



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

603-271-3503 FAX 603-271-2867

TDD Access: Relay NH 1-800-735-2964



November 14, 1996

TOWN: BETHLEHEM
PROJECT: NCE S
LETTER/DATA/PERMIT/FA/OTHER: _____



Mr. Larry B. Lackey, P.E.
North Country Environmental Services, Inc.
501 South Street, Box E, Suite 302
Bow, New Hampshire 03304

**SUBJECT: BETHLEHEM - NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.:
ANNUAL SUMMARY OF WATER QUALITY MONITORING (DES #870433)**

Dear Mr. Lackey:

I have reviewed the annual summary prepared by Sanborn, Head & Associates (SHA) as required by Condition #13 in the revised Groundwater Management and Release Detection Permit No. GWP-870433-B-002, dated January 3, 1996. I have the following comments.

1. The table that includes all VOC analyses (including the monthly analyses) for the main Seep (S-1) was not included in the report. The table (SHA file S:\DATA\1003.1\WQTAB\SEEPCHAR.XLW) was Table 23 in the SHA report dated 04/19/96. Because the tables for sodium and phenols have been dropped from the summary report, this table would now be Table 21. Please send this table as an addendum to the summary report.
2. In July, the first VOC analysis for water from site SF-1 reported acetone (80 ug/L) and MEK (60 ug/L). However, neither VOC was detected in July in water from the main Seep (S-1). One explanation for the source of these VOCs could be that additional water containing these VOCs enters the surface flowage from another spring or seepage area below the main Seep. Additional investigation may be necessary depending on the results of the November sampling round.
3. As noted in the report, MEK (10 ug/L) in the July water sample from B-402L was the first VOC detected in this well. Water samples from this well have been analyzed for VOCs since September 1987. SHA states that additional monitoring is required to confirm the presence of VOCs in B-402L. The Department requests that VOCs be analyzed during the November round.
4. The Department requested in a letter, dated 05/17/96, that the annual report include a discussion on the possible sources of elevated specific conductance values in MW-402U&L and increasing chloride concentrations in MW-402U. The report included an explanation that leachate breakouts on the landfill side slopes from October 1995 through July 1996 were a possible source of the elevated inorganic parameters in B-402U. However, the two above parameters appear to have been increasing since mid 1993. Please provide the Department with information on any leachate breakouts prior to October 1995. The inference is that some of the leachate contained within the stormwater drainage system potentially could infiltrate the ground and recharge groundwater. This scenario is also suggested by the possible presence of a VOC in B-402L. Please provide the Department with a plan to investigate this possibility.

AIR RESOURCES DIV.
64 No. Main Street
P.O. Box 2033
Concord, N.H. 03302-2033
Tel. 603-271-1370
FAX 603-271-1381

WASTE MANAGEMENT DIV.
6 Hazen Drive
Concord, N.H. 03301
Tel. 603-271-2900
FAX 603-271-2456

WATER RESOURCES DIV.
64 No. Main Street
P.O. Box 2008
Concord, N.H. 03302-2008
Tel. 603-271-3406
FAX 603-271-7894

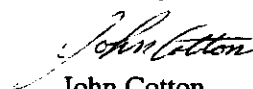
WATER SUPPLY & POLLUTION CONTROL DIV.
P.O. Box 95
Concord, N.H. 03302-0095
Tel. 603-271-3503
FAX 603-271-2181

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6. In the metals section (page 6, line 3 and 4), the reference to tables should be to tables 11 through 18, not table 19.

Please respond to these comments and confirm that a VOC analysis for well B-402L will be added to the November schedule.

Sincerely,



John Cotton
Waste Management Division

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cc: Harry T. Stewart, P.E., Chief Engineer, WMD
Pamela Sprague, P.E., WMD, PADRS
Richard Reed, WMD, SWMB
John Regan, WMD, HWRB
R. Scott Shillaber, P.E., SHA, Inc.
HWRB File