event

would be performed each month until ten sets of data have been collected. Historical shredder waste monitoring data generated by the generator should be reviewed to ascertain if there is sufficient data to bypass the **Accelerated Frequency Cycle.**

ii. If the historical data can be used to calculate a confidence interval (CI), the data will be subjected to the "Statistical Analysis Procedure" included in Figure No. 2 of the *Protocol* to select the most appropriate statistical method.

iii. A "rolling window" using the data of the events will constitute the characterization of the waste stream.

c. As long as the CI concentrations, calculated as described in this *Section*, for

TCLP lead remains below 4.5 mg/l;

TCLP cadmium remains below 0.85 mg/l;

Total PCB remains below 45 mg/kg (dry weight).

The monitoring frequency will continue in the **Standard Frequency Cycle** which will consist of one sampling event every three months.

i. As each new event is completed, the data generated by this event will be incorporated into the "rolling window" and the data from the oldest of the ten events would drop out of the calculation.

ii. As long as the "rolling window" CI remains below the Required Concentrations, testing in accordance with the **Standard Frequency Cycle** will continue.

iii. If the "rolling window" of any of these parameters exceeds the Required Concentrations but below the RCRA and TSCA limits, the **Accelerated Frequency Cycle** will be initiated until the "rolling window" CI drops below the Required Concentrations, at which time the **Standard Frequency Cycle** will resume.

iv. If the "rolling window" of any of these parameters exceeds RCRA or TSCA limits, generation of the shredder waste will stop and any applicable notification requirements will be complied with.

d. As a standard procedure, sufficient sample will be collected at each event as duplicates to allow for confirmation testing should an anomaly appear. If the confirmation sample is used, the result of the mean of the original and the confirmation of this test will replace the original result in the set.

6. Other methods of evaluating data may be considered. However, it is important to note that attempts to apply EPA's student's T-test confidence level method contained in Chapter 9 of *SW 846* have demonstrated that the method is often inappropriate for shredder waste. There are two primary reasons for this. First, the non-homogeneous nature of the waste makes procedures designed for soils and homogeneous waste questionable. Second, EPA has acknowledged in a 1992 letter to our firm that the method presented in the current edition of *SW 846* was mathematically flawed if the centrality of the data (i.e. the standard deviation is greater than the mean) is not easily defined.

H. DATA REVIEW - WASTE PILE

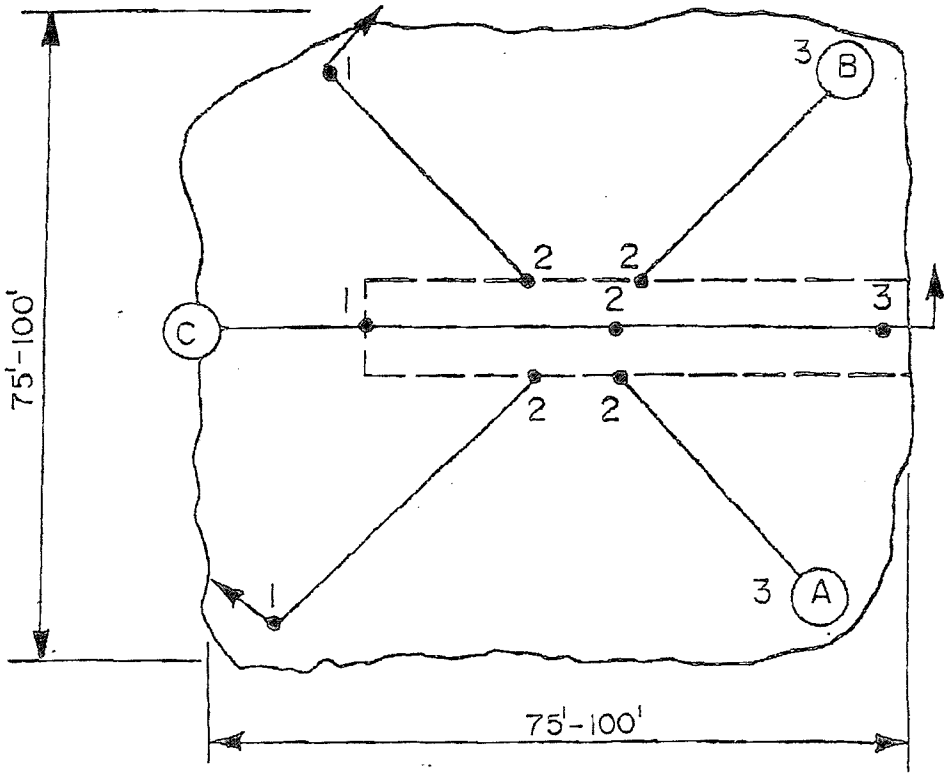
1. Using the methods described in Section B, a minimum of ten (10) to twenty-five (25) samples are to be collected. Depending on the size of the pile(s), additional samples may be required.

2. Since this method may be used to characterize a pile for regulatory compliance, the number of samples to be analyzed should be agreed upon in advance. If no such advance agreement is reached, a minimum of ten (10) samples will be selected using random numbers.

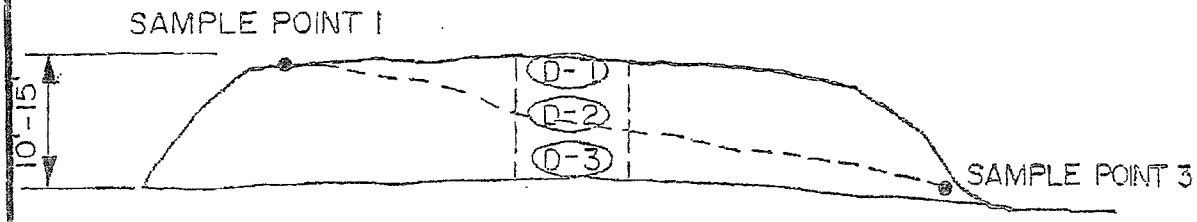
3. The most appropriate method for statistically evaluating the data shall be selected using Figure No. 2. Based on the variability of characteristics of shredder waste, W. Z. Baumgartner & Associates, Inc. has documented that the CI method presented in Chapter 9 of *SW 846* is inappropriate for non normally distributed data.

FIGURE NO. 1

SHREDDER WASTEPILE
TYPICAL SAMPLE POINT SELECTION



PLAN VIEW



CROSS-SECTION
TYPICAL FOR A,B,&C

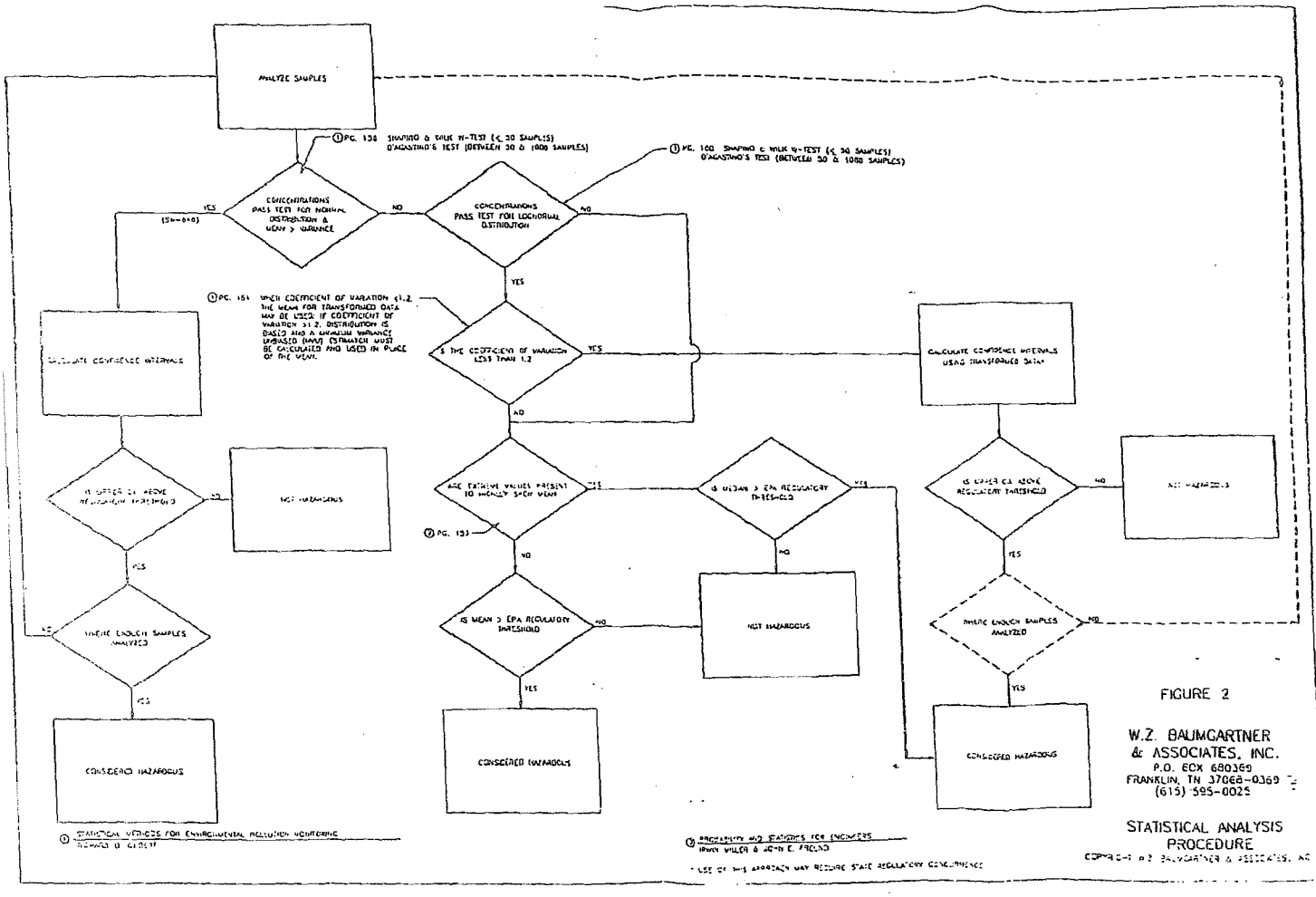


FIGURE 2

W.Z. BAUMGARTNER & ASSOCIATES, INC.
P.O. BOX 680369
FRANKLIN, TN 37068-0369
(615) 595-0025

STATISTICAL ANALYSIS PROCEDURE

APPENDIX F
SCRAP ACCEPTANCE GUIDELINES

METAL THEFT POLICY

In an effort to curtail the rising incidence of metal theft, Schnitzer Steel Hawaii Corp. (SSHIC) refuses to accept the following materials unless ownership is clearly established:

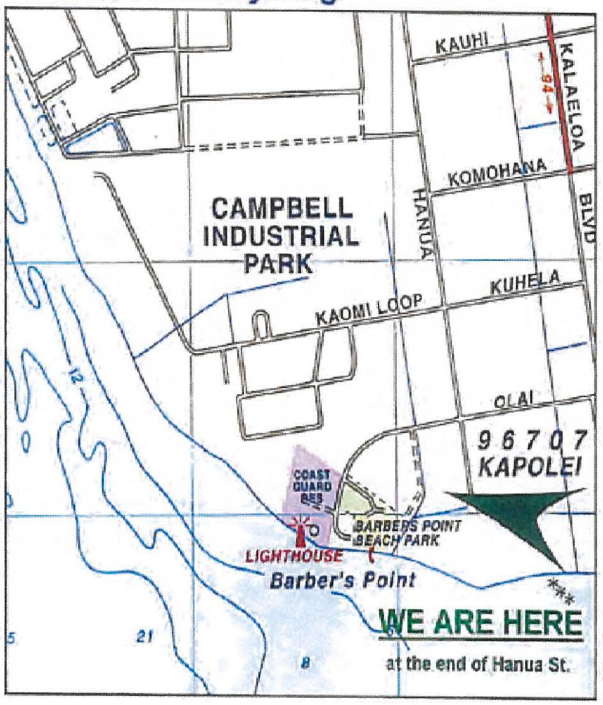
- New production scrap or new materials that are part of a manufacturing process that are being sold by an individual, not a company.
- Items used only by governments, utilities, railroads or for very specific purposes. This includes guardrails, manhole covers, certain cables used only in high voltage 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 customer unless a written record of title is presented.
- Materials that have been reported stolen.

SSHIC maintains records of all transactions, and cooperates fully with local law enforcement in the prosecution of metal theft.

"Recycling for a Sustainable Future"

SCHNITZER STEEL HAWAII CORP.

- 1906 - Start of Schnitzer Steel
- Help Hawai`i's environment; bring your scrap metal to Schnitzer Steel Hawaii for recycling



Schnitzer Steel Hawaii Corporation
Campbell Industrial Park
91-056 Hanua Street
Kapolei, Hawaii 96707
Ph: 808-682-5810 Fax: 808-682-0604
www.schnitzersteel.com

Hours of Operation

Mon - Fri - 7:00 AM - 3:00 PM

Closed on Saturday and Sunday

SCHNITZER STEEL HAWAII CORP.

- premier scrap metal recycler
- automobile bodies and hulks
- pipes, beams, posts, cables, wires
- cast iron, motor blocks, bicycles

SCRAP ACCEPTANCE GUIDELINES

Schnitzer Steel Hawaii Corp.
Campbell Industrial Park
91-056 Hanua St., Kapolei, HI 96707
Ph: (808) 682-5810 Fax: (808) 682-0604
www.schnitzersteel.com

SCRAP ACCEPTANCE POLICY

Aloha Customers,

This brochure clarifies our guidelines for accepting recyclable metals. These requirements reflect our commitment to responsible environmental management. Please be aware that many of our policies are controlled by state and federal environmental regulations which apply both to us and to our customers.

This list is not inclusive; other items not listed may be inappropriate for recycling as scrap metal. Please read this brochure carefully, and contact us at 682-5810 if you have questions about specific items.

Remember that any load may be rejected at your cost if these guidelines are not followed.

MANDATORY POLICIES to ENTER PROPERTY:

1. **You must have a valid photo ID.**
2. **You must wear covered shoes.**
3. **You must wear a hard hat.**
4. **You must be 18 years or older.**

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 customers are REQUIRED to sign a statement certifying that all refrigerants have been properly removed (40 CFR §82).

Will NOT be accepted:

- Asbestos or asbestos containing materials, such as pipe insulation 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.
- Any materials for recycling which include **components containing PCBs** at concentrations of 50 parts per million (ppm) or more. All materials that once contained PCBs must have the PCBs removed prior to delivery to our facilities. Items that contain or have contained PCBs, including small capacitors and fluorescent light ballasts.
- Automobile airbags, which contain sodium azide (40CFR §261).
- Paint cans or other paint containers
- Acetylene bottles and other sealed containers. Sealed containers are described as air or water tight containers without visible openings.
- Fluorescent lights, neon, high intensity or mercury vapor lights.
- Any material containing hazardous or toxic substances.
- Munitions; Explosives or explosive residues.
- Radioactive materials of any kind.
- Microwave ovens.
- Tires, wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.
- Manhole covers.
- Tires, wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.

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

- Appliances: ALL electrical components and compressors/sealed units must be removed.
- Automobiles: ALL fluids, including refrigerants, must be drained. Tires, batteries, lead wheel weight, mercury switches and un-deployed air bags must be removed. **Gas tank must be removed.** Oil pan must be punctured. Title/ownership papers required. Engine compartment hood and trunk must be removed or bent back for inspection.
- Air conditioning compressors: MUST be removed from item, cut in half, and/or punctured and drained.
- Drums, barrels and other containers: MUST be thoroughly cleaned and open for inspection. Customer MUST provide letter stating that drums do not contain any hazardous waste.
- Gas cylinders, including air bottles, shock absorbers, and propane and other gas tanks, must be cut in half or have a hole to allow inspection.
- Cable wire and banding: MUST be cut in 3-foot lengths.
- Metal banding: MUST be cut in 1-foot lengths.
- Aerosol cans: MUST be empty and crushed or punctured. Plastic caps must be removed.
- Lead-acid or NiCad batteries or battery parts, including automobile batteries must be free of leaks, cracks, holes, erosion.

Mahalo for your cooperation. We value your support and friendship.

Malama Pono!

Revised 09/26/19

Schnitzer

Hazardous Substance Removal Compliance Contract

Schnitzer Steel of Hawaii is required by 40 CFR §§ 63, 82 & 761 to have all scrap customers certify the following:

Refrigerants:

Seller hereby certifies that all appliances, including without limitation motor vehicle air conditioning units, delivered to Hawaii Metal Recycling, dba Schnitzer Steel of Hawaii (SSH) are, and/or will be, free of any and all "refrigerants" and any substitutes (including but not limited to chlorofluorocarbons (CFCs) and hydro chlorofluorocarbons (HCFCs), as defined in §608 of the Clean Air Act Amendments and 40 CFR Part 82) and that all such refrigerants or substitutes were, and/or will be, removed and recovered in accordance with the requirements of 40 CFR 82.156(g) or (h) prior to delivery of the appliances to SSH. Seller agrees to defend, indemnify and hold SSH harmless from any claim, penalty, fine, fee, cost or other liability (including reasonable attorneys' fees at trial and appeal) resulting in whole or part from Seller's breach of this certification.

PCB-Containing Small Capacitors:

Seller hereby represents and warrants that all appliances to be delivered to SSH have been, and/or will be, inspected for small capacitors, and that all PCB-containing small capacitors have been, and/or will be, removed before delivery to SSH. Seller agrees to defend, indemnify and hold SSH harmless from any claim, penalty, fine, fee, cost or other liability (including reasonable attorneys' fees at trial and appeal) resulting in whole or part from Seller's breach of this certification.

Mercury Switches:

Seller further certifies that all vehicles delivered to SSH have been, and/or will be, inspected for mercury switches in hood and trunk convenience lights, and that all such switches were, and/or will be, removed or stripped of mercury-containing components prior to crushing and delivery to SSH. Seller also certifies that these mercury-containing components were, and/or will be, managed in accordance with state and federal requirements. Seller agrees to defend, indemnify and hold SSH harmless from any claim, penalty, fine, fee, cost or other liability (including reasonable attorney's fees at trial and appeal) resulting in whole or part from Seller's breach of this certification.

Seller:

_____
VENDOR NUMBER IF KNOWN

_____
SELLER (COMPANY)

_____
ADDRESS CITY, STATE & ZIP CODE

_____
CONTACT NAME AND PHONE NUMBER

_____ _____
AUTHORIZED SIGNATURE DATE

91-056 Hanua Street; Kapolei, HI 96707
Phone 808-682-5810 FAX 808-682-0604

APPENDIX G
DOH DATA REPORTING FORM

Department of Health / Solid Waste Section
Diversion Survey for the period July 1, 2012 to June 30, 2013

Facility _____ Permit # _____

Address _____

_____

Contact Person _____ Title _____

Phone _____ E-mail: _____

- Submittal deadline: July 31
- ***Check your permit conditions for additional reporting requirements***
- Mail or scan & e-mail completed form to:
  Office of Solid Waste Management
  919 Ala Moana Blvd., Rm. 212
  Honolulu, HI 96814
  e-mail: lane.otsu@doh.hawaii.gov
- Questions? Contact Lane Otsu at (808) 586-4226

Category	Material	Tonnage Jul 1 to Dec 31	Tonnage Jan 1 to Jun 30	Destination of Material
Ferrous Metal	General Scrap			
Non-Ferrous Metal	Auto Scrap			
	Aluminum			
	Other:			
Glass				
Electronic Components (Computer components, TVs, etc.)				
Organics	Greenwaste/Woodwaste			
	Food / Wet Waste			
Paper	Cardboard			
	Newspaper			
	High-Grade			
	Mixed Paper			
	Magazines			
	Other:			
Plastic	Rigid Containers			
	Film/Bags/Etc.			
Remediated Soil				
Other Materials	Tires			
	Auto Batteries			
	Other:			
Total Material Recycled :		0.00	0.00	Total Recycled: 0.00
Total Material Disposed (sent to the landfill):				Total Disposed: 0.00

Version 7/13 (2)

APPENDIX H
SIGNAGE

CAUTION!

You are entering a scrap yard at your own risk. Loaders and other equipment are operating in this facility. Please use extreme caution and continually be on the look out for moving machinery. Do not assume that an operator sees you. Always maintain a safe distance and stay away from any machinery at all times.

The activities in a scrap yard involve risks of bodily injury or property damage. By entering onto these premises, you are agreeing to assume any and all risks you may encounter. We are not responsible for injury to you or damage to your vehicle while on our premises.

If you observe a condition on these premises which you believe is dangerous, please alert management immediately.

NOTICE:

REFRIGERANT & COMPRESSORS MUST BE PROPERLY REMOVED BEFORE DELIVERY OF APPLIANCES OR OTHER ITEMS THAT HAVE CONTAINED

- CHLOROFLUOROCARBONS (CFCs)
- HYDROCHLOROFLUOROCARBONS (HCFCs)

OR OTHER REFRIGERANTS TO THIS FACILITY (40 CFR PART 82)

Scrap Acceptance Guidelines

Schnitzer Steel Hawaii Corp.
Campbell Industrial Park
91-056 Hanua St., Kapolei, HI 96707
Ph: (808) 682-5810 Fax: (808) 682-0604
www.hawaiimetal.com www.schnitzersteel.com

SCRAP ACCEPTANCE POLICY

Aloha Customers,

The following acceptance guidelines clarify our requirements for accepting recyclable metals. These requirements reflect our commitment to responsible environmental management. Please be aware that many of our federal environmental regulations which guidelines are controlled by state and apply both to us and to our customers.

This list is not inclusive; other items not listed may be inappropriate for recycling as scrap metal. Please read this document carefully, and contact us at 682-5810 if you have questions about specific items.

Remember that any load may be rejected at your cost if these guidelines are not followed.

MANDATORY PROCEDURES TO ENTER PROPERTY:

1. You must have a valid photo ID.
2. You must wear covered shoes.
3. You must be 18 years or older.

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 customers 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 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, NiCad batteries or battery parts, including automobile batteries, and battery cable terminal connector ends (40CFR §273).
- Items that contain or have contained PCBs, including small capacitors and fluorescent light ballasts.
- Automobile airbags, which contain sodium azide (40CFR §261).
- Paint cans or other paint containers.
- Acetylene bottles and other sealed containers. Sealed containers are described as air or water tight containers without visible openings.
- Fluorescent lights, neon, high intensity or mercury vapor lights.
- Any material containing hazardous or toxic substances.
- Munitions.
- Explosives or explosive residues.
- Radioactive materials of any kind.
- Microwave ovens.
- Tires, wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.
- Manhole covers.

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

- Appliances: ALL electrical components and compressors must be removed.
- Automobiles: ALL fluids, including refrigerants, must be drained. Tires, batteries, lead wheel weight, mercury switches and un-deployed air bags must be removed. Gas tank must be punctured in 3 places on bottom of tank. Title/ownership papers required. Engine compartment hood and trunk must be removed or bent back for inspection.
- Air conditioning compressors: Must be removed from item, cut in half, and/or punctured and drained.
- Drums, barrels, and other containers: MUST be thoroughly cleaned and open for inspection. Customer MUST provide letter stating that drums do not contain any hazardous waste.
- Gas cylinders, including air bottles, shock absorbers, and propane and other gas tanks, must be cut in half or have a hole to allow inspection.
- Cable wire and banding: MUST be cut in 3-foot lengths.
- Metal banding: MUST be cut in 1-foot lengths.
- Aerosol cans: MUST be empty and crushed or punctured. Plastic caps must be removed.

Mahalo for your cooperation. We value your support and friendship.

Malama Pono!

ATTACHMENT A: SPILL KIT EQUIPMENT LISTING & LOCATIONS

Spill Response Equipment Listing

The spill response kits will be located in the following areas:

1 – Scale

2 – Shop maintenance warehouse

3 – Shredder/Downstream building

The kits will consist of:

1 – 25 gallon UN/DOT approved drum

2 – absorbent pads

3 – absorbent socks

4 – absorbent pillows

5 – bag of absorbent

6 – Tyvek suits

7 – nitrile gloves

8 – safety goggles

9 – waste disposal bags

10 – shovel

The battery spill response kits will be located in the following areas:

1 – Non-ferrous receiving area

The kits will consist of:

1 - absorbent/neutralizer

2 – degreaser

3 – goggles

4 – aprons

5 – pvc gloves

6 – hazmat boot covers

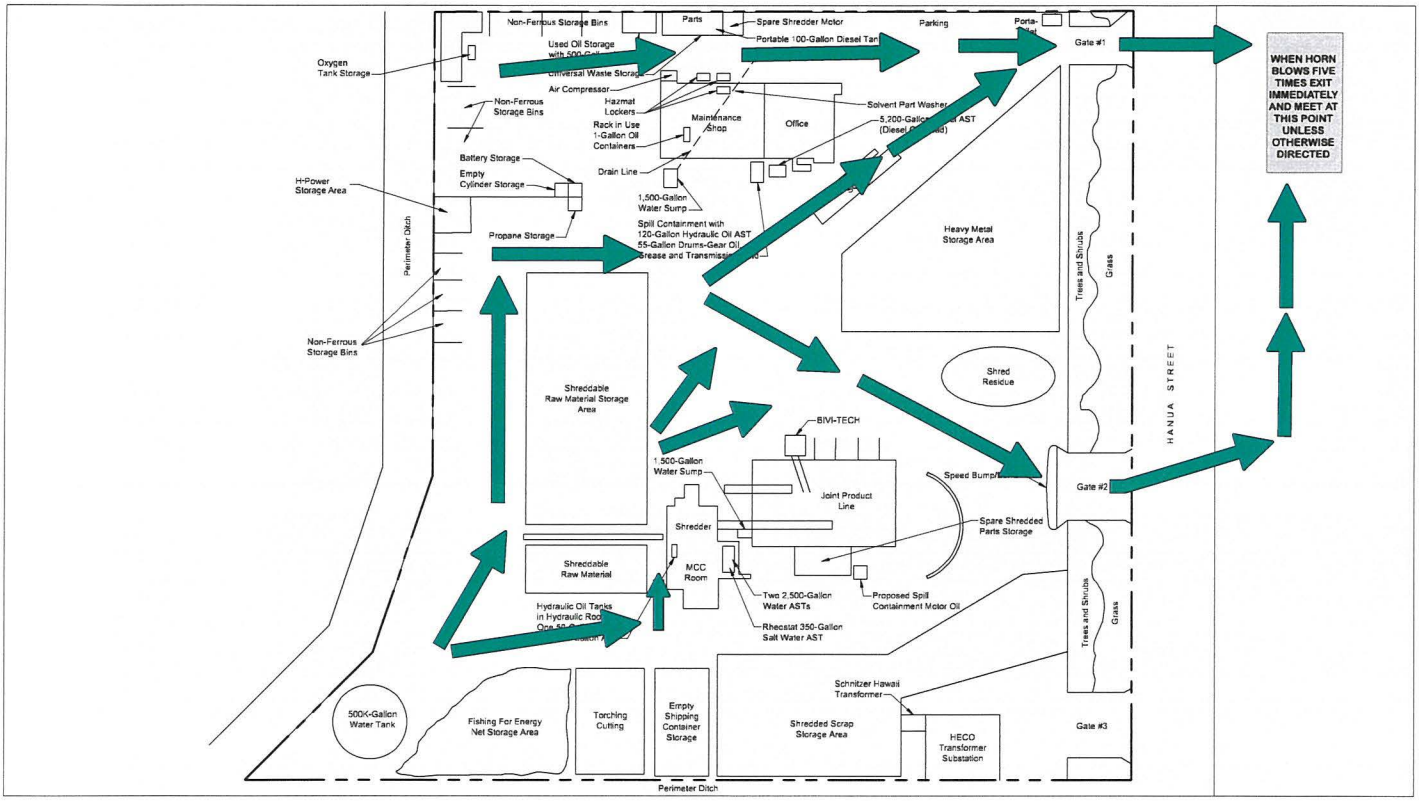
7 – dust pan

8 – whisk broom

9 – barrier tape

10 – disposal bag

ATTACHMENT B: EVACUATION ROUTES



Legend:

Site Boundary

0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.

Job Number:	60027	Created by:	ALS/KJC
Date:	02/27/2020	Reviewed By:	MCC

Evacuation Routes

Project: Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, Oahu, Hawaii

Client: Watanabe Ing LLP

ATTACHMENT C: STORM WATER POLLUTION CONTROL PLAN

Storm Water Pollution Control Plan Schnitzer Steel Hawaii Corp. Facility

6 March 2020

Prepared for

Schnitzer Steel Hawaii Corp.
91-056 Hanua Street
Kapolei, Hawaii 96707

Revised by

NEPTUNE AND COMPANY, INC.
1435 Garrison St, Suite 201, Lakewood, CO 80215

CONTENTS

TABLES

ACRONYMS AND ABBREVIATIONS

AST	Aboveground storage tank
BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
Bonus	heavy gauge HMS
CFR	Code of Federal Regulations
COD	Chemical Oxygen Demand
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
HAR	Hawaii Administrative Rules
HDOH-CWB	State of Hawaii Department of Health – Clean Water Branch
HECO	Hawaiian Electric Company, Inc.
HMS	Heavy melting steel
JP	Joint Products
NAICS	North American Industrial Classification System
NFR	Non-ferrous raw
NPDES	National Pollutant Discharge Elimination System
PCB	Polychlorinated Biphenyls
QA/QC	Quality Assurance/Quality Control
Schnitzer Hawaii	Schnitzer Steel Hawaii Corp.
SHD	Super Heavy Duty
Shred	Shredded ferrous iron
SIC	Standard Industrial Classification
SPCC	Spill Prevention Control and Countermeasure
SR	Shredder residue
SWMP	Storm Water Monitoring Plan
SWPCP	Storm Water Pollution Control Plan
TSS	Total Suspended Solids

1.0 Introduction

1.1 General

This Storm Water Pollution Control Plan (SWPCP) for the Kapolei, Oahu, Hawaii facility of Schnitzer Steel Hawaii Corp. (Schnitzer Hawaii) has two major objectives:

1. Identify and evaluate potential sources of pollution that may affect the quality of storm water if it were to discharge offsite from the facility; and
2. Identify and implement best management practices (BMPs) to prevent and reduce pollutants in storm water which is contained on site, as well as storm water that could potentially discharge offsite during an extreme storm event.

There are two types of BMPs, which may be used to reduce the potential for storm water to become contaminated by industrial pollutants. These are:

- non-structural BMPs - administrative, materials handling and management measures, including hazardous waste/materials pollution prevention measures; and
- structural BMPs - structural storm water treatment and source reduction, and other engineered measures, such as containment berms, covers, etc.

This SWPCP also contains descriptions of industrial activities and pollutant sources, descriptions of BMPs, storm water monitoring procedures, drawings, and maps. The SWPCP will be revised whenever appropriate and maintained at the General Manager's office at the facility, readily available for review by employees or inspectors.

1.2 Site Data

Facility Name	Schnitzer Steel Hawaii Corp.
Address	91-056 Hanua Street, Kapolei, Hawaii 96707
Primary Facility Contact	Mr. Bryan Graham Senior Environmental Manager (253) 404-6686 (office) (253) 254-4810 (mobile)
Alternate Facility Contact	Mr. Drew Coats Facility & Operations Manager (808) 682-5810 (office) (808) 265-5617 (mobile)
Alternate Facility Contact	Mr. Nick Garofalo General Manager (808) 682-5810 ext. 202 (office) (808) 214-2125 (mobile)

Type of Facility	Recyclable Material Wholesalers (NAICS Code 423930; SIC Code 5093)
Total Size of Facility	6 acres (261,360 square feet)
Site Area with the Potential to Contribute to Storm Water Runoff During an Extreme Storm Event	0.13 acre (5,500 square feet)
Percent of Runoff Area with Impervious Base	100%

1.3 Narrative Facility Description

The Schnitzer Hawaii facility recycles metal (ferrous [contains iron] and non-ferrous). The North American Industrial Classification System (NAICS) Code for the facility is 423930 and the Standard Industrial Classification (SIC) Code for the Facility is 5093. The facility receives, processes, and stores recyclable metal generated throughout the State of Hawaii. The processed metals are then shipped off-island in bulk to various recovery facilities.

Number of Employees

The Schnitzer Hawaii facility currently has approximately 35 employees. Personnel are normally present during business hours (6:30 a.m. to 4:30 p.m.), Monday through Saturday.

Site Description

The Schnitzer Hawaii facility comprises approximately 261,360 square feet (6 acres) of land area and is paved with concrete. Storm water runoff from 100 percent of the site is contained on site and used for dust suppression and may be used for shredder cooling water in the future. No storm water runoff from the site is discharged off of the site. The Schnitzer Hawaii facility is improved with a building containing administrative offices and an adjoining maintenance shop garage, an employee lunchroom and restroom building, and a "shredder" and joint product line building.

Process Descriptions

The Schnitzer Hawaii facility processes (accepts, stores, dismantles, and shreds) military scrap, discarded and abandoned vehicles, white goods, and other scrap metal into ferrous and non-ferrous metal stock for resale.

Maintenance and other activities on-site include vehicle repair and fueling, and general equipment repair. Vehicle repair, fueling, and general equipment repair are normally performed at designated areas under cover in the northern portion of the facility.

The Schnitzer Hawaii facility has one 5,200-gallon capacity SuperVault MH diesel aboveground storage tank (AST) and dispenser at the facility ("Diesel Off Road" for heavy equipment in the yard), which is located south of the office and maintenance shop building. The other ASTs at the

Schnitzer Hawaii facility are located under cover at the site, including: a 500-gallon SuperVault MH AST containing used oil located in the covered storage area on the northern fence line; a portable 100-gallon diesel AST located in the parts warehouse on the northern fence line; a 50-gallon and 350-gallon hydraulic oil AST located at the southwest corner of the shredder building; and two 2,500-gallon fresh water ASTs and a 350-gallon salt water AST for the rheostat located in the shredder building. All of these tanks are located within the portion of the site where storm water runoff is contained and used on site. In addition, one 500,000-gallon storm water tank, which is used to store excess storm water, was installed on the southwestern corner of the subject property.

There are also 55-gallon drums of gear oil, grease, and transmission fluid, and three hazardous material lockers in the vicinity of the maintenance shop. In addition, there is a parts washer/cleaner containing solvent located in the maintenance shop. A covered battery and propane storage area is located to the southwest of the office and maintenance shop building. A covered Schnitzer Hawaii electrical transformer and a Hawaiian Electric Company, Inc. (HECO) electrical transformer are located in the southeastern corner of the facility. The Schnitzer Hawaii electrical transformer has a capacity of 342 gallons of non-polychlorinated biphenyl (PCB) mineral oil.

The general location of the site is included as Figure 1 in Appendix A. A site map is included as Figure 2 in Appendix A.

1.4 Identification of Storm Water Collection Areas

Storm water runoff from 100 percent of the site is contained on site. The storm water is conveyed through a drainage swale, sumps, and general grading of the site towards the water sump located under the shredder and joint product line building before being transferred to an aboveground tank. The front gate entrance was graded to ensure that all storm water is contained on site. A concrete drainage swale in the northern parking lot, between the maintenance workshop and parking stalls bordering the northern fence line, discharges into a concrete vault with a capacity of approximately 50 gallons. Water captured within this concrete vault is pumped into a 1,500-gallon sump collection system located at the southwest corner of the office and maintenance shop building for reuse as process water for shredder operations. In addition, the surface of the facility is graded and sloped to direct process water and storm water run-off into a low area located beneath the shredder and joint product line building to a second 1,500-gallon sump.

The area of the site where storm water run-off could potentially be discharged from the facility, during extreme storm events, is limited to the northeastern driveway located along Hanua Street. If any discharge occurred it would be directed into two storm drains along Hanua Street. This outfall is identified in Figure 2 in Appendix A.

2.0 Storm Water Pollution Control Team

The Schnitzer Hawaii Facility Storm Water Pollution Control Team is composed of individuals who are knowledgeable of facility operations, and will be responsible for developing and maintaining this SWPCP and assisting and advising the facility management in its implementation, maintenance, and revision. The activities and responsibilities of the Team address all aspects of the facility's SWPCP, including:

- Developing the SWPCP;
- Reviewing and revising the SWPCP;
- Ensuring proper implementation of the SWPCP, including required sampling, periodic observations, and inspections;
- Performing SWPCP Quality Assurance/Quality Control (QA/QC) as described in Section 5.1.9 of this SWPCP;
- Coordinating the training of facility personnel on the requirements of the SWPCP;
- Advising facility management regarding the requirements and effectiveness of the SWPCP; and
- Implementing the facility's spill prevention and response plan.

The Schnitzer Hawaii Facility Storm Water Pollution Control Team is composed of the following individuals:

Name	Title	Phone Number
Mr. Bryan Graham	Senior Environmental Manager	(253) 404-6686 (office) (253) 254-4310 (mobile)
Mr. Drew Coats	Facility & Operations Manager	(808) 682-5810 (office) (808) 265-5617 (mobile)
Mr. Nick Garofalo	General Manager	(808) 682-5810 ext. 202 (office) (808) 214-2125 (mobile)

3.0 List of Significant Materials

The following table lists the significant materials which are located at the facility. All of these materials are located within the portion of the site where storm water is contained and used on site.

Table 1—Significant Materials On-Site.

Material	Location	Quantity	Handling Areas	Receiving/ Shipping Areas	Delivery Frequency
Diesel fuel	South side of office & maintenance shop building	One 5,200-gallon diesel AST (SuperVault MH)	South side of office & maintenance shop building	South side of office & maintenance shop building	Monthly
Used oil	Inside used oil storage area along northern fence line	500-gallon SuperVault MH AST	Used oil storage shed along northern fence line	Used oil storage shed along northern fence line	Infrequently (Used oil is generated, not delivered)
Diesel fuel	Inside parts warehouse along northern fence line	100-gallon portable AST	Inside parts warehouse along northern fence line	Inside parts warehouse along northern fence line	As needed
Hydraulic oil	Inside southwest corner of shredder building	50-gallon & 350-gallon AST	Inside southwest corner of shredder building	Inside southwest corner of shredder building	As needed
Gear oil, grease & transmission fluid	In the covered spill containment to the south of the office & maintenance shop building	Five 55-gallon drums (in use)	In the covered spill containment to the south of the office & maintenance shop building	In the covered spill containment to the south of the office & maintenance shop building	As needed
Used Batteries	Storage container to the southwest of the office & maintenance shop building	Varies	Storage container to the southwest of the office & maintenance shop building	Storage container to the southwest of the office & maintenance shop building	Infrequently (Used batteries are generated, not delivered)
Salt water for the shredder rheostat	Shredder building	350-gallon AST	Shredder building	Shredder building	As needed
Stockpile of heavy metal	Northeastern portion of site	Varies	Northeastern portion of site	Northeastern portion of site	Frequently

Material	Location	Quantity	Handling Areas	Receiving/ Shipping Areas	Delivery Frequency
Stockpile of shreddable raw material	Western portion of site	Varies	Western portion of site	Western portion of site	Frequently
Stockpile of shredded scrap	Southeastern portion of site	Varies	Southeastern portion of site	Southeastern portion of site	Frequently
Stockpile of irony aluminum	Southwestern portion of site	Varies	Southwestern portion of site	Southwestern portion of site	Frequently
Stockpile of shred residue	Eastern portion of site	Varies	Eastern portion of site	Eastern portion of site	Frequently

4.0 Description of Potential Pollutant Sources

4.1 Narrative Description of Potential Pollution Sources

The source materials and activities discussed below are located within the portion of the site where storm water runoff is contained and used on site.

Facility Operations

Refueling of trucks and vehicles is conducted by Schnitzer Hawaii facility personnel. Fuel from the diesel ASTs are dispensed, when needed, to yard equipment. Most equipment is fueled each day they are in use. The 5,200-gallon AST is filled approximately once a month and the other smaller diesel ASTs are filled as needed.

Hazardous materials including batteries, new and used motor oil, transmission and hydraulic fluid, antifreeze, and lubricants are kept in the maintenance shop, battery storage shed, used oil storage shed, shredder building, and hazardous materials lockers.

4.1.1 Industrial Processes

Outdoor Storage, Manufacturing and Processing Activities

Incoming material is driven onto a platform scale located adjacent to the northeast driveway to obtain the gross weight of the vehicle and recyclable material. The vehicle is directed to a designated area where the material is inspected to evaluate its acceptance.

Schnitzer Hawaii has developed a scrap acceptance policy which prohibits acceptance of items such as explosives, radioactive materials and items containing PCBs, and all but trace amounts of certain automotive fluids (i.e., gasoline, diesel fuel, motor oil, transmission fluid and coolant). General refuse is not accepted in junked vehicles, and gasoline tanks are drained or removed before the vehicles are accepted.

Metal that is received at the facility is separated into different piles including heavy melting steel (HMS), bonus (heavy gauge HMS), and light iron (i.e., appliances, drained end of life vehicles, and other lighter metals). HMS and bonus is resized using a shear or by torch cutting in a designated area. Light iron is shredded and separated into ferrous and non-ferrous raw (NFR) materials. Shredded ferrous iron (shred) is stockpiled on site for shipment to other customers. The NFR is further separated in the Joint Products (JP) plant where non-ferrous metal is recovered and shredder residue (SR) is produced. The SR is stockpiled onsite temporarily before transport offsite where it is beneficially used as daily cover and disposed at a landfill.

4.1.2 Material Handling and Storage Areas

Maintenance & Repair Operations

Various petroleum products, oils, and lubricants are stored in 5-gallon pails, 55-gallon drums, and various other containers, including ASTs, both inside and outside the maintenance shop. Paints, thinners, solvents, lacquer, gasoline containers, spray cans that contain solvents, paints,

and penetrating oils, etc. are stored separately in three "Flammables Lockers" in the vicinity of the maintenance shop.

In addition, an open-sided used oil storage shed with bollards (crash-posts) fronting the structure is located on the fence line in the northwest corner of the facility. The structure contains a 500-gallon used oil AST. Used oil from vehicle and equipment maintenance is collected and placed in the 500-gallon AST.

There is a parts solvent washer/cleaner located at the site. There are 50-gallon and 350-gallon hydraulic oil ASTs located in the southwest corner of the shredder building.

Fueling Operations

Schnitzer Hawaii has one 5,200-gallon diesel AST on-site for fueling yard equipment. Equipment is fueled by the driver when they pull up to the diesel dispenser. A portable 100-gallon diesel AST is used to fuel other equipment. Sufficient absorbent material is kept near the fuel-dispensing areas in case a release occurs.

Vehicle Washing Operations

The exteriors of the vehicles are cleaned in the wash area on the western side of the office/workshop building. Washing operations are conducted by Schnitzer Hawaii personnel. The wash water is collected in a sump and recycled for use as cooling water in the shredder.

Spill and Leak Prevention and Response Procedures

Schnitzer Hawaii observes and monitors specific material handling procedures and storage requirements to reduce the occurrence of potential spills or leaks. Proper hazardous materials and waste handling and storage are part of the training provided to employees who handle such materials.

Schnitzer Hawaii's clean-up equipment and procedures, along with internal reporting procedures for spills of significant materials, are designed to limit the potential effects of a spill on storm water. Minor spills of hazardous materials that can be handled safely by responding employees are cleaned up (primarily using dry methods, such as use of absorbents or by using absorbent booms or pads) by internal Schnitzer Hawaii personnel. Larger or higher hazard spills and releases are managed and cleaned up by outside (public or contract) emergency responders after notification by Schnitzer Hawaii facility personnel.

4.1.3 Historical Spills and Leaks

No significant spills or leaks of hazardous pollutants have taken place at the facility.

Minor spills sometimes occur during truck fueling or during refilling of the bulk diesel fuel tank due to residues in the hoses, and would only be a small amount. Absorbents are used to contain such releases. Other BMPs include: (1) the use of spill and overflow protection; (2) implementing a proper spill prevention control program; (3) inspecting fueling areas regularly to detect problems before they occur; and (4) training employees on proper fueling,

clean-up, and spill response techniques. Schnitzer Hawaii has also implemented a Spill Prevention Control and Countermeasure (SPCC) Plan for the facility.

4.1.4 Non-Storm Water Discharges

Methods Used to Identify the Presence of Non-Storm Water Discharges

The facility was evaluated for the presence of non-storm water discharges in 2004 and 2011 by Bureau Veritas North America. There was no evidence of non-storm water discharges observed.

4.1.5 Soil Erosion

Erosion and Sediment Controls

The facility is covered with concrete (with the exception of small landscaped areas). Therefore, the potential for soil erosion is extremely low.

4.2 Assessment of Potential Pollutant Sources

The following is an evaluation of source areas that may potentially affect storm water runoff at this facility. The source areas are categorized as on-site or off-site potential pollutant source areas. Pollution prevention measures designed to mitigate the potential storm water effect of these activities are described in Section 5.0.

4.2.1 On-Site Potential Pollutant Source Areas

On-site sources are defined as potential sources of pollutants that are located on the Schnitzer Hawaii facility property. All of these potential sources are located within the portion of the site where storm water is contained and used on site. Notwithstanding the containment of runoff from the potential source areas, facility management has developed management practices to reduce the risk of pollutant discharge from each source area. These source areas are:

- Fuel Dispensing Areas
- Trucks
- Stockpiles of ferrous shred, processed HMS and bonus, and SR are temporarily stored at designated areas of the facility.

Fuel Dispensing Area

Diesel for the refueling of off-road vehicles and heavy equipment is stored in one 5,200-gallon AST. There is a potential for spills or leaks of diesel fuel to occur during use of fuel dispenser, refilling of the AST, or improper washing or hosing down of the fueling areas.

Trucks

A large number of trucks pass through the facility each year. Each of these trucks has the potential to leak small amounts of petroleum hydrocarbons onto the ground. These petroleum hydrocarbons could impact storm water runoff.

Vehicle Wash Area

Vehicle washing is conducted onsite under the following conditions:

- Washing is done over a sump that recycles water through the shredder,
- When it is not raining,
- When there is no rain in the forecast, and
- Steam-clean/Pressure wash

Outdoor Maintenance Areas

Maintenance activities take place indoors in the maintenance shop or under cover at the facility.

Outdoor Storage Areas

Stockpiles of ferrous shred, processed HMS and bonus, and SR are temporarily stored at designated areas at the facility.

4.2.2 Off-Site Sources

Based on drainage patterns observed at the site and neighboring sites, it appears that no run-off from off-site sources has the potential to enter the site. Off-site sources are defined as those potential sources of pollutants located on properties adjacent to the Schnitzer Hawaii facility which, because of existing drainage patterns, have the potential to impact storm water that discharges onto the site from the adjacent properties.

4.3 Potential Pollutant Sources and Associated BMPS

Potential source areas, which have the potential to add significant quantities of pollutants to storm water runoff, are identified in the Table 2, located on the following pages, and evaluated in Sections 4.1 and 4.2. Selected pollution prevention measures (BMPs) are described in Section 5.0 and are summarized in Table 2. Please note that storm water runoff from 100% of the site is contained on site. The primary BMP for the overall site is to prevent source materials and actions that could cause releases of source materials in the unlikely event of an extreme storm event with sufficient magnitude to cause a release of storm water from the site.

5.0 Storm Water Best Management Practices

Storm water management controls, known as BMPs are those administrative, procedural, or engineering based practices which may prevent, eliminate, reduce, or otherwise control the discharge of pollutants into storm water or the storm drain system. The following describes procedures that will be implemented to ensure that the intent of the National Pollutant Discharge Elimination System (NPDES) General Permit is achieved.

5.1 Non-Structural BMPS

The primary non-structural BMP is to prevent storage or use of source materials and activities that could release source materials in the unlikely event of an extreme storm event with sufficient magnitude to cause a release of storm water from the site. Additional non-structural BMPs intended to reduce releases to onsite storm water runoff are discussed below.

5.1.1 Good Housekeeping

Good housekeeping generally consists of practical procedures to maintain a clean and orderly facility. Examples are:

- A street cleaner sweeps the facility twice a month
- Routine sweeping of all areas that may generate potential storm water pollution sources
- Promptly cleaning up any spills or leaks and removing all absorbents used to clean up spills or leaks
- Steam/pressure washing of outside areas as needed and proper collection and disposal of the residue or wash water generated
- Keeping chemical storage areas neat and dry
- Keeping all hazardous materials containers and areas neat
- Always return all materials to their proper (and preferably covered) storage area with lids and caps in place

Table 2—Summary Assessment of Potential Pollution Sources and Corresponding Best Management Practices.

Source Areas	Activity	Pollutant Source	Potential Pollutants	Best Management Practices (as detailed in Section 5.0)
Fuel Dispensing Areas	Fueling, Refueling	Spills and leaks during delivery	Petroleum Hydrocarbons (diesel)	- Use spill and overflow protection. - Implement proper spill prevention control program. - Inspect fueling areas regularly to detect problems before they occur. - Train employees on proper fueling, clean-up, and spill response techniques.
		Spills caused by topping off fuel tanks	Petroleum Hydrocarbons (diesel)	- Implement proper spill prevention control program. - Drivers should remain at vehicle while fueling. - Train employees on proper fueling, clean-up, and spill response techniques.
		Hosing or washing down fuel area	Petroleum Hydrocarbons (diesel)	- Use dry clean-up methods rather than hosing down area. - Train employees on proper fueling, clean-up, and spill response techniques.
		Leaking fuel dispensers	Petroleum Hydrocarbons (diesel)	- Inspect fueling areas daily to detect problems before they occur. - Implement adequate preventative maintenance program to prevent dispenser and line leaks.
		Rainfall running off fueling area, and rainfall running onto and off fueling area	Petroleum Hydrocarbons (diesel)	- Minimize run-on of storm water into the fueling area. - Install a containment berm around the fueling area if run-on causes storm water pollution.

Table 2 (continued)

Source Areas	Activity	Pollutant Source	Potential Pollutants	Best Management Practices (as detailed in Section 5.0)
Truck and Vehicle Wash Area	Washing Trucks and Vehicles	Wash water	None likely	- Do not wash vehicles in driveway areas adjacent to Hanua Street. - Allow only the washing of truck and vehicle exteriors. - Use only biodegradable detergents in wash water. - Visual inspection of wash water for a sheen or other evidence of contamination.
Trucks and Large Machinery Parking Areas	Truck and Large Machinery Parking	Drips and leaks from trucks and large machinery	Petroleum Hydrocarbons	- Inspect trucks regularly to detect leaking vehicles as soon as possible. - Use drip pans to collect drips and leaks. - Repair leaking vehicles/machinery as soon as possible.
Maintenance Areas	Vehicle and Equipment Repair and Maintenance	Drips and leaks from equipment to be repaired	Petroleum Hydrocarbons, Transmission Fluid, Ethylene Glycol (antifreeze, coolant)	- Do not perform outdoor maintenance in driveway areas adjacent to Hanua Street. - Use drip pans to collect drips and leaks. - Identify and store leaking or dripping equipment inside the building until repaired - Inspect equipment staging areas regularly to detect leaking equipment as soon as possible - Repair/work on oil-containing equipment inside the building

Table 2 (continued)

Source Areas	Activity	Pollutant Source	Potential Pollutants	Best Management Practices (as detailed in Section 5.0)
Maintenance Areas (cont.)	Vehicle and Equipment Repair and Maintenance	Spills and leaks during oil, transmission fluid, or antifreeze draining and filling	Petroleum Hydrocarbons, Transmission Fluid, Ethylene Glycol (antifreeze coolant)	- Do not drain/fill vehicle fluids in driveway areas adjacent to Hanua Street. - Use drip pans to collect drips and leaks. - Use appropriate filling and draining devices to minimize spillage. - Implement proper spill prevention control program. - Train employees on proper materials management, clean-up, and spill response techniques.
		Leaking containers or small spills of maintenance chemicals	Petroleum Hydrocarbons, Transmission Fluid, Ethylene Glycol (antifreeze coolant)	- Inspect container storage and dispensing areas regularly to detect problems before they occur. - Keep maintenance chemicals in storage areas until used. - Train employees on proper clean-up and spill response techniques.
Outdoor Storage Areas	Stockpiles of finished product, raw material, waste and non-ferrous metal	Rainfall running off stockpiles	Metals, Oil and Grease	- Install a containment berm around the storage area if run-on causes storm water pollution.

Good housekeeping requires that facility areas that discharge storm water be kept clean. In addition, maintenance chemicals and oils will not be stored where they are vulnerable to vehicle traffic damage. Material handling areas will be routinely inspected and cleaned to reduce the potential for pollutants to enter the storm water system. These areas include the storage shed, outside the maintenance area, and the fuel dispensing area. Outside areas will be dry swept (or using other dry clean-up methods) rather than hosed or washed down whenever the areas are to be cleaned. A street cleaner sweeps the facility grounds twice a month.

Employees will be required to follow proper procedures for the handling, collection, and disposal of waste products, such as fuels, machine and automotive oils, and will be instructed to perform these activities inside or under cover, as much as practicable.

Material handling area inspections will be performed on a semi-annual basis. Blank inspection forms are included in Appendix B. Completed inspection forms will be retained and filed.

5.1.2 Preventive Maintenance

Preventive maintenance includes the regular inspection and maintenance of structural storm water controls, as well as other facility equipment and systems whose failure could cause pollutants to enter storm water run-off. Examples are:

- Inspection and repair of containment berms and walls
- Routine and frequent identification, inspection and repair of all equipment which contain oils or other chemicals, and not just using absorbents in place of actually repairing a leak
- Regular inspection and repair of fuel-dispensing equipment

Inspections of facility equipment will be performed daily. A tracking or follow-up procedure will be used to ensure appropriate response has been taken in response to an inspection. Inspections and maintenance activities will be documented, recorded and retained for at least five years as part of the SWPCP. It is the responsibility of the Storm Water Pollution Control Team to ensure that all action items are addressed in a timely fashion.

5.1.3 Spill Prevention and Response

Spill prevention and response requires the identification of areas where significant materials can spill into or otherwise enter the storm water runoff. Schnitzer Hawaii observes and monitors specific material handling procedures and storage requirements to reduce the potential for spills or leaks to occur.

Proper hazardous materials and waste handling and storage are part of the training provided to employees who handle such materials.

Schnitzer Hawaii's clean-up equipment and procedures, along with internal reporting procedures for spills of significant materials, are designed to limit the potential effects of a spill on storm water. Minor spills of hazardous materials that pose no danger to responding employees are cleaned up (primarily using dry methods, such as use of absorbents or by using absorbent booms or pads) by internal Schnitzer Hawaii personnel. Larger or higher hazard spills and releases are

managed and cleaned up by outside (public or contract) emergency responders after notification by Schnitzer Hawaii facility personnel.

5.1.4 Chemical and Material Handling and Storage

Procedures and equipment used at the Schnitzer Hawaii facility to minimize the potential for spills and leaks and to minimize exposure of materials to storm water run-on, run-off, and direct rainfall contact include:

- Storage of materials, parts, and equipment inside, within a storage building or shed or under some type of roof or other cover, when possible
- Storage of materials on secondary containment pallets
- Storage of materials on covered containment pallets or on containment pallets underneath a tarp when kept outside
- Keeping containers closed tightly to reduce the possibility of spills or leaks if the container tips over
- Use of proper drum/container handling equipment (such as a drum grabber) or moving drums only on containment pallets to reduce the potential for a forklift to damage containers, or to cause the container to fall
- When possible, only moving, loading, or receiving hazardous materials during dry periods, and not during a storm
- Using the proper type of equipment when dispensing from or adding to a container to reduce the possibility of spills and overflows
- Only dispensing or recontainerizing hazardous materials indoors
- Using drip pans under any leaking equipment awaiting repair
- Use effective adsorbents for minimizing pollution potential from leaks

Some materials, equipment, and vehicle management practices used to minimize the contact of potential pollutants with storm water discharges include the following:

- In all circumstances where possible, vehicle maintenance work will be performed inside or under covered structures. All vehicle fluid changes will be conducted indoors when possible.
- For equipment that cannot be serviced under covered areas, all maintenance that requires the change of fluids or has the potential to release pollutants into the storm water will be performed with drip pans or non-permeable tarps under the equipment. Additionally, where adequate space exists, a temporary bermed area can be constructed that will accommodate the vehicle requiring service. Any spills within the bermed area will promptly be cleaned up.
- Prevent excessive use of lubricants/oils on conveyors.
- Use spill buckets during fueling.

5.1.5 Employee Training

General Training Requirements

General stormwater protection training for all personnel having a role in implementation of this SWPCP is provided through Schnitzer's online Cornerstone training stormwater training module. This training module informs personnel about the overall purpose of the SWPCP. Additional instructor-led training is held on-site to explain site-specific stormwater management methods and each individual's specific responsibilities for implementing the SWPCP. Cornerstone training documentation is recorded in a database from which training completion reports can be produced. Blank training documentation forms are included in Appendix C to document the instructor-led training. Completed training program documentation, including Cornerstone training completion reports and written records of instructor-led training will be retained in a central training file and in Appendix C. In addition, all personnel who manage fuels and petroleum products on-site receive specific training in spill prevention and response measures.

5.1.6 Waste Reduction/Recycling

Schnitzer Hawaii currently contracts with qualified companies to pick up used motor oil, used oil filters, used antifreeze, and used batteries as needed. Relatively small volumes of these materials are generated.

5.1.7 Record Keeping and Internal Reporting

The NPDES General Permit requires that all records generated in implementation of the Storm Water Monitoring Program be maintained for a period of at least five years from the date of the sampling, observation, measurement, or report. Therefore, the facility will maintain all information required by the NPDES General Permit for a period of no less than five years.

The list below summarizes the documents kept on file at Schnitzer Hawaii:

- Semi-annual inspection on a dry day of all storm water discharge locations and containment areas;
- Spill reports and records;
- Storm water visual observations (performed during first hour of storm event; annually);
- Annual employee training;
- Annual or periodic regulatory reports to the State of Hawaii, Department of Health – Clean Water Branch (HDOH-CWB) (includes laboratory results from sampling);
- Copies of the Notice of General Permit Coverage, this SWPCP, the Notice of Intent Application, and all subsequent revisions.

5.1.8 Erosion Control and Site Stabilization

The facility is relatively flat and covered with concrete pavement and does not represent a significant potential for soil erosion. No method of erosion control or site stabilization is necessary for the facility at this time.

5.1.9 Quality Assurance/Quality Control

Elements of the QA/QC Program

The QA/QC program is designed to confirm that all elements of the SWPCP are performed and that all monitoring is conducted by trained personnel. The following are the elements of this SWPCP:

- Semi-annual site non-storm water discharge inspections on a dry day
- Storm water discharge visual observations
- Storm water sampling
- Proper SWPCP amendments
- Employee training

The Storm Water Pollution Control Team is responsible for ensuring the implementation of the QA/QC Program.

Storm Water Monitoring Program QA/QC Checklist

A checklist will be used to verify that the elements of the QA/QC program have been properly performed. If the checklist reveals that a particular element of the SWPCP is not being properly performed, steps will be taken to correct the problem. Completed Storm Water Sampling QA/QC Checklists are retained in Appendix D.

5.2 Structural BMPS

Structural BMPs generally consist of engineered and/or constructed structural devices that physically reduce or prevent the discharge of pollutants.

5.2.1 On-Site Containment of Storm Water Runoff

The site is graded and contained in a manner that collects storm water runoff from 100 percent of the site. The storm water is pumped into the 500,000-gallon tank when a storm event occurs. Maintaining this degree of site containment is the primary structural BMP. In addition, as a precautionary measure, in the event of a possible extreme storm event which would cause a discharge to occur, absorbent booms will be placed the site's outfall at the northeastern driveway to contain any potential pollutants. Additionally, the front gate entrance has been graded to stop any storm water runoff to the street.

Other structural BMPs intended to reduce releases of source material to onsite storm water are discussed below.

5.2.2 Overhead Coverage

All hazardous materials are stored under cover or within enclosed areas, except when used.

5.2.3 Secondary Containment Structures

The Schnitzer Hawaii facility uses spill pallets as secondary containment for drums of petroleum products greater than 50 gallons.

5.2.4 Portable Covers

Offsite discharge storm drains are not located on-site and not under the control of Schnitzer Hawaii.

6.0 Storm Water Pollution Control Plan Amendments

As required by the NPDES General Permit, this SWPCP will be amended if any of the following conditions exist:

- A change in construction, operation, or maintenance which may significantly increase the quantities of pollutants in potential storm water discharges;
- A change in construction, operation, or maintenance which causes a new area of industrial activity at the facility to be exposed to storm water;
- Whenever this SWPCP has not achieved the general objectives of controlling pollutants in storm water that could potentially discharge off of the site during extreme storm events, pursuant to the requirements of the NPDES General Permit; or
- Whenever any discharge limitation or water quality standard established in Hawaii Administrative Rules (HAR), Section 11-54-04, for marine waters is exceeded (the revisions shall include BMPs and/or other measures to reduce the amount of pollutants found to be in exceedance from entering storm water runoff).

The SWPCP will be reviewed and updated as often as needed or as required by the State of Hawaii Department of Health, Clean Water Branch.

Any amendments to the SWPCP will conform with the conditions of the NPDES General Permit. Any changes to the plan will be reported to the HDOH-CWB within thirty days of when the changes arise, as required by the NPDES General Permit.

7.0 Storm Water Monitoring Program (SWMP)

7.1 Introduction

The objectives of the SWMP are:

- Monitor BMPs and the facility to ensure that all storm water is contained on-site during a storm event;
- Ensure that offsite storm water discharges are in compliance with the discharge prohibitions, effluent limitations and receiving water limitations specified in the NPDES General Permit;
- Ensure practices at the facility to control pollutants in storm water offsite discharges are evaluated and revised as necessary to meet changing conditions;
- Aid in the implementation and revision of this SWPCP; and
- Measure the effectiveness of BMPs in containing storm water during a storm event.

The SWMP addresses sampling and analysis in accordance with 40 Code of Federal Regulations (CFR) 122:21(g)(7) and 40 CFR Part 136.

7.2 Rationale for Selection of Monitoring Methods

These monitoring methods were selected to provide all necessary and required information with the least disruption to facility operations. The methods were developed with the knowledge that facility personnel will have to respond in a rapid manner when a rainfall event begins in order to meet the various time constraints for storm water visual observations and storm water sampling and analyses.

The analytical methods that will be used to analyze storm water samples collected from the facility are those required by the NPDES General Permit. Analytical methods shall utilize the test methods indicated in 40 CFR Part 136.

7.3 Storm Water Sampling and Analyses

Storm water runoff from 100% of the site is contained on site. In the unlikely event of an extreme storm event with sufficient magnitude to cause a release of storm water from the site, grab or composite storm water samples collected from the sampling location will be analyzed for the following routine parameters:

Table 3—General Permit Requirements and Associated Analytical and Preservation Methods.

Parameter	Analytical Method	Preservation Method and Required Sample Volume	Effluent Limitation
Biochemical Oxygen Demand (BOD) (5-day)	Environmental Protection Agency (EPA) 405.1	1 L in polyethylene container; Cool to 4°C Hold time: 48 hours Grab or composite	None
Chemical Oxygen Demand (COD)	EPA 410.4	250 ml in polyethylene container; Cool to 4°C, H_2SO_4, pH<2 Hold time: 28 days Grab or composite	None
Total Suspended Solids (TSS)	EPA 160.1	1 L in polyethylene container; Cool to 4°C Hold time: 7-days Grab or composite	None
Total Phosphorus	EPA 365.1	250 ml in polyethylene container; Cool to 4°C, H_2SO_4, pH<2 Hold time: 28 days Grab or composite	None
Total Kjeldahl Nitrogen	EPA 351.2	250 ml in polyethylene container; Cool to 4°C, H_2SO_4, pH<2 Hold time: 28 days Grab or composite	None
Nitrate+Nitrite Nitrogen	EPA 353.2	250 ml in polyethylene container; Cool to 4°C, H_2SO_4, pH<2 Hold time: 28 days Grab or composite	None
Oil and Grease	EPA 1664, Revision A	1 L amber container Cool to 4°C, HCl, pH<2 Hold time: 28 days Grab	15 mg/L
pH	EPA 150.1	250 ml in polyethylene container; Cool to 4°C Hold time: Immediately after sampling Grab	7.0-8.6
Aluminum	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	None
Cadmium	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	43 µg/L

Parameter	Analytical Method	Preservation Method and Required Sample Volume	Effluent Limitation
Chromium (VI)	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	1,100 µg/L
Copper	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	2.9 µg/L
Iron	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	None
Lead	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	140 µg/L
Nickel	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	75 µg/L
Zinc	EPA 200.7	250 ml in polyethylene container; Cool to 4°C, HNO_3, pH<2 Hold time: 28 days Grab or composite	95 µg/L

Note: Total Nitrogen = Total Kjeldahl Nitrogen plus Nitrate + Nitrite
mg/L = milligrams per liter
µg/L = micrograms per liter

7.3.1 Monitoring Frequency

In the unlikely event of an extreme storm event with sufficient magnitude to cause a release of storm water from the site, samples will be collected from that event. If possible, a sample will be collected during the first 15 minutes of the discharge, and at 15-minute intervals thereafter for the duration of the discharge. If the discharge lasts for over an hour, the sample collection will be stopped.

The facility must collect samples only if significant discharges commence during scheduled facility operating hours. When it is not possible to collect any of the required samples due to weather conditions, a description of why the samples could not be collected will be documented.

7.3.2 Storm Event Information

Storm event information (e.g., date and time when storm event began, date and time when storm event ended, duration of storm, date, time elapsed since last storm event, precipitation, run-off

discharged) shall be recorded on the Storm Water Sample Tracking Form included in Appendix D. Completed Storm Water Sample Tracking Forms are retained in Appendix D.

7.3.3 Visual Observations

During storm water sampling, field observations (e.g., turbidity, odor, oil sheen and discoloration) of the storm water discharge, receiving water, controls measures and BMPs shall be recorded on the Storm Water Sample Tracking Form included in Appendix D.

Semi-annual maintenance and equipment inspections and semi-annual inspections on a dry day of potential storm water discharge locations and containment areas shall be recorded on the Maintenance/Equipment Inspection Form included in Appendix B.

7.3.4 Sampling Locations

During the occurrence of an extreme weather event, and in an unlikely event that storm water discharge occurs, the sample location at the facility is shown in Figure 2 in Appendix A and is labeled Outfall 1. Outfall 1 is located in the northeastern corner of the facility. The discharge point is located in the northeastern driveway leading onto Hanua Street.

7.3.5 Calculation of Discharge Quantity

The volume of run-off associated with the potential outfall can be calculated using the following equation:

$$V = P \times A \times R \times C$$

V = Volume of Run-off (gallons)
P = Precipitation (inches)
A = Drainage Area (square feet)
R = Run-off Coefficient
C = CONVERSION FACTOR

Because the area is mainly impervious, a run-off coefficient of 0.85 will be used. A conversion factor of (7.48 gallons/cubic feet)/(12 inches/feet) or 0.623 gal/in-ft^2 will be used.

The following approximate area will be used for the outfall at the facility:

POTENTIAL OUTFALL 1 = 5,500 SQUARE FEET

The discharge volume will be recorded for the outfall sampled on the Storm Water Sample Tracking Form included in Appendix D.

7.3.6 Sampling Methods

Samples of the storm water discharge will be collected manually by personnel trained in accordance with Section 5.1.5 of the SWPCP. For each sampling event, a grab or composite sample will be collected within the first 60 minutes of discharge. If the collection of this sample during the first 60 minutes is impractical, the sample must be collected as soon as possible

thereafter. The Annual Monitoring Report will include an explanation of why the sample could not be collected in the first 60 minutes.

If a grab sample is collected, only one set of storm water samples collected within 60 minutes of discharge will be submitted to the laboratory. However, if composite samples are obtainable, i.e., storm event duration produces sufficient storm water samples for an extended period of time, the first aliquot (an individual sample taken for the purpose of combining with other aliquots) for the composite sample shall be collected immediately after the grab sample. Additional aliquots shall be collected at 15-minute intervals, not to exceed one hour.

Refer to Table 3 in Section 7.3 to determine which sample bottles need to be used. Be sure to fill coolers with ice placed in zipper bags. Proceed to the designated sampling location indicated on the diagram found in Appendix A and set up traffic cones if necessary. If the discharge point is sheet flow, channel the flow with a clean temporary rubber berm, if available. Don clean latex gloves and using a clean glass or plastic collection container fill the sample containers. Cap the sampling bottles tightly and place in the cooler. Decontaminate the glass or plastic collection bottle and temporary rubber berm before sampling the outfall again.

The water should be added carefully to the sample containers which contain acid as a preservative and the containers should be handled so as not to spill the acid. The sample container will then be completely labeled (e.g., collection date and time, sample ID number, name of sampler, sample collection, preservation method) and placed in an ice chest. A chain-of-custody form shall be completely filled out prior to submittal to the laboratory (a copy of the laboratory chain-of-custody form is included in Appendix E). Copies of laboratory chain-of-custody forms shall be attached to the associated Storm Water Sample Tracking Form and retained in Appendix D. Samples will be transported under appropriate chain-of-custody procedures to an accredited laboratory.

During manual sampling activities or other sample handling, sampling personnel will wear chemical resistant gloves to minimize the potential for contact with the sample.

7.3.7 Parameters of Concern and Analytical Methods

Table 3 (Section 7.3) lists the parameters for which storm water discharges from the facility are monitored, as listed in the General Storm Water Permit, which might be present in quantities exceeding the effluent limitation. Table 3 (Section 7.3) also lists the analytical method by which the sample is to be analyzed and the preservation method by which the sample is to be preserved from the time of collection to the time of analysis. In addition, compounds potentially present in the storm water runoff include aluminum, cadmium, chromium, copper, iron, lead, nickel, zinc, and petroleum hydrocarbons.

If a particular compound is not detected in a significant quantity in samples collected after two consecutive sampling events, then the facility may eliminate analysis or reduce sampling frequency for that pollutant from future sampling events upon approval by the State of Hawaii, Department of Health – Clean Water Branch.

7.3.8 Reporting

The storm water monitoring results will be submitted on a Discharge Monitoring Report (DMR) form, which is included as Appendix F. The DMR form shall be submitted to the HDOH-CWB no later than 60 calendar days following sample collection. If no discharges occur during the monitoring period, the DMR shall state so. Completed DMR forms are retained in Appendix F.

7.4 Sampling Quality Assurance/Quality Control Program

The sampling QA/QC program is designed to confirm that all storm water sampling is conducted in a proper manner. The program consists of:

- Sample Tracking Form
- Sample labeling requirements
- Sampling QA/QC Checklist

Blank copies of the Sample Tracking Form and the Sampling QA/QC Checklist are included in Appendix D.

7.4.1 Sample Tracking Form

- The date, exact place, and time of the sampling, observation, and/or measurement;
- Storm event information;
- The individual(s) who performed the sampling, observation, and/or measurement;
- Standard observations (i.e., visual observations, odors, etc.).

Completed Sample Tracking Forms are attached to the associated Sampling QA/QC Checklist and retained as part of the Storm Water Monitoring Program in Appendix D. In addition, a copy of the chain-of-custody form used to transmit the sample to the laboratory (i.e., TestAmerica - Honolulu) will be attached to the QA/QC checklist. A copy of the laboratory chain-of-custody form is included in Appendix E.

7.4.2 Sample Labeling Requirements

Each collected sample will be labeled with the following information:

- Facility name and address
- Field ID number
- Collection date and time
- Collection location
- Sampler name

7.4.3 Sampling QA/QC Checklist

The purpose of the sampling QA/QC checklist is to ensure that all samples are collected and handled according to appropriate procedures and that all necessary information is recorded for each sample. Following completion of every round of storm water sampling, the checklist should be completed. The checklist is intended to verify the following:

- Samples were collected using the proper containers,
- Sample labels were properly completed,
- Samples were properly preserved,
- Proper chain-of-custody procedures were followed,
- Sample tracking forms were properly completed.

Completed Sampling QA/QC Checklists are retained in Appendix D.

7.5 Record Retention

All records and information resulting from the storm water monitoring activities shall be retained for a minimum of five years.

PHOTOGRAPHS

Client:	Schnitzer Steel Hawaii Corp	**Project No.:** 14-1002
Site Name:	Schnitzer Steel Hawaii Corp., 91-056 Hanua Street, Kapolei, Oahu, Hawaii	**Date:** July 8, 2015 September 22, 2017

Overview of the entrance to the subject property, looking east from the office building	PHOTO **1**

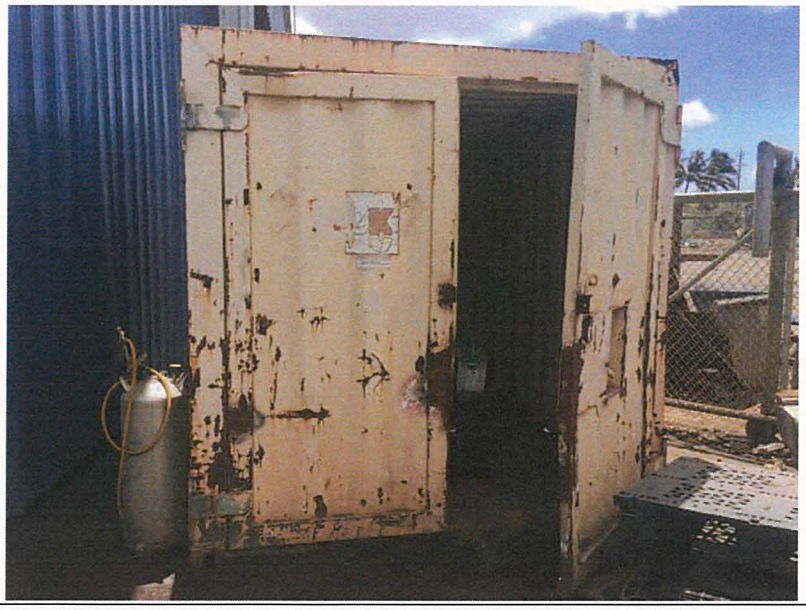
Overview of the office building	PHOTO **2**

Client:	Schnitzer Steel Hawaii Corp	**Project No.:** 14-1002
Site Name:	Schnitzer Steel Hawaii Corp., 91-056 Hanua Street, Kapolei, Oahu, Hawaii	**Date:** July 8, 2015 September 22, 2017

Neatly stacked metal bales and shredded metal pile located on the northwestern portion of the subject property	PHOTO **3**

Non-ferrous loading area	PHOTO **4**

Client:	Schnitzer Steel Hawaii Corp	**Project No.:** 14-1002
Site Name:	Schnitzer Steel Hawaii Corp., 91-056 Hanua Street, Kapolei, Oahu, Hawaii	**Date:** July 8, 2015 September 22, 2017



Battery storage container	PHOTO **5**

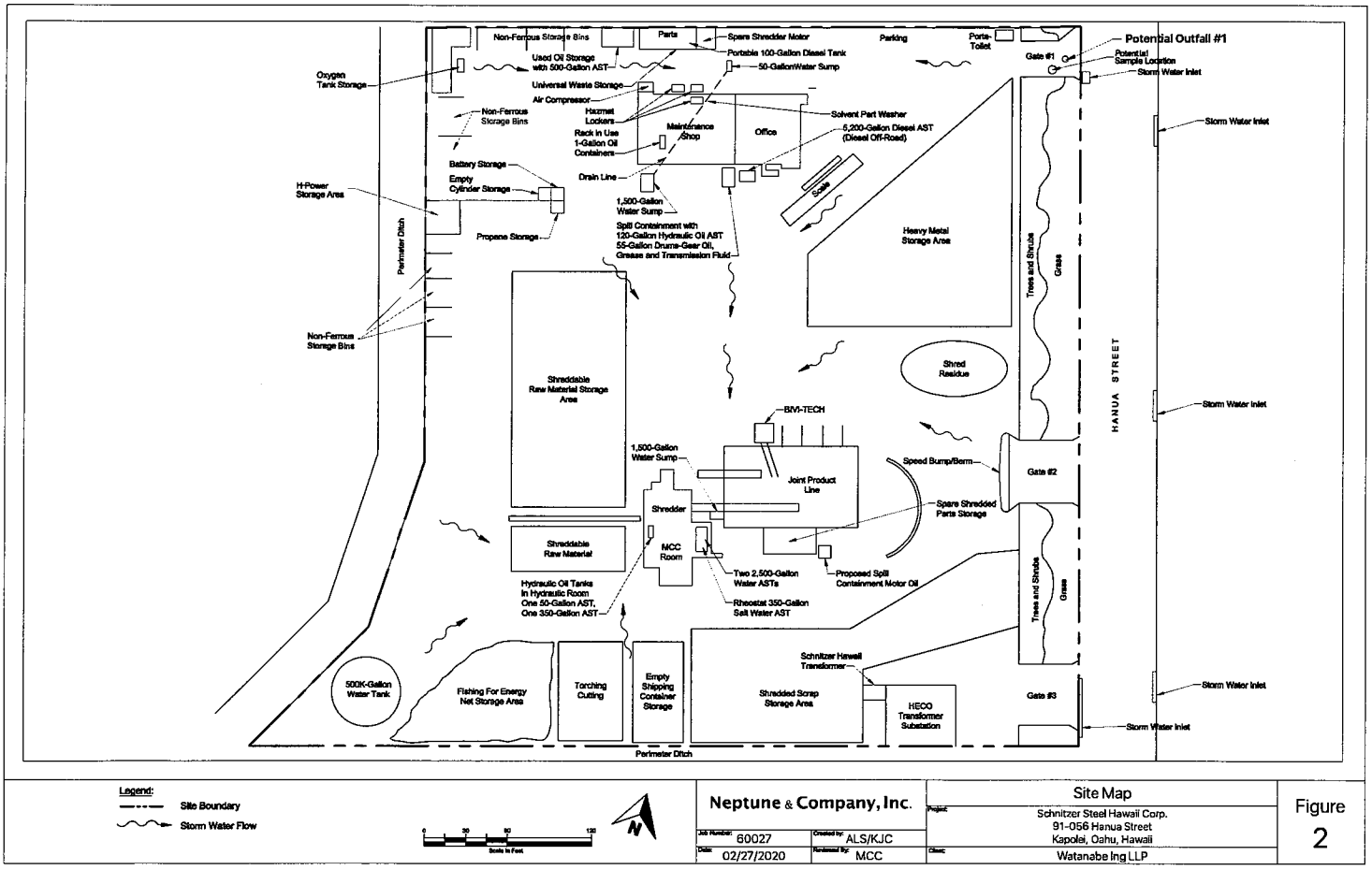
55-gallon drums and AST of hazardous and non-hazardous waste located on secondary spill pallets under covered shed on the northern side of the subject property	PHOTO **6**

Client:	Schnitzer Steel Hawaii Corp	**Project No.:** 14-1002
Site Name:	Schnitzer Steel Hawaii Corp., 91-056 Hanua Street, Kapolei, Oahu, Hawaii	**Date:** July 8, 2015 September 22, 2017

500,000-gallon water tank located on the southwest side of the facility	PHOTO **7**

APPENDIX A
FACILITY/SITE MAP

Neptune & Company, Inc.		Site Location Map	Figure 1
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/21/2020	Reviewed by: MCC	Client: Watanabe Ing LLP	



Legend:

Site Boundary

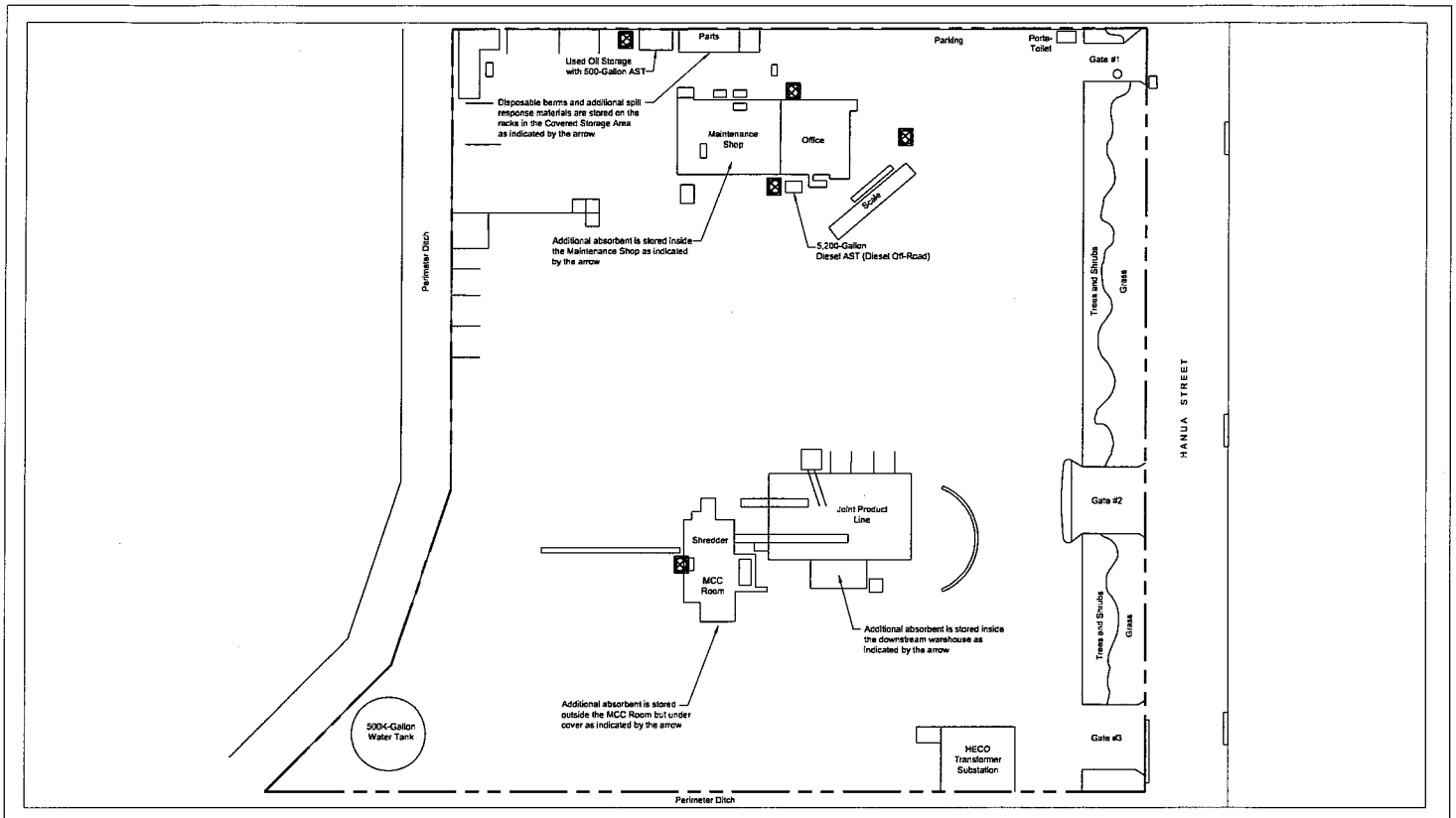
Storm Water Flow

0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.		Site Map	Figure 2
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/27/2020	Reviewed By: MCC	Client: Watanabe Ing LLP	



Legend:

Site Boundary

Spill Kits

0 30 60 120

Scale in Feet

N

Neptune & Company, Inc.		Spill Control Emergency Equipment Map	Figure 3
Job Number: 60027	Created by: ALS/KJC	Project: Schnitzer Steel Hawaii Corp. 91-056 Hanua Street Kapolei, Oahu, Hawaii	
Date: 02/21/2020	Reviewed by: MCC	Client: Watanabe Ing LLP	

APPENDIX B

MAINTENANCE/EQUIPMENT INSPECTION FORMS

MAINTENANCE/EQUIPMENT INSPECTION FORM

Signature of Inspector .....

Name of Inspector .....

Title of Inspector .....

Date of Inspection .....

Date of Last Inspection .....

PREVENTIVE MAINTENANCE

1. Is the integrity of all impervious surfaces intact?
   _____yes _____no

   If no:
   Identify the surfaces that need to be repaired_____

   _____

   _____

2. Are hazardous materials/wastes stored in appropriate storage areas?
   _____yes _____no

   If no:
   Move all hazardous materials/wastes to appropriate storage area.

3. Are hazardous material/waste storage containers intact and in good condition?
   _____yes _____no

   If no:
   List the containers that are damaged and the steps being taken to repair/replace them.

   _____

   _____

4. Are all storm water conveyance system devices (i.e., sumps and drainage areas, etc.) and bermed and walled areas, in good condition, and free of debris?
   _____yes _____no

   List areas inspected_____

   _____

If no:
List the devices that are damaged and the steps being taken to repair/replace them

_____

_____

NON-STORM WATER (DRY DAY) VISUAL OBSERVATIONS

1. Are there any non-storm water sources observed near Potential Outfall #1?
_____yes _____no

Describe any flows, stains, sludges, odors or abnormal conditions that were observed

_____

_____

_____

HOUSEKEEPING PRACTICES

1. Are the parking areas and roadways kept clean ofdebris?
_____yes _____no

If no:
Identify the areas which needs to be cleaned_____

_____

_____

2. Are any oily machinery or vehicle parts stored outside?
_____yes _____no

If yes:
Identify the machinery that needs to be cleaned_____

_____

_____

Identify the machinery that needs to be moved_____

_____

_____

3. Are hazardous material/waste storage areas kept clean of oil and debris?
_____yes _____no

If no:
Identify the areas which needs to be cleaned_____

_____

_____

SPILL PREVENTION AND RESPONSE

1. Is spill clean-up equipment (i.e., personal protective equipment, absorbent, shovels, containers, etc.) kept in a central place that is accessible to employees to expedite spill response?
_____yes _____no

   If no, list the equipment to be obtained and the location where it will be stored

   _____

   _____

2. If a spill occurred, were the proper reporting and clean-up procedures followed?
_____yes _____no

   If no:
   Describe actions for any improper reporting and clean-up procedures; describe procedure to prevent a recurrence

   _____

   _____

3. Has the cause of each spill been determined to attempt to prevent a repeat?
_____yes _____no

   If no:
   Evaluate each spill that occurred during the past six months and develop a procedure to prevent a recurrence

   _____

   _____

FOLLOW UP

1. Have anydeficiencies identified during the previous six month's inspection been corrected?

   _____yes _____no

   If no, provide the date of corrective action_____

APPENDIX C
TRAINING DOCUMENTATION FORMS

ANNUAL TRAINING DOCUMENTATION FORM

I certify that I have read and understand the contents of the following:

- the Storm Water Pollution Control Plan prepared for the Schnitzer Hawaii Facility

In addition, the storm water pollution control personnel have explained my responsibilities under the Storm Water Monitoring Program. I understand and am prepared to execute the responsibilities outlined below.

RESPONSIBILITIES_____

_____

_____

_____

_____

_____

_____

SIGNATURE_____

NAME_____

TITLE_____

APPENDIX D
STORM WATER SAMPLING QA/QC CHECKLISTS AND SAMPLE TRACKING FORMS

STORM WATER SAMPLING
QUALITY ASSURANCE/QUALITY CONTROL CHECKLIST

Date_____

Name of Sampler_____

Title of Sampler_____

Sample Field Identification Number(s): (write in below)

1. Were samples collected in the proper containers (Refer to Table 3 of Section 7.3) and were all sample containers and equipment clean.
   _____yes _____no

2. For each sample collected:

   Was the following information recorded on the label:

   - the facility name and address _____
   - collection date and time _____
   - collection location _____
   - collector name _____

3. Was the sample collected and preserved in accordance with the requirements in Table 3 of Section 7.3?
   _____yes _____no

4. Was the sample sent under chain-of-custody documentation to an accredited and State-approved laboratory for the analyses to be performed?
   _____yes _____no

5. For each sample collected, attach a completed Sample Tracking Form and Chain-of-Custody Form to the QA/QC checklist.

STORM WATER SAMPLE TRACKING FORM

Date_____

Name of Sampler_____

Title of Sampler_____

Sample Field Identification Number_____

Type of Sample Grab _____Composite

Date of sample collection / / .

Time storm water sampling started_____

Time storm water sampling ended_____

Time storm event started_____ Time storm event ended_____

Duration between the storm event sampled and the end of previous storm event greater than 0.1 inches:

_____(days & hours)

Time of sample collection (For composite samples, provide range for continuous samples, or time each sample portion was collected.)

a.m. p.m._____

Rainfall in inches_____

Quantity of flow in gallons (refer to Section 7.3.5)_____

Grab samples must be collected during the first 60 minutes of discharge. If the sample was not collected during the first 60 minutes of discharge, explain why_____

_____

_____

Location of sample collection_____

Indicate any specific visual observations made at time of sampling such as turbidity, odor, oil sheen or discoloration:

_____

_____

_____

Name of laboratory to be used for sample analyses_____

APPENDIX E
CHAIN-OF-CUSTODY FORM

TestAmerica
ANALYTICAL TESTING CORPORATION

TestAmerica - Honolulu
99-193 Aiea Heights Drive Suite 121 • Aiea, HI 96701-3900
808-486-LABS (5227) • Fax 808-486-2456

LABORATORY USE ONLY
LAB JOB NO.
LOCATION
CONTAINERS

Chain of Custody / Analysis Request Form

Report to:			Project identification
Company name			Job name
Address			Job number
City	State	ZIP	P.O. number
Phone	Fax		Contact email address / Date results needed
Sampler	# samples in shipment		

Indicate analyses requested

Item no.	Client sample ID	COMP	GRAB	Matrix: Water	Soil	Wastewater	Drinking water	Sludge	Liquid	Solid	Oil	Other	Preservation method	Sampling: Date	Time	No. of containers	Laboratory ID no.
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Released by (print / sign)	Date / time released	Delivery method	Received by (print / sign)	Company / Agency affiliation	Date / time received	Condition noted
	/				/	
	/				/	
	/				/	

Comments:

Please check one:
- ☐ Dispose by lab
- ☐ Return to client
- ☐ Archive

APPENDIX F
DISCHARGE MONITORING FORMS

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*

DISCHARGE MONITORING REPORT *(DMR)*

Form Approved.
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*
NAME SCHNITZER STEEL HAWAII CORP.

ADDRESS 91-056 HANUA STREET, KAPOLEI, HAWAII 96707

FACILITY SCHNITZER STEEL HAWAII CORP.

LOCATION 91-056 HANUA STREET, KAPOLEI, HAWAII 96707

HI R60B930	1
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD							
	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			

NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
Flow	SAMPLE MEASUREMENT			mgd					0	1/365	calc
	PERMIT REQUIREMENT		Report							1/365	calc or est
BOD5	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp
COD	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp
TSS	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp
Total Phosphorus	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp
Total Nitrogen	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp
Nitrate + Nitrite Nitrogen	SAMPLE MEASUREMENT							mg/L	0	1/365	grab
	PERMIT REQUIREMENT						Report			1/365	grab or comp

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted 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.		TELEPHONE		DATE		
MR. /GENERAL MANAGER			808	682-5810			
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

ATTACHMENT P-4
CLOSURE PLAN
INCINERATION, TRANSFER STATION, RECYCLING, SALVAGE, COMPOSTING, REMEDIATION, MEDICAL/FOREIGN WASTE TREATMENT, OR WASTE TREATMENT/PROCESSING/STORAGE FOR DISPOSAL FACILITIES
SOLID WASTE PERMIT APPLICATION

All Solid Waste Management Facilities are required to prepare and maintain a closure plan. **The closure plan** shall include, but is not limited to, the following information:

1. The identification of any contaminants inherent to the specific facility operation.

2. Day to day operation methods to deal with contaminant and releases at the site.

3. A narrative and flow chart of how the closure will occur at the site. The narrative should review the contaminant compounds of concern, how a detection and testing program will be used at site closure, and the steps to be taken if contaminant compounds are detected, including proposed remedial actions. A flow chart should be provided to explain how the steps will be implemented.

4. A contaminant release log during the life of the site and results of any environmental sampling/investigation at the site should be included as part of the closure planning. The Director of Health may require complete and detailed plans or reports (i.e. site assessment, remediation plans) on solid waste facilities in the event of any releases and/or incidences at the facility.

5. A schedule for implementation of the plan.

An updated closure plan must be completed and submitted for approval 180 days prior to the termination or closure of the facility. Closure of a facility may also be initiated by a permit revocation by the Director of Health, or eviction by the property owner. The updated closure plan shall consist of an updated implementation schedule, the contaminant release log, results of any past environmental sampling/investigation at the site, and any necessary modifications required as a result of the operations.

ATTACHMENT P-4
CLOSURE PLAN, TRANSFER STATION, RECYCLING, SALVAGE, COMPOSTING, REMEDIATION, MEDICAL/FOREIGN WASTE TREATMENT, OR WASTE TREATMENT/PROCESSING/STORAGE FOR DISPOSAL FACILITIES
SOLID WASTE PERMIT APPLICATION

SCHNITZER STEEL HAWAII CORP.
KAPOLEI, OAHU
(SEE OPERATIONS MANUAL)

ATTACHMENT P-5
ZONING CLEARANCE FORM
SOLID WASTE PERMIT APPLICATION

TO THE APPLICANT:

Please be advised that a requirement for the issuance of a solid waste management permit in Hawaii is that the facility meets local ordinances and zoning requirements, including the recording of its disposal facility with the Bureau of Conveyances.

In order that the SHWB may determine whether the facility is in compliance with local land use policy, **we require that this attachment be completed and signed by the appropriate county land use/planning agency** (on Oahu, contact the Department of Planning and Permitting). No permit will be issued unless this form has been properly completed and returned. If a Use Permit or SMA Permit is required, submit a copy of said permit with this form.

Name of Applicant: Schnitzer Steel Hawaii Corp.

Name and phone number of primary contact for applicant:
Nick Garofalo, General Manager, (808) 682-5810

Address of proposed facility:
91-056 Hanua Street
Kapolei, Hawaii 96707

Tax Map Key: 9-1-026: 025

Description of proposed facility [e.g., waste processing, waste storage (indoor or outdoor), recycling, composting, waste disposal, etc.): Salvage, scrap and junk storage and processing facility for a scrap metal recycling business.

COUNTY AGENCY APPROVAL:

The Current Zoning of the proposed site for the Proposed Activity / Facility / Operation is: I-2

X Allowed — Identify Approved Use Permit/SMA, other Restrictions/Limitations: Allowed as a salvage, scrap and junk storage and processing facility pursuant to Conditional Use Permit No. 89/CUP2-1 and subject to its conditions.

____ Not Allowed — Reason (ex: Use Permit/SMA required, application pending, etc.): ____

Name: Kathy K. Sokugawa

Title: for Acting Director

Agency: Department of Planning and Permitting

Signature: [signature] Date: March 12, 2020

Enclosure: Receipt No. 125780
cc: SDOH-Solid and Hazardous Waste Branch

ATTACHMENT P-6
PROPERTY OWNER APPROVAL FORM
SOLID WASTE PERMIT APPLICATION

TO THE APPLICANT:

In order that the SHWB may determine whether the property owner and/or master lessee is knowingly allowing the proposed solid waste activity, we require that this attachment be completed and signed by the property owner and the master lessee, if appropriate. **No permit will be issued unless this form has been properly completed and returned.**

Name of Applicant: Schnitzer Steel Hawaii Corp.

Name and phone number of primary contact for applicant:
Nick Garofalo, General Manager, (808) 682-5810

Address of proposed facility:
91-056 Hanua Street
Kapolei, HI 96707

Tax Map Key: 1-9-1-026:025

Description of proposed facility [e.g., waste processing, waste storage (indoor or outdoor), recycling, composting, waste disposal, etc.): Scrap metal recycling business

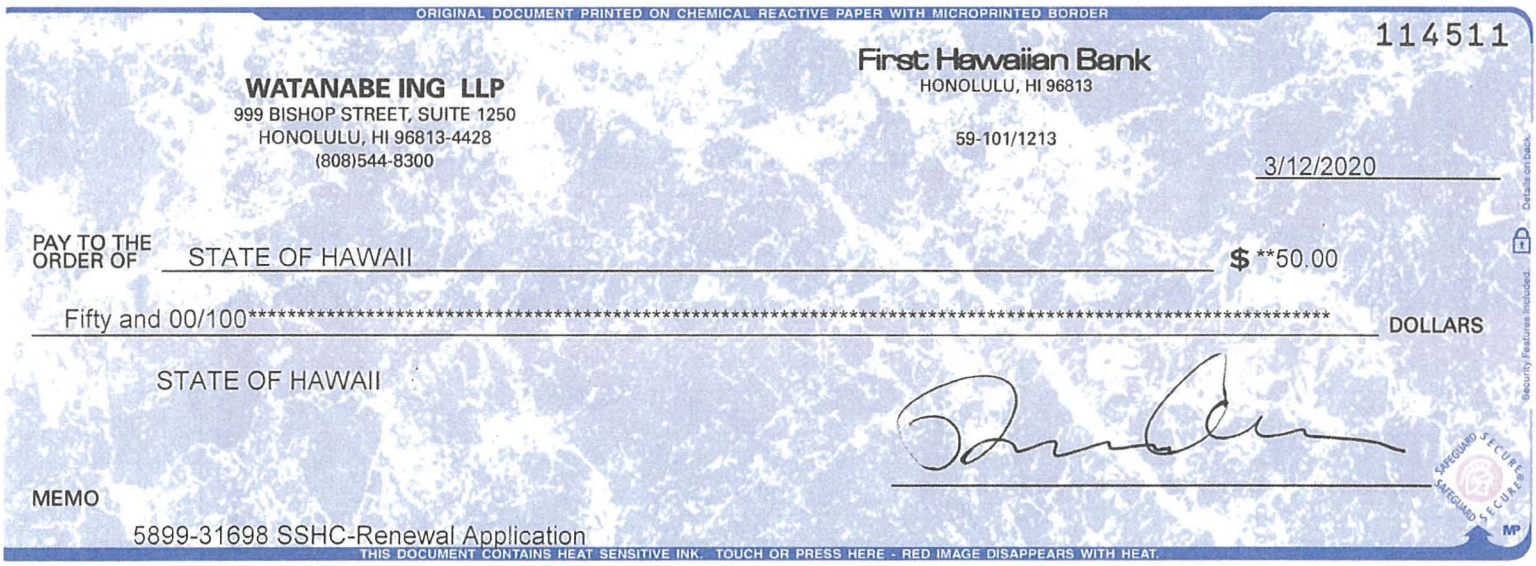
PROPERTY OWNER / MASTER LESSEE APPROVAL:

I/We certify that I/we have knowledge and approve of the applicant's proposed solid waste management facility for the subject location. I/We further certify that I/we fully understand the requirements under HAR Chapter 11-58.1, Subchapter 6, such that I/we am/are also responsible for the aesthetic, nonhazardous, sanitary storage, and removal of solid waste to approved solid waste management facilities.

If the property owner/master lessee is a partnership or group other than a corporation, a county, or state entity, one individual who is a member of the group shall sign this form. If the property owner/master lessee is a corporation, a county, or a state entity, an officer of the corporation, or an authorized representative of the county or state shall sign this form.

Property Owner:
Name of Authorized Representative: Nick Garofalo
Signature: _____ Date: _____
Title: General Manager Telephone: (808) 682-5810
Company Name: Schnitzer Steel Hawaii Corp. Termination date of
Address: 91-056 Hanua St., Kapolei, HI 96707 lease/approval: _____

Master Lessee:
Name of Authorized Representative: N/A
Signature: _____ Date: _____
Title: _____ Telephone: _____
Company Name: _____ Termination date of
Address: _____ lease/approval: _____



ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

114511

WATANABE ING LLP
999 BISHOP STREET, SUITE 1250
HONOLULU, HI 96813-4428
(808)544-8300

First Hawaiian Bank
HONOLULU, HI 96813

59-101/1213

3/12/2020

PAY TO THE ORDER OF STATE OF HAWAII $ **50.00

Fifty and 00/100********** DOLLARS

STATE OF HAWAII

MEMO 5899-31698 SSHC-Renewal Application

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT.

⑈114511⑈ ⑆121301015⑆ 01⑈121235⑈

WATANABE ING LLP

114511

STATE OF HAWAII		3/12/2020	
Cost Advanced	5899-31698 SSHC-Renewal Application		50.00

FHB Business AC 01- 5899-31698 SSHC-Renewal Application 50.00

ASR 2023

MONTH	NET LBS	NET TONS
JANUARY	4502760	2251.38
FEBRUARY	3711640	1855.82
MARCH	5457060	2728.53
APRIL	4151760	2075.88
MAY	5447000	2723.5
JUNE	4328520	2164.26
JULY (UP TO 07/25)	2800260	1400.13
AUGUST		
SEPTEMBER		
OCTOBER		
NOVEMBER		
DECEMBER		
	30399000	15199.5

ASR 2022

MONTH	NET LBS	NET TONS
JANUARY	4418740	2209.37
FEBRUARY	5461720	2730.86
MARCH	6056060	3028.03
APRIL	4958820	2479.41
MAY	5583560	2791.78
JUNE	5073460	2536.73
JULY	3942700	1971.35
AUGUST	4452520	2226.26
SEPTEMBER	4559580	2279.79
OCTOBER	5001120	2500.56
NOVEMBER	4138700	2069.35
DECEMBER	4360020	2180.01
	58007000	29003.5

ASR 2021

MONTH	NET LBS	NET TONS
JANUARY	4882740	2441.37
FEBRUARY	4558960	2279.48
MARCH	4801500	2400.75
APRIL	5451260	2725.63
MAY	4270840	2135.42
JUNE	4642660	2321.33
JULY	5570640	2785.32
AUGUST	4809400	2404.7
SEPTEMBER	4948020	2474.01
OCTOBER	4909500	2454.75
NOVEMBER	4219080	2109.54
DECEMBER	4739500	2369.75
	57804100	28902.05

ASR 2020

MONTH	NET LBS	NET TONS
JANUARY	6204600	3102.3
FEBRUARY	3620680	1810.34
MARCH	4367000	2183.5
APRIL	6149340	3074.67
MAY	4397020	2198.51
JUNE	5959680	2979.84
JULY	4626380	2313.19
AUGUST	3700780	1850.39
SEPTEMBER	5395100	2697.55
OCTOBER	4394800	2197.4
NOVEMBER	4584480	2292.24
DECEMBER	5495160	2747.58
	58895020	29447.51

Project Overview

Company Overview: With more than 100 years in the field, Schnitzer Steel Industries, Inc. ("Schnitzer") is globally recognized for its proficiency in metals reprocessing, reutilization, recycling, and production. We serve over four million clients every year across 108 facilities supporting a workforce of over 3,400 individuals. Schnitzer has taken great strides to decrease our carbon footprint and we are constantly striving to push our emissions lower and encourage manufacturing efficiencies. By the end of FY 2025, we commit to reducing scope 1 and scope 2 greenhouse gas (GHG) emissions from our recycling operations by 25%. We have a long history of recycling a myriad of products to create value out of waste and further the circular economy. The Hawaii facility represents decades of onsite experience. Prior experience in dealing with a wide range of scrap sources—industrial manufacturers, railroads, auto salvage facilities, metal dealers, and more—attests to our capabilities and adaptability. With a focus on operationally efficient and high-quality scrap metal processing, Schnitzer utilizes advanced technologies, including mega-shredders, to produce uniform, valuable metal pieces, enhancing their utility in new metal production. Its recycling facilities' aggregate processing capability surpasses five million tons of ferrous metal and six hundred million pounds of nonferrous metal annually. Our commitment to continual investment in our facilities for improved efficiencies, quality, and regulatory and environmental compliance, coupled with our strategic focus on synergies between our auto and metals recycling facilities, showcases Schnitzer's strong prior experience and dedicated evolution in the recycling sector.
Project Scope: We seek federal investment to incorporate a new briquetting technology at our Kapolei recycling plant on the island of Oahu, Hawaii. This technology will allow Schnitzer to further a circular economy in steel production, reduce landfill waste, create a new fuel source, and reduce GHG emissions. The technology will divert current waste material, automotive shredder residue (ASR), from landfills in Hawaii and thus reduce scope 3 GHG emissions. Between April 2022 and April 2023, approximately 26,905 metric tons (MT) of ASR generated 240 MT of CO2 equivalent (MT CO2e). When broken down into monthly values, about 2,070 MT of ASR were responsible for the emission of approximately 18 MT CO2e. This measure solely accounts for the ASR disposal process, excluding the additional CO2 emissions incurred during ASR transport. By innovatively transforming ASR into a reusable briquette product instead of directing it to the landfill, we could potentially avoid the 240 MT CO2e associated with its disposal. In addition to contributing to GHG emissions savings, this project will create a new fuel source alternative to metallurgical coal used in industrial manufacturing such as steel. Additionally, this project would advance the recycling of electric vehicles and internal combustion engines beyond current practice by avoiding landfill disposal of ASR. The technology will clear the ASR of plastics and compress remaining materials into briquettes. These briquettes can then be burned, like coal, as an energy source in the steel manufacturing process. Schnitzer is an ideal company to implement such technology since we specialize in recycling and steel production. We will leverage the ASR briquettes in our steelmaking facilities, further reducing GHG emissions of an important industrial process.

Commercial Viability

Project Plan: *Project Timeline:* We expect six months of planning, contracting, and permitting (estimated completion Fall 2024); 12 months of equipment purchases and procurement lead time (see *Risk Management Plan*), and one year of construction/installation (estimated to start Fall 2024). Operation will begin in Fall 2025. Within six months of commissioning, the facility is expected to ramp up to full production capacity. Thus, we anticipate reaching full capacity within a 3-year time frame. *Siting and Permitting:* The project will be sited within our facility at 91-056 Hanua St, Kapolei, HI 96707. The site is roughly seven acres, with the major process equipment covering around 35,000 square feet. We will pursue any required permits, which may include an air permit modification. This project will be piloted with guaranteed offtake by our Oakland, CA and McMinnville, OR steel manufacturing plants followed by later strategic expansion (see *Market Information*). *Risk Management Plan:* Legal: This project could face permitting obstacles, such as receiving timely approvals in a state with stringent environmental regulations. This potential risk will be offset by proactive community and stakeholder engagement that explains how briquetting technology will have a net positive impact on land quality and resources (see

Workforce and Community Engagement). Financial: The project's success will be tied to the strength of offtake arrangements, briquette pricing, market demand (predicted to grow – see *Market Information*), and the availability of buyers with a genuine interest in sustainable practices who are willing to purchase the briquettes at competitive prices. To ensure the project's success and evaluate its cost-benefits accurately, we will conduct post-implementation reviews regularly once ramp-up is achieved, allowing for comprehensive measurement of performance against predicted outcomes. Regular monthly and quarterly cost exercises will incorporate periodic reviews to assess ongoing operational efficiency and financial viability. Procurement: Delays in timely receipt of equipment due to shipping logistics are a perennial risk in HI, present before COVID-19 strained the global supply chain. These risks will be mitigated by advance planning for early procurement. Construction: Securing a trained and skilled workforce is challenging on an island with a limited labor pool and high demand for construction workers. We will assess the ability to hire union labor to complete this project and we are committed to paying locally hired contractors above the local prevailing wage for similar jobs in the region. Our ability to secure a strong and skilled construction workforce will be supported by workforce partnerships at the local level (see *Workforce and Community Engagement*). Physical Climate and Environmental Risks: The project location is in the 89th percentile for risk to properties from projected floods (tides, rain, and river and storm surges) within 30 years.[1] Nevertheless, the site's location on the leeward side of the island means that it is relatively sheltered from prevailing winds, rain, and hurricanes as compared to the windward side.

Business Plan: *Financial Information:* The success of this project is not just a standalone venture; it aligns with Schnitzer's dedication to the success of our business and to creating a more sustainable future. Equity investment for this project will come from Schnitzer (100%). These funds will be allocated from operating expenses and sourced from regular company revenue generated by our commercial and manufacturing divisions. Valuations are based on Schnitzer 2022 fully burdened labor rates and typical operational costs, and we are fully committed to supporting this project without reservation or limitation. No debt obligations will be incurred. At this time, Schnitzer does not have any federal, state, or local government funding for its HI location, though we may pursue viable opportunities in the future. If match funding is somehow significantly reduced or lost, we have a well-established strategy to replace the funds, integrated into our regular business plans and response measures to cope with industry challenges.

Market Information: We expect steel manufacturers and landfill operators, seeking to adopt more eco-friendly and cost-effective fuel alternatives, to serve as our niche market. Potential downstream target consumers are waste management companies, recycling facilities, manufacturers, and other organizations interested in reducing waste and promoting clean energy technology. We will seek on-island buyers. Our strategy will also target operations across the US to amplify the project's reach and impact, enhancing its growth potential and solidifying its position as an environmentally conscious and economically viable solution. Market forecasts support our confidence in growth potential. A Research Nester report projects the briquetting machine market size to reach USD $5B in 2035, exhibiting a compounded annual growth rate (CAGR) of over 7% during the forecast period.[2] Similarly, a GlobeNewswire report estimates this industrial segment to grow at a CAGR of ~7% over the forecast period (especially in developing economies like India and China) and to dominate the market's revenue contribution through 2028.[3] [4] The

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[1] Climate and Economic Justice Screening Tool (CEJST)

[2] Research Nester. (n.d.). Briquetting Machine Market Size, Growth Forecasts 2035. Retrieved from https://www.researchnester.com/reports/briquetting-machine-market/4067

[3] GlobeNewswire. (2022, August 25). Global Briquetting Machine Market is Predicted to Grow at a CAGR of 7% during 2022-2031. Retrieved from https://www.globenewswire.com/news-release/2022/08/25/2504790/0/en/Global-Briquetting-Machine-Market-is-Predicted-to-Grow-at-a-CAGR-of-7-during-2022-2031-Market-to-Grow-on-Account-of-Increasing-Focus-on-Utilizing-Renewable-Energy-Resources-Researc.html

[4] Future Market Insights. (n.d.). Briquetting Machine Market Size, Growth, Trends, Share | 2033. Retrieved from https://www.futuremarketinsights.com/reports/briquetting-machine-market

strong growth potential aligns seamlessly with our project's objectives. We expect to generate additional job opportunities during installation and in the system operation and maintenance, contributing to the growth of the market. The terms of the offtake agreements, such as the volume of purchased briquettes and the contract duration, will determine the extent of revenue generation and cost offset for Schnitzer. *Cost Information:* By transforming ASR waste into briquettes and incorporating them as part of steel production plants, the project is primed to make substantial contributions to improved cost and waste management. Funds from this grant will serve as a pivotal seed fund to demonstrate the feasibility and profitability of this technology in HI, paving the way for larger Pan-American scaling efforts. Focusing on HI for the initial market penetration is strategic, as the region's commitment to environmental sustainability aligns well with the project's objectives. Without this tax credit, we currently could not achieve a break-even point with this technology. The tax credit will allow us to validate the effectiveness of the briquetting technology and create economic opportunities (see *Workforce and Community Engagement*). One major cost trade-off involves competing factors of transport and landfill costs. The potential closure of Hawaii's only landfill presents significant challenges for the recycling industry, particularly waste disposal costs and logistics. Barging waste to the mainland is expensive, making it economically impractical for dealing with ASR waste. Adopting briquetting technology offers a compelling alternative. By converting ASR waste into metal briquettes, Schnitzer can potentially offset landfill costs. Briquetting technology is the only proven technology to make a viable energy alternative to ASR waste. Schnitzer will carry out an extensive analysis to compare costs of briquetting technology with similar technologies or materials in the market segment to chart a financially viable path forward.
Management Plan: *Key Team Members:* Julian Kift, Senior Director of Metals Technologies, will serve as Project Director. He is an accomplished business unit leader with expertise across a wide range of mining and mineral processing environments. Highly experienced at managing multidisciplinary and engineering teams, Mr. Kift has successfully implemented improved metals separation and recovery technologies. Mr. Kift will oversee the design and commissioning of the project, supported by the Technology Team's 12 team whose experience spans 100+ years in the industry. The HI team is led by Nick Garofalo, Regional General Manager with 10 years at Schnitzer, supported by a team of 18 reports plus floor operators. Permitting, engineering, project management, and construction will be managed by a local HI contractor selected through a competitive process. Schnitzer has stringent contracting guidelines, including priority consideration for companies with minority and indigenous ownership. *Corporate Health Indicators:* Schnitzer has no legal claims or liabilities, planned debt restructuring, planned corporate actions, or other factors that could negatively affect the likelihood of project completion.

Greenhouse Gas Emissions Impacts

GHG Emissions Impacts of the Facility's Products

End Product Impacts: Our end product, the briquettes, will significantly reduce GHG emissions and landfill waste and provide economic benefits through our innovative approach to waste management and recycling. The on-site conversion of residual ASR waste to briquettes will feed directly into Schnitzer's onshore steel plants, creating a closed-loop system with net positive impacts on land quality and resources. Made from recycled materials, our briquettes further reduce GHG emissions by eliminating emissions associated with mining and raw materials processing of metallurgical coal ("met coal"). Moreover, the ASR processed into reusable briquettes instead of directing it to landfills could potentially avoid the associated 240 MT CO2e emissions.
Product Performance: Briquettes are used as a consumable in the steel production process as a carbon neutral alternative to met coal. They result in a net-zero carbon footprint, as their carbon equivalent emissions are the same as those that would have been produced by met coal.
GHG Emissions from the Facility: *Direct Emissions:* An estimated annual 26,905 MT of ASR residue at our recycling plant in Hawaii results in approximately 240 MT of CO2 equivalent (mtCO2e) emissions. On a monthly basis, around 2,070 MT of ASR contributed to emitting approximately 18 MT of CO2 equivalent, solely from the ASR disposal process, excluding transportation-related emissions, such as the fuel used to transport the waste to the landfill. Each briquette unit is expected to contribute to a further

reduction of 18 MTCO2e/ton. This approach not only reduces the volume of waste going to landfills but also mitigates the direct emissions associated with landfill disposal.
Facility Performance: We will ensure that all our ASR is either briquetted (75%) or used in recycled plastic (25%), with nothing going to landfill. This strategy will significantly reduce our GHG emissions and contribute to a more environmentally conscious future. Our projected recovery rate is 20,000 MT/year of ASR, producing 18,000 briquette units annually. An estimated 10% of the manufacturing facility will be allocated to eligible equipment. The deployed property, including the new briquetting technology, is expected to last for a lifetime of 20 years, making it a significant step toward realizing Schnitzer's commitment to long-term sustainability.
Mitigation Efforts: Schnitzer commits to further minimizing the environmental impact of our facility and operations. We implemented measures to reduce methane and other GHG emissions from the bio-breakdown process at landfills. This includes enclosing processes to capture volatile organic compounds.

Strengthening U.S. Supply Chains and Domestic Manufacturing for a Net-Zero Economy

Facility Outputs: Each year, the Hawaii facility generates 100,000 tons of recycled metal (ferrous metal, steel, and iron) sold and used in various downstream applications. It also generates 30,000 tons of ASR annually and disposes it in an on-island landfill. This project would install a new briquette technology to repurpose the ASR waste, thereby diverting it from the landfill and creating a value-add product, a fuel source that can be used to offset metallurgical coal in industrial processes such as steelmaking. **Facility Inputs:** The Kapolei facility, located on approximately seven acres of land on the island of Oahu, receives 130,000 tons of scrap metal per year inclusive of ferrous metal, steel, and iron. Major capital investments at the site leverage over $15 million in recycling equipment and supportive tools including a metal shredder ($3.5M) and a downstream nonferrous metal separator ($1.5M). All materials received by the facility each year come from the State of Hawaii. **Supply Chain Resilience:** Our metal recycling facility plays a vital role in bolstering the resilience of domestic supply chains that are crucial for energy products, thereby facilitating progress towards a net-zero economy. By processing 130,000 tons of waste material annually and producing 100,000 tons of recycled metal, we create recycled feedstock for various industries, including those essential for renewable energy infrastructure. Moreover, the implementation of the new briquetting technology will allow us to harness ASR waste, showcasing a new innovative approach that completely avoids landfilling waste. The new technology will convert 20,000 tons of ASR waste into fuel briquettes annually. These briquettes provide a coal alternative, assisting in decarbonizing the energy-intensive steel sector. Furthermore, by promoting circular economy principles, we ensure that materials are utilized to their maximum potential from raw material extraction to end-of-life. This approach contributes to resource efficiency, reduction of environmental impact, and the overall resilience and sustainability of supply chains crucial to a net-zero future. **End-Use Applications:** The ASR waste briquette's end-use application is as a steel production fuel source, offsetting the use of coal. Schnitzer will pursue sales for both the end use briquettes as well as the technology itself, as enumerated in the market information.

1. Job creation and workforce continuity. We anticipate needing **25-30 skilled contract workers** for up to 6-9 months during construction and installation of the briquetting waste-to-energy infrastructure. In the past, Schnitzer utilized a mix of union and non-union workers for similar projects. We will assess the ability to hire union labor for the proposed 48C project. Schnitzer pays locally hired contractors above the prevailing wage for similar jobs in the region, and we will pay contracted workers a competitive rate for their work at our 48C project site. In addition to contracted labor, we anticipate **hiring 6-10 permanent, full-time employees** who will work in separation process operations and maintenance once the project is online. We offer competitive wages and full benefits including quality health insurance, paid leave, and retirement plans. Additionally, all Schnitzer employees have the option of joining a labor union of their choosing. New positions will be advertised through Honolulu Community College, which serves Hawaii's largely Native Hawaiian, Pacific Islander, and Asian-American populations. New training programs on briquetting technologies will upskill current Schnitzer employees, ensuring skilled workforce continuity. The project will also ensure workforce continuity in jobs related to barging briquette products to the mainland, e.g., cargo ship loading, operation, and terminal handling. **2. Timely Project Completion Through Workforce and Community Engagement**. Schnitzer's goal is to attract, develop, and retain a high-performing workforce that reflects the rich diversity of the local communities. We plan to partner with Honolulu Community College's Construction and Trades department to establish a Federally Approved Applied Trades apprenticeship program. Timely on-site paid apprenticeships will provide Oahu's underrepresented students with on-the-job training and an immediate onramp to a career in metals recycling. As briquetting represents a frontier in recycling technology, Schnitzer will also seek to partner with local chapters of the AFL-CIO and United Steel Workers District 12 to establish a clean energy apprenticeship program for union members. Schnitzer places a continuous focus on enriching our employees' career growth. We currently offer several professional development opportunities such as our Skills Development Program, as well as tuition reimbursement and mentoring through our trade and community college partnerships. Schnitzer management works with employees to set comprehensive career development goals through our Leadership Development Cycle. In addition, the local municipalities and grassroots groups support Schnitzer providing an alternative to landfill. **3. Energy Community Transition**. Hawaii's last remaining coal-fired plant closed in 2022. Most of the plant's 40 workers transitioned to clean energy jobs in the state. However, we will offer skills training through our partnerships with local trade schools so that former AES employees or their families may enter the scrap metal industry. We will convert existing space at our Oahu plant for briquette manufacturing, thus increasing the economic feasibility of installation and operation, and speeding project development. **4. Local Environmental Impacts**. Converting existing recycling infrastructure at our Oahu plant to briquette manufacturing will have minimal environmental impact on the local area. Briquetting technology has a net positive impact on land quality and resources: conversion of residual recycling waste to briquettes creates a coal alternative for powering our onshore steel plants. Similarly, this technology allows for the complete recycling of e.g., electric vehicles, thus eliminating the total volume of waste sent to landfill and creating a closed-loop system. Similarly, minor secondary environmental impacts related to transport of briquettes to the mainland will be offset by using briquette power in place of coal. **5. Disadvantaged communities (DACs)**. The proposed project benefits DACs in Waianae Beach, Nānākuli, and Mākaha, near to our project site and where most of our employees live. Composed primarily of Native Hawaiians or Pacific Islanders, these communities are considered disadvantaged owing to socioeconomic factors, exposure to climate change impacts, and hardships that are compounded by inequities related to health, education, and high housing costs. This project will directly benefit these communities by, e.g., reducing the share of household income spent on garbage removal/utilities, increasing energy/recycling sector job training and pathways, and increasing parity in clean energy technology access and adoption through partnership with the Honolulu Community College system.

CLEAN ENERGY INFRASTRUCTURE

Qualifying Advanced Energy Project Credit (48C) Program

Clean Energy Infrastructure

Now Accepting Concept Papers

DOE and Treasury are accepting concept papers for the Qualifying Advanced Energy Project Credit (48C) through the 48C Exchange Portal.

Applicants have until July 31st to submit their concept paper for consideration for the first

The Qualifying Advanced Energy Project Credit (48C) program was established by the American Recovery and Reinvestment Act of 2009 and expanded with a $10 billion investment under the Inflation Reduction Act of 2022. The Advanced Energy Project Credit provides a tax credit for investments in advanced energy projects, as defined in 26 USC § 48C(c)(1).

The Department of the Treasury and the Internal Revenue Service, in partnership with DOE, have announced up to $4 billion in a first round of tax credits for projects that expand clean energy manufacturing and recycling and critical materials refining, processing and recycling, and for projects that reduce greenhouse gas emissions at industrial facilities.

round of this pivotal program.

Approximately $1.6 billion of this allocation will be set aside for projects in designated energy communities. The program will provide an investment tax credit of up to 30% of qualified investments for certified projects that meet prevailing wage and apprenticeship requirements.

Applicant Portal - Concept Papers Due July 31 at Noon ET

- Apply at **https://48c-exchange.energy.gov/**
- Concept papers (5-pages in length) are required to be eligible to apply for the tax credit.

Guidance

- **Additional Guidance Notice 2023-44**.
- **Initial Guidance Notice 2023-18**.
- **Read Appendix C**, which lists the Section 48C(e) Energy Communities Census Tracts that taxpayers may rely on to substantiate a tax return position.

Blog

- **New 48C Tax Credit Will Spur Historic Investments in Manufacturing and Critical Materials**

Frequently Asked Questions (FAQs) - *NEW*

- **48C FAQs - July 21, 2023** - New questions added.
- **48C FAQs - July 17, 2023**
- **48C FAQs - July 13, 2023.**
- The Internal Revenue Service provides **frequently asked questions** related to the eligibility and application of the credit.

Program Resources

- **48C designated energy communities map** -**NOTE:** The mapping tool may not be relied upon by taxpayers to substantiate a tax return position or for determining whether certain penalties apply and will not be used by the IRS for examination purposes. The mapping tool does not reflect the application of the law to a specific taxpayer's situation, and the applicable Internal Revenue Code provisions ultimately control.
- **Interagency Working Group's landing page on 48C Tax Credit Program**
- Refer to **DOE's draft critical materials for energy list** and **USGS critical mineral list** for eligibility

Informational Webinar

The **48C eXCHANGE portal** is open for registration and concept paper submission. **Taxpayers must submit their concept papers through DOE's 48C eXCHANGE portal prior to 12 p.m. ET on July 31, 2023.**

DOE and Treasury hosted a virtual informational webinar for potential applicants on June 27, 2023, at 2 p.m. ET. Watch the webinar below, or view the webinar slides **here**.

This Office of Manufacturing & Energy Supply Chains (MESC) webinar presents a joint informational session with the U.S. Department of Treasury on the Qualifying Advanced Energy Project Credit (§48C).

Office of Manufacturing & Energy Supply Chains

Help with Online Applicant Portal

Applicants may email **InfrastructureExchangeSupport@hq.doe.gov** for questions regarding the registration process or submitting your application on the eXCHANGE applicant portal.

Any questions or comments regarding the non-tax aspects of this notice can be submitted to the Department of Energy at **48CQuestions@hq.doe.gov**.

1000 Independence Ave. SW
Washington DC 20585
202-586-5000

BEFORE THE PLANNING COMMISSION
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAII

In the Matter of the Application of DEPARTMENT OF ENVIRONMENTAL SERVICES, CITY AND COUNTY OF HONOLULU Application to Modify SUP No. 2008/SUP-2 (SP09-403) by Modifying (1) Condition No. 1 of the Planning Commission's Findings of Fact, Conclusions of Law, and Decision and Order, dated June 10, 2019, and (2) Condition No. 5 of the LUC's Findings of Fact, Conclusions of Law, and Decision and Order Approving with Modifications the City and County of Honolulu Planning Commission's Recommendation to Approve Special Use Permit, certified on November 1, 2019	FILE NO. 2008/SUP-2 LUC DOCKET NO. SP09-403 CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was duly served upon the parties identified below on the date set forth below:

DEPARTMENT OF ENVIRONMENTAL SERVICES (via Certified Mail)
City and County of Honolulu
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Kapolei, Hawaii 96707

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