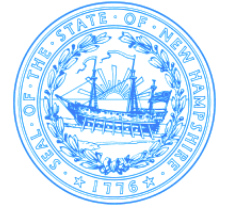




The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Robert R. Scott, Commissioner**

EMAIL ONLY

March 23, 2023

John Gay  
Casella Waste Management, Inc.  
1855 VT Route 100  
Hyde Park, VT 05655

Subject: Bethlehem – North Country Environmental Services (NCES) Landfill 581 Trudeau Road,  
DES Site #198704033, Project #1737

*Initial Response Action (IRA) – November 2022 Water Quality Monitoring Results*, prepared  
by Sanborn, Head & Associates, Inc., dated January 5, 2023

Dear John Gay:

The New Hampshire Department of Environmental Services (NHDES) has reviewed the above-referenced *Initial Response Action (IRA) - November 2022 Water Quality Monitoring Results* document for the NCES Landfill, as submitted on your behalf by Sanborn, Head & Associates, Inc. (SHA) and conducted in response to a May 2021 leachate spill. In response to the May 2021 leachate spill, an increased frequency of groundwater monitoring has been required in this portion of the site, with monitoring events documented in Initial Response Action (IRA) groundwater monitoring submittals to evaluate if the corrective action/remedial efforts documented in the *Initial Response Action Report*, dated June 18, 2021, and *Supplement to Initial Response Action Report*, dated June 30, 2021 appropriately addressed impacts from the spill.

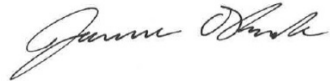
As you are aware the May 2021 leachate spill occurred within the Groundwater Management Zone (GMZ), associated with the former unlined landfill which was removed in the 1990s, located in the northeast portion of the site. As has been documented in the project record residual impacts from the former unlined landfill, although diminished, are still present within the GMZ. The northeast portion of site has also been subject to a Supplemental Site Investigation (SSI) related to groundwater impacts detected at the B-304 monitoring well couplet during groundwater monitoring (prior to the leachate spill) that has been attributed to the removal of facility infrastructure in 2019. As a result, three distinct incidents; the former unlined landfill, 2019 infrastructure removal, and May 2021 leachate spill, have occurred in this portion of the site.

Based on the results of the groundwater monitoring, conducted since the May 2021 leachate spill, NHDES concurs with SHA that impacts to groundwater detected during the November 2022 sampling round are consistent with those concentrations and trends present prior to the May 2021 leachate spill. NHDES has determined that the corrective action/remedial work taken in response to the May 2021 leachate spill have been adequate and concurs with the recommendation by SHA to cease IRA specific groundwater sampling at this time. NHDES notes the groundwater impacts detected prior to and during the IRA sampling will continue to be monitored under the existing Groundwater Management and Release Detection Permit with additional investigation, if determined necessary, conducted as part of the ongoing SSI being undertaken in this portion of the site and addressed under separate cover.

John Gay  
DES #198704033  
March 23, 2023  
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Should you have any questions, please contact me at NHDES' Waste Management Division.

Sincerely,



James W. O'Rourke, P.G.  
Waste Management Division

Tel: (603) 271-3116

Email: [James.W.ORourke@des.nh.gov](mailto:James.W.ORourke@des.nh.gov)

ec: Timothy White, P.G., Sanborn, Head & Associates, Inc.  
Bethlehem Health Officer  
Sarah Yuhas Kirn, P.G., WMD Assistant Director, NHDES  
Leah McKenna, SWMB Administrator, NHDES  
Jaime Colby, P.E., SWMB/NHDES  
Amy Renzi, P.G., HWRB State Sites Supervisor, NHDES