



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



June 9, 2000

FILE COPY

Mr. Michael Hanscom, Superintendent
Waste Water Plant
City of Concord
125 Hall Street
Concord, N.H. 03301-3228

Re: North Country Environmental Services, Inc., Bethlehem, N.H.

Dear Mr. Hanscom:

On April 3, 2000, the Department of Environmental Services (DES) met with representatives of the City of Concord Waste Water Plant (Concord POTW) and North Country Environmental Services, Inc., (NCES) to review the regulatory status of the Stage I – Phase III leachate generated at NCES’s landfill located in Bethlehem, N.H. At this meeting, the Concord POTW requested a DES letter to confirm our discussions on the current regulatory status of NCES’s leachate.

In response to your concerns, I have enclosed a copy of Letter of Deficiency No. WMD 00-11 and Administrative Fine Docket No. AF 2000-037 issued concurrently to NCES on May 23, 2000. As these documents explain, analytical test data submitted by NCES document that the leachate from Stage I – Phase III failed the New Hampshire hazardous waste mixture rule per Env-Wm 404.01 (b)(2) from July 15, 1998 to September 10, 1998, from October 21, 1998 to November 10, 1998 and from April 9, 1999 to the repiping of the leachate collection system on March 9, 2000. The Administrative Fine was issued to penalize NCES for the six leachate shipments that were sent to the Concord POTW from August 10, 1998 to September 2, 1998.

At the time NCES’s leachate from Stage I – Phase III failed the New Hampshire hazardous waste mixture rule, NCES collected the leachate from individual phases of the landfill in four separate collection tanks. NCES repiped their leachate collection system to allow for the common mixing of the leachate from all phases of the landfill to one common collection tank. The new common collection tank is considered the single “point of generation” where the leachate becomes subject to a hazardous waste determination under Env-Wm 502. The hazardous waste determinations completed on March 9, 2000 and April 12, 2000 for the combined leachate determined that NCES’s leachate passed the New Hampshire hazardous waste mixture rule.

If you have any questions on this matter or require further assistance, please feel free to contact me at 271-1998.

Sincerely,

John J. Duclos, Supervisor
Hazardous Waste Compliance Section
Waste Management Division

TOWN:	BETHLEHEM
PROJECT:	NCES Stage II
LETTER/DATA/PERMIT/FA/OTHER:	

Enclosures
CC w/o enclosures: Mike McCluskey, DES – WMD
Jon Bushold, Concord POTW
David Adams, P.E., NCES

E-Mail: KWM/RSR