



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

October 17, 2008

Mr. Ronald Guerin  
Facility Manager  
Tillotson Rubber Co., Inc.  
One Spur Road  
Dixville Notch, NH 03576

**RE: Inspection Report**

Dear Mr. Guerin:

The New Hampshire Department of Environmental Services, Air Resources Division conducted a Full Compliance Evaluation at your facility on July 24, 2008. Enclosed is a copy of the Inspection Report for your records.

There were no deficiencies found during the inspection.

If you have any questions, please feel free to call me at (603) 271-6797.

Sincerely,

Alan H. Moulton  
Compliance Assessment Engineer  
Air Resources Division

Enclosure: Inspection Report

cc: Chairman, Dixville Board of Selectmen



**AIR RESOURCES DIVISION**

**COPY**

**Full Compliance Evaluation Report  
Onsite Visit**

**Tillotson Rubber Co., Inc.  
One Spur Road  
Dixville Notch, New Hampshire 03576**

**(603) 255-4572**

**Coos County**

**AFS #: 33000700006**

**Inspection Date: July 24, 2008**

**Final Report: October 17, 2008**

Date/Time of Inspection: July 24 2008, 9:30 AM – 11:45 AM  
Type of Inspection: Onsite Full Compliance Evaluation  
Inspected by: Alan Moulton, DES ARD Compliance Inspector  
Weather: Cloudy, Rainy and ~65° F  
Source Contact(s): Ronald Guerin, Facility Manager

Observation upon approach to the facility: There were some visible emissions from the boiler stack (<20%), and there were no unusual odors detected.

Last compliance inspection conducted at facility: August 23, 2006  
Inspection Result: There were no deficiencies found as a result of the inspection.

Permit Number(s): TV-OP-026

## **I. Inspection**

On July 24, 2008, the New Hampshire Department of Environmental Services, Air Resources Division (“DES”) conducted an Onsite Full Compliance Evaluation of Tillotson Rubber Co., Inc. (“Tillotson”), located in Dixville Notch, NH. Tillotson was targeted for inspection based on DES inspection criteria, which requires that a major source with a Title V Permit be inspected once every two years. The last inspection at Tillotson was in 2006.

DES contacted Mr. Guerin on July 2, 2008 to schedule a compliance inspection for July 24, 2008.

The DES Inspector discussed the purpose of the current inspection with Tillotson personnel and discussed the rules pertaining to claims of confidentiality. Mr. Guerin agreed to the inspection and authorized access to the facility. No material provided to the inspector during the inspection was stated to be confidential.

After the opening meeting and a safety briefing, Mr. Guerin conducted a tour of the facility.

Tillotson is a privately-owned company that employs 10 people in a 10,000 square foot facility. The facility was built in the late 1800’s, and supplies steam to the Balsams Hotel and to Healthco International (“Healthco”). The facility currently operates 24-hours per day, 365 days per year.

## **II. Process Description**

Tillotson operates an electric and steam generating facility. Tillotson has one wood-fired boiler and three oil-fired boilers (one Wickes and two Dillons) to supply steam for

Healthco (medical glove manufacturing factory) and the Balsams Hotel. The primary boilers are the Wickes Wood-fired Boiler and the Wickes Oil-fired Boiler. Tillotson uses the two Dillon Oil-fired Boilers as backup and in the event of an emergency. The boilers produce steam used for heat and hot water at the Balsams Hotel, process steam at Healthco, and to spin two steam turbines that drive generators, which produce two-thirds of the electricity needs for the Balsams Hotel. In the event of a power loss from the electrical grid, Tillotson has two Caterpillar diesel emergency generators.

**III. Observations**

A facility tour was conducted by Mr. Guerin which began with the boilers. The DES Inspector observed each of the boilers and then observed each of the emergency generators.

**IV. Compliance With Permitting Requirements**

**CHAPTER ENV-A 600 - Statewide Permit System**

DES issued Title V Operating Permit TV-OP-026 (“the Permit”) to Tillotson on March 10, 2006, and issued an Administrative Amendment on March 30, 2007. The Administrative Amendment changed the identity of the responsible official. Tillotson requires a Title V Permit because its emissions of CO exceed the major source threshold of 100 tons per year. The Permit expires on March 31, 2011.

**A. Fuel and Operating Data**

Inspection and operation information for the significant activities are listed in Table 1.

**Table 1: Information on Significant Activities**

<b>Device</b>	<b>Permitted Operating Limits</b>	<b>Operating &amp; Reported Fuel Usage Data</b>
<u>EU1</u> Wickes Wood-fired Boiler Model #: Type A Serial #: NB2884 Heat Rating: 40.8 MMBtu/hr Fuel: Wood/Bark at 50% moisture. Maximum Design Fuel Flow Rate: 6.6 tons/hr Install Date: 1978	The maximum firing rate of 40.8 MMBtu/hr is equivalent to a steam generation rate of 22,000 lbs of steam per hour.  The fuel usage rate shall be limited to 120 tons of wood/bark at 50% moisture during any calendar day.  Opacity: 40%	Hour Meter Reading: 247856 hrs  <u>2006</u> : 19,806.0 tons of wood/bark <u>2007</u> : 19,209.0 tons of wood/bark  Operation Status: Operating. Opacity observed: <20% Steam Pressure: 250 psig Stack Temperature: 375°F
<u>EU2</u> Wickes Oil-fired Boiler	The fuel usage rate shall be limited to 5,300 gallons per calendar day.	Hour Meter Reading: 10806.1 hrs  <u>2006</u> : 33,623 gallons #6 fuel oil

<p>Model: Type A Serial #: NB2480 Heat Rating: 33.2 MMBtu/hr Fuel: #4 and/or #6 fuel oil Maximum Design Fuel Flow Rate: 211 gal/hr Install Date: 1982</p>	<p>Sulfur content of #4 and #6 fuel oils limited to 0.5% by weight.</p> <p>Opacity: 20%</p>	<p><u>2007</u>: 37,145 gallons #6 fuel oil</p> <p>Operation Status: Not in operation during the inspection. Opacity observed: 0%</p>
<p><u>EU3</u></p> <p>Dillon Boiler #1 Model: 4RT Serial #: 2RLHC024880 Heat Rating: 8.2 MMBtu/hr Fuel: #4 and/or #6 fuel oil Maximum Design Fuel Flow Rate: 55 gal/hr Install Date: 1914</p>	<p>EU3 and EU4 combined fuel consumption rate shall be limited to 2,088 gallons per calendar day; or</p> <p>EU3 and EU4 combined operating hours limited to 38 hours of operation per consecutive 24-hour period.</p>	<p>Hour Meter Reading: 18375 hrs</p> <p><u>2006</u>: 2,042 gallons #6 fuel oil <u>2007</u>: 1,729 gallons #6 fuel oil</p> <p>Operation Status: Not in operation during the inspection. Opacity observed: 0%</p>
<p><u>EU4</u></p> <p>Dillon Boiler #2 Model: 4RT Serial #: HC026944 Heat Rating: 8.2 MMBtu/hr Fuel: #4 and/or #6 fuel oil Maximum Design Fuel Flow Rate: 55 gal/hr Install Date: 1914</p>	<p>Sulfur content of #4 and #6 fuel oils limited to 0.5% by weight.</p> <p>Opacity: 40%</p>	<p>Hour Meter Reading: 15164 hrs</p> <p><u>2006</u>: 1,676 gallons #6 fuel oil <u>2007</u>: 1,256 gallons #6 fuel oil</p> <p>Operation Status: Not in operation during the inspection. Opacity observed: 0%</p>
<p><u>EU5</u></p> <p><u>Emergency Generator</u></p> <p>Caterpillar, 400 kW Model #: D379 Serial #: 76B415 Rating: 610 hp 4.84 MMBtu/hr Fuel: #2 diesel fuel oil Maximum Design Fuel Flow Rate: 37.16 gallons/hr Install Date: 1960</p>	<p>Hours of operation: 500 hrs per consecutive 12-month period.</p> <p>No fuel usage limit.</p> <p>Sulfur content of #2 diesel fuel oil limited to 0.4% by weight.</p> <p>Opacity: 40%</p>	<p>Hour Meter Reading: 4044 hrs</p> <p><u>2006</u>: 1,469 gal. #2 diesel fuel oil <u>2007</u>: 1,364 gal. #2 diesel fuel oil</p> <p>Operation Status: Not in operation during the inspection. Opacity observed: 0%</p>
<p><u>EU6</u></p> <p><u>Emergency Generator</u></p> <p>Caterpillar, 600 kW Model: D3412</p>	<p>Hours of operation: 500 hrs per consecutive 12-month period.</p> <p>No fuel usage limit.</p>	<p>Hour Meter Reading: 0571_ hrs</p> <p><u>2006</u>: 4,430 gal. #2 diesel fuel oil <u>2007</u>: 4,513 gal. #2 diesel fuel oil</p>

Serial #: 81Z08025 Rating: 890 hp 5.74 MMBtu/hr Fuel: #2 diesel fuel oil Maximum Design Fuel Flow Rate: 37.16 gallons/hr Install Date: 1993	Sulfur content of #2 diesel fuel oil limited to 0.4% by weight.  Opacity: 20%	Operation Status: Not in operation during the inspection. Opacity observed: 0%
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Previous inspection reports have listed a small boiler that is located in the Balsams Hotel. This boiler operates on #2 fuel oil and is rated less than 10 MMBtu/hr. Therefore, this boiler does not require a permit. During the current inspection, the DES Inspector learned that the boiler is owned by the Hotel and is not owned by Tillotson.

**Env-A 609.04 – Insignificant Activities**

Tillotson included a list of insignificant activities in its application for the Title V Permit. These activities include a distillate oil-fired hot air furnace in the Truck Maintenance Garage, a distillate oil-fired furnace in the Hydro Building, propane burner pilots in the Power Plant, and parts cleaning units in the Power Plant and the Truck Maintenance Garage.

**B. Emissions**

Facility emissions for calendar years 2006 and 2007 are included in Table 2. Facility emissions are calculated using the facility’s fuel usage data and the EPA’s AP-42 Emission Factors. The fuel usage data and the facility emissions reported by Tillotson were confirmed during this inspection. The Permit limits the SO<sub>2</sub> emissions from the Wickes Oil-fired boiler, EU2, to 39.9 tons during any consecutive 12-month period. SO<sub>2</sub> emissions from the Wickes Oil-fired boiler are shown in Table 3.

**Table 2: Facility-Wide Emissions**

	Nitrogen Oxides (tpy)	Sulfur Dioxide (tpy)	Carbon Monoxide (tpy)	Particulate Matter (PM <sub>10</sub> ) (tpy)	VOCs (tpy)
<b>Permitted Emission Limits</b>	<b>49.9</b>	<b>75.3*</b>	<b>360.0*</b>	<b>64.0*</b>	<b>4.28*</b>
<b>2006</b>	16.61	3.56	174.75	15.99	1.56
<b>2007</b>	16.26	3.62	169.49	15.52	1.52

\* Based on potential emission calculations of significant activities in Engineering Summary.

**Table 3: SO<sub>2</sub> Emissions for EU2, Wickes Oil-fired Boiler**

	<b>Sulfur Dioxide (tpy)</b>
<b>Permitted Emission Limit</b>	<b>39.9</b>
<b>2006</b>	1.32
<b>2007</b>	1.46

Part Env-A 609 – Title V Operating Permits

During the inspection, the DES inspector reminded Tillotson that, in order to renew the current permit and be in compliance with application shield per Env-A 609.08, it must submit a complete permit application to DES at least six months prior to the expiration date of the Permit, i.e., September 30, 2010.

Part Env-A 618 – Additional Requirements in Non-Attainment Areas and the New Hampshire Portion of the Northeast Ozone Transport Region

Tillotson is located in Coos County of New Hampshire and is in the Northeast Ozone Transport Region. Coos County is not classified in this part. Tillotson is an existing major stationary source, but has not had any major modifications. Therefore, this part is not applicable to Tillotson's facility.

Part Env-A 619 – Prevention of Significant Deterioration ("PSD") of Air Quality Permit Requirements

Tillotson is an existing major stationary source, but has not had any major modifications. Therefore, this part is not applicable to the facility.

**V. Control Equipment**

The Wickes Wood-fired Boiler operates in conjunction with an air pollution control device. Particulate matter from the boiler is controlled by a multi-cyclone dust collector without ash re-injection. The dust collector is in operation whenever the Wickes Wood-fired Boiler is in operation and has a minimum efficiency of 90%.

**VI. Compliance with Recordkeeping and Reporting****CHAPTER ENV-A 900 - Owner or Operator Recordkeeping and Reporting Obligations**

Tillotson has all the required monitoring data and records to show that it meets the

conditions of the Permit. Tillotson has submitted all required reports.

Env-A 903.03 – General Recordkeeping Requirements for Combustion Devices

(Eff. 4/23/99, Amend. 10/21/03, Formerly Env-A 901.03, Eff. 11/15/92)

For the Wickes Wood-fired Boiler, Tillotson maintains records of the fuel consumption, fuel type, and calculated MMBtu/ton of fuel. Tillotson maintains these records on a weekly basis. In addition, Tillotson records the average pounds of steam produced each day.

For the Wickes Oil-fired Boiler, Tillotson maintains records of the fuel consumption, calculated MMBtu/gallon, and sulfur content as percent sulfur by weight of the fuel. Tillotson maintains these records on a daily basis.

For the two Dillon boilers, Tillotson maintains records of the dates and number of hours that each boiler ran. In addition, Tillotson maintains records on the amount of fuel used, the calculated MMBtu/gallon of the fuel, and the sulfur content as percent sulfur by weight of the fuel. The operation time and fuel usage data are recorded on an hourly basis.

For the two emergency generators, Tillotson maintains records of the fuel used and the hours of operation, including the twelve consecutive month rolling totals of fuel usage and hours of operation, for each device.

Env-A 905.02 – General NOx Recordkeeping

(Eff. 4/23/99, Formerly Env-A 901.08, Eff. 11/15/92)

Tillotson emits greater than 10 tons per year of NOx and is; therefore, subject to this part. Tillotson is maintaining the operational data required by this section.

Env-A 907.01 – General Reporting Requirements

(Eff. 4/23/99, Formerly Env-A 901.09, Eff. 11/15/92)

Tillotson is required to submit an annual emissions report, in addition to several other reports, which are submitted on either an annual, semi-annual, or quarterly basis. The facility has submitted the reports as required; see the *Full Compliance Evaluation Records Review* sheet attached to the back of this report.

Part Env-A 909 – NOx Emission Statements Reporting Requirements

(Eff. 4/23/99, Formerly Env-A 901.09, Eff. 11/15/92)

Tillotson has actual NOx emissions greater than 10 tons per year and; therefore, is required to submit annual NOx Emissions Statements. Tillotson has filed the information required in the NOx Emissions Statement as part of the Annual Emissions Reports.

**VII. Compliance with RACT**

**CHAPTER ENV-A 1200 – Prevention, Abatement, and Control of Stationary Source Air Pollution**

Part Env-A 1204 - Stationary Sources of VOCs

Tillotson is not subject to the requirements of this part; it has no devices or processes that are subject to VOC RACT.

Part Env-A 1211 - Nitrogen Oxides

Tillotson has accepted a Permit restriction limiting the facility-wide NOx emissions to less than 49.9 tons during any consecutive 12-month period in accordance with Env-A 1211.01(n) to opt out of NOx RACT. Tillotson calculates its NOx emissions to verify compliance with this restriction.

**VIII. Compliance with Toxics Regulations**

**CHAPTER ENV-A 1400 – Regulated Toxic Air Pollutants (“RTAPs”)**

Fuel burning devices burning virgin fuels are exempt from an Env-A 1400 compliance determination. There are no other devices at Tillotson which emit RTAPs which require an air toxics compliance determination.

**IX. Compliance with Process/Particulate/Opacity Regulations**

**CHAPTER ENV-A 1600 - Fuel Specifications**

Env-A 1603.01 – Applicable Liquid Fuels

Tillotson uses #4 and #6 fuel oils in the boilers (EU2, EU3 & EU4). Tillotson uses #2 diesel fuel oil in the emergency generators. Tillotson uses #2 fuel oil in the insignificant activities.

Env-A 1604.01 – Maximum Sulfur Content Allowable in Liquid Fuels

The Permit limits the sulfur content of the #4 and #6 fuels oil used in the boilers to 0.5% sulfur by weight. Tillotson has the delivery tickets for each shipment of #4 and #6 fuel oil received. The tickets contain data that indicate the sulfur content is at or below permit requirements.

Env-A 1604.01 limits the sulfur content of the #2 fuel oil and #2 diesel fuel oil used in the generators and insignificant activities to 0.4% sulfur by weight. Tillotson is using ultra low sulfur diesel in the emergency generators. Tillotson has the sulfur content data for each shipment of #2 fuel oil and #2 diesel fuel oil received. The sulfur data indicates

the sulfur content is at or below permit requirements.

## **CHAPTER ENV-A 2000 - Fuel Burning Devices**

### Env-A 2002.01 – Visible Emission Standard for Fuel Burning Devices Installed on or Prior to May 13, 1970

Env-A 2002.01 and the Permit limits the emissions from the Dillon boilers (EU3 & EU45) and the 400 kW emergency generator at this facility to 40% opacity. At the time of inspection, the Dillon boilers, and the 400 kW emergency generator activities were not in operation; therefore, opacity readings could not be taken.

### Part Env-A 2002.02 – Visible Emission Standard for Fuel burning Devices Installed After May 13, 1970

Env-A 2002.02 and the Permit limits the emissions from the Wickes boilers (EU1 & EU2) and the 600 kW emergency generator at this facility to 20% opacity. During the inspection, the visible emissions from the Wickes Wood-fired boiler stack had an opacity less than 20%. At the time of inspection, the Wickes Oil-fired boiler and the 600 kW emergency generator were not in operation; therefore, opacity readings could not be taken.

### Env-A 2002.06 – Particulate Emission Standards for Fuel Burning Devices Installed on or Prior to May 13, 1970

Particulate emission standards specified in the Permit are based on a formula in Env-A 2002.06. The emissions of TSP from the two Dillon boilers and the 400 kW emergency generator at the facility shall be limited to 0.60 lb/MMBtu. Actual compliance with emission standards for the fuel burning devices can only be determined by stack testing which has not been required for these devices at this time.

### Env-A 2002.07 – Particulate Emission Standards for Fuel Burning Devices Installed After May 13, 1970 but Before January 1, 1985

Particulate emission standards specified in the Permit are based on a formula in Env-A 2002.07. The emissions of TSP from the Wickes Wood-fired boiler at the facility shall be limited to 0.42 lb/MMBtu. The emissions of TSP from the Wickes Oil-fired boiler at the facility shall be limited to 0.44 lb/MMBtu. Compliance with emission standards for the fuel burning devices can only be determined by stack testing which has not been required for these devices at this time.

### Env-A 2002.08 – Particulate Emission Standards for Fuel Burning Devices Installed On or After January 1, 1985

Particulate emission standards specified in the Permit are based on a formula in Env-A 2002.08. The emissions of TSP from the 600 kW emergency generator at the facility

shall be limited to 0.30 lb/MMBtu. Compliance with emission standards for the fuel burning devices can only be determined by stack testing which has not been required for these devices at this time.

**X. Source Testing and Monitoring:**

**CHAPTER ENV-A 800 - Testing and Monitoring Procedures**

The Permit requires Tillotson to conduct monitoring in several areas.

- Documentation of the sulfur content of each fuel oil delivery.

Tillotson maintains the delivery tickets for each shipment of #2 diesel oil, #4, and #6 fuel oil it receives. Each delivery ticket contains the weight percent of sulfur of the delivery.

- The multi-cyclone dust collector shall be maintained regularly, in accordance with the maintenance schedule submitted to DES on May 29, 2000. The multi-cyclone shall be fully operational upon startup of the Wickes Wood-fired Boiler and shall not be bypassed during startup, operation, or shutdown of the Boiler.

Tillotson is maintaining the multi-cyclone dust collector in accordance with the maintenance schedule it submitted to DES. The multi-cyclone dust collector is fully operational during the operation of the Wickes Wood-fired Boiler.

- The Permit requires Tillotson to perform the following fuel usage monitoring:

For the Wickes Oil-fired Boiler and the two Dillon Boilers:

- Monitor fuel oil usage on a calendar day basis and for the Wickes Oil-fired Boiler, monitor the hours of operation.
- The fuel flow meters will be operated and maintained to monitor fuel oil usage.
- The fuel flow meters shall be calibrated in accordance with the manufacturer's specifications.

Tillotson maintains a fuel meter on each boiler. Tillotson maintains readings from each fuel meter and hours of operation of the Wickes Oil-fired Boiler on a daily basis. The manufacturer of the fuel flow meters recommends that the meters not be adjusted. There is also no mechanism to calibrate the meters. Each meter is serviced once per year.

- The Permit requires Tillotson to monitor the wood usage in the Wickes Wood-fired Boiler on a monthly basis along with the hours of operation.

Tillotson monitors the wood usage in the boiler on a weekly basis. Tillotson has an hour meter on the boiler to monitor the hours of operation.

The Permit requires Tillotson to monitor steam production on a 24-hour block

average using a steam flow meter. The steam flow meter shall be calibrated and maintained according to manufacturer's specifications.

Tillotson monitors steam production and maintains maintenance records on the steam flow meter.

- The Permit requires Tillotson to conduct compliance stack testing on the Wickes Wood-fired Boiler and the multi-cyclone within the five year term of the Permit.

Tillotson is planning to conduct compliance stack testing on the Wickes Wood-fired Boiler and the multi-cyclone prior to the expiration of the current Permit.

- Tillotson is subject to the Compliance Assurance Monitoring ("CAM") requirements of 40 CFR 64 for the multi-cyclone. If Tillotson accumulates exceedances of the indicator ranges specified in the CAM plan that is greater than 5% of the rolling 12-month total operating time of the multi-cyclone, then it is required to prepare and submit to DES a Quality Implementation Plan ("QIP").

The accumulated exceedances did not exceed 5% of the rolling 12-month total; therefore, Tillotson is not required to prepare a QIP.

- To meet the requirements of CAM, the Permit requires Tillotson to:
  - Use a magnahelic gauge to measure the differential pressure across the multi-cyclone;
  - Maintain the differential pressure across the multi-cyclone between 1.0 and 5.0 inches of water column;
  - Maintain a magnahelic gauge with a minimum accuracy of  $\pm 0.2$  inches of water column;
  - Calibrate the magnahelic gauge semiannually and conduct routine repair and maintenance on the unit;
  - Measure the pressure drop across the multi-cyclone once every two hours; and
  - Record the data in a logbook.

Tillotson is complying with the CAM requirements.

## **XI. Compliance with Permit Fee System**

### **CHAPTER ENV-A 700 - Permit Fee System**

#### **Env-A 705.04 – Payment of Emission-Based Fee**

Emission-based fees are due by April 15 of the following year for the previous year's emissions.

Tillotson has paid its emission-based fees each year through the 2007 emission year and

on time.

## **XII. Compliance with other Miscellaneous Provisions**

### **CHAPTER ENV-A 500 - Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants**

Tillotson is not subject to any of the New Source Performance Standards ("NSPS") specified in Env-A 503.01 or 40 CFR 60, any of the National Emission Standards for Hazardous Air Pollutants ("NESHAP") specified in Env-A 504.01 or 40 CFR 61, or any of the National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology, or MACT Standards) specified in Env-A 505.01 or 40 CFR 63.

## **XIII. Compliance With Applicable Federal Rules**

### **40 CFR 64 Compliance Assurance Monitoring**

Tillotson is subject to the CAM regulation. See Section X. Source Testing and Monitoring of this report.

### **40 CFR 70.6 (a)(3) Permit Content, Monitoring, Record Keeping, and Reporting Requirements**

Tillotson is meeting its Title V permit requirements. See the *Full Compliance Evaluation Records Review* which is included as an attachment to this report for greater detail of Tillotson's Title V reporting history and compliance status.

### **Clean Air Act Amendments 112 (r)(1) – Accidental Release Program Requirements**

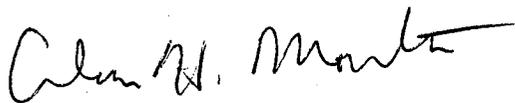
To comply with the Accidental Release Program Requirements, Tillotson has a Spill Prevention, Control and Countermeasure ("SPCC") Plan. The current plan is Revision 6 dated 2007. Tillotson is scheduled to review the SPCC plan in the near future.

## **XIV. Enforcement History and Status**

From 2006 to 2007, DES has had no past or ongoing enforcement actions against Tillotson.

## **XV. Conclusion & Recommended Actions**

There were no deficiencies found as a result of the inspection. During the closing meeting, the DES Inspector indicated that significant problems were not noted during the inspection and its records appeared to be in order.



Alan H. Moulton  
Air Pollution Control Engineer  
Air Resources Division

Attachments: Full Compliance Evaluation Records Review.

## Full Compliance Evaluation Records Review

Facility: Tillotson Rubber Co., Inc.

Date of FCE: July 24, 2008

Reviewer: Alan Moulton

Annual Emission Reports (incl. NOx, VOC etc.):

Reporting Period	When Rec'd	Report OK	In Database
2006	1/19/07 & 2/12/07	Yes	Yes
2007	2/01/08	Yes	Yes

Annual Emissions-Based Fee Payments:

Reporting Period	When Rec'd	In Database
2006	3/05/07	Yes, in DES Emission Section's Spreadsheet
2007	3/13/08	Yes, in DES Emission Section's Spreadsheet

TV Annual Compliance Certifications:

Reporting Period	When Rec'd	Report OK	In Database
2006	3/12/07 & 3/19/07	Yes	Yes
2007	3/11/08	Yes	Yes

TV Semi-Annual Permit Deviation and Monitoring Reports:

Reporting Period	When Rec'd	Report OK	In Database
Jan. – Jun. 2006	7/19/06	Yes	Yes
Jul. – Dec. 2006	1/31/07	Yes	Yes
Jan. – Jun. 2007	7/20/07	Yes	Yes
Jul. – Dec 2007	1/28/08	Yes	Yes
Jan. – Jun. 2008	7/21/08	Yes	Yes

Individual Permit Deviations Reports:

Reporting Period	When Rec'd	Report OK	In Database
None.			

Quarterly Continuous Emission Monitoring Excess Emission Reports (CEM EERs):

Reporting Period	When Rec'd	Report OK	In Database
Not applicable.			

CEM Audits (OPAs, CGAs, RAAs, RATAs):

Reporting Period	Report Type	When Rec'd	Report OK	In Database
Not applicable.				

Stack Tests:

Stack Test Date	Device Tested	When Rec'd	Report OK	In Database
None.				

Other reports:

Reporting Period	Report Type	When Rec'd	Report OK	In Database
None.				

# Compliance Inspection Report

AFS No.: 3300700006 Inspection Date: 7/24/08 Report date: 10/17/08

Facility/Company: Tillotson Rubber Co., Inc.

Street/Location: One Spur Road

Mailing Address: Same

City: Dixville Notch State: NH ZIP: 03576 Phone: 603-255-4572

Parent Corporation: Tillotson Corporation

Corporation Address: 1 Cranberry Hill, Suite 105, Lexington, MA 02421

Corporate CEO: Bill Alico Title: President/CEO Phone: \_\_\_\_\_

Responsible Official: Frederick Tillotson Title: President Phone: \_\_\_\_\_

Environmental Contact: Ronald Guerin Title: Facility Manager Phone: \_\_\_\_\_

Inspection Contact: Ronald Guerin Title: Facility Manager Phone: \_\_\_\_\_

Principal Business: Electric and Other Services SIC: 4931

Latitude: 44° 52' 14" N Longitude: 71° 18' 29" W

Government Facility Code: 0 Air Program Code(s): 0V

Air Program Status: 0 Class: TV Pollutant (if SM): \_\_\_\_\_

Inspection Type: FS Results: MC Compliance/Violation rating: \_\_\_\_\_

Regulations violated (by rule number): \_\_\_\_\_

Comments:

Inspection and Results added to db (initials, date): AHM 7/25/08

Inspection Targeting Sheet updated (initials, date): AHM 7/25/08

Inspection Report Drafted (initials, date): AHM 10/9/08

Report E-Mailed to Permitting (initials, date): AHM 10/17/08

Inspection Report added to H: Drive (initials, date): AHM 10/9/08

Investigator (initials): AHM

COPY FROM

1/12/04 Application

TABLE 1  
LIST OF INSIGNIFICANT ACTIVITIES

Tillotson Rubber Co., Inc.  
Dixville Notch, New Hampshire

0.39 MMBTU  
0.101 MMBTU

Description	Location	Rating	Basis for Designation
Distillate oil-fired hot air furnace ✓	Truck Maintenance Garage	390,000 MMBTU/hr	< 10 MMBTU/hr
Distillate oil-fired furnace ✓	Hydro Building	101,000 MMBTU/hr	< 10 MMBTU/hr
Propane boiler pilots ✓	Power Plant	not available	Emissions < 1000 lb/yr
Parts cleaner ✓	Power Plant	30 gallons	< 5 tons/yr for all parts cleaners
Parts cleaner ✓	Truck Maintenance Garage	34 gallons	< 5 tons/yr for all parts cleaners