

STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: March 2, 2022

AT (OFFICE): NHDES/WMD

FROM: Jay Hargy, Permit Engineer
Solid Waste Management Bureau

THROUGH: Jaime Colby, Engineering & Permitting Supervisor
Solid Waste Management Bureau

TO: File

RE: **North Country Environmental Services (NCES)**
Bethlehem, New Hampshire
February 24, 2022 Meeting Notes

The purpose of this memorandum is to document a meeting held on February 24, 2022 at the request of NCES to discuss multiple topics regarding the subject facility. The Meeting Attendance Record and Agenda are attached to this memorandum.

The following topics were discussed.

1. Type II - 2022 Gas work: NCES submitted a Type II permit modification application for expansion of the facility's landfill gas (LFG) system, proposed to be constructed in 2022. NCES summarized that the proposed project includes construction of horizontal and vertical gas wells in Stage VI, and a "bypass" header near the flare. Flow modeling indicates the bypass pipe will increase system efficiency by improving flow in an area where the header pipe is smaller than most other header pipes in the landfill. NCES does not anticipate the need for many replacement wells; however, a more detailed assessment of the existing wells will be completed in the spring. NCES conducts bi-weekly LFG system meetings with its consultants, and the quality of the facility's LFG has gone up. Surface emission monitoring is completed at the landfill as required by its air permit.

While NHDES received an electronic copy of the application, NHDES noted that it has not received a paper copy of the application. NHDES also noted that a construction quality assurance (CQA) report for the 2021 LFG work has not been received. NCES stated that it will submit a paper copy, and it will contact its consultant regarding the CQA report.

2. Operational Update: NCES stated that multiple new employees have been hired including an environmental technician, a mechanic, and a transfer station operator. The environmental technician will oversee construction and operation of the facility's LFG systems, and likely also the facility's surface water management systems and leachate management system. New

equipment has been purchased including a GPS-equipped bulldozer and a GPS-equipped excavator. NCES anticipates purchasing a larger water truck soon. NCES anticipates that it will begin filling the outer slope of Stage VI mid-month. Overall, NCES believes the site held up well during recent thaw and rain events, that operations are going well, and that they have a good crew.

3. Annual Volume Restrictions: NCES noted that waste intake had to be restricted at the end of last year due to the annual filling restrictions. NCES asserted that it is more difficult to track airspace usage (i.e., cubic yards) than to track tonnage received. NCES wondered whether NHDES would be willing to change annual usage to either tonnage-based or a three-year average. NCES knows its daily intake tonnages but knowing cubic yard usage requires a survey and calculations that can take several days to complete. NCES stated that it conducts surveys at least quarterly, but more frequently in the fall. Intake of spot market deliveries were affected last year and NCES anticipates that the spot market will be affected again this year because NCES must accommodate its contracts and its own transfer facilities first. NCES stated that NHDES should be prepared for phone calls (e.g., complaints).

NHDES noted that the annual airspace usage limit is based on the public benefit determination and facility life expectancy. The limit placed in the permit is consistent with what NCES proposed in its application for Stage VI, and NHDES sets these limits based on airspace usage (i.e., cubic yards). NCES can make any application it likes, but NHDES cannot comment on whether a request to change the annual usage provision would be approved.

4. RNG Plant: NCES stated that the RNG Plant is still under construction due to market supply and demand issues, and delivery delays. NCES anticipates startup in late summer or early fall.

5. Type II FOP/Closure Grade/Stormwater: NCES anticipates submitting a Type II permit modification application in April 2022 to request approval of proposed changes to the facility's operating and closure plans, as well as stormwater systems. Changes are likely to relate to closure grading.

6. Type II for Stage VI Phase B Construction: NCES anticipates submitting a Type II permit modification application for Stage VI, Phase B (also known as Phase II) in early to mid-summer. Construction is anticipated in 2023. NHDES suggested that NCES review Condition (30) of the Type I-A approval for Stage VI because it relates to final design of Stage VI, Phase B and noted that the Application Review Summary provides additional details.

NHDES also noted that Phase B will require relocation of groundwater monitoring wells. New monitoring wells should be installed under the groundwater management and release detection permit to replace wells decommissioned for expansion construction. NHDES requested that the new wells be installed early enough to allow for no gap in groundwater quality monitoring and to have an overlap of groundwater quality results between the new wells and the wells to be decommissioned. The new wells should have well screen intervals similar to the wells that are to be decommissioned. NHDES also stated that it would issue a

letter soon regarding information submitted by NCES and its consultant regarding groundwater monitoring related to the May 2021 leachate release.

7. Type II for Cap 4: NCES anticipates submitting a Type II permit modification application for “Cap 4”, which is a final cap area on the northern side of the landfill. Construction is anticipated in 2023.

During wrap-up discussion, NHDES noted that it has only received electronic copies of several applications requesting changes to financial assurance plan at several Casella facilities, and that a paper copy is required. NCES indicated that they would submit paper copies as soon as possible.

Agenda

DES/NCES

February 24, 9:00 am Hazen Drive

- Type II - 2022 Gas work
- Operational Update
- Annual Volume Restrictions
- RNG Plant
- Type II FOP/Closure Grade/Stormwater
- Type II for Stage VI Phase B Construction
- Type II for Cap 4