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Jon Swan: I believe the NCES Landfill is failing

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Jon Swan

I HAVE bad news to share with my fellow Granite Staters. Based on my analysis of groundwater monitoring reports and the historical record, I believe we are witnessing the failure of the controversial NCES Landfill in Bethlehem.

Toxic “forever chemicals” known as PFAS were detected in groundwater at 11 of 19 monitoring wells tested, according to the **July, 2023, Tri-Annual Groundwater Monitoring Report**, which was submitted to NHDES by Sanborn, Head and Associates (SHA) on behalf of Casella Waste Systems and the NCES Landfill.

Of particular concern is the detection and high level of PFOA, which the **EPA is proposing** to designate as a hazardous substance under the Superfund law, which would help hold polluters accountable for cleaning up their contamination.

According to the July report, new maximum concentrations of PFOA contaminants were detected in groundwater at two monitoring wells closest to and upgradient of the Ammonoosuc River, which is a mere 550 and 400 feet away.

I've analyzed lab results from 2018-2023 for NCES landfill leachate, also known as "garbage juice," which is trucked in daily by tankers to the City of Concord wastewater treatment plant (WWTP) and the NHDES-operated Franklin WWTP.

Top PFAS compounds present in NCES Landfill leachate also have been consistently detected in groundwater at their various monitoring wells. It appears that the NCES Landfill is failing to contain the leachate it generates, based on the data from both the NCES groundwater monitoring well reports and NCES leachate lab results.

Like DNA in an episode of CSI, the landfill's leachate seems to match the evidence left behind at the scene, which lies within the watershed of the downgradient Ammonoosuc River.

Unfortunately, the numerous detections of PFAS contaminants in groundwater at NCES have been downplayed in the reports submitted to NHDES since at least 2017, when PFAS testing became a requirement. I believe a false narrative has been relied upon by all parties, to dispel any concerns that the landfill may actually be leaking. Blame is consistently placed on the former Sanco unlined landfill, like an alibi, to explain the presence of contaminants in groundwater at the various monitoring wells outside of the lined landfill. A search of the July 2023 report finds "unlined landfill" comes up 52 times!

The problem with that narrative is that the **old Sanco unlined landfill** was actually excavated by **Casella Construction in the fall of 1993**. The waste was relocated to Stage I of the "state-of-the-art", double-lined landfill, as Casella Waste Systems **boasted in Aug. 25, 1993**. Ironically, on Nov. 5, 1993, Paul Sanborn, president of Sanborn, Head and Associates (yes, the same company pointing to the "unlined landfill" today), **wrote to NHDES** to inform them of the completion of the waste-relocation project. He stated residual contamination was not present in the soils in the excavation area, thus clearing the way for NHDES approval for the development of the Stage II landfill expansion over the unlined landfill site.

On Dec. 9, 1993, James Berg of NHDES **wrote of the department's "concurrence"** that "no further excavation to remove additional soils is necessary." In other words, the unlined landfill was excavated of all trash and deemed free of contamination by both SHA and NHDES!

So which is a more plausible source of PFAS and other contaminants: the unlined landfill – excavated 30 years ago and given a clean bill of health by the same engineering firm and NHDES – or are we witnessing the failure of the 36-year old “state-of-the-art” double-liner system of Stage I?

Regardless of cause, the data does not lie. There is a steady release of PFAS and other contaminants from the NCES Landfill into groundwater, all within the watershed of the Ammonoosuc River. Will the EPA investigate? I’ve sent numerous requests, since NHDES appears unconcerned.

Will the Town of Bethlehem become home to a new Superfund site? I don’t see how it doesn’t. The fears and concerns of so many Bethlehem residents over years of contention at growth of this landfill now seem justified, and, sadly, realized.

NHDES failed its mission to protect the environment (and citizens of Bethlehem). Will Casella be held responsible for the expense of PFAS cleanup and remediation? We shall see; their track record of accepting responsibility is shaky.

It would be irresponsible for NHDES to allow the NCES Landfill to continue to operate, ensuring the continued generation of millions of gallons of leachate annually, which monitoring reports confirm is not being contained. It’s time for NHDES to do its job and close this controversial dump, and potential Superfund site, once and for all.

It would be unconscionable for NHDES to permit another one of these toxic landfills for out-of-state trash next to pristine Forest Lake and the Ammonoosuc River, endangering private, PFAS-free wells in neighboring Dalton, Littleton, Whitefield, and Bethlehem, as well as public water supplies downstream.

Jon Swan lives in Dalton.