



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA E-MAIL

January 14, 2014

Raymond D. Thayer, Chairman
Town of Newton Board of Selectmen
2 Town Hall Road, P.O. Box 378
Newton, NH 03858
E-mail: selectmen@newtonnh.net

**SUBJECT: TYPE I-B PERMIT MODIFICATION APPLICATION – REVIEW COMMENTS
NEWTON TRANSFER STATION & RECYCLING CENTER
4 DUGWAY ROAD, NEWTON, NH; PERMIT #: DES-SW- 90-012**

Dear Mr. Thayer and Board Members:

The NH Department of Environmental Services Solid Waste Management Bureau (Department) has reviewed the Type I-B Permit Modification Application to modify the Town of Newton's Solid Waste Management Facility Standard Permit for the Newton Transfer Station/Recycling Center. The application was received on December 23, 2013, and was submitted by the Town in response to the Department's issuance of a Letter of Deficiency (LOD No. WMD-13-149), dated November 4, 2013.

The Department requires that the following comments be addressed by the Town and a revised permit application package be submitted to the Department **by 4:00 p.m. January 31, 2014**:

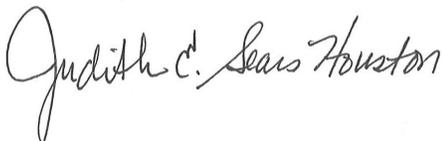
1. Application Section VIII: The table references an attached list of permits that was not attached. Please either list the permits in the table that are required for this permit modification, attach the list as noted, or indicate that this section is 'not applicable'.
2. Operating Plan:
 - a. Section III (5): Indicate the party that would sample and analyze potentially unauthorized waste – the Town or the waste generator.
 - b. Section III (7) (2.c.8): Expand this paragraph, such as "...The burning of brush and trees \leq 5-inches in diameter shall be in accordance with the terms and conditions of the Category IV – Commercial Fire Permit for the facility, issued by the NH Department of Resources and Economic Development (NHDRED), Division of Forests and Lands, as renewed annually."
 - c. Section III (8)(a) Add the "Collection, Storage and Transfer Procedures" for Universal Wastes at the facility to this section.
 - d. Section III (8)(a.6):
 - i. Revise the 3rd sentence, such as "...The burning of brush and trees \leq 5-inches in diameter shall be in accordance with the terms and conditions of the Category IV – Commercial Fire Permit for the facility, issued by the NHDRED, Division of Forests and Lands, as renewed annually."
 - ii. Please clarify the last sentence of this sub-section, i.e. indicate the distance the burn pile must be from another pile or other structure/obstacle.

- iii. Indicate where the burn pile (or ash) is being "removed from the site" to. Please also note that the management of the burn pile ash (after combustion) shall be in accordance with Solid Waste Rule Env-Sw 902. A copy of these rules may be found at:
<http://des.nh.gov/organization/commissioner/legal/rules/index.htm#solid>.
 - e. Section III (8)(a.10): Describe how used oil is handled, e.g. poured from container into tank using funnel, type of tank, etc.
 - f. Section III (8)(b.7): Only brush that is \leq 5-inches in diameter is allowed to be burned at the Facility, unless a revised Fire Permit is approved by the NHDRED, Division of Forests and Lands.
 - g. Section IV (2)(c.1): Add information on surface water management for the Facility, e.g. sheet drainage to the adjacent wetlands and/or Fire Pond, or other treatment area, swales/ditch lines, etc.
 - h. Section VII (2.a): The referenced AFR form is not attached to the Operating Plan, however, since this form is revised by the Department each year, the Operator should be directed to our website to download the most up-to-date form:
<http://des.nh.gov/organization/divisions/waste/swmb/categories/hot.htm#facility-reports>
3. Site Plan: Signatures of the Certified Wetland Scientist and Professional Engineer are required with the professional stamps.
 4. Closure Plan:
 - a. Section 5 & 6: Please clarify the first sentence (are there any required closure systems?).
 - b. Section 7: Reference the correct Rule - Env-Sw 1106.04(7).
 - c. Section 7 (1) & (2): Replace this information for record keeping and reporting requirements for Facility closure, per Env-Sw 1106.04 Closure Plan, Content and Format, and submittals to the Department and impacted municipalities.
 5. State Certifications: Mr. Gagnon's permit was renewed on 10/23/14. Please update the table.

We hope these comments are helpful in finalizing the Type I-B Permit Modification Application, and updating the Facility's Standard Permit. The revised application package is due to the Department and other municipalities, **by 4:00 p.m. January 31, 2014**.

Please contact me at (603) 271-2936 or via e-mail at judith.houston@des.nh.gov, with any questions or comments.

Sincerely,



Judith E. Sears Houston, P.E.
Solid Waste Management Bureau
NH Department of Environmental Services
Tel: (603) 271-2936
Fax: (603) 271-2456
E-mail: judith.houston@des.nh.gov

Ec. Douglas Kemp, SWMB Compliance Subsection; E-mail: Douglas.Kemp@des.nh.gov