



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

VIA EMAIL ONLY

April 3, 2023

John Gay, E.I.
North Country Environmental Services, Inc.
1855 VT Route 100
Hyde Park, VT 05655
Email: john.gay@casella.com

SUBJECT: North Country Environmental Services, Inc. Landfill, Bethlehem, NH
Permit No. DES-SW-SP-03-002

Incomplete Application – Request for Additional Information

Application for Type II Permit Modification to update Facility Operating Plan; received January 30, 2023; and assigned Application No. 2023-62427

Dear John Gay:

The New Hampshire Department of Environmental Services, Waste Management Division (NHDES) has reviewed the above-cited application by which North Country Environmental Services, Inc. (NCES) seeks approval of an updated operating plan to address emergency leachate removal at the NCES landfill in Bethlehem, NH. In accordance with the requirements of the New Hampshire Solid Waste Rules, Env-Sw 100 et seq. (Rules), NHDES has determined that the application is **incomplete**.

Please address the following comment(s) to satisfy the provisions of Env-Sw 300, and clarify aspects of the application in support of making a technical review pursuant to Env-Sw 304.07:

1. In accordance with Env-Sw 1105.11(a), which requires the operating plan to provide sufficient detail to allow the certified operator and other trained facility personnel to operate the facility in compliance with RSA 149-M, the permit and the solid waste rules without further explanation or guidance:
 - a. In Section 3.1 of the Operating Plan, define “significant rain accumulation” in measurable terms.
 - b. In Section 6.9 of the Operating Plan, identify the specific circumstances that result in “higher-than-normal leachate generation occurrences” and what measures an operator will use to know that a “higher than-normal leachate generation” event is occurring or has occurred. That is, provide measurable circumstances under which the “emergency leachate removal” provisions will be invoked. In a separate explanation (not in the operating plan), provide justification for these measurable circumstances based on the facility design and leachate storage capacity (see Env-Sw 805.06) and the leachate management requirements in Env-Sw 806.05.
 - c. In Section 6.9 of the Operating Plan, describe the appropriate response of facility personnel and include identification of and telephone numbers for local and state officials to be notified of the emergency in accordance with Env-Sw 1105.11(d)(6).
2. In accordance with Env-Sw 1105.08(b), provide information that demonstrates the facility will not successfully operate within the normal window (of 6 a.m. to 6 p.m.) and the alternative hours will not

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result in problems relating to safety, access control, or nuisances (e.g., noise, spills, vectors, odors, insects, litter, dust).

Please address the above comment(s) and submit your response by concurrently submitting one hardcopy and one electronic copy to NHDES. Submit the electronic version through the NHDES OneStop Data Provider portal using the site code "123456789." To expedite processing of your updated application, please also designate "Application No. 2023-62427" on both the e-submittal and the paper copy.

Pursuant to Env-Sw 304.04, *Incomplete Applications*, review of your application is suspended until the additional requested information is received. Please note that, pursuant to Env-Sw 304.05(d), all of the information needed to complete the application must be submitted within one year of the date of this letter to avoid having the application become dormant and be deemed denied.

If you have any questions regarding this correspondence, please contact me.

Sincerely,



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Solid Waste Management Bureau
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