



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL

October 20, 2014

John LaRiviere, General Manager
Wheelabrator Concord Company, L.P.
11 Whitney Road
Penacook, NH 03303
Email: jlariviere@WM.com

SUBJECT: PENACOOK- Wheelabrator Concord Company L.P., 11 Whitney Road;
Type IB Permit Modification Application for a Revised Operating Plan, Permit #
DES-SW-SP-03-001, prepared the Wheelabrator Concord Company L.P., Ref.:
WMD Doc Log #s 14983 and 15054

Dear Mr. LaRiviere:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed a review of the above-cited Type IB 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 304.07 and Env-Sw 315 for a technical review.

Application

1. In Section VI(2), please state the type of equipment kept in the equipment storage enclosure.
2. In Section VI(2), please describe how the ash building scrubber system is being upgraded. Please explain why this upgrade information is not in the Operating Manual.
3. In Section VI(2), please describe what installing a lime grit pumping system would entail and the different processes within this system. Please explain why this upgrade information is not in the Operations Manual.
4. The responses for Section VI(3-5) addresses the lime grit pumping system and the equipment storage enclosure, but not the ash building scrubber. Please explain.
5. Section VI(2) refers to lime grit; however, page 12 of the Operations Manual refers to "scrubber residue." Please explain the difference and why lime grit is not mentioned in the Operations Manual also.

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John LaRiviere
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Operating Plan

1. Page 4 references Env-Wm instead of Env-Sw. Please revise this rule reference.
2. Pages 10 and 13 state the metal recovery system information is found in Section 9.3. However, this information cannot be found in this section. Please explain.
3. In Section 6, no emergency phone numbers are listed, per Env-Sw 1105.11(d)(6)(c). Please explain.
4. The SDA Slaker Grit Pump System Drawing set, Sheet 2, shows the bag house connected to the Main Building. However, Figure 2- Stormwater Areas does not show this connection. Please explain.
5. Section 7 does not include a reference to the Solid Waste Operator Training and Certification requirements located in Env-Sw 1600. Please explain and incorporate the information in <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-sw1600-adpt-pstd.pdf>.
6. Section 8 does not reference the reports requirements found in Env-Sw 1105. 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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