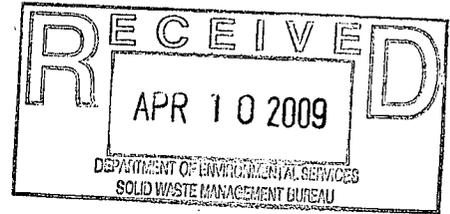


HEBRON-BRIDGEWATER REFUSE DISTRICT

**297 Mayhew Turnpike
Bridgewater, NH 03222**

WMD Log 2009 00048



4/6/2009

Tom Seigle, P.E.
Solid Waste Management Bureau

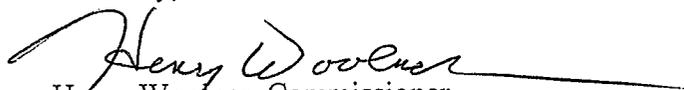
Dear Tom,

In response to your letter of 1/26/2009, find attached:

- 1) Revised Ash Management Plan of 2008.
- 2) The available results of that plan from 2001 to 2006.
- 3) The results from 2008 and 2009 for ash and a new analysis for the scrubber slurry processing. (See Eastern Analytical Results ash and salt)
If you want all the detailed analysis on the available years, let us know.
- 4) The Ash Management Plan of 2008 can be attached to the Solid Waste Application.
5. With respect to E Waste. We accept all residential electronics, fluorescents bulbs, computers, monitors, TV's, faxes, printers. (pay as you throw)
6. See attached a letter to Michael Wimsatt, Director. This is in regard to waivers.

If you have any questions, please let me know,

Sincerely,

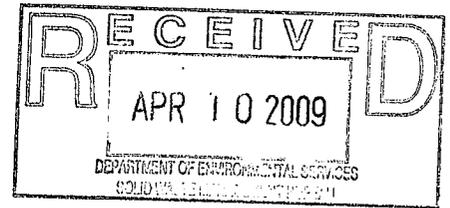

Henry Woelner, Commissioner

HEBRON-BRIDGEWATER REFUSE DISTRICT

297 Mayhew Tpke
Bridgewater, NH 03222

WMD Log 2009 00048

Michael J. Wimsatt, P.C., Director
Waste Management Division
DEPARTMENT OF ENVIRONMENTAL SERVICES
PO Box 95, 29 Hazen Drive
Concord, NH 03302



Re: Hebron-Bridgewater Processing Facility
Application for Waiver
WMD Log #: 200800142

Dear Mr. Wimsatt:

The Department of Environmental Services, Waste Management Division (Department) has denied our requests for a waiver of the requirement for a public hearing, as required by Env-Sw 304.08 and waiver of the application fee as required by Env-Sw 310.01.

The reasons cited were:

Env-Sw 202.04(a)(1) of the Solid Waste Rules specifies three criteria, all of which must be satisfied and Env-Sw 202.04(a)(2) specifies three criteria, one of which must be satisfied, in order for a waiver to be approved.

The basis of the Department's decision on each request for waiver is as follows:

Request for Waiver of Env-Sw 304.08 Requiring a Public Hearing

Env-Sw-202.04(a)(1)c. requires that exemption from the rule will be in keeping with the intent and purpose of the rule being waived.

The intent and purpose of the rule is to inform the public and allow the Department to receive input before deciding whether to approve or deny a permit. As the Hebron-Bridgewater facility has changed over the years and evolved to its current operation, granting this waiver would deny both the public and the Department the opportunity to be fully informed of any problems issues or concerns regarding the current operation.

As pointed out in our request

1. The facility was established by a vote the towns of Hebron and Bridgewater in 1976 to form a Refuse District under RSA53. It was further discussed and a note to upgrade the facility approved at public hearings held in 2003.
2. A public hearing for the same facility's Incinerator Air Permit was held by DES in 2004.
3. The facility has existed at the same location for more than 30 years.

The above would suggest the both the public and the Department have been informed..

Additionally,

4. The facility is designed to accommodate less than 30 tons per day.
5. Exemption from the rule will not result in adverse affects on the environment, public health, or public safety.
6. Exemption from the rule will not result in an impact on abutting properties

Request for Waiver of Env-Sw 310.01 Requiring Payment of an Application Fee

Env-Sw-202.04 (b) states that "Economic, technological, practical and safety issues shall be considered in evaluating a demonstration of the above criteria; however, the application of rules shall not be weighed solely on the basis of cost". The Refuse District has not demonstrated any reason for waiving the fee other than cost avoidance. Therefore the Department cannot grant the request to waive the application fee.

Env-Sw 202.04 (a) (2) states:

Strict compliance with the rule will provide no benefit to the public and will cause an operational or economic hardship to the applicant.

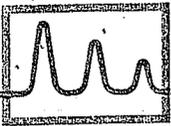
This suggests that economic reasons can and should be considered when reviewing a request for waiver when there is no benefit to the public. Additionally, fees were paid in 2004 when the Air Permit granted for the same facility.

We therefore respectfully request that these waivers be granted.

.Sincerely yours,

Mr. Henry Woolner, Commissioner
Hebron-Bridgewater Refuse District
297 Mayhew Turnpike
Bridgewater, New Hampshire 03222

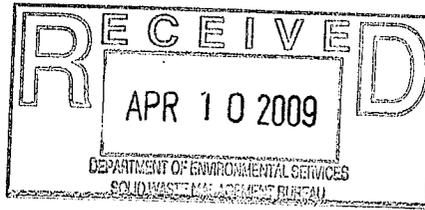
Cc: M. Guilfoy
W. Wheeler
T. Seigle



eastern analytical

professional laboratory services

Kieran Murphy
H.B. Refuse District
297 Mayhew Turnpike
Bristol, NH 03222



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 77063
Client Identification: H-B
Date Received: 3/6/2009

Dear Mr. Murphy:

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.eailabs.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:
Solid samples are reported on a dry weight basis, unless otherwise noted
< : "less than" followed by the reporting limit
TNR: Testing Not Requested
ND: None Detected, no established detection limit
RL: Reporting Limits
%R: % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269) and Vermont (VT1012).

This report package contains the following information: Sample Conditions summary, Analytical Results/Data and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample(s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

WMD Log 200900048

Lorraine Olashaw
Lorraine Olashaw, Lab Director

3.16.09
Date

4
of pages (excluding cover letter)

Misc. Sampling			
	Units = mg/l		
Date 9/13/05	Evap	Blowdown	Water
Arsenic	3.6	1.4	0.004
Barium	0.05	0.39	0.072
Cadmium	0.06	0.0876	<.001
Chromium	0.33	0.079	<.001
Lead	5.2	1.7	0.003
Mercury	0.003	0.001	<.0001
Nickel			
Selenium	0.49	0.13	0.002
Silver	<.005	<.005	<.001

WWD Log 200900048

Ash Management

Units = mg/l

Ash Management	8/31/2001	4/12/2002	8/17/2004	4/21/2005	4/21/2005
Arsenic		<0.5	<0.5	<0.5	<0.5
Barium		1.1	0.9	6.3	0.9
Cadmium		<0.1	<0.1	<0.1	<0.1
Chromium		0.1	<0.1	<0.1	<0.1
Lead	<0.5	<0.5	<0.5	<0.5	<0.5
Mercury		<0.01	<0.01	<0.01	<0.01
Nickel		0.1		0.1	0.1
Selenium		<0.1	<0.1	<0.1	<0.1
Silver		<0.1	<0.1	<0.1	<0.1

EPA /DES Limits mg/l

Arsenic	5
Barium	1
Cadmium	1
Chromium	5
Iron	5
Lead	
Manganese	5
Mercury	0
Selenium	1
Silver	5

WHD Log 200900048