



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-2900 FAX (603) 271-2456



May 28, 1999

**CERTIFIED MAIL # Z 535 308 510**  
**RETURN RECEIPT REQUESTED**

Mr. Larry Lackey, Vice President  
North Country Environmental Services  
Permits, Compliance & Engineering  
16 State Street  
Montpelier, Vermont 05602

**SUBJECT: NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL  
BETHLEHEM, NEW HAMPSHIRE (PERMIT NO. DES-SW-89-009)  
GROUNDWATER QUALITY RESULTS - APRIL 1999**

Dear Mr. Lackey:

The Department of Environmental Services (Department) is in receipt of the Subject analytical results which were received by the Department May 27, 1999. As noted in the North Country Environmental Services (NCES) cover letter, the concentrations of volatile organic compounds (VOCs) in monitor well MW-406L were elevated and "seem to be an anomaly when compared to historical data at this location." The Department finds the VOC concentrations very high and of significant concern when compared with historical data. After reviewing the report, the Department has the following concerns/comments regarding the data:

1. The Department expects NCES to provide for immediate turn around on the May 26 confirmatory sample from MW-406L and to fax the results to the Department upon receipt from the laboratory.
2. The Department will look for NCES and its consultant Sanborn, Head & Associates (SHA) to discuss the analytical data and surrounding issues at a meeting on Thursday June 3, 1999 at 1:00 p.m. at the Department's offices in Concord.
3. Past occurrences of relatively low levels of VOCs in monitor well MW-405U&L and MW-406U&L have resulted in the Department requesting NCES to increase the frequency these wells are analyzed for VOCs to three times a year. This increased monitoring represented the beginning steps in assessment monitoring as required by the New Hampshire Code of Administrative Rules relating to Groundwater Management and Groundwater Release Detection (Env-Wm 1403.21). If the results from the April 1999 sampling round are confirmed, the Department will require NCES to develop a more aggressive and rigorous sampling program.
4. It is the judgement of the Department that the ultimate source of the VOCs is the lined landfill; however, the mode of occurrence of the VOCs in the samples prepared for analyses is uncertain (e.g. VOCs may originate from gas and gas condensate, leachate

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NHDES letter dated May 28, 1999

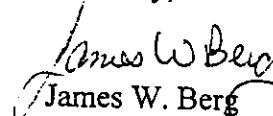
Page 2

breakouts, or liner leaks). Therefore, the Department requests that within thirty (30) days from receipt of this letter, NCES submit for review a corrective action plan which includes investigative and remediation approaches for each potential mode of occurrence.

5. Please verify for the Department the date NCES received the April 1999 analytical results from SciTest Laboratory Services. The New Hampshire Code of Administrative Rules (Rules) relating to Groundwater Management and Groundwater Release Detection (Env-Wm 1403.21) require that the permittee notify the Department within 10 days of receipt of such results of detection monitoring. The dates on the laboratory sheets indicate that all analyses had been completed by SciTest Laboratory Services by April 29, 1999.

The Department will look for confirmation of the meeting by NCES and its consultant Sanborn, Head & Associates. If there are any questions regarding this letter please contact Mr. John Cotton or myself at the Solid Waste Management Bureau, Waste Management Division at 271-2925.

Sincerely,



James W. Berg  
Waste Management Specialist III  
Solid Waste Management Bureau

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cc: Richard Reed, SWMB  
John Cotton, SWMB  
Michael McCluskey, PDRS  
BOS, Town of Bethlehem  
R. Scott Shillaber, P.E., SHA  
Bethlehem, NCES file/DB