

February 19, 2021

Pamela Hoyt-Denison, P.E. Administrator
Waste Management Division
New Hampshire Department of Environmental Services
P.O. Box 95, 29 Hazen Drive
Concord, New Hampshire 03302-0095

**Re: North Country Environmental Services Landfill
Trudeau Road – Bethlehem, NH
Response to February 18, 2021 Notice of Findings**

Dear Ms. Hoyt-Denison:

This letter responds to your February 18, 2021 Notice of Findings (NOF) concerning North Country Environmental Services, Inc. (NCES). Your NOF describes a potential compliance deficiency with respect to the Stage V permit modification issued August 15, 2014 and certain operational requirements. Those operational requirements specified appear to be based on an analysis using our June 7, 2019 survey as a baseline, and from there, applies a mathematical depletion of capacity using data from NCES's monthly tonnage reports. The pertinent issue, however, is not the number of tons across the scales but whether NCES has remained within its permitted grades.

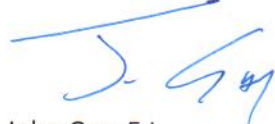
The NHDES analysis does not consider that the landfill has settled by at least 104,000 cubic yards since the June 7, 2019 survey. Based on a site survey conducted on January 4, 2021 and engineering analysis, NCES's Stage I-V remaining capacity is approximately 141,000 cubic yards. Additional detail on the site's remaining capacity will be provided in the Annual Facility Report for 2020.

The approved limits (footprint and permitted grades) have not been altered at the site and are in accordance with NHDES Waste Management Rule, Env-Sw 805.10 and our Type 1-A Modification for Stage V; dated August 15, 2015.

It is unfortunate that DES had to devote the resources necessary to prepare the notice, and of course as the permittee we do not like to see enforcement-related letters from DES based on inaccurate information or a misunderstanding. If a question like this arises in the future please feel free to contact me so we can assist DES in gathering the facts. You can reach me by telephone at (802) 236-5973 or by email at john.gay@casella.com.

Sincerely,

NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.



John Gay, E.I.
Permits, Compliance & Engineering

- c. Kevin Roy, NCES (via email)
Brian Oliver, NCES (via email)