



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL

January 8, 2015

Joseph Ruggiero
Ruggiero Processing Facility, LLC
PO Box 434
Saxtons River, VT 05154
Email: ruggierotrashremoval@gmail.com

SUBJECT: WALPOLE- Ruggiero Processing Facility, LLC, Map 1, Lot 10-2, 32 Industrial Park Drive;
Type IA Permit Modification Application for Accepting MSW, Permit # DES-SW-SP-12-001, prepared by SVE Associates; Ref.: WMD Doc Log #s 15089, 15545, and 15546

Dear Mr. Ruggiero:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed a review of the above-cited Type IA permit modification application. In accordance with the requirements of the New Hampshire Solid Waste Rules (Rules), the following information must be provided to satisfy the provisions of Env-Sw 304.03 for a completeness determination, and Env-Sw 304.07 and Env-Sw 315 for a technical review.

Completeness

1. Per Env-Sw 304.03(f), please submit all disclosure forms required pursuant to Env-Sw 316 to the NHDOJ. This requirement is not only for new owners, directors, and partners.
2. In Section III(4), "Facility Design Plans/Specifications" of the Application is not checked, while Section III(5) "Facility Design Plans..." is checked. Please explain.
3. Per Env-Sw 315.05(c)(4)(a) and Env-Sw 1103.05, please provide a Solid Waste permit number, seasonal restrictions, and a construction schedule on the plans.
4. Section VI(5) of the Application is missing. Please explain.
5. While RSA 149-M:11(III)(b-c) were addressed, the remainder of RSA 149-M:11 was not been addressed as required by Env-Sw 315.05(g) and Section VII of the Application. Please explain.
6. Env-Sw 315.05(i and j) and Section IX of the Application were not addressed. Please explain.

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7. In Section II(1) of the Application, the name of the company is not listed as the permittee. Please explain.
8. Section III(5) of the Application states a revised Closure Plan was submitted. However, only page 3 of 9 of the Closure Plan was included. Please submit the entire Closure Plan for review.

Application

9. In Section VI(2), please address all the requirements of Env-Sw 1005.01(d), not just odor. Also, please describe in more detail the phrase "any longer than necessary."
10. In Sections VI(3 and 4), please describe in more detail how recyclables will be removed.

Operating Plan

11. The Site Plan shows access is through a lot to the south of the property. If this lot is not owned by the permittee, please provide an access agreement with this property owner. Please describe this agreement in Section 3.02 of the Operating Plan.
12. In Section 1.03, please describe all the different wastes that comprise the 90 tons of waste storage capacity.
13. In Section 3.02(2)(a), 2nd paragraph, the staging period is given as no longer than one week. However, in Section 1.04, it is given as 72 hours. Please explain.
14. In Section 3.02(2)(c) it is mentioned that MSW may be temporarily stored in a loaded trailer in the staging area. Please show where this staging area is on the Site Plan. Please also describe in Section 5.05 what odor control measures will be used during this temporary storage time.
15. In Section 3.03, 2nd paragraph, "section 405.04(1) below" is stated. However, this section cannot be found in this Operating Plan or the Rules. Please explain. If it is a rule reference, use the nomenclature "Env-Sw" instead of "Section."
16. In the 4th paragraph of Section 3.03, non-recyclable materials are mentioned. Please describe what these non-recyclable materials are. In the last paragraph of this section and in Section 3.07, Section 6.1.6 is mentioned. Please revise this to Section 6.01(6), if this is the correct reference.
17. In Section 3.06, the tonnage of unprocessed recyclables shown on the closure cost estimate is not included. Please explain.
18. In Section 3.06, Env-Sw 405.03(a and b) are referenced but the information stated following this reference cannot be found in these sections. Please explain.
19. In Section 3.07(1), Env-Sw 405.04(2) is referenced; however, this section does not exist. Also, Sheet C-1 is referenced, but no sheets are labeled C-1. Please explain.

20. On the Site Plan, please show the masonry and concrete products, metal wood, and non-recyclables listed in Section 3.07.
21. Section 4.02(2) lists NHDES Groundwater Discharge Drinking and Groundwater Bureau. However, there is no such bureau. Please explain.
22. Please place on the Site Plan the hot load area mentioned in Section 6.01(3).
23. In Section 6.01(6), 4th paragraph, no mention of using materials between layers of batteries, storing batteries on an impervious surface, or labeling the container used to store the batteries is mentioned. Please explain.
24. In Appendix D, no spill response contractor or asbestos contractor are listed. Please explain.
25. In Section 6.02, the Emergency Contact list date is not current. Please explain.
26. Section 7.01 mentions Env-Sw 1005.07(b)(1-3); however, this reference does not exist in the Rules. Please explain.
27. Please update Section 7.0 to incorporate Env-Sw 1600, Solid Waste Facility Operator Training and Certification rules, which were adopted on July 1, 2014. A link to these rules is <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-sw1600-adpt-pstd.pdf>.
28. In Section 8.01, please state that the facility will not exceed its permitted capacity limits.
29. Section 8.02(4) references Env-Sw 405.05; however, this rule reference does not exist. Please explain.
30. Env-Sw 405.04(3) is referenced in Section 8.03. However, this rule reference does not exist. Please explain.
31. Section 8.02 references Env-Sw 315(g). However, this rule reference does not exist. Please explain.

Closure Cost Estimate

32. The Closure Cost Estimate included was not on the new form. Please resubmit this estimate on the form located at the attached link: http://des.nh.gov/organization/divisions/waste/swmb/documents/transfer_station.xls.
33. On the Closure Cost Estimate, the miscellaneous costs increased from \$1,000 to \$4,100.

Joseph Ruggiero
Ruggiero Processing Facility, LLC
January 8, 2015
Page 4 of 4

Please describe what costs are included under miscellaneous.

Site Plan

34. Please show where the different wastes are stockpiled inside the building.
35. Please show the access routes to and from the building. Explain if the "entry/exit to tipping floor" is for a vehicle or a person.
36. Please ensure the facility sign abides by Env-Sw 1105.05.
37. The entry/exit ways, walls, and holding tanks shown on the Site Plan do not match the information shown on the Building Detail on Sheet C-2. Please explain.
38. Please show the locations on the Site Plan for all the proposed details on Sheet C-2. Please only show the proposed details on Sheet C-2.
39. Please provide a current "Two-Lot Subdivision" plan showing all abutter, lot, and easement information.
40. The plan title of "Land of C&D Debris Recycling" does not include all of the materials, such as MSW, that the facility accepts. Please explain.

Please address the above comments by submitting one copy of the required information. Be certain to note the revision date on each replacement page. Continued review of your application will commence upon receipt of this information.

Until the Department has completed its completeness and technical reviews, there may be additional comments. In the meantime, if you have any questions, please contact me.

Sincerely,



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