



JUN 18 1999

North Country Environmental  
Services, Inc.

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Montpelier, Vermont 05602

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June 15, 1999

Mr. Philip J. O'Brien, Ph.D.  
Director Waste Management Division  
New Hampshire Department of Environmental Services  
6 Hazen Drive  
Concord, NH 03301-0509

**RE: North Country Environmental Services, Inc., Lined Landfill  
Bethlehem, NH**

Dear Mr. O'Brien:

We are writing in response to your March 18, 1999 letter regarding the New Hampshire Department of Environmental Services (NHDES) response to our request for a waiver from Env-Wm 404.01(b)(2) [Hazardous Waste Mixtures] of the New Hampshire Hazardous Waste Rules (NHHW). North Country Environmental Services, Inc. (NCES) acknowledges that the NHDES can not waive the hazardous waste definitional criteria of the above said rule.

Since November 10, 1998 NCES has sampled the Phase III primary leachate on three separate occasions (listed below) with total volatile organic compound concentrations as follows:

**November 10, 1998 - 90.0 ppm**  
**February 11, 1999 - 73.4 ppm**  
**April 8, 1999 - 100.7 ppm**

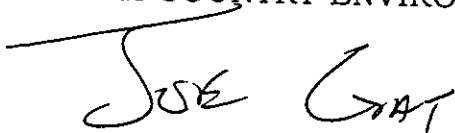
Following the February 1999 results listed above, NCES submitted correspondence requesting clarification as to how long NCES would have to transport the leachate out of state if the total concentrations continued to be less than 100 parts per million. However, with the April sampling results (100.7 ppm) we can not conclude at this time that the total concentrations of VOC's are consistently receding. However, the total concentrations marginally exceed the mixture rule on some occasions. We have attached a summary of the primary leachate volatiles log for your information.

NCES would like to meet and discuss the options outlined in the March 18 1999 correspondence in detail with the appropriate Department staff. We feel that additional information is necessary to formulate an appropriate response. NCES can meet at the Departments earliest convenience.

At this time, NCES will continue to transport the leachate to an approved out of state treatment facility. We look forward to hearing from you soon. Please call either Larry Lackey or myself if you have any questions or have a date and time at which the Department can meet.

Sincerely,

NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.



Joe Gay, E.I.  
Permits, Compliance and Engineering

Encl.

- c: James Bohlig, North Country Environmental Services, Inc.
- Larry Lackey, North Country Environmental Services, Inc.
- Lenny Wing, North Country Environmental Services, Inc.
- Karen Flanders, North Country Environmental Services, Inc.
- Don Monahan, North Country Environmental Services, Inc.
- Scott Shillaber, Sanborn, Head & Associates
- Richard Reed, NHDES, Solid Waste Management Bureau
- John Cotton, NHDES, Solid Waste Management Bureau
- James Berg, NHDES, Waste Management Division
- Mike McClusky, NHDES, Waste Management Division
- John Duclos, Hazardous Waste Compliance

# NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.

## STAGE 1 PHASE III PRIMARY LEACHATE VOLATILES LOG

DETECTED CONSTITUANTS PER (ENV.-WM. 402.05) (ug/l)						COMBINED CONCENTRATION
SAMPLING DATE	ACETONE	2-BUTANONE (mek)	METHYLENE CHLORIDE	TETRAHYDROFURAN	TOLUENE	(mg/l)
2/27/96	9,000	17,000	600		400	27.0
4/15/96	7,800	10,000	400		500	18.7
11/12/96	26,000	35,000	700		500	62.2
4/1/97	23,000	37,200	662		746	61.6
7/7/97	18,300	28,900	688		468	48.4
11/13/97	1,300	21,100	410		328	23.1
4/15/98	31,400	45,100	690		660	77.9
7/15/98	50,200	62,700	660		270	113.8
9/10/98	17,800	25,300	310		190	43.6
10/21/98	57,400	59,000	540		280	117.2
10/29/98	36,600	51,300	360			88.3
11/4/98	48,300	56,000	450			104.8
11/10/98	38,700	50,700	400		210	90.0
2/11/99	24,100	44,200	570	4,300	220	73.4
4/8/99	43000	53600	400	3500	240	100.7