



The State of New Hampshire  
**Department of Environmental Services**  
Thomas S. Burack, Commissioner



*Celebrating 25 years of protecting  
New Hampshire's environment.*

December 28, 2012

Terence Murphy, Commissioner  
Hebron-Bridgewater Regional Refuse  
District  
297 Mayhew Turnpike  
Bridgewater, NH 03222

**CERTIFIED MAIL (7007 2560 0001 3867 4091)  
RETURN RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION**

Dear Mr. Murphy:

On September 22, 2010, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") issued Title V Operating Permit No. TV-0060 ("the Permit") to Hebron-Bridgewater Regional Refuse District ("the District") authorizing the operation of a municipal waste incinerator. The District operates the incinerator at 290A Dick Brown Road in Bridgewater, New Hampshire.

On June 30, 2011, DES conducted an on-site full compliance evaluation at the District to determine its compliance with NH Admin. Rules Env-A 100 *et seq.* and the Permit. On August 19, 2011, DES sent a cover letter and report to the District noting certain deficiencies identified during the compliance evaluation.

The purpose of this letter is to notify the District of the following violations discovered during the compliance evaluation and subsequent file review:

1. Env-A 903.03 and Condition VIII. F., Table 7b, Item 2 of the Permit require the District to maintain monthly records of fuel consumption, fuel type and sulfur certifications. During the compliance evaluation, the District was unable to provide documentation demonstrating that it has been maintaining these monthly records. On September 27, 2011 and October 31, 2011, DES received from the District copies of the monthly records.
2. 40 CFR 70.6(a)(3)(iii)(A), Env-A 4308 and Condition VIII. F., Table 7b, Item 6a of the Permit require the District to maintain records of the summary of maintenance and repair records for the wet fume scrubber. During the compliance evaluation, the District was unable to provide documentation demonstrating that it has been maintaining these records for the period 2006 through 2010. On September 27, 2011, DES received from the District copies of the maintenance and repair records for the wet fume scrubber.
3. 40 CFR 70.6(a)(3)(iii)(A) and Condition VIII. F., Table 8, Item 4a of the Permit require the District to submit with its Semi-Annual Permit Deviation and Monitoring Report

("Semi-Annual Report"), a summary of all monitoring and testing requirements contained in the Permit. In the Semi-Annual Report for the reporting period January 1, 2011 to June 30, 2011, the District incorrectly referenced the applicable permit conditions and failed to identify that a stack test occurred during the reporting period. On October 7, 2011, DES received from the District a revised Semi-Annual Report referencing the current permit conditions and the stack test that occurred during the reporting period.

4. Env-A 907.01, Condition IV and Condition VIII. F., Table 8, Item 6 of the Permit require the District to submit an annual emission report, to include emissions from insignificant activities, and using the emission factors established during the most recent stack test. The District's emergency generators and auxiliary building heaters are insignificant activities, and emissions from these devices were omitted from the annual emission reports for calendar years 2009 and 2010. On October 31, 2011, DES received from the District revised annual emission reports including these insignificant activities.

In addition, the District did not use the emission factors established during the September 2010 stack test in its annual emission report for calendar year 2010. On October 28, 2011, DES received from the District a revised annual emission report using the latest stack test emission factors.

5. Env-A 907.01 and Condition VIII. F., Table 8, Item 6c of the Permit require the District to report propane fuel usage within its annual emission reports. The District failed to report propane fuel usage in its annual emission reports for calendar years 2006 through 2010. On October 28, 2011, DES received the District's propane usage for calendar year 2010. On October 31, 2011, DES received authorization from the District to use the 2010 data as substitute data for calendar years 2006 through 2009.
6. Env-A 808.13 and Condition VIII. F., Table 8, Item 7 of the Permit require the District to submit quarterly excess emission reports for its continuous emissions monitoring ("CEM") system starting after December 16, 2010, and within 30 days following the end of each quarterly reporting period. On October 21, 2011, the District submitted late excess emission reports for the fourth quarter of 2010, and the first, second, and third quarters of 2011. On February 29, 2012, the District submitted a late excess emissions report for the fourth quarter 2011. On April 11, 2012, the District submitted a timely excess emission report for the first quarter 2012.
7. 40 CFR 70.6(c)(1) and Condition XXI B. of the Permit require the District to include a Certification of Accuracy Statement signed by the responsible official, with all documents submitted to the DES. During the file review, DES discovered that the District has not been submitting the required certification with its reports. All recent submittals have included the certification and have been signed by the responsible official.

DES reviewed all of the information that the District submitted and determined that it meets the requirements listed in the Permit. DES believes that no further action in response to the listed violations is required and appreciates the efforts that the District has taken to come into

compliance. DES requests that the District continue to comply with all obligations contained in the Permit.

In the event that additional violations are identified or if the District fails to comply with all applicable requirements in the future, DES may take action, including issuing an administrative order, seeking administrative fines, and/or referring this matter to the New Hampshire Department of Justice for civil penalties.

If you believe that DES has cited these violations in error, or have questions regarding this matter, please contact Sheri Eldridge, Enforcement Section Supervisor, at (603) 271-1374. A current copy of the Air Resources Division Rules can be obtained from the DES website at <http://des.nh.gov/organization/commissioner/legal/rules/index.htm>, or by contacting the DES Public Information Center at (603) 271-2975.

Sincerely,



Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

PGM/sre

cc: DES Legal Unit  
E. Kudrauskas, EPA Region 1

AFS #3300900021  
(Stationary Source)