



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

December 14, 2010

Mr. Charles Howland
President/CEO
Warwick Mills, Inc.
301 Turnpike Road, P.O. Box 409
New Ipswich, NH 03071-0409

**CERTIFIED MAIL (7007 2560 0001 3867 3711)
RETURN RECEIPT REQUESTED**

NOTICE OF PAST VIOLATION

Dear Mr. Howland:

On August 19, 2009, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted an on-site full compliance evaluation at Warwick Mills, Inc. ("WMI") located at 301 Turnpike Road in New Ipswich, NH ("the Facility"). On December 22, 2008, DES issued Temporary Permit TP-0001 ("the Permit") to WMI, authorizing the operation of fabric and metal coil coating processes and two boilers. The purpose of the compliance evaluation was to determine WMI's compliance with NH Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution, and the Permit. On November 20, 2009, DES sent a cover letter and a copy of the compliance evaluation report to WMI. The cover letter and report noted certain deficiencies identified during the compliance evaluation. During the period of December 18, 2009 through June 7, 2010, WMI responded in writing with the responses set forth below.

On March 30, 2010, DES received a timely application for a Title V Operating Permit from WMI. On May 15, 2010, DES issued WMI a completeness letter for the application. The Permit expired on June 30, 2010. However, Env-A 607.08(c) provides that if the owner submits a timely and complete application for a Title V operating permit, the owner may continue to operate under the terms of the expired permit until DES has taken final action on the Title V operating permit application.

The purpose of this letter is to notify you of the violations discovered during the compliance evaluation. The specific violations are as follows:

1. Condition VIII., Table 6, Item 4. of the Permit requires WMI to submit, not later than 30 days after the end of each quarter, a quarterly report regarding exceedences of the volatile organic compounds ("VOCs") limit specified in Table 3, Item #15.a. of the Permit. During the compliance evaluation, DES determined that WMI had not submitted reports for the first, second and third quarters of 2009. On December 18, 2009, DES received the three quarterly reports for 2009 from WMI. On February 26, 2010, DES received a timely report for the fourth quarter of 2009. On April 30, 2010 and July 29, 2010, DES received timely first and second quarterly reports for 2010.

2. Env-A 903.03, Env-A 907.01 and Conditions VII., Table 5, Item 4 and VIII., Table 6, Item 1.d. of the Permit require that WMI maintain records and submit, as part of the annual emission report, the total fuel usage on a monthly basis for each combustion device. On April 15, 2009, WMI submitted the annual emission report for 2008. DES determined that WMI submitted total fuel usage combined for the combustion devices. On April 15, 2010, WMI submitted the annual emission report for 2009, which contained the total fuel usage for each combustion device as required by the Permit.
3. Env-A 903.03, Env-A 907.01 and Condition VIII., Table 6, Items 1.b. and 1.c. of the Permit require that WMI submit an annual emission statement that includes the actual calendar year emissions from each process device of VOCs (speciated by individual VOC), hazardous air pollutants ("HAPs")(speciated by individual HAP) and regulated toxic air pollutants ("RTAPs") (reported by CAS number). DES determined that WMI's 2008 annual emission report contained only the total VOC usage. On April 15, 2010, WMI submitted the 2009 annual emission statement. On June 7, 2010, WMI submitted a revised 2008 annual emission statement. DES determined that both of those reports contained the required information.
4. Env-A 904, Env-A 908 and Condition VIII., Table 6, Item 2. of the Permit require WMI to keep certain records and to annually submit a VOC Emission Statement, because WMI had actual emissions of VOCs of greater than 10 tons per year for calendar years 2006 through 2008. For calendar years 2006 through 2008, WMI did not submit a VOC Emission Statement. On February 26, 2010, DES received the VOC Emission Statement from WMI for the Facility for calendar years 2006 through 2008. While those reports did not contain all of the required information, DES was able to use other information submitted by WMI for the VOC Emission Statements for the calendar years 2006 and 2007 and did not request revised reports for those years. On June 7, 2010, DES received a revised VOC Emission Statement for calendar year 2008 from WMI for the Facility. DES determined that both of those reports contained the required information.

DES believes that no further action in response to the listed violations is required and appreciates the efforts that WMI has taken to come into compliance. DES requests that WMI continue to comply with all obligations contained in the Permit. In the event that additional violations are identified 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 these matters, please contact Sheri Eldridge at (603) 271-1374, Air Resources Division, Compliance Bureau. 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

ec: E. Kudarauskas, EPA Region 1
New Ipswich Select Board
M. MacAdam, Compliance Manager, WMI

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(Stationary Source)