

**STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
AIR RESOURCES DIVISION**

Offsite Full Compliance Evaluation Report

**Four Hills Landfill Gas to Energy Facility
840 West Hollis Street
Nashua, NH 03062**

AFS # 3301100191

Review Completed: September 28, 2007

I. Inspection

On September 28, 2007, the New Hampshire Department of Environmental Services, Air Resources Division (“DES”) completed an offsite full compliance evaluation (“FCE”) of Four Hills Landfill Gas to Energy Facility (“Four Hills”), located in Nashua, NH, in Hillsborough County. DES’s offsite records review was conducted in accordance with EPA’s Compliance Monitoring Strategy. Four Hills was last evaluated for compliance during a joint EPA-DES onsite FCE on June 7, 2005. As a result of that inspection, and the results of a landfill gas analysis that preceded the inspection that showed no non-methane organic compounds (“NMOCs”) present, the EPA ordered Four Hills to retest the landfill gas for NMOC content.

Offsite Review Completed:	September 28, 2007
Type of Inspection:	Offsite Full Compliance Evaluation
Inspected by:	Ray Walters
Source Contact(s):	Jason Marcotte – Superintendent, 603-589-3410

Four Hills is a solid waste management facility owned and operated by the City of Nashua. The City is the permit holder. Algonquin Power Systems, Inc. of Oakville, Ontario, through its two subsidiary companies, Four Hills, LLC and Suncook Energy, LLC, owns and operates the landfill gas collection system and combustion devices. Four Hills, LLC is responsible for maintaining the landfill gas collection system which includes all wells, headers and associated piping, and the flare (EU03). Suncook Energy, LLC is responsible for Engines #1 and #2 (EU01 and EU02). The City of Nashua, Department of Public Works, Four Hills, LLC, and Suncook Energy, LLC have signed a Memorandum of Understanding delineating the responsibility of each party.

II. Facility Description

The predominant sources of air pollutant emissions at Four Hills are the landfills; the landfill gas recovery systems, consisting of the flare and the two engines; and fugitive dust sources, including vehicular traffic, landfill operations, construction activities, the loading and unloading of daily cover material (consisting of either ground construction/demolition waste or on-site soil) and bulldozing of the daily cover. Other insignificant activities, such as an emergency generator, an animal crematorium, propane heaters, and fuel storage tanks, emit small amounts of air pollutants.

The facility consists of a 15 acre construction and demolition (“C&D”) landfill that was capped in 1995 and 1996. There is also a 65 acre unlined landfill that was capped in five phases between 2000 and 2005. The unlined landfill contains primarily municipal solid waste (“MSW”) with approximately 10 percent C&D waste, and smaller amounts of sludge and asbestos materials. Currently, Four Hills is placing waste in a lined expansion that has a four million cubic yard capacity. This expansion first started accepting waste in April, 2003.

In 1995, Minnesota Methane installed a landfill gas collection system at Four Hills consisting of a flare and two internal combustion engines and associated electrical generators. After installation, Four Hills, LLC was responsible for maintaining the gas collection system and flare, and Suncook Energy, LLC was responsible for maintaining the two engines. Algonquin Power Systems assumed ownership of Suncook Energy, LLC and Four Hills, LLC and is currently responsible for all operation and maintenance of the gas collection system, flare and two engines.

The gas collection system currently withdraws landfill gas from vertical wells installed in the unlined MSW landfill and vertical wells and horizontal trenches in the active lined landfill. Landfill gas is not pulled from the C&D landfill, and the engines and flare are burning gas produced by the unlined and lined MSW landfills only.

Engine #1 is limited by permit condition to generating a maximum of 820 kilowatts ("KW"). This engine can accept approximately 305 cubic feet per minute ("cfm") of landfill gas. Engine #2 is limited by permit condition to generating a maximum of 2285 KW, and can accept approximately 825 cfm of landfill gas. The flare capacity is about 2000 cfm and burns any landfill gas that exceeds the combined input capacity of the engines. The two engines can generate a total of 3.0 megawatts ("MW") of electricity, approximately 0.8 MW of which is used to power onsite equipment. Approximately 2.2 MW is provided to the electric power utility grid for distribution and use.

In July 2005, Four Hills installed a sulfur removal system on the fuel header to the two engines. Prior to the installation, the engines had been damaged internally by acidic sulfur compounds produced from the hydrogen sulfide during combustion of the landfill gas. The damage required Four Hills to periodically remove one or both engines from service for repair. When the engines were run, it was often at maximum output such that Four Hills exceeded the maximum allowable generation capacities of 820 and 2285 KW of each engine and the corresponding hourly emission limits for sulfur dioxide. See more in Section VI of this report (Compliance and Enforcement Status).

During the last onsite FCE in June 2005, additional sources of emissions (air and/or water) were noted:

- Four Hills has a 10,000 gallon storage tank of on-road diesel fuel that is used for landfill equipment, trash collection trucks, etc;
- There is an air conditioning unit for the offices at the landfill. This is a residential size unit and was verified to have less than 50 pounds of refrigerant charge;
- All leachate from Four Hills goes to the city waste water treatment plant. There is no on-site treatment, and the landfill possesses an industrial discharge permit;
- Four Hills has an onsite stormwater detention pond. Four Hills also accepts approximately 5000 tons per year of yardwaste, which is composted and used for cover; and
- There is a small, emergency generator used for the landfill office in the event of a power outage. The hour meter had recorded 141 hours of operation in June 2005.

Since April 2005, Four Hills has been requesting the DES Waste Management Division to approve an expansion of the landfill by allowing it to deposit MSW inside the 500 foot setback required by Env-Sw 202.04(a)(1)c to protect property owners that abut the landfill. On April 11, 2007, the DES Waste Management Division denied Four Hill's application for the waiver. On August 10, 2007, Four Hills requested that DES Waste Management Division reconsider its decision. In a letter to Four Hills dated September 24, 2007, the DES Waste Management Division confirmed that because Four Hills had not demonstrated that the criteria under which DES Waste Management Division could grant a waiver had been satisfied, its original decision stands.

III. Regulatory Compliance

CHAPTER ENV-A 300 - Ambient Air Quality Standards ("AAQS")

On September 15, 2006, Four Hills submitted air quality modeling data as part of its pending solid waste permit modification and waiver request and its application for the Title V air permit. DES concluded that the maximum predicted impacts from the products of combustion of landfill gas (Particulate Matter, Carbon Monoxide, Nitrogen Oxides and Sulfur Dioxide) do not exceed National Ambient Air Quality Standards ("NAAQS"). In addition, DES concluded that the maximum predicted impacts from the emissions of Regulated Toxic Air Pollutants ("RTAPs") evaluated do not exceed the Ambient Air Limits

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

Four Hills is subject to the New Source Performance Standard ("NSPS") specified in Env-A 503.01: 40 CFR 60 Subpart WWW *Standards of Performance for Municipal Solid Waste Landfills* (only in part, because its calculated NMOC emission rate is less than 50 megagrams per year). Four Hills is also subject to the National Emission Standards for Hazardous Air Pollutants ("NESHAP") specified in Env-A 504.01: 40 CFR 61 Subpart M *National Emission Standard for Asbestos* for active or inactive disposal sites that contains any asbestos material. It is not subject to any National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology, or MACT, Standards) specified in Env-A 505.01.

CHAPTER Env-A 600 - Statewide Permit System

Four Hills is currently operating under the conditions and requirements of Title V Operating Permit TV-OP-047 ("the Permit") which DES issued to Four Hills on March 3, 2003. Four Hills is major for its emissions of carbon monoxide ("CO") from the combustion of landfill gas in the engines and flare. The Permit expires on March 31, 2008.

Since the issuance of the Permit, Four Hills has submitted the following additional applications for permit modifications:

- On September 25, 2003, DES received an application seeking to amend the Permit to incorporate the (at the time) proposed lined landfill. Subsequently, DES determined that administrative procedures related to the Title V permit program would necessitate the issuance of a Temporary Permit before for any changes to the facility could be included in the Title V Permit.
- On May 20, 2005, DES received an application from Suncook Energy, LLC for a temporary permit for the installation of the sulfur removal system and the modification of the SO₂ emission limitations for the two engines and the flare. In addition, a permit waiver was requested to allow the immediate installation of the sulfur removal system to prevent excessive wear on the internal engine components that had been determined to be caused by high sulfur concentrations in the landfill gas. Suncook Energy, LLC requested the modified SO₂ emission limits to reflect the actual H₂S concentrations present in the landfill gas. DES granted the waiver request and Temporary Permit in the form of a letter dated May 31, 2005.
- On May 5, 2005, January 18, 2006, and February 2, 2007, DES received applications from Four Hills for minor permit amendments to change the name of the responsible official, the technical contact and/or to revise the official mailing address.
- On May 31, 2007, DES received an application from Four Hills to consolidate the three contiguous existing landfills and all gas collection, treatment, and control facilities serving the three landfills into one Temporary Permit. The landfills and associated facilities will later be incorporated into a single Title V Permit covering the entire landfill site.

PART Env-A 604.02 – Permit Terms and Conditions

The respective permitted devices, heat input limits, capacities and reported fuel usage are shown below in Table I:

Table I

Device and Model	Operating Limits	Reported Operations
EU01 - Internal Combustion Engine #1 Caterpillar Model No. G3516, Serial Number 4EK000649	9.2 MMBtu/hr or 80,592 MMBtu during any consecutive 12-month period of gross heat input (HHV) of landfill gas equivalent to 161,184,000 acf of landfill gas (assuming 500 Btu/cubic feet, HHV); or 1144 HP or 820 kilowatts output.	2006: 29,693 MMBtu and 56.77 MMcf landfill gas 2005: 40,707 MMBtu and 77.83 MMcf landfill gas
EU02 - Internal Combustion Engine #2 Caterpillar Model No. G3612, Serial Number 1YG00078	24.7 MMBtu/hr or 216,372 MMBtu during any consecutive 12-month period of gross heat input (HHV) of landfill gas equivalent to 432,744,000 acf of landfill gas (assuming 500 Btu/cubic feet, HHV); or 3175 HP or 2285 kilowatts output	2006: 114,301 MMBtu and 218.55 MMcf landfill gas 2005: 62,094 MMBtu and 118.73 MMcf landfill gas

Device and Model	Operating Limits	Reported Operations
EU03 - Landfill Gas Flare LFGas Candle Flare	60.0 MMBtu/hr (HHV-input) 60.0 MMBtu/hr or 288,029 MMBtu during any consecutive 12-month period of gross heat input (HHV) of landfill gas equivalent to 576,058,000 acf of landfill gas (assuming 500 Btu/cubic feet, HHV).	2006: 62,759 MMBtu and 120.00 MMcf landfill gas 2005: 119,536 MMBtu and 228.56 MMcf landfill gas
EU04 - Unlined Landfill	NA	Active landfill
EU05 - C/D Landfill	NA	Closed landfill

Table II shows the emission limits and reported emissions for each device.

Table II

Device	NOx	SO ₂	CO	PM	NMOC
EU01	Limit: 3.0 #/hr and 13.3 tpy 3/31/04 testing: 2.04 #/hr 2006: 3.58 tons 2005: 4.91 tons	Limit: 0.49 #/hr and 2.2 tpy 2006: 0.33 tons 2005: 2.22 tons	Limits: 5.8 #/hr and 25.4 tpy 2006: 6.34 tons 2005: 8.69 tons	Limits: 1.1 #/hr and 4.84 tpy 2006: 0.83 tons 2005: 1.14 tons	Limits: 1.51 #/hr and 6.6 tpy 2006: 0.97 tons 2005: 1.32 tons
EU02	Limits: 4.9 #/hr and 21.5 tpy 3/31/04 testing: 3.33 #/hr 2006: 7.49 tons 2005: 4.07 tons	Limits: 1.4 #/hr and 6.1 tpy 2006: 1.26 tons 2005: 3.38 tons	Limits: 15.4 #/hr and 67.5 tpy 2006: 36.06 tons 2005: 19.59 tons	Limits: 3.0 #/hr and 13.0 tpy 2006: 3.20 tons 2005: 1.74 tons	Limits: 5.6 #/hr and 24.5 tpy 2006: 16.75 tons 2005: 9.10 tons
EU03	Limits: 7.1 #/hr and 17.0 tpy 2006: 1.26 tons 2005: 2.39 tons	Limits: 3.2 #/hr and 7.7 tpy 2006: 3.83 tons 2005: 6.51 tons	Limits: 45.0 #/hr and 108.0 tpy 2006: 23.44 tons 2005: 44.65 tons	Limits: 1.0 #/hr and 2.5 tpy 2006: 0.53 tons 2005: 1.02 tons	Limits: 6.23 #/hr and 14.9 tpy 2006: 0.16 tons 2005: 0.30 tons

EU04 and EU05 emitted 164.00 MM cubic feet of Fugitive Landfill Gas Emissions in 2006.

The Permit stipulates maximum hourly heat input and maximum electrical output of Engines #1 and #2, and hourly emission limits. DES noted during its review of Four Hills' semi-annual Title V Permit Deviation and Monitoring ("TV PD/M") reports for 2003 and 2004 that the source identified exceedances of these input and output limits and also exceedances of the corresponding hourly SO₂ #/hr limits. When brought to its attention, Four Hills explained that these instances occurred because the engine operator was trying to maximize power output given that the engines had been down for extended periods of repair after being damaged by the high H₂S content in the landfill gas.

During subsequent conversations with Four Hills, DES realized that the reported SO₂ emissions had been calculated by the source using emission factors that did not take into account the high levels of H₂S content in the landfill gas. On 1/27/06, DES requested that Four Hills use sulfur concentrations from actual sulfur testing of the landfill gas and to review past emissions in light of the newly collected sulfur data and emission factor. DES also requested that Four Hills re-evaluate all RTAPs in light of the recently received NMOC data.

Table III shows the number of hours of exceedances of the SO₂ hour emission limit, the number of hours operated in the year and the percentage of time operating in exceedance.

Table III: Exceedances of Hourly SO₂ Limit

Device	# of months exceeded	Year	# of hourly exceedances/# of hours operated	Exceedances as % of total operation
Eng #1	5 (Jan-Apr, Dec)	2004	1781 / 5647	31.5
Eng #1	7 (Jan - Jul)	2005	3228 / 5621	57
Eng #2	4 (Jan-Feb, May, Dec)	2005	1331 / 3849	35

Ultimately, DES re-calculated Four Hills' actual SO₂ emissions using the more conservative landfill gas analysis for sulfur content. See more discussion in Section VI of this report (Compliance and Enforcement Status).

CHAPTER ENV-A 700 – Permit Fee System

Part Env-A 704 – Emission-Based Fees

Based on its reported emissions, Four Hills has paid its emission-based fees in full through 2006.

CHAPTER ENV-A 800 - Testing and Monitoring Procedures

Part Env-A 802 – Testing and Monitoring for Stationary Sources

The NSPS, Subpart WWW, requires Four Hills to sample its landfill gas for NMOCs every 5 years. Four Hills sampled its landfill gas while being observed by DES on December 8, 2005. The average NMOC content measured at the gas collection header was 389 ppm as hexane. The test report was reviewed by both DES and EPA Region 1.

As a result of the permit exceedances reported to DES in the TV PD/M reports and DES's concern that the calculated SO₂ emissions did not accurately reflect actual sulfur content of the landfill gas, on April 5, 2006 and amended on July 28, 2006, Four Hills submitted a Landfill Gas Testing Protocol to DES. On August 3, 2006, Four Hills collected its first round of landfill gas samples following this protocol. The sulfur and RTAP concentrations in the August 2006 samples were used to determine compliance with associated AAQS and AALs. Modeling results using the reported concentrations did not predict impacts of SO₂ or RTAP emissions at levels greater than AAQS or AALs

On May 4, 2007, DES issued Letter of Deficiency No. ARD 07-014 ("the LOD") to Four Hills in which it requested Four Hills to collect monthly landfill gas samples, beginning in June 2007, to be analyzed for sulfur compounds and fixed gases. The LOD requested that the monthly collection and analyses continue until DES issues the Temporary Permit, at which time Four Hills shall follow the permit schedule. At the request of Four Hills, DES agreed to reduce the number of sampling locations to one that is representative of the combined landfill gas from the unlined closed landfill and existing active landfill. Four Hills will collect and analyze the samples in accordance with the approved Landfill Gas Testing Protocol and Addendum dated April 5, 2006 and July 28, 2006, respectively.

CHAPTER ENV-A 900 - Owner or Operator Recordkeeping and Reporting Obligations

A determination of Four Hills' compliance with all recordkeeping requirements of the Title V Permit is beyond the scope of this offsite FCE. However, the annual emissions reports, NO_x reports and Title V-required reports submitted to DES by Four Hills indicate that it is maintaining the necessary records. A review of Four Hills' actual recordkeeping and data maintenance procedures will be conducted during the next onsite FCE of the facility in 2009.

The Full Compliance Evaluation Records Review is included as an attachment to this report. The attachment lists all the reports that were reviewed in order to complete this compliance evaluation. The records review attachment includes a determination of each report's timeliness with regard to the required submittal date, and if the report was acceptable in terms of its content.

Part Env-A 905 - NO_x Emission Statements Recordkeeping Requirements

Four Hills uses stack test-derived emission factors to calculate the NO_x emission rates from the two engines. A published AP-42 emission factor is used to calculate NO_x emission rates from the flare. Four Hills emits more than 10 tons of NO_x per year and is subject to this Part.

Part Env-A 909 - NO_x Emission Statements Reporting Requirements

Four Hills reports its annual NO_x emissions as part of its annual emissions report.

CHAPTER ENV-A 1200 - Stationary Source Air Pollution

Part Env-A 1204 - Stationary Sources of VOCs

Four Hills does not have any processes or devices with VOC emissions that subject them to the

Reasonably Achievable Control Technology ("RACT") requirements for VOCs.

Part Env-A 1211 - Nitrogen Oxides

Four Hills emits less than 50 tons of NO_x per year and is not subject to NO_x RACT

CHAPTER ENV-A 1400 - Regulated Toxic Air Pollutants ("RTAPs")

DES reviewed Four Hills' submittal dated September 15, 2006 for a solid waste permit modification and waiver request to the DES Waste Management Division. Four Hills conducted air quality ambient modeling which was requested by DES to support its request for a waiver. DES concurred that the maximum impacts from Four Hills' emissions of RTAPs predicted by the modeling do not exceed the Ambient Air Limits for each constituent evaluated.

CHAPTER ENV-A 2000 - Fuel Burning Devices

DES was not onsite during this FCE to confirm Four Hills' compliance with the opacity standard, however, there have been no reports of exceedances, and in general, the combustion of landfill gas produces negligible opacity.

IV. Pollution Control Equipment

Although not required by the permit, or by any state or federal air quality regulation, Four Hills installed a sulfur removal system to reduce the H₂S in the landfill gas being fed to the engines. This was to prevent damage to the engine internals which had previously resulted in extended shutdowns of the devices by the acidic products of combustion.

V. Compliance with Federal Requirements

40 CFR 70.6 (c)(1) Permit Compliance Requirements

Four Hills 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 Four Hills' Title V reporting history and compliance status.

40 CFR 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

Subpart WWW and the Permit require Four Hills to calculate an NMOC emission rate for the landfill using the procedures specified in 40 CFR 60.754 and submit the data to DES. This shall be done annually, unless the estimated NMOC emissions rate is less than 50 megagrams per year, in which case it can be done every 5 years. Four Hills submitted an annual NMOC test report to DES on January 10, 2006. The average concentration of NMOC in the landfill gas was 389 ppm as hexane. DES determined, using Four Hills' 12-month rolling landfill gas generation rate, that this concentration is equivalent to an NMOC emission rate of 20 to 24 megagrams per rolling 12-month period.

40 CFR 61 Subpart M National Emission Standard for Asbestos

The asbestos NESHAP stipulates requirements for active and inactive asbestos landfill to minimize emissions of asbestos to the environment. In its Title V annual compliance certifications, Four Hills states that it either caps or has closed areas of the landfill that contain asbestos. The landfill has a perimeter fence and 24-hour security as barriers to prevent access to the active asbestos landfill.

VI. Compliance and Enforcement Status

On February 5, 2007, DES issued Notice of Findings (“the NOF”) to Four Hills in order to get its response to DES’s determination that Four Hills had emitted approximately 12 tons of SO₂ from its combustion devices in excess of the allowable permit limit(s) in calendar years 2003 through 2005. In its semi-annual TV PD/M reports for those years, Four Hills reported hourly exceedances of SO₂, CO, and NMOCs from the engines and the flare in 2003 and 2004. Four Hills also reported several 12-month rolling average exceedances of SO₂ in 2005 from the engines.

Table IV: Excess Emissions City of Nashua, Four Hills Landfill in 2003–2005

Parameter Exceeded	Device	Year of exceedance	Approximate Excess Emissions (tons) based on 389 ppm H₂S
SO ₂	EU1	2003	2.85
SO ₂	EU2	2003	1.21
SO ₂	Flare	2003	2.58
		Total excess SO2 2003	6.64
SO ₂	EU1	2004	2.24
SO ₂	EU2	2004	1.64
SO ₂	Flare	2004	0.0
		Total excess SO₂ 2004	3.88
SO ₂	EU1	2005	0.89
SO ₂	EU2	2005	0.70
SO ₂	Flare	2005	0.00
		Total excess SO₂ 2005	1.59
		Total excess SO₂ 2003-2005	12.11
CO	EU2	2003	0.43
CO	Flare	2003	0.04
		Total excess CO 2003	0.47
		Total excess emissions	12.58

Four Hills and Algonquin Power Systems responded to the NOF on March 7, 2007 agreeing with the method used by DES to calculate the excess emissions

On May 4, 2007, DES issued Letter of Deficiency No. ARD 07-014 (“the LOD”) to Four Hills in which it requested that Four Hills perform monthly landfill gas sampling and analysis for sulfur compounds and fixed gases until such time that DES issues a permit with landfill gas sampling requirements. In addition, the LOD requested that, by May 31, 2007, Four Hills pay past-due

emissions-based fees of \$2,125 for the excess emissions from the combustion devices and that Four Hills submit an application for a consolidated Temporary Permit for the three contiguous existing landfills (unlined closed landfill, C&D landfill, and existing lined active landfill) and all gas collection, treatment, and control facilities serving the three landfills.

On May 18, 2007, Four Hills submitted notification to DES that it planned to begin monthly landfill gas sampling with the first to occur on June 21, 2007. On May 31, 2007, Four Hills submitted past-due fees of \$2,125 to DES.

On May 31, 2007, DES received an application from Four Hills to consolidate the three contiguous existing landfills and all gas collection, treatment, and control facilities serving the three landfills into one Temporary Permit.

VII. Conclusion and Recommended Actions

No additional problems or violations were noted during this offsite file review and compliance determination. No further action is necessary at this time.

VIII. Attachments:

07-0928 Four Hills Landfill FCE Offsite Records Review Checksheet



Raymond A. Walters
Compliance Measurement & Data Programs Manager
Air Resources Division

File: 07-0928 Four Hills Landfill FCE Offsite Report

Full Compliance Evaluation Records Review

Facility: Four Hills Landfill Gas to Energy Facility

Date of FCE: September 28, 2007

Reviewer: Raymond Walters

Annual Emission & NOx Emission Reports:

Reporting Period	When Rec'd?	Report OK?	In Database?
CY 2006	04/16/07	Yes	Yes
CY 2005	04/28/06	Yes	Yes

Annual Emissions-Based Fee Payments:

Reporting Period	When Rec'd?	In Database?
CY 2006	04/16/07	Yes, in Sonny's spreadsheet
CY 2005	04/28/06	Yes, in Sonny's spreadsheet

TV Annual Compliance Certifications:

Reporting Period	When Rec'd?	Report OK?	In Database?
CY 2006	04/16/07	Yes	Yes
CY 2005	04/28/06	Yes	Yes

TV Semi-Annual Permit Deviation and Monitoring Reports:

Reporting Period	When Rec'd?	Report OK?	In Database?
Jan-June, 2007	08/01/07	Yes	Yes
July-Dec, 2006	02/02/07	Re-submittal on 03/19/07	Yes
Jan-June, 2006	08/03/06	Yes	Yes
July-Dec, 2005	03/03/06	Yes	Yes
Jan-June, 2005	08/02/05	Yes	Yes

Individual Permit Deviations Reports:

Date	Duration	When Rec'd?	Report OK, Cause?	In Database?
05/08/05	1 hour	05/25/05	Engine operation test and evaluation	Yes

Other reports:

When Rec'd?	Report Type	Report OK?	In Database?
04/28/06	Toxic Air Pollutant Report	Yes	Yes
02/22/06	Work Plan from GZA	Yes	Yes

Last revised: May 17, 2005

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