The State of New Hampshire

Department of Environmental Services

Robert R. Scott, Commissioner

February 8, 2021

Steven Gabrielle
Chief Operating Officer
EPP Renewable Energy, LLC.
1605 North Cedar Crest Blvd., Suite 509
Allentown, PA 18101

RE: Compliance Evaluation Report

Dear Mr. Gabrielle,

The New Hampshire Department of Environmental Services, Air Resources Division has completed a compliance evaluation of EPP Renewable Energy, LLC at Four Hills Landfill in Nashua, New Hampshire. The purpose of the evaluation was to determine compliance with Title V Operating Permit TV-0064 and the N.H. Admin. Rules, Env-A 100 *et seq*. This is a copy of the compliance evaluation report for your review and records.

Please note that this compliance evaluation pertains only to N.H. Code Admin. Rules, Env-A 100 *et seq.* as they relate to your air permit. Any compliance determination made with respect to the air rules does not in any way imply compliance with any other applicable environmental rules or laws.

NHDES did not identify deficiencies during this compliance evaluation.

If you have any questions, please contact David Smith at (603) 271-1987 or by email at david.smith@des.nh.gov.

Sincerely,

David Smith

David Smith
Senior Compliance Assessment Engineer
Air Resources Division

ec: Board of Aldermen, City of Nashua, 229 Main St., PO Box 2019, Nashua, NH 03061-2019
Ed Werkheiser, Sr. Asset Manager, EPP Renewable Energy

Abbreviations and Acronyms

AAL	Ambient Air Limit
acf	actual cubic foot
ASTM	American Society of Testing and Materials
Btu	British thermal units
CAS	Chemical Abstracts Service
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CNG	Compressed Natural Gas
CO	Carbon Monoxide
Env-A	New Hampshire Code of Administrative Rules – Air Related Programs
ft	foot or feet
ft^3	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant as defined in Section 112 of the 1990 Clean Air Act Amendments
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
LPG	Liquefied Petroleum Gas
MM	million
MSDS	Material Safety Data Sheet
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standard for Hazardous Air Pollutants
NG	Natural Gas
NHDES	New Hampshire Department of Environmental Services (the department)
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standard
PM_{10}	Particulate Matter < 10 microns
ppm	parts per million
psi	pounds per square inch
RACT	Reasonable Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
scf	standard cubic foot
SO_2	Sulfur dioxide
TSP	Total Suspended Particulate
tpy	tons per consecutive 12-month period
ULSD	Ultra-low Sulfur Diesel (15 ppm)
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

I. Facility Description

The City of Nashua, NH (AFS #3301100191) is the owner/operator of the Four Hills Solid Waste Landfill located at 840 West Hollis St., Nashua, NH. The landfill covers approximately 263 acres. It contains a closed, 65-acre, unlined municipal solid waste (MSW) landfill, a closed, unlined 11-acre C&D landfill, and active, lined, 33.5-acre Phase I, II, and III landfill. An active gas collection system consisting of a network of vertical extraction wells and horizontal gas collection trenches have been installed in the Phase I, II, and III expansion and the closed MSW portion of the landfill. A vacuum blower is used to extract gas from the landfill and convey the gas through manifold piping to a LFGTE facility operated by EPP Renewable Energy, LLC (EPP). The LFGTE facility consists of a Caterpillar G3516 LFG-fired engine (two used interchangeably but not simultaneously) and a Caterpillar G3520 LFG-fired engine. The engines were originally the responsibility of Four Hills Landfill and hence the city of Nashua. In October 2015, with the issuance of Permit TP-0169, the responsibility was transferred to EPP. The City operates an LFG flare to control any LFG that is not directed to the engines and a small emergency generator. The landfills, flare and small emergency generator are covered under a separate Title V Operating Permit (TV-0047) issued to the City of Nashua.

EPP is a major source under the Title V program for CO emissions. The facility is a true minor source for NO_x, SO_2, PM, VOCs, and GHG and an area source for HAPs.

Facility name and address	EPP Renewable Energy, LLC
Address	840 West Hollis St., Nashua, NH 03062
County	Hillsborough
Telephone	(603) 791-5061
AFS#	3301100231
Source Type	Major (Title V)
Date/Time of Inspection:	January 20, 2021 (date records review began)
Type of Inspection:	State Off-Site Full Compliance Evaluation
Inspected by:	David Smith, Senior Compliance Assessment Engineer
Weather:	N/A, off-site evaluation
Source Contact(s):	Steven Gabrielle, COO Ed Werkheiser, Sr. Asset Manager Thatcher Evans, Facility Operations Manager
Last compliance inspection conducted at facility:	July 31, 2019
Last Inspection Result: • NHDES did not identify deficiencies during this compliance evaluation.	
Permit Number(s):	TV-0064 Issued: March 28, 2017 Expires: February 28, 2022

NHDES conducted a compliance evaluation of EPP located at 840 West Hollis St., Nashua, NH, and the results are presented herein. The compliance evaluation covers the period of 2019 to January 20, 2021. Due to current COVID-19 physical distancing guidelines and best practices being taken by NHDES, an on-site tour of the facility was not conducted. Material provided and operations conducted by EPP at the time of the evaluation were not claimed as confidential.

II. Emission Unit Identification

Table 1 below, taken from permit TV-0064, lists the permitted emission units as verified during the evaluation.

Table 1 - Emission Unit Identification

Emission Unit ID	Device Identification	Manufacturer Model Number Serial Number	Installation Date	Maximum Design Capacity and Fuel Type(s)
EU01	Engine #1	Caterpillar G3516 4EK00649	1995	11.6 MMBtu/hr LFG – equivalent to 382.1 scfm (22,925 scf/hr) 1148 bhp
EU07	Alternate Engine #1	Caterpillar G3516 CTL00209	2001	11.6 MMBtu/hr LFG – equivalent to 382.1 scfm (22,925 scf/hr) 1148 bhp Hour Meter: 41,885 Hrs.
EU08	Engine #2	Caterpillar G3520 GZJ00176	July 2005	18.0 MMBtu/hr LFG – equivalent to 592.9 scfm (35,573 scf/hr) 2233 bhp Hour Meter: 54,706 Hrs.

During the compliance evaluation EPP reported that no changes to these devices were made nor has it added any devices requiring a permit or permit modification. EU07 was removed from service in 2018. EPP will keep this engine in storage and exchange it with EU01 when repairs become necessary.

The table below lists the facility's reported annual emissions for the review period.

Facility-Wide Emissions (tpy)

	TSP	SO_2	NO_x	CO	VOC	HAPs/RTAPs
Permitted Limits						
2020	17.27	22.84	29.69	86.16	0.06	6.70
2019	16.65	22.49	26.92	81.57	0.06	6.30

III. Control Equipment

There is no air pollution control equipment required for the devices listed in Table 1.

IV. Stack Criteria

Table 2 below, taken from permit TV-0064, lists the permitted stack requirements for the facility's devices. EPP reported the stacks are vertical and unobstructed and no changes have been made since the permit was issued.

Table 2 – Stack Criteria			
Stack Number	**Emission Unit ID**	**Minimum Height (feet above ground surface)**	**Maximum Exit Diameter (feet)**
1	EU01 and EU07	46	0.83
2	EU08	46	0.83

V. Compliance with Operating and Emission Limitations

Table 3, taken from permit TV-0064, lists the State-only enforceable operational and emission limitations for the facility, and any deficiencies noted during the evaluation.

Table 3 – State-Only Enforceable Operational and Emission Limitations				
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
1	*24-hour and Annual Ambient Air Limit* The emissions of any Regulated Toxic Air Pollutant (RTAP) shall not cause an exceedance of its associated 24-hour or annual AAL as set forth in Env-A 1450.01, *Table Containing the List Naming All Regulated Toxic Air Pollutants*.	Facility Wide	Env-A 1400	**Yes**
2	*Revisions of the List of RTAPs* In accordance with RSA 125-I:5 IV, if the department revises the list of RTAPs or their respective AALs or classifications under RSA 125-I:4, II and III, and as a result of such revision the owner or operator is required to obtain or modify the permit under the provisions of RSA 125-I or RSA 125-C, the owner or operator shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to file a complete application for such permit or permit modification.	Facility Wide	RSA 125-I:5 IV	**Noted**
Findings: NHDES did not revise the list of RTAPs since the most recent compliance evaluation of EPP.				
3	*Activities Exempt from Visible Emission Standards* The average opacity shall be allowed to be in excess of those standards specified in Env-A 2002 for one period of 6 continuous minutes in any 60 minute period during startup, shutdown, and malfunction.	EU01, EU07, & EU08	Env-A 2002.04(c)	**Yes**
4	*Engine Operation Limitation* The owner or operator shall not operate the two Caterpillar G3516 (EU01 and EU07) simultaneously until such time as an updated air dispersion model is conducted and approved by the department to evaluate compliance with the National Ambient Air Quality Standards (NAAQS).	EU01 & EU07	Env-A 606.06 & Env-A 607.01(w)	**Yes**
Findings: Since EU01 and EU07 are never installed at the same time, the engines cannot be operated simultaneously.				

Table 4, taken from permit TV-0064, lists the federally enforceable operational and emission limitations for the facility, and any deficiencies noted during the evaluation.

Table 4 – Federally Enforceable Operational and Emission Limitations				
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
1	*Permit Deviations* In the event of a permit deviation, the owner or operator shall investigate and take corrective action immediately upon discovery of the permit deviation to restore the affected device, process, or air pollution control equipment to within allowable permit conditions.	EU01, EU07, & EU08	Env-A 911.03	**Yes**
Findings: EPP did not report any permit deviations during this evaluation period.				
2	*Visible Emission Standard for Fuel Burning Devices Installed After May 13, 1970* The average opacity from fuel burning devices installed after May 13, 1970 shall not exceed 20 percent for any continuous 6-minute period.	EU01, EU07, & EU08	Env-A 2002.02	**Unknown**
Findings: NHDES did not conduct opacity observations as this was an off-site evaluation. EPP reported no deviations from this opacity standard, and there were no complaints filed for opacity exceedances during this compliance period.				
3	*Particulate Emission Standards for Fuel Burning Devices Installed on or After January 1, 1985* The particulate matter emissions from fuel burning devices installed on or after January 1, 1985 shall not exceed 0.30 lb/MMBtu.	EU01, EU07, & EU08	Env-A 2003.03	**Yes**
Findings: Compliance with the particulate emission standard is determined through stack testing, which has not been required to date. However, at the time the permit was issued, NHDES had sufficient information to determine that under normal operating conditions, these devices would meet the particulate matter standard.				
4	*RICE NESHAP - Existing Stationary RICE* The owner or operator of non-emergency, non-black start stationary RICE which combusts landfill gas equivalent to 10 percent or more of the gross heat input on an annual basis and are subject to 40 CFR 63, Subpart ZZZZ shall: a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; d. Operate and maintain the stationary engine according to the manufacturer's emission-related operation and maintenance instructions (O&M manual) or develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation	EU01 & EU07, & EU08	40 CFR 63.6603, 40 CFR 63.6625 & 40 CFR 63.6640 (Subpart ZZZZ))	**Yes**

Table 4 – Federally Enforceable Operational and Emission Limitations				
Item #	**Requirement**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
	of the engine in a manner consistent with good air pollution control practice for minimizing emissions; and e. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.			
5	*RICE NESHAP - General Provisions* The owner or operator must be in compliance with the operating limitations, and other requirements in 40 CFR Part 60, Subpart ZZZZ that apply at all times. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the department which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	EU01, EU07 & EU08	40 CFR 63.6605(Subpart ZZZZ)	**Yes**

VI. Compliance with Monitoring and Testing Requirements

Table 5 below, taken from permit TV-0064, lists the monitoring and testing requirements for the facility and any deficiencies noted during the evaluation.

Table 5 - Monitoring and Testing Requirements						
Item #	**Parameter**	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
1	To Be Determined	When conditions warrant, the department may require the owner or operator to conduct stack testing in accordance with USEPA or other department approved methods.	Upon request by the department	Facility Wide	RSA 125-C:6, XI	**Noted**
Findings: NHDES did not require stack testing at this facility during the inspection period.						
2	Hours of Operation	Each engine shall be equipped with a non-resettable hour meter.	Continuous	EU01, EU07 & EU08	Env-A 604.01	**Yes**
3	Landfill gas flow rate	*Monitoring of Landfill Gas Flow Rate* The engines shall be equipped with	Continuous	EU01, EU07 &	Env-A 604.01	**Yes**

Table 5 - Monitoring and Testing Requirements						
Item #	**Parameter**	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
		instrumentation to monitor landfill gas flow. The owner or operator shall monitor landfill gas flow to the engines and shall record instantaneous flow rate (scfm) and totalized flow (scf) on a daily basis, corrected for standard temperature and pressure. The owner or operator shall operate, calibrate, and maintain the landfill gas flow meter(s) in accordance with the recommended procedures and maintenance schedules of the equipment manufacturer.		EU08		
4	Opacity Measurements	*Testing for Opacity from Stationary Sources* Opacity measurements shall be conducted following the procedure set forth in 40 CFR 60, Appendix A, Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources* or other Division approved method.	Upon request by NHDES/EPA	EU01, EU07 & EU08	Env-A 807.02	**Noted**
Findings: NHDES did not require additional testing during this inspection period.						
5	Oil Analysis	The oil analysis program for the engines must at a minimum analyze the following parameters: a. Total base number, viscosity, and percent water content; b. The condemning limits for the following parameters in a.) above are: 1. Total base number is less than 30% of the total base number of the oil when new; 2. Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or 3. Percent water content (by volume) is greater than 0.5 4. If all of the condemning limits listed in b.) above are not exceeded, the engine oil is not required to be changed; 5. If any of the condemning limits listed in b.) above are exceeded, the engine oil must be changed within 2 business days of receiving the results of the analysis; and 6. If the engine is not in operation	Annually if choosing to use the oil analysis program in lieu of the annual oil change specified in Table 3, Item 7	EU01, EU07 & EU08	40 CFR 63.6625(j) (Subpart ZZZZ)	**Noted**

Table 5 - Monitoring and Testing Requirements						
Item #	**Parameter**	**Method of Compliance**	**Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
		when the results of the analysis are received, the engine oil must be changed within two business days or before commencing operation of the engine, whichever is later.				
Findings: EPP has not chosen to participate in the oil analysis program, oil changes are performed as required.						

VII. Compliance with Recordkeeping Requirements

Table 6 below, taken from permit TV-0064, lists the recordkeeping requirements for the facility and any deficiencies noted during the evaluation.

Table 6 - Recordkeeping Requirements					
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
1	*Record Retention and Availability* The owner or operator shall retain records of all required monitoring data, recordkeeping and reporting requirements, stack testing results and support information for a period of at least 5 years from the date of origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B)	**Yes**
2	*Monitoring Recordkeeping Requirements* The owner or operator shall maintain records of the monitoring listed in Table 5 of this permit including a summary of maintenance, calibration, and repair records of the LFG flow meters and temperature and pressure monitoring devices.	Maintain on a continuous basis	EU01, EU07 & EU08	40 CFR 70.6(a)(3)(ii)	**Yes**
3	*General Recordkeeping Requirements for Combustion Devices* The owner or operator shall maintain the following records of fuel characteristics and utilization for the fuel burned in the combustion devices: a. Type (e.g. landfill gas) and amount of actual LFG flow to each engine (scf/day and total scf/month); b. Hours of operation of each engine (hours/day); c. Sulfur content of landfill gas; and d. BTU content per cubic foot of landfill gas.	Monthly unless otherwise noted	EU01, EU07 & EU08	Env-A 903.03	**Yes**

Table 6 - Recordkeeping Requirements					
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
4	*NESHAP Subpart ZZZZ Recordkeeping Requirements* The owner or operator shall keep records to show continuous compliance with the requirements of 40 CFR 63, Subpart ZZZZ including the maintenance conducted on the stationary engines in order to demonstrate that the owner or operator operated and maintained the stationary RICE according to the manufacturer's emission-related written instructions or your own maintenance plan including but not limited to the maintenance required in Table 4, Item 4 and Table 5, as applicable	Maintain Up-to-date Data	EU01, EU07 & EU08	40 CFR 63.6655 Subpart ZZZZ	**Yes**
5	*NOx Emission Statements Recordkeeping Requirements* If the actual annual NOx emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then record the following information: a. Identification of each combustion device (EU01, EU07 or EU08); b. Operating schedule during the high ozone season (June 1 through August 31) for each combustion device identified in (a) above, including for each device: 1. Typical hours of operation per day 2. Typical days of operation per calendar month; 3. Typical and amount of fuel burned 4. Design heat input rate in MMBtu/hr; and 5. The following NOx emission data; i. Actual Monthly NOx emissions ii. Typical High ozone season day NOx emissions, in pounds per day; and iii. Emission factors and the origin of the emission factors used to calculate the NOx emissions.	Maintain Data for Annual Report	EU01, EU07 & EU08	Env-A 905	**Yes**
6	*Regulated Toxic Air Pollutants* Maintain records documenting compliance with Env-A 1400. Compliance was demonstrated at the time of permit issuance as described in the department's Application Review Summary for application #15-0053. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if: a. There is a revision to the list of RTAPs lowering the AAL or De Minimis Value for any RTAP emitted from the Facility; b. The amount of any RTAP emitted is greater than the amount that was evaluated in the Application	Update prior to process changes and within 90 days of each revision of Env-A 1400	Facility Wide	Env-A 902.01 (State-only Requirement)	**Yes**

Table 6 - Recordkeeping Requirements					
Item #	**Requirement**	**Duration/ Frequency**	**Applicable Unit**	**Regulatory Basis**	**Compliant**
	Review Summary; c. An RTAP that was not evaluated in the Application Review Summary will be emitted; or d. Stack conditions (e.g. air flow rate) change.				
7	*Recordkeeping for Permit Deviations:* In the event of a permit deviation, the owner or operator shall record the following information: a. A description of the permit deviation, including the applicable permit number and permit condition(s); b. The probable cause of the permit deviation; c. The date and time of the discovery of the permit deviation; d. The actual date(s) and time(s) of the permit deviation; e. The duration of the permit deviation, including the date and time that the device, process, or air pollution control equipment returned to operation in compliance with an enforceable emission limitation or operating condition; f. The specific device, process, or air pollution control equipment that contributed to the permit deviation; g. Any corrective measures taken to address the permit deviation; h. Preventative measures taken to prevent future permit deviations; i. The type and amount of any excess emissions that occurred as a result of the permit deviation, if applicable; and j. If applicable, the calculation or estimation used to quantify the excess emissions.	Maintain Up-to-date Data	EU01, EU07 & EU08	Env-A 911.03	**Yes**

VIII. Compliance with Reporting Requirements

Table 7 below, taken from permit TV-0064, lists the reporting requirements for the facility and any deficiencies noted during the evaluation.

Table 7 - Reporting Requirements					
Item #	**Requirement**	**Frequency**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
1	*General Reporting Requirements* a. Each report shall be separately and clearly labeled with: 1. The name, mailing address and physical address of the source covered by the	For each report submitted to the department	Facility Wide	Env-A 907.01 State-only Requirement	**Yes**

Table 7 - Reporting Requirements					
Item #	**Requirement**	**Frequency**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
	report; 2. The operating period covered by the report; 3. The permit number and condition or item number that requires the report submittal; 4. The type of report, using the name of the report as specified in the reporting condition in the permit, that is being submitted; and 5. The date the report was prepared; b. An owner or operator who submits a report that is a revision to a previously-submitted report shall clearly identify the previously-submitted report with the information specified in Table 6, Item 1.a. above, and indicate which portions of the report have been revised; c. The owner or operator may submit more than one report with a single cover, provided the owner or operator clearly identifies each report being submitted using the information required in Table 6, Items 1.a. and 1.b. above, if applicable, for each report; d. Each report submitted to the department and/or USEPA shall include the certification of accuracy statement outlined in Condition XII.B. of this permit and shall be signed by the responsible official; and e. The owner or operator shall submit reports as paper documents or by electronic means. The owner or operator who submits a report by electronic means shall separately mail or deliver a cover letter, signed by the responsible official that contains the information specified in Table 6, Items 1.a. through 1.c. above, as well as the date the report was submitted by electronic means.				
2	*Annual Emissions Report* Submit an annual emissions report to the department which shall include the following information: a. Actual calendar year emissions from each emission unit of NOx, total VOCs, total filterable and condensable PM, filterable PM_{10}, filterable $PM_{2.5}$, CO, SO_2, each HAP and each RTAP (reported by CAS number), CO_2e, ammonia, and lead;	Annually (received by the department no later than April 15th of the following year)	EU01, EU07 & EU08	Env-A 907.02	**Yes**

Table 7 - Reporting Requirements					
Item #	**Requirement**	**Frequency**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
	b. The methods used in calculating emissions in accordance with Env-A 705.02, *Determination of Actual Emissions for Use in Calculating Emission-Based Fee*; c. The emission factors and the origin of the emission factors; and d. All information recorded in accordance with Table 6, Item 3.				
3	*NO_x Emission Statements Reporting Requirements* If the actual annual NO_x emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then include the information recorded in accordance with Table 6, Item 5.	Annually (received by the department no later than April 15th of the following year)	EU01, EU07 & EU08	Env-A 909	**Yes**
4	*Update to Air Pollution Dispersion Modeling Impact Analysis* If an update to the facility's air pollution dispersion modeling impact analysis is required pursuant to Env-A 606.02, submit the information required pursuant to Env-A 606.04: a. With the permit application submitted for the change which triggered the analysis; or b. Within 15-days of completion of the change which triggered the analysis, if a permit application is not required.	As specified	Facility wide	Env-A 910.01	**Noted**
Findings: No changes occurred which would trigger an update to the facility's air pollution dispersion modeling.					
5	*Permit Deviations that lasted More than 9 Consecutive Days* In the event of a permit deviation that does not cause an excess emission but continues for a period greater than 9 consecutive days, the owner or operator of the affected device, process, or air pollution control equipment shall: a. Notify the department by electronic means by submitting a report which contains: 1. Facility name; 2. Facility address; 3. Name of the responsible official; 4. Facility telephone number; and 5. All of the information required in Table 6, Item 7	Within 24 hours of discovery of excess emission	EU01, EU07 & EU08	Env-A 911.04(b)	**Noted**

Table 7 - Reporting Requirements					
Item #	**Requirement**	**Frequency**	**Applicable Emission Unit**	**Regulatory Basis**	**Compliant**
	b. Reports which can be submitted by electronic means shall be submitted by e-mail (pdeviations@des.nh.gov) or fax (603) 271-7053				
Findings: EPP reported no permit deviations during this inspection period.					
6	*Permit Deviations – Excess Emission Reporting Requirements* In the event of a permit deviation that causes excess emissions, the owner or operator of the affected device, process, or air pollution control equipment shall: a. Notify the department of the permit deviation and excess emissions by telephone (603) 271-1370 or by electronic means within 24 hours of discovery of the permit deviation, and b. Submit a written report of the permit deviation on paper at the address listed in Condition XX.B. or by electronic to the department within 10 days of discovery of the permit deviation which contains: 1. Facility name; 2. Facility address; 3. Name of the responsible official; 4. Facility telephone number; and 5. All of the information required in Table 6, Item 7 c. Reports which can be submitted by electronic means shall be submitted by e-mail (pdeviations@des.nh.gov) or fax (603) 271-7053	Prompt reporting, within 24 hours of discovery of the excess emission and In writing, within 10 days of discovery of the excess emission	EU01, EU07 & EU08	Env-A 7911.04	**Noted**
Findings: EPP reported no permit deviations during this inspection period.					
8	*Semi-annual Permit Deviation and Monitoring Report* The owner or operator shall submit a semi-annual permit deviation and monitoring report, which contains a summary of all permit deviations that have occurred during the reporting period.	Semi-annually by July 31st and January 31st of each calendar year	EU01, EU07 & EU08	40 CFR 70.6(a)(3)(iii)(A)	**Yes**
9	*Annual Compliance Certification* Annual compliance certification shall be submitted in accordance with Condition XII of the permit.	Annually (no later than April 15th of the following year)	EU01, EU07 & EU08	40 CFR 70.6(c)(1)	**Yes**

IX. Permit Deviations

EPP is aware of the recordkeeping and reporting requirements for permit deviations. During the inspection period EPP reported no permit deviations.

X. Other Findings

There were no other findings during this inspection.

XI. Enforcement History and Status

During the inspection period, NHDES did not issue any enforcement actions against EPP.

XII. Compliance Assistance, Recommendations and Corrective Actions

NHDES recommends EPP explore the Energy Efficiency Incentive Program at www.nhsaves.com. For major renovations and end of life replacement of electrical devices, up to 75% of the incremental cost to install high efficient equipment is covered. The retrofit program offers incentives up to 50% of the installed cost to replace older equipment with new, energy efficient equipment.

In addition, the facility can receive email notifications of rule changes by subscribing to E-News found at the following link: www.des.nh.gov

Report Prepared By	David Smith
Title	Senior Compliance Assessment Engineer
Signed	David Smith