



REGION 1

BOSTON, MA 02109

Clean Air Act Inspection Report

Report Date: July 2, 2025

I. Background

Inspection Date: June 16 and 17, 2025

Inspection Type: Partial Compliance Evaluation

EPA Inspector: Davianna Vasconcelos, Enforcement and Compliance Assurance Division, Air Compliance Section

**DAVIANNA
VASCONCELOS**

Digitally signed by DAVIANNA
VASCONCELOS

Date: 2025.07.02 11:37:05 -04'00'

EPA Reviewer: John Melcher, Senior Enforcement Coordinator, Air Compliance Section

**JOHN
MELCHER**

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MELCHER

Date: 2025.07.02 12:53:32 -04'00'

Facility Name: Turnkey Recycling and Environmental Enterprises

ICIS Air ID#: NH0000003301700003

Facility Location: 176 Rochester Neck Road, Rochester, NH 03839

Mailing Address: 14 Taylor Avenue, Rochester, NH 03839

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees:

Name	Title	Organization	Day(s)
Davianna Vasconcelos	Environmental Engineer	EPA R1 ACS	June 17 & 18
Mike Zarenski	Gas Operations Supervisor	Waste Management	June 17 & 18
Derek Cleveland	Energy Analyst	Weston & Sampson	June 17 & 18
Mike Camacho	Senior Compliance Assessment Specialist	NH DES	June 17
David Smith	Compliance Assessment Section Supervisor	NH DES	June 18

Facility/Process Description:

The Turnkey Recycling and Environmental Enterprises (“TREE”) facility, a subsidiary of Waste Management of New Hampshire, Inc. (“WMNH” or “Waste Management”), located at 176 Rochester Neck Road, Rochester, New Hampshire, is a solid waste landfill that has historically accepted municipal solid waste, construction and demolition debris, asbestos, municipal wastewater sludge, and other solid wastes.

The facility has three landfills: TLR-I which was installed in 1979 and capped in 1992 with a capacity of 2.52 million megagrams (Mg), TLR-II which was installed in 1990 and capped in 1997 with a capacity of 3.48 million Mg, and TLR-III which was installed in 1995 and is active with a rated capacity of 34.5 million Mg. Some areas of TLR-III are covered by a temporary exposed geomembrane cover system.

The facility collects landfill gas from all three landfills and operates several combustion and electrical generating devices to control, and produce energy from, the collected gas.

Potentially Applicable Federal Air Regulations:

The following federal air regulations may be applicable to the Facility:

- 40 CFR Part 60, Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014
- 40 CFR Part 60, Subpart XXX - Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
- 40 CFR Part 62, Subpart OOO - Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014
- 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

State Air Permit:

- New Hampshire Title V Permit Number TP-0062

Previous Enforcement Actions:

A “[Detailed Facility Report](#)” from EPA’s Enforcement and Compliance History Online database indicates that there have been no informal or formal enforcement actions taken against TREE with respect to this facility in the past ten years.

II. Inspection

The inspection was coordinated with TREE and NH DES personnel in advance.

A. Monday, June 16, 2025

EPA inspector Davianna Vasconcelos arrived at the facility’s main office at 12:00 p.m. Ms. Vasconcelos signed in at the front desk and was directed to drive to the field office to meet the monitoring personnel.

Ms. Vasconcelos arrived at the field office at approximately 12:15 p.m. and met Mike Camacho, of New Hampshire Department of Environmental Services, Mike Zarenski, of Waste Management, and Derek Cleveland, of Weston & Sampson. Mr. Cleveland said that the day was the last day of monitoring penetrations. Mr. Cleveland said that he was using an app called “MDCS” to track the monitored penetrations and record the observed monitoring values.

Mr. Cleveland, Mr. Camacho, and Ms. Vasconcelos began monitoring at 12:38 p.m. Mr. Cleveland said that a majority of the exceedances in the previous monitoring days occurred at penetrations in the geomembrane.

Ms. Vasconcelos noted the emission points monitored to be greater than 500 parts per million (ppm) including both surface exceedances and gas collection areas of concern found above the surface. See Table 1.

Ms. Vasconcelos noted significant lifting of the geomembrane due to an unknown gas underneath in Phase 7 of the landfill.

Mr. Vasconcelos observed Mr. Cleveland conduct the upwind background reading at 2:05 p.m. and recorded a value of 2.1 ppm. Ms. Vasconcelos observed Mr. Cleveland conduct the downwind background reading at 2:17 p.m. and recorded a value of 1.8 ppm.

Mr. Cleveland, Mr. Camacho, and Ms. Vasconcelos returned to the field office and met Mr. Zarenski at 2:31 p.m. Ms. Zarenski reviewed the plan for the following monitoring days.

Mr. Cleveland said that penetration monitoring was complete and had resulted in a surface exceedance count of 116. Mr. Cleveland said this count did not include the gas collection areas of concern which were points above 500 ppm found above the surface.

Ms. Vasconcelos observed a map of the facility that had been annotated to indicate where the exceedances were located.

Ms. Vasconcelos departed the facility at approximately 3:00 p.m.

B. Tuesday, June 17, 2025

Ms. Vasconcelos arrived at the facility's field office at 7:30 a.m. and met Mr. Cleveland and David Smith, of New Hampshire Department of Environmental Services.

Mr. Vasconcelos observed Mr. Cleveland conduct the downwind background reading at 8:33 a.m. and recorded a value of 3.6 ppm.

Ms. Vasconcelos observed Mr. Cleveland conduct the downwind background reading at 8:41 a.m. and recorded a value of 2.5 ppm.

Mr. Cleveland, Mr. Smith, and Ms. Vasconcelos began monitoring at 8:48 a.m. Mr. Cleveland explained that the goal of the day is to rescan 18 previously identified surface exceedances.

Ms. Vasconcelos noted the emission points monitored to be greater than 500 parts per million (ppm) including both surface exceedances and gas collection areas of concern found above the surface. See Table 2.

Mr. Vasconcelos observed Mr. Cleveland conduct the upwind background reading at 10:37 a.m. and recorded a value of 2.9 ppm.

Ms. Vasconcelos observed Mr. Cleveland conduct the upwind background reading at 10:49 a.m. and recorded a value of 3.9 ppm.

Mr. Cleveland, Mr. Smith, and Ms. Vasconcelos returned to the field office and waited for Waste Management personnel to arrive to discuss the plan for the remaining monitoring. At 11:20 a.m., Mr. Cleveland talked with Waste Management personnel and said the monitoring was finished for the day.

Mr. Cleveland said he would coordinate with NH DES and EPA regarding the plan for the remaining monitoring.

Ms. Vasconcelos departed the facility at approximately 11:30 a.m.

C. Wednesday, June 18, 2025

Mr. Zarenski notified Ms. Vasconcelos that monitoring would be cancelled for the day due to inclement weather.

Table 1: Day 1 Emission Points Greater Than 500 PPM

Daily Count	Well ID (or location description)	Facility ID ^a	Facility Reading	Notes
1	EW091	114	781 ppm	Base of 4" rim collector
2	WP675	N/A	600 ppm	Top of Fernco Cap (not surface) State reading ~3000ppm
3	W672	N/A	<i>EPA did not record</i>	Top of Fernco Cap (not surface) State reading 9,000ppm
4	WP756	N/A	11,470 ppm	Top of Fernco Cap (not surface) State equipment flamed out
5	WP763	N/A	25%	Top of Fernco Cap
6	WP775	115	5,200 ppm	Base of 3" vacuum line
7	TRNLR001	N/A	2.6%	Top of pipe; Ms. Vasconcelos observed rust
8	WP653	116	4,400 ppm	Tear in the liner near base of well
9	Phase 7 Valve House Vent	N/A	2.5%	Side vent on valve house; State equipment flamed out

Table 2: Day 2 Emissions Points Greater Than 500 PPM

Daily Count	Well ID (or location description)	Facility ID # ^b	Facility Reading	State Reading	Notes
1	HC721	45	1,700 ppm	1,300 ppm	
2	WP779	46	680 ppm	800 ppm	
3	W1411	27	21,000 ppm	Not scanned	Ring collector joint with membrane (4" pipe)
4	W1204	52	2%	Not scanned	Tear in liner near base of well
5	W1202	54	719 ppm	945 ppm	
6	W1036	58	704 ppm	3,000 ppm	
7	W1040	59	2400 ppm	2%	
8	W1026	60	1%	1,000 ppm	

^a This numerical ID was assigned by the facility upon the finding of the initial exceedance on June 17, 2025. Emission points that were not assigned a Facility ID were not designated as a surface exceedance and therefore were noted, but not including in the surface exceedance count.

^b This numerical ID was assigned by the facility upon the finding of the initial exceedance in the days monitoring was conducted prior to EPA personnel attendance.