

The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner



*Celebrating 25 Years of Protecting
New Hampshire's Environment*

May 9, 2012

Mr. Timothy Porter
Director of Air Quality Management
Wheelabrator Technologies Inc.
4 Liberty Lane West
Hampton, NH 03842

**Re: Approval of Research & Development Project
Landfill Leachate Evaporation
Wheelabrator Concord Company LP, 11 Whitney Road, Concord, New Hampshire
Facility ID # 3301300102; Application #12-0079**

Dear Mr. Porter:

The New Hampshire Department of Environmental Services, Air Resources Division (DES) received your letter on May 3, 2012 and additional information filed on May 7, 2012 requesting an exception to obtaining a Temporary Permit for a research and development (R&D) project at the Wheelabrator Concord Company's (Wheelabrator) facility in Concord, New Hampshire. The May 3, 2012 letter describes the scope, schedule, and emissions associated with the project. DES has determined that the proposed project meets the definition of a "Research & Development operation" as specified in the New Hampshire Code of Administrative Rules Env-A 101, *Definitions*. DES also determined that the R&D project satisfies the criteria established in Env-A 617.01, *Exception to Obtaining a Temporary Permit or State Permit to Operate*. DES hereby approves Wheelabrator's request to perform the R&D project without obtaining a Temporary Permit for air emissions. Wheelabrator may proceed with the R&D activity as proposed, under the conditions noted below.

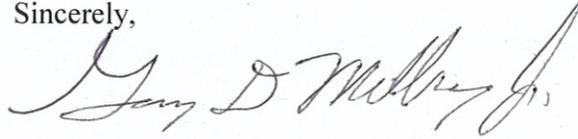
As described in the May 3, 2012 letter, Wheelabrator is proposing to conduct annual compliance stack testing during May 15-18, 2012. During the testing, Wheelabrator has proposed using leachate from Waste Management of New Hampshire's Turnkey landfill as part of the dilution water to produce the lime slurry. The slurry will be used in the Spray Dryer Absorbers (designated as PCE2 & PCE6 in the Title V operating permit TV-0032) to control the emissions of acid gases. Compliance stack test results will be submitted to DES as per Env-A 802.11 *Report Submission Requirements*. If, during the R&D activity, Wheelabrator determines that the scope of the R&D project is different than that described in the May 3 or May 7, 2012 correspondence, or that total emissions are expected to increase, DES requests that Wheelabrator contact DES as soon as practicable to discuss whether the modification requires additional review. Wheelabrator is authorized to conduct the R&D activity for 8 weeks from the start of using leachate, with a maximum leachate usage of 8,000 gallons per day. DES requests that Wheelabrator provide DES with written notification that the project is complete within 10 working days of its conclusion. Please note that Wheelabrator must still comply with all applicable requirements, including emission limits, during the R&D operation.

www.des.nh.gov

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If you have any questions concerning this matter, please contact Padmaja Baru of the Air Resources Division, Permitting and Environmental Health Bureau, by phone at (603) 271-0905 or by e-mail at padmaja.baru@des.nh.gov.

Sincerely,



Gary D. Milbury, Jr.
Air Permit Programs Manager
Permitting and Environmental Health Bureau

cc: John LaRiviere, Plant Manager, Wheelabrator Concord Company (via e-mail)