



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

June 26, 2008

John Gay, E.I.
North Country Environmental Services, Inc.
3 Pitkin Court
Montpelier, Vermont 05602

**SUBJECT: WASTE CONTROL EVALUATION/NORTH COUNTRY
ENVIRONMENTAL SERVICES/LOCATED AT 581 TRUDEAU ROAD,
BETHLEHEM, NEW HAMPSHIRE/DES-SW-SP-03-002**

Dear Mr. Gay:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed a review of the January 10, 2008 NCES Waste Control Evaluation submitted on your behalf by Brown and Caldwell and has the following comments:

1. A statement is made in the first paragraph that the purpose of the report is to access the existing operations with respect to Best Management Practices (BMPs). A statement is also made in Section 3 that the waste acceptance and rejection procedures meet the BMPs utilized at solid waste disposal facilities. Please provide a list of BMPs and a description of how NCES meets them.
2. Please describe how each operator is monitored regarding familiarization/compliance with the Operating Plan; operator signature requirements for training received; and training requirements and updates. Please include this information in the Operating Plan.
3. A description is included in Section 1.1 and 2.1 of how the scale house operator monitors traffic flow between the scale house and operating face. However, there is no thorough description in the draft operating plan. Please include.
4. The last paragraph of Section 2.2 states that a disproportionate number of inspections were conducted from 10/1/07 through 12/17/07. Please explain what is typical; include items included on the waste inspection logs; and indicate whether the waste inspection log is adequate to prevent disposal of prohibited waste. Also, please provide recommendations of how to conduct random inspections, thus avoiding inspections during certain months, time periods, etc.
5. Section 3 states that a small number of delivery vehicles associated with local routes have a higher occurrence of prohibited waste delivery to the Facility. Section

DES Web site: www.des.nh.gov

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

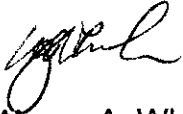
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- 4.1.7 indicates that local route generators/haulers bringing C&D are those described in Section 3. However, it is unclear how this conclusion was reached. Please provide a table/additional description as to how this conclusion was reached and what prohibited waste was found.
6. Section 3 states that the operators were generally attentive in characterizing waste while the waste was being discharged to the active face. This description does not appear to be in compliance with the draft operating plan which states that compactor operators are to visually inspect the waste as the vehicles discharge their load onto the working face. Please explain.
 7. Although many of the requirements are listed under Random Load Inspection, Section 3 of the draft operating plan does not contain a section entitled "Waste Inspection and Rejection Procedures". Please include.
 8. The draft operating plan should include specific instruction as to how common prohibited wastes (electronic waste, asbestos, etc.) are handled and/or disposed of when the hauler is unknown or unavailable to remove the items from the Facility.
 9. Section 1.1 identifies the list of authorized wastes as being incomplete, but no mention is made in Section 4.2 as to the specific recommendations that should be made to the draft operating plan or the Rules. Please explain and include specific recommendations.
 10. Section 4.2 uses the phrases "is improved", "more accurately describes", "improves", etc. A clear statement is needed that either the section is adequate or should be revised. If the section should be revised, please include the recommended revision.
 11. In addition to the above comments, a March 21, 2008 comment letter submitted by Boutin Altieri, Attorneys At Law, on behalf of the Town of Bethlehem is attached. Some of the Town's comments have been incorporated into this letter, but others have not. Please address the Town's comments in your response.

John Gay, E.I.
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June 26, 2007
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If you have any questions, please contact me.

Sincerely,



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Solid Waste Management Bureau
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Encl: March 21, 2008 comment letter

cc: Town of Bethlehem, Board of Selectmen
Town of Sugar Hill, Board of Selectmen
Town of Lancaster, Board of Selectmen
Town of Dalton, Board of Selectmen
Town of Easton, Board of Selectmen
Town of Littleton, Board of Selectmen
Town of Franconia, Board of Selectmen
Brenda Keith, Boutin Altieri
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Maureen Smith, Senior Assistant Attorney General