

December 18, 2024

Via Email

New Hampshire Department of Environmental Services

Michael Wimsatt
Director, Waste Management Division
michael.wimsatt@des.nh.gov

Jaime Colby
Supervisor, Engineering and Permitting Section
Jaime.M.Colby@des.nh.gov

**Re: NHDES File Number: 2023-66600 Solid Waste Standard Permit Application;
Subject Properties: Dalton Tax Map 406, Lots 2.1, 2.3, 2.4, 2.5, 3, and 3A and
Bethlehem Tax Map 406, Lots 1 and 2
("Application")**

Dear Director Wimsatt and Ms. Colby,

I write in continued representation of North Country Alliance for Balanced Change ("NCABC"). On October 31, 2023, Granite State Landfill, LLC ("GSL" or "Applicant"), a subsidiary of Casella Waste Systems, Inc. ("Casella"), submitted the above-referenced application for a Standard Permit for Solid Waste Landfill ("Application") to the Solid Waste Management Bureau ("Bureau") of the New Hampshire Department of Environmental Services ("Department") for its proposed landfill on the private road of Douglas Drive in Dalton and Bethlehem, New Hampshire ("Landfill" or "Proposal"). Please make this letter part of your record in this matter.

Since my letter dated January 3, 2024 ("January Letter"), Casella has continued to demonstrate its severe lack of sufficient reliability, expertise, integrity, and competence to be qualified for a new solid waste permit. NCABC once again respectfully requests the Department exercise its discretion to deny the Application on these grounds pursuant to RSA 149-M:9, and states that to do otherwise could only be an abuse of discretion.

Casella's Extensive Environmental Noncompliance Means Ineligibility for Permit

The January Letter pointed out that, pursuant to Env-Sw 303.14(b)(3), GSL has *wrongfully* certified on its Application that they, their officers, directors, partners, etc. have not "owned or operated any hazardous or solid waste facility which has been the subject of an administrative or judicial enforcement action for a violation of environmental statutes or rules during the 5 years before the date of the application."

The January Letter exhaustively documents the numerous violations of environmental statutes, rules, and permits in the five years before the date of the Application, i.e., November 1, 2018 to October 31, 2023 of the Applicant, their officers, directors, or partners. This letter supplements the long list of Applicant’s violations with new violations documented since the January Letter to further emphasize the Applicant’s unsuitability to manage and operate a new landfill, contrary to the Applicant’s now even *more wrongful* certification that they, their officers, directors, partners, etc., have not “owned or operated any hazardous or solid waste facility which has been the subject of an administrative or judicial enforcement action for a violation of environmental statutes or rules during the 5 years before the date of the application.” N.H. Admin. R. Env-Sw 303.14(b)(3).

Applicant’s Continued Violations of Environmental Laws since January 2024

The Applicant, its owner, officers, directors, and partners have committed the following numerous violations of environmental laws since the January Letter, as detailed below.

a. The Department’s Letter of Deficiency to NCES

On June 14, 2024, the Department sent North Country Environmental Services, Inc. (“NCES”), a Casella subsidiary, a letter of deficiency documenting several violations of environmental statutes or rules related to leachate management, leachate data collection, and reporting at its landfill facility in Bethlehem, NH from July 1, 2023 to June 12, 2024. *See* Exhibit A: June 14, 2024 Letter of Deficiency. Specifically, the Department documents 450 total instances of leachate storage violations; six (6) instances of leachate data collection and reporting violations on the primary liner; 550 instances of leachate data collection and reporting violations on the secondary liner; failure to control the production of leachate to the greatest extent practicable; and several incidents of incident reporting violations. In this letter alone, the Department documents over 1,100 instances of operational violations of environmental regulations, plus the accompanying administrative and reporting violations, all within a one-year period from July 1, 2023 to June 12, 2024.

b. NCES’s Incident Reports in 2024

NCES has self-reported to the Department nineteen (19) incidents at its Bethlehem facility in 2024 as of the date of this letter. NCES began filing the incident reports as required by law only after receiving the Department’s letter of deficiency dated June 14, 2024 reminding NCES of its legal obligation to do so. Below follows a summary of each of those incident reports.

1. June 12, 2024 Incident Report: elevated secondary flows at two pump stations. *See* Exhibit B.

2. June 18, 2024 Incident Report: elevated secondary flows at one pump station. *See* Exhibit C.
3. June 18, 2024 Incident Report: excess hydraulic head on the primary liner system. *See* Exhibit D.
4. July 2, 2024 Incident Report: elevated secondary flow at two pump stations. *See* Exhibit E.
5. July 16, 2024 Incident Report: excess hydraulic head on primary liner system. *See* Exhibit F.
6. July 26, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit G.
7. July 29, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit H.
8. August 5, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit I.
9. August 12, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit J.
10. August 19, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit K.
11. August 26, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit L.
12. September 3, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit M.
13. September 6, 2024 Incident Report: NCES contractors mistakenly made holes in the overliner system when installing landfill gas wells in 2014, contributing to increased leachate flows in the base liner system. *See* Exhibit N.
14. September 9, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit O.

15. September 13, 2024 Incident Report: elevated secondary flow at one pump station. *See* Exhibit P.
16. October 11, 2024 Incident Report: excess hydraulic head on primary liner system. *See* Exhibit Q.
17. November 6, 2024 Incident Report: elevated flow at one pump station. *See* Exhibit R.
18. November 8, 2024 Incident Report: subsurface oxidation in lined portion of stormwater diversion down chute. *See* Exhibit S.
19. November 22, 2024 Incident Report: excess hydraulic head on primary liner system. *See* Exhibit T.

Furthermore, on August 6, 2024, the Department notified NCES that its incident reports from June 12, 2024 to August 5, 2024 were missing information in violation of Env-Sw 1005.09. *See* Exhibit U: Aug. 6, 2024 Department Review of Incident Reports on Primary Leachate Levels; Exhibit V: Aug. 6, 2024 Department Review of Incident Reports on Secondary Leachate Flows. So, even when attempting to achieve some measure of compliance, Casella does not even have enough competence to complete incident reports correctly.

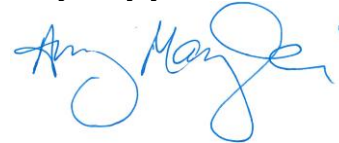
Finally, the September 6, 2024 incident report (Exhibit N) in particular puts into stark relief Casella's unsuitability to manage and operate a landfill facility. The twelve overliner penetrations created by the drilling of landfill gas wells—the oldest of which dates back to 2014, *ten years ago*—were undetected until the Department compelled NCES via its June 12, 2024 letter of deficiency (Exhibit A) to properly manage, monitor, and report its leachate collection processes. Prior to the letter of deficiency, NCES took no action to address the head exceedances on the primary liner or the elevated flow rates in the secondary leachate collection system, all significant issues. NCES finally investigated the elevated flows in the secondary liner system as required by the letter of deficiency, and subsequently discovered the mismanagement of the drilling of the wells—that occurred a decade ago—which created the overliner penetrations. NCES promised in its September 6, 2024 incident report to supplement the report with “a detailed explanation of how these gas wells have contributed to the increased leachate flows,” which it has yet to do. ***It is clear from this series of events that Casella cannot be trusted to reliably and competently manage a landfill.***

This year's violations alone show the Applicant, as a subsidiary of its controlling company Casella, is unsuitable to manage and operate a landfill facility and severely lacks sufficient reliability, expertise, integrity, and competence to be qualified for a new solid waste permit. Moreover, when you pair this year's abysmal performance with the prior chronic unreliability and failures noted in the January Letter, the consistent picture of unsuitability cannot be avoided.

Conclusion

The North Country Alliance for Balanced Change, therefore, respectfully requests the Department exercise its discretion to deny the Application pursuant to RSA 149-M:9. Thank you for your attention to this matter.

Very truly yours,



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Enclosures

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Davidson, Tyler

From: Werner, Pam
Sent: Friday, June 14, 2024 2:23 PM
To: john.gay@casella.com
Cc: Davidson, Tyler; Colby, Jaime; Daun, Mary
Subject: NCES LF_LOD SWMB 24-006 for Leachate Deficiencies.pdf
Attachments: NCES LF_LOD SWMB 24-006 for Leachate Deficiencies.pdf

Good afternoon,

Please find the attached letter from Ms. Leah McKenna regarding the Leachate deficiencies for 581 Trudeau road. If you have any questions or cannot open the above attachment please feel free to call.

Thank you,

Pamela Werner

Administrative Supervisor

NH Department of Environmental Services

Tel. (603)271-2905



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



June 14, 2024

CERTIFIED MAIL #7018 0680 0000 7433 2951
RETURN RECEIPT REQUESTED

North Country Environmental Services, Inc.
John Gay, Engineer
1855 Vermont Route 100
Hyde Park, VT 05655
Email: john.gay@casella.com

LETTER OF DEFICIENCY
No. SWMB 24-006

**Subject: North Country Environmental Services, Inc. Landfill, 581 Trudeau Road, Bethlehem, NH
Permit No. DES-SW-SP-03-002**

Dear John Gay:

The records of the New Hampshire Department of Environmental Services, Waste Management Division, (NHDES) show that North Country Environmental Services, Inc. has been issued a solid waste permit for the subject facility (the Facility). As such, North Country Environmental Services, Inc. (the Permittee) is required to comply with RSA 149-M, NH Admin. Rules Env-Sw 100 – 2000, and the Facility's permit. The purpose of this letter is to notify North Country Environmental Services (NCES) of violations identified by NHDES and request that NCES take specific actions to address the non-compliance. The violations were identified through a review of the Facility's 2023 Third and Fourth Quarter Facility Reports, 2024 First Quarter Facility Report, and leachate management system records from April 1, 2024 through June 12, 2024, which were obtained from NCES during site visits on June 4 and June 12, 2024.

Based on NHDES' review of the above-referenced reports and documentation, violations related to leachate management, and leachate data collection and reporting have been identified. More specifically, violations relate to storage of leachate on the liner system in excess of 12 inches of head on the liner; failure to collect data as required when head exceeds 12 inches; flow rates in the secondary leachate system exceeding 25 gallons per acre per day (G/A/D) and, in some locations, exceeding 100 G/A/D; failure to control to the greatest extent practical the generation of leachate; and failure to report data, investigations, and incidents as required. Further details are provided below.

Please be aware that leachate storage on the liner in the depths and at the frequency suggested by the currently available data is a significant issue. When this occurs, it is NCES's responsibility to identify and resolve the issue as quickly as possible.

#1: Storage of Leachate on Liner System

Env-Sw 806.05(b) requires that, as part of a facility's operating plan, a leachate management plan is to be developed and implemented based on the criteria outlined in Env-Sw 806.05(b)(1) through (7). In accordance with Env-Sw 1105.04(a), a facility is to operate in compliance with RSA 149-M, all requirements in the solid waste rules, and the terms and conditions of the permit. In the permit modification issued October 9, 2020, Condition (16)(c) requires the Facility to be operated in accordance with the Facility's approved Operating Plan of record, and Condition (18)(a) identifies the approved Operating Plan of record, dated October 9, 2020 (Operating Plan). Section 5.7 of the Operating Plan specifies that, "Leachate is removed from the sump area to keep head on the liner less than 12-inches during routine operations, including up to the 25-year, 24-hour storm events."

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According to the Facility’s 2023 Third and Fourth Quarter Facility Reports (Q3-2023 and Q4-2023 Facility Reports) and 2024 First Quarter Report (Q1-2024 Facility Report), the Facility experienced a hydraulic head elevation on the primary liner greater than 12 inches at variable dates throughout the reporting periods as identified using leachate level measurements at Pump Stations #1, #2 and #3. Through a review of the Facility’s leachate management system records from April 1, 2024 through June 4, 2024, provided to NHDES on June 4, 2024, NHDES identified hydraulic head elevations greater than 12 inches at variable dates throughout April and May as well as on June 3 and 4, 2024 using leachate level measurements at Pump Stations #1, #2, and #3. On June 7, 2024, NHDES received an email from John “Joe” Gay of NCES providing the April and May 2024 sump levels taken from the NCES’ telemetry system at a more consistent time than those provided on June 4, 2024. NHDES observed differences in the data sets that averaged 1.58 to 2.79 inches more head on the liner system in the June 7 data set. For the purpose of the analyses presented herein, NHDES has used the data provided on June 7, 2024, except for:

- (a) June 3 through 12, 2024, for which it used the data obtained on June 4 and June 12, 2024; and
- (b) for Pump Station No. 3, December 4 through December 21, 2024, for which it used the handwritten logs provided by Bruce Grover, NCES, on June 12, 2024.

Based on email from Samuel Nicolai of NCES, received on June 6, 2024, leachate level measurements taken on June 5 and June 6, 2024 for Pump Stations #1 and #2 indicated less than 12 inches of head on the primary liner, and for Pump Station #3 indicated greater than 12 inches of head on the primary liner. A follow-up email from Samuel Nicolai on June 7, 2024 stated that NCES’ replaced the transducer in the Stage III sump (Pump Station #3), and reported head on the liner to be less than 12 inches at this location. Based on data provided by NCES during a follow-up site visit on June 12, 2024, head on the liner was less than 12 inches on June 10 through June 12, 2024.

Specific instances of hydraulic head elevation on the primary liner greater than 12 inches between July 1, 2023 and June 12, 2024 for the sump associated with Pump Station #1 are provided in Table 1 below.

Table 1 – Instances of Hydraulic Head Elevation >12 inches		
Sump Associated with Pump Station #1 (Stage IV, Phase II)		
Date / Date Range	Hydraulic Head on Liner (inches)	# of Instances
11/11/2023 – 11/15/2023	15.84 – 23.45	5
12/24/2023 – 12/25/2023	13.39 – 19.73	2
12/30/2023 – 2/2/2024	12.63 – 74.78	35
2/25/2024 – 2/27/2024	12.33 – 18.13	3
3/11/2024 – 3/26/2024	16.58 – 71.82	16
3/29/2024 – 3/31/2024	12.76 – 27.00	3
4/1/2024 – 5/1/2024	12.80 – 116.42	31
TOTAL		95

Specific instances of hydraulic head elevation on the primary liner greater than 12 inches between July 1, 2023 and June 12, 2024 for the sump associated with Pump Station #2 are provided in Table 2 below.

Table 2 – Instances of Hydraulic Head Elevation >12 inches		
Sump Associated with Pump Station #2 (Stage IV, Phase I)		
Date / Date Range	Hydraulic Head on Liner⁽¹⁾ (inches)	# of Instances
7/21/2023	45.16	1
8/19/2023 – 8/21/2023	49.07 – 66.71	3
10/23/2023	56.42	1
11/2/2023 – 11/17/2023	34.78 – 74.16	16
11/25/2024 – 11/28/2024	46.62 – 66.62	4
12/10/2023 – 12/12/2023	54.5 – 67.53	3
12/18/2023 – 12/21/2023	33.77 – 61.31	4
12/23/2023 – 12/30/2023	65.61 – 76.6	8
1/1/2024 – 1/4/2024	65.00 – 76.6	4
1/7/2024 – 1/10/2024	62.93 – 76.6	4
1/12/2024 – 1/18/2024	56.00 – 76.6	7
1/21/2024 – 2/1/2024	15.83 – 76.6	12
2/5/2024 – 2/8/2024	51.66 – 66.01	4
2/11/2024 – 2/14/2024	54.56 – 66.5	4
2/17/2024 – 2/28/2024	17.14 – 74.34	12
3/9/2024 – 3/23/2024	53.83 – 76.6	15
4/1/2024 – 4/2/2024	76.6, both dates	2
4/6/2024	76.6	1
4/8/2024 – 5/8/2024	31.39 – 76.6	31
5/15/2024	23.85	1
5/17/2024 – 5/22/2024	19.43 – 29.07	6
5/25/2024 – 5/31/2024	36.64 – 51.54	7
6/3/2024	32.86	1
TOTAL		151
(1) The transducer in the sump associated with Pump Station #2 appears to have a maximum reading of 100 inches, which equates to a maximum measurement of 76.6 inches of head on the liner system. Hydraulic head may exceed the maximum measurement of which the transducer is capable.		

Specific instances of hydraulic head elevation on the primary liner greater than 12 inches between July 1, 2023 and June 12, 2024 for the sump associated with Pump Station #3 are provided in Table 3 below.

Table 3 – Instances of Hydraulic Head Elevation >12 inches Sump Associated with Pump Station #3 (Stage III)		
Date / Date Range⁽¹⁾	Hydraulic Head on Liner⁽²⁾ (inches)	# of Instances
7/10/2023	19.86	1
7/21/2023	76	1
7/25/2023	17.12	1
7/27/2023	17.27	1
7/30/2023	12.87	1
8/1/2023	13.24	1
8/3/2023	15.32	1
8/9/2023	17.67	1
8/18/2023 – 8/21/2023	17.91 - 76	4
8/28/2023 – 9/1/2023	76, all dates	5
9/5/2023	76	1
9/8/2023	76	1
9/12/2023 – 9/14/2023	76, all dates	3
9/18/2023	76	1
9/20/2023	76	1
9/25/2023	76	1
9/28/2023	76	1
10/2/2023 – 10/4/2023	15.26 – 30.76	3
10/9/2023	65.96	1
12/4/2023 – 12/6/2023	111.8 – 113.5	3
12/11/2023 – 12/14/2023	113.5 – 113.7	4
12/19/2023 – 12/21/2023	115.0 – 115.1	3
12/22/2023 – 1/13/2024	48.22 - 76	23
1/16/2024 – 3/31/2024	28.72 - 76	76
4/1/2024 – 5/31/2024	59.15 - 76	61
6/3/2024 – 6/6/2024	45.62 - 62.44	4
TOTAL		204

(1) Measurements were not reported in the Q4-2023 report from October 11 through December 21, 2023. Data from December 4 through 21, 2023 were taken from handwritten logs provided by NCEs on June 12, 2024.

(2) The transducer in the sump associated with Pump Station #3 appears to have a maximum reading of 100 inches, which equates to a maximum measurement of 76 inches of head on the liner system. Hydraulic head may exceed the maximum measurement of which the transducer is capable.

Based on the data presented in Tables 1 - 3 above, NHDES concludes there were 95 recorded instances where head on the liner exceeded 12 inches proximate to the sump in Stage IV Phase II; 151 recorded instances where head on the liner exceeded 12 inches proximate to the sump in Stage IV Phase I; and 204 recorded instances where head on the liner exceeded 12 inches proximate to the sump in Stage III, for a total of 450 total instances of head on the primary liner exceeding 12 inches. Precipitation data included in the quarterly reports indicate that there were no storm events that exceeded the 25-year/24-hour storm.

#2: Primary Liner - Leachate Data Collection and Reporting

Env-Sw 806.08 establishes requirements for inspecting, maintaining, and monitoring landfills which have not undergone closure, and further specifies the requirements for reporting this information to NHDES. Env-Sw 806.08(d) identifies the requirements for monitoring leachate management systems and recording the data in the facility operating records. Relative to leachate management systems, Env-Sw 806.08(d)(1)(a) requires the hydraulic head elevation on the liner to be measured at the low point of a cell, phase, or stage where leachate is collected and be recorded at least once per month. Further, Env-Sw 806.08(d)(1)(c) requires hydraulic head elevation on the liner to be measured daily when the hydraulic head is found to be greater than or equal to 12 inches, where daily means on each operating day. Additionally, Env-Sw 806.08(h)(2) requires that this data be included in the quarterly reports provided to NHDES pursuant to Env-Sw 806.08(g)(1).

The Q4-2023 Facility Report did not include any hydraulic head elevations for the primary sump in Stage III of the landfill for the month of November 2023. The report specified that, "The Stage III sump was temporarily disconnected from the leachate management system for construction of a new cell during the month of November; therefore, no data is available." Further, in the Q3-2023 and Q4-2023 Facility Reports, head on the liner exceeded 12 inches and was not recorded on the following operating day, as follows:

- At the sump associated with Pump Station #2, located in Stage IV Phase I:
 - On July 21, 2023 and was not recorded again until July 26, 2023, totaling 2 missed daily measurements; and
- At the sump associated with Pump Station #3, located in Stage III:
 - On September 5, 2023 and was not recorded again until September 7, 2023, totaling 1 missed daily measurement;
 - On September 14, 2023 and was not recorded again until September 18, 2023, totaling 1 missed daily measurement; and
 - On October 4, 2023 and was not recorded again until October 9, 2023, totaling 2 missed daily measurements.

Based on the data, NHDES concludes the Permittee failed to record 6 required measurements of head on the liner.

#3: Secondary Liner – Leachate Data Collection and Reporting

Env-Sw 806.08(d)(3)(a) requires the flow in the secondary leachate collection system(s) to be measured and recorded at least once per week.

The Q4-2023 Facility Report did not include secondary flow rates for Pump Station #3 from October 31, 2023 through December 22, 2023, equating to 6 weeks without secondary flow rate measurements.

Env-Sw 806.08(d)(4) requires the average flow in the secondary leachate collection system(s) occurring during the 30-day period preceding the last measurement to be calculated, recorded, and reported to NHDES in accordance with reporting thresholds identified in Env-Sw 806.08(k). Env-Sw 806.08(k)(1) requires average secondary leachate collection system flow rates less than or equal to 25 gallons per tributary acre per day to be reported to NHDES in the quarterly reports provided pursuant to 806.08(g).

The Q3-2023 and Q4-2023 Facility Reports and the Q1-2024 Facility Report did not include the 30-day averages for secondary leachate flow rates for any of the Facility’s secondary leachate collection system pumps, as required by Env-Sw 806.08(d)(4). As a result, average secondary leachate collection system flow rates less than or equal to 25 gallons per tributary acre per day (G/A/D) were not provided in the quarterly reports, as required by Env-Sw 806.08(k)(1).

Env-Sw 806.08(k)(2) requires the average secondary leachate collection system flow rates occurring over a 30-day period which exceed 25 G/A/D to be reported to NHDES within one week of identifying the rate. Additionally, Env-Sw 806.08(k)(3) requires the permittee to file an investigation report with NHDES for average secondary leachate collection system flow rates occurring over a 30-day period which exceed 100 G/A/D. For both requirements, no notification or report is required for flows above these thresholds which NHDES agrees is the result of the dewatering of the drainage layer following construction.

Though NCES did not provide the 30-day average for secondary leachate flows at any of the Facility’s pump stations in the Q3-2023, Q4-2023, and Q1-2024 Facility Reports, NHDES reviewed the flow rate data in the reports and the Facility’s leachate management system records from April 1, 2024 through June 12, 2024, as provided by NCES on June 4 and June 12, 2024, and identified 30-day average secondary leachate collection system flow rates that exceeded 25 G/A/D at Pump Stations #1, #2, #3 and #4. More specifically, 30-day average flow rates in the secondary leachate collection system exceeded 25 G/A/D between July 30, 2023 and June 12, 2024, as detailed in Table 4 below.

Pump Station	Date / Date Range	30-day Average Secondary Leachate Flow Rate(s)⁽¹⁾ (G/A/D)	# of Instances
1	1/24/2024 – 1/26/2024	25.4 - 27	3
	1/29/2024 – 2/22/2024	25.1 - 28	25
	3/26/2024 – 3/29/2024	26 - 28	4
	3/31/2024	26	1
	4/9/2024 – 6/12/2024 ⁽²⁾	26 - 43	69
2	8/31/2023 – 9/30/2023	25.3 - 30	41

Table 4 – Instances of 30-day Average Secondary Leachate Flow Rates > 25 G/A/D (continued)			
Pump Station	Date / Date Range	30-day Average Secondary Leachate Flow Rate(s)⁽¹⁾ (G/A/D)	# of Instances
2	10/1/2023 – 12/31/2023	25.3 - 141	92
	1/1/2024 – 3/31/2024	86 - 234	91
	4/1/2024 – 6/4/2024	109 - 362	65
3 ⁽³⁾	12/26/2023 – 12/31/2023	30 - 50	6
	1/1/2024 – 2/15/2024	28 - 54	46
	3/12/2024 – 3/31/2024	26 - 54	20
	4/1/2024 – 5/27/2024 ⁽⁴⁾	26 - 80	57
4	4/14/2024 – 5/14/2024	28 - 45	30
TOTAL			550
(1) As calculated by NHDES SWMB using data from the Facility's Q3-2023 and Q4-2023 Facility Reports, Q1-2024 Facility Report, and leachate management system records from April 1, 2024 through June 4, 2024, provided to NHDES on June 7, 2024. (2) Data for June 1 through June 12, 2024 is from data provided to NHDES on June 4 and June 12, 2024 by NCES. (3) Measurements were not reported from October 11 through December 21, 2023. (4) Flow rates are based on data submitted by NCES on June 7, 2024. Data provided to NHDES on June 4 and June 12, 2024 indicate that secondary flow rates in Pump Station No. 3 exceeded 25 G/A/D from March 28 through June 11, 2024.			

Additionally, NHDES identified 30-day average secondary leachate collection system flow rates that exceeded 100 G/A/D at Pump Station #2 between July 30, 2023 and June 12, 2024, as detailed in Table 5.

Table 5 – Instances of 30-day Average Secondary Leachate Flow Rates > 100 G/A/D			
Pump Station	Date / Date Range	30-day Average Secondary Leachate Flow Rate(s)⁽¹⁾ (G/A/D)	# of Instances
2	11/14/2023 – 11/20/2023	102 - 110	7
	12/20/2023 – 12/31/2023	116 - 141	12
	1/4/2024 – 3/31/2024	113 - 234	88
	4/1/2024 – 6/12/2024 ⁽²⁾	109 - 362	69
TOTAL			176
(1) As calculated by NHDES SWMB using data from the Facility's Q3-2023 and Q4-2023 Facility Reports, Q1-2024 Facility Report, and leachate management system records from April 1, 2024 through June 4, 2024, provided to NHDES on June 4, 2024. (2) Flow rates for June 1 through June 12, 2024 are from data provided to NHDES on June 4 and June 12, 2024 by NCES.			

As of the date of this letter, NHDES has not received the notifications required by Env-Sw 806.08(k)(2), nor the investigation report required by Env-Sw 806.08(k)(3), for the 726 exceedances detailed above. NHDES acknowledges that NCES provided written notifications of secondary leachate collection system flow rates which exceeded 25 G/A/D on a weekly average basis, as discussed further in #5 below.

#4: Failure to Control the Production of Leachate to the Greatest Extent Practicable

Env-Sw 1005.01(d)(7) requires the Permittee to operate and maintain the Facility in a manner that controls the production of leachate to the greatest extent practicable.

Based on a review of the Q3-2023 and Q4-2023 Facility Reports and the Q1-2024 Facility Report, leachate removed by pump from the liner systems totaled:

- *4,940,850 gallons in Q3-2023;*
- *4,083,367 gallons in Q4-2023; and*
- *5,184,026 gallons in Q1-2024.*

Prior to Q3-2023, between the third quarter in 2021 and the second quarter in 2023, leachate removal rates have ranged between 1,978,348 gallons and 2,829,879 gallons. Paired with the preceding information regarding head exceedances on the liner system and 30-day average secondary flow rates, the Permittee has not controlled to the greatest extent practical the generation of leachate as required by Env-Sw 1005.01(d)(7).

#5: Incident Reporting

Env-Sw 1005.09(a) requires the permittee to report all incidents at the facility which involve an imminent and substantial risk to human health, safety, or the environment, or which constitute a violation of the solid waste rules or the facility permit. In accordance with Env-Sw 1005.09(b), the permittee is required to verbally notify NHDES of an incident as soon as practicable, and Env-Sw 1005.09(c) requires the permittee to submit a written report of the incident to NHDES within 5 working days of becoming aware of the incident.

On 450 occasions, as detailed in Violation #1 above, the Facility experienced hydraulic head elevations on the primary liner that were greater than 12 inches at Pump Stations #1 through #3. The hydraulic head elevations are in violation of Section 5.7 of the Operating Plan, and thus the Facility's permit and the Solid Waste Rules. NCES did not provide the required verbal or written notification of the incidents.

Additionally, the Facility experienced 30-day average secondary leachate collection system flow rates that exceeded 25 G/A/D as described above, on 550 instances, that required notification to NHDES in accordance with Env-Sw 806.08(k)(2). NHDES acknowledges that NCES provided written notification of secondary leachate collection system flow rates which exceeded 25 G/A/D on November 6, November 29, and December 19, 2023, as well as June 12, 2024. However, the average flow rates reported in these notifications were weekly (i.e., 7 day) averages, rather than the 30-day averages required by Env-Sw 806.08(d)(4). Therefore, NCES failed to properly notify NHDES of the 550 instances in which 30-day average secondary leachate collection system flow rates exceeded 25 G/A/D at the Facility, as required by Env-Sw 806.08(k)(2).

NHDES believes that the deficiencies may be corrected by taking the following actions:

1. **No later than June 21, 2024**, in accordance with Env-Sw 1005.09(c), submit a written incident report for each of the following violations:
 - a. One incident report for hydraulic head elevations on the primary liner greater than 12 inches for the period beginning July 1, 2023 through June 12, 2024 (Violation #1).
 - b. One incident report for average secondary leachate collection system flow rates occurring during the 30-day operating period preceding the last measurement which exceeded 25 G/A/D for the period beginning July 1, 2023 through June 1, 2024. (Violation #3).
2. **Beginning July 1, 2024 and continuing until the 30-day average secondary leachate collection system flow rates are below 25 G/A/D for all pump stations at the Facility**, provide updates to NHDES once every two weeks on the flow and 30-day average flows in the secondary leachate collection system at the Facility, as well as any changes or updates to Facility operations implemented to reduce secondary leachate flow rates.
3. **No later than July 15, 2024**, submit an analysis of the cause(s) of the excessive leachate head buildup on the primary liner system, which includes:
 - a. The amount of leachate generated per day from the primary leachate collection system, and the capabilities of the facility to manage, store, and dispose of such leachate;
 - b. Proposed operational and maintenance changes, as well as schedule adjustments, to ensure that the quantity of leachate generated at the Facility is limited by properly planning the sequenced development of the facility, properly managing stormwater infiltration and inflow, and minimizing the active area of the landfill in accordance with Env-Sw 806.05(b)(2).
4. **No later than July 15, 2024**, perform the investigation required by Env-Sw 806.09(e) for secondary leachate collection system flow rates exceeding 100 G/A/D and submit the proposed response action plan required by Env-Sw 806.09(f).
5. **No later than July 15, 2024**, identify, implement, and submit a report on improvements in stormwater diversion and other measures taken to control to the greatest extent practical the generation of leachate.

The information requested in this letter should be sent to NHDES and/or addressed as follows:

Tyler J. Davidson, Enforcement Program Coordinator
New Hampshire Department of Environmental Services
Solid Waste Management Bureau
PO Box 95
Concord, NH 03302-0095
swmbenforcement@des.nh.gov

A variety of resources are available to assist in complying with the Solid Waste Rules. An incident reporting form is available on the NHDES [website](#). If any of the actions above require a permit

North Country Environmental Services, Inc.
North Country Environmental Services, Inc. Landfill, 581 Trudeau Road, Bethlehem, NH
Permit No. DES-SW-SP-03-002
Letter of Deficiency No. SWMB 24-006
Page 10 of 10

modification, forms are available on the NHDES [website](#). For further questions regarding engineering or permitting, contact Mary Daun, P.E., by phone at (603) 271-8573, or by email at mary.f.daun@des.nh.gov.

A copy of the New Hampshire Solid Waste Rules, [Env-Sw 100 et seq.](#) is available on the NHDES website or by contacting the Public Information Center at (603) 271-2975. Statutes are available via the [State of NH](#) website.

Failure to comply with this letter may result in a formal administrative action in accordance with the department's Compliance Assurance Response Policy. Potential enforcement actions include issuance of an administrative order or referral to the New Hampshire Department of Justice (NHDOJ) for enforcement. If you have any questions concerning this matter, please contact Tyler Davidson by phone at (603) 271-0674 or by email at tyler.j.davidson@des.nh.gov.

Sincerely,



Leah McKenna, Administrator
Solid Waste Management Bureau

ec: NHDES Legal Unit
Tyler Davidson, Solid Waste Management Bureau, NHDES
Jaime Colby, P.E., Solid Waste Management Bureau, NHDES
Mary Daun, P.E., Solid Waste Management Bureau, NHDES



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: Env-Sw 1005.09(c)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
Date: 6/2/24-6/8/24	6/12/2024	Bruce Grover
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574


Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Bruce Grover	Operations Manager	Casella
b.	Joe Gay	Engineer	Casella
c.	Kevin Roy	General Manager	Casella
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This matter involves the stage IV phase I (pump station # 2) and stage IV phase II (pump station # 1) secondary detection flows.</p> <p>Pump station # 1 secondary for the reporting period of June 2nd thru June 8th is reported as 64 gallons per acre per day.</p> <p>Pump station # 2 secondary for the reporting period of June 2nd thru June 8th is reported as 27 gallons per acre per day.</p> <p>As there was no release to the environment, no clean up is required.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No releases caused by this incident.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There was no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
<p>NCES believes that the cause of the elevated flows in pump station #2 is related to the recent construction and dewatering of stage VI phase II, and the connection to pump station #2.</p> <p>NCES is investigating the cause of the elevated flow in pump station#1 and we have scheduled to clean the secondary system the week of June 17th.</p>	
14. If measures not completed by time of report submission, expected date of completion:	In process and to be determined

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Bruce Grover	Operations Manager, Casella	
Phone Number:	Email Address:	
603-728-8391	Bruce.Grover@Casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager, Casella	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Subject: FW: Incident Report June 9-June 15
Date: Tuesday, June 18, 2024 3:13:10 PM
Attachments: [june 9-june 15 incident report.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good afternoon Austin, fyi, ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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From: Bruce Grover <bruce.grover@casella.com>
Sent: Tuesday, June 18, 2024 3:00 PM
To: DES: SolidWasteInfo <solidwasteinfo@des.nh.gov>; Colby, Jaime <Jaime.Colby@des.nh.gov>;
Daun, Mary <Mary.F.Daun@des.nh.gov>
Subject: Incident Report June 9-June 15



EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Please find the attached incident report regarding secondary flows from June 9 thru June 15. Thank you

Bruce Grover

OPERATIONS MANAGER

North Country Environmental Services

Bethlehem Landfill

581 Trudeau Road, Bethlehem N.H. 03574

C. 603.728.8391 | P. 603.869.3366 |

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: Env-Sw 1005.09(c)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
6/9/24-6/15/24		Bruce Grover
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574


Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Bruce Grover	Operations Manager	Casella
b.	Joe Gay	Engineer	Casella
c.	Kevin Roy	General Manager	Casella
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This matter involves stage IV phase I (pump station #2)</p> <p>Pump station #2 secondary for the reporting period of June 9th thru June 15th is reported as 51 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No releases caused by this incident.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There was no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
<p>NCES believes that the cause of the elevated flows in pump station #2 is related to construction of stage VI phase II and the connections to pump station#2.</p> <p>NCES is scheduled to have primary and secondary piping at the site cleaned the week of June 17. When pump station #2 secondary is cleaned we will be introducing clean water for the cleaning. Once cleaning is complete we anticipate increased generation in the secondary system based on this additional water in the system and our reporting will reflect that temporary increase.</p>	
14. If measures not completed by time of report submission, expected date of completion:	In process and to be determined

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Bruce Grover	Operations Manager, Casella	
Phone Number:	Email Address:	
603-728-8391	Bruce.Grover@Casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager, Casella	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Subject: FW: Incident report June 18th
Date: Tuesday, June 18, 2024 3:14:00 PM
Attachments: [June 18th.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Austin, fyi, ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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From: Bruce Grover <bruce.grover@casella.com>
Sent: Tuesday, June 18, 2024 3:03 PM
To: DES: SolidWasteInfo <solidwasteinfo@des.nh.gov>; Colby, Jaime <Jaime.Colby@des.nh.gov>;
Daun, Mary <Mary.F.Daun@des.nh.gov>
Subject: Incident report June 18th



EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Please find attached report regarding levels exceeding 12 inches on primary liner system.

Thank you

Bruce Grover

OPERATIONS MANAGER

North Country Environmental Services

Bethlehem Landfill

581 Trudeau Road, Bethlehem N.H. 03574

C. 603.728.8391 | P. 603.869.3366|

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
June 18, 2024	June 18 th , 2024	Bruce Grover
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574


Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This is regarding 12 inches or more hydraulic head on the primary liner system on June 18th, from 9:20am till roughly 9:40am.</p> <p>During the annual cleaning of the sumps and cleanouts in the pump stations the third party doing the cleaning damaged the transducer on June 17th. When the transducer was replaced the level showed 50 inches in the primary sump, and was pumped down to a normal level within 30 minutes.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There was no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
NCES and gates electric has met with the cleaning crew on site and explained how to remove a transducer properly while doing the cleaning, as to reduce potential damage, and replacement of the transducer.	
14. If measures not completed by time of report submission, expected date of completion:	Incident has been resolved

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Bruce Grover	Operations Manager/Casella	
Phone Number:	Email Address:	
603-728-8391	Bruce.Grover@Casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager/Casella	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

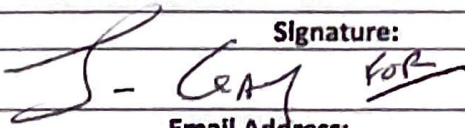
Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
6/23/2024-7/1/2024	7/2/24	John Gay
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

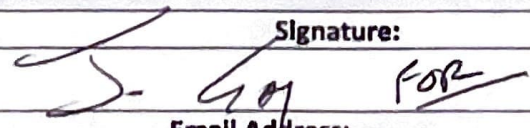
Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	John Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.			
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>Pump Station #1 secondary for the reporting period of June 23rd is reported an average of 26 gallons per acre per day on one day, June 25, 2024 during the reporting period.</p> <p>Pump Station #2 secondary for the reporting period of June 23rd thru July 1st is reporting a range of 49.1 - 56.0 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the Incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the Incident:	
There was no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the Incident or situation:	
<p>Pump Station #1 - NCES completed routine cleaning of secondary piping at the site on June 20th. During the cleaning, the third party contractor utilizes water as part of the cleaning process therefore, we believe the increase in flow is attributed to this process. Samples have been collected from the Primary and Secondary systems for qualitative evaluation and the laboratory results are due soon.</p> <p>Pump Station #2 - NCES completed routine cleaning of secondary piping at the site on June 20th. During the cleaning, the third party contractor utilizes water as part of the cleaning process therefore, we believe the increase in flow is in part attributed to this process as well as continued dewatering from Stage VI construction. Samples will be collected from the Primary an Secondary systems for qualitative assesment the week of July 8. NCES will also perform a field test on the accuracy of the flow meter.</p>	
14. If measures not completed by time of report submission, expected date of completion:	In process

Section IV – Signatures

15a. Person Preparing Report:			
Name:	Title / Affiliation:	Signature:	
Kevin Roy	General Manager		
Phone Number:		Email Address:	
603-361-6477		kevin.roy@casella.com	

15b. Permittee:			
Name:	Title / Affiliation:	Signature:	
Kevin Roy	General Manager		
Phone Number:		Email Address:	
603-361-6477		kevin.roy@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

Colby, Jaime

From: Kimberly Crosby <Kimberly.Crosby@casella.com>
Sent: Tuesday, July 16, 2024 5:20 PM
To: Colby, Jaime; Daun, Mary
Cc: Kevin Roy; Bruce Grover
Subject: NCES Incident Report
Attachments: NCES Incident Report 7-12-24.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good Evening Jamie & Mary –

Attached is an incident report for Friday, July 12th. Kevin is unavailable to sign so I filled in “on file” for his signature. Please let me know if that is an issue and I will have someone else sign, just wanted to make sure I got it over to you within the required timeframe. If you have any additional questions, please feel free to reach out.

Have a great evening!

Kim Crosby, CES
Director of Environmental Compliance

Permits, Compliance & Engineering
408 East Montpelier Road, Montpelier, VT 05602
c. 802-585-5442
e. kimberly.crosby@casella.com • w. casella.com

CASELLA
RECYCLING • SOLUTIONS • ORGANICS • COLLECTION • ENERGY • LANDFILLS

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
7/12/2024	7/13/24	Kim Crosby
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Kim Crosby	Director of Compliance	Casella
d.	Bruce Grover	Operations Manager	NCES
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
On July 12 th Gates Electric conducted testing of flow meters at the site and left the primary pump in pumphouse 2 off, causing the level to reach 54 inches. Once the pump was turnde back on, the level returned to compliance.

11. Measures employed to contain releases caused by the incident or situation:	
No releases to the environment occurred.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
No potential hazards to the environment, safety and human health occurred as a result of the incidents.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
NCES has reemphasized with Gates Electric the importance of turning pumps back on after testing is completed.	
14. If measures not completed by time of report submission, expected date of completion:	7/12/2024

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Compliance	<i>Kim Crosby</i>
Phone Number:	Email Address:	
802-585-5442	kimberly.crosby@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager/Casella	On File
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Cc: [Jones, Emily](#); [Colby, Jaime](#)
Subject: FW: NCES Incident Report 7/8/24-7/21/24
Date: Friday, July 26, 2024 2:00:11 PM
Attachments: [NCES June 26 24 SR.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Fyi, ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



Think Green!

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From: Joe Gay <John.Gay@casella.com>
Sent: Friday, July 26, 2024 1:47 PM
To: DES: SolidWasteInfo <SolidWasteInfo@des.nh.gov>; Colby, Jaime <Jaime.M.Colby@des.nh.gov>;
Daun, Mary <Mary.F.Daun@des.nh.gov>
Cc: Kevin Roy <Kevin.Roy@casella.com>; Bruce Grover <bruce.grover@casella.com>; Lindsey
Menard <lindsey.menard@casella.com>

Subject: NCES Incident Report 7/8/24-7/21/24

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

John Gay

Engineer

Permits, Compliance & Engineering

1855 Vermont Route 100, Hyde Park, VT 05655

p. 802-651-5454 • c. 802-236-5973

e. john.gay@casella.com • w. casella.com

CASELLA

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: Env-Sw 1005.09(c)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
7/8/2024-7/21/2024	7/25/24	John Gay
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

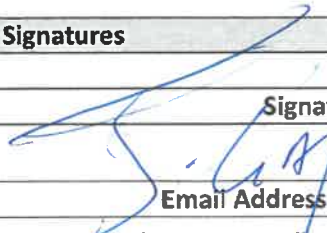
Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	John Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.			
e.			
f.			

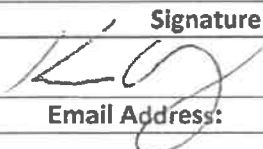
Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>Pump Station #2 secondary for the reporting period of July 8th through July 21st is reporting a range of 46.6 - 51.04 gallons per acre per day.</p>

NHDES-S-05-004

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There was no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
Investigation of this matter and the measures necessary to reduce, eliminate and prevent a recurrence is ongoing.	
14. If measures not completed by time of report submission, expected date of completion:	In process

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
John Gay	Engineer	
Phone Number:	Email Address:	
802-236-5973	john.gay@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:	Email Address:	
603-361-6477	kevin.roy@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

Colby, Jaime

From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Monday, July 29, 2024 4:03 PM
To: DES: SolidWasteInfo; Colby, Jaime; Daun, Mary
Cc: Joe Gay; Kevin Roy; Bruce Grover
Subject: NCES Incident Report 7/29/24
Attachments: NCES Incident Report 7.29.24.pdf

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Lindsey Menard

Environmental Engineer
Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655
p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: Env-Sw 1005.09(c)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
7/22/24 - 7/28/24	7/29/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574


Section II – Parties Involved In Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	John Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>Pump Station #2 secondary for the reporting period of July 22nd through July 28th is reporting a range of 50.7 - 53.2 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There were no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
Investigation of this matter and the measures necessary to reduce, eliminate and prevent a recurrence is ongoing.	
14. If measures not completed by time of report submission, expected date of completion:	In process

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
John Gay	Engineer	
Phone Number:		Email Address:
802-236-5973		john.gay@casella.com

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:		Email Address:
603-361-6477		kevin.roy@casella.com

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

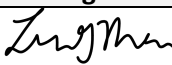
Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

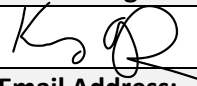
Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
7/29/24 - 8/4/24	8/5/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	John Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>Pump Station #2 secondary for the reporting period of July 29th through August 4th is reporting a range of 54.5 - 57.2 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
There were no hazards to the environment, human health and safety related to this matter.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
Investigation of this matter and the measures necessary to reduce, eliminate and prevent a recurrence is ongoing.	
14. If measures not completed by time of report submission, expected date of completion:	In process

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:	Email Address:	
603-361-6477	kevin.roy@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

NHDES-S-05-004



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
8/5/2024-8/11/2024	8/12/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Compliance	Casella
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>This matter involves Pump Station #2 secondary detection flows.</p> <p>The 30-day rolling average flows for the reporting period of August 5th to August 11th for Pump Station #2 secondary ranged from 49.1 to 56.0 gallons per acre per day.</p>

NHDES-S-05-004

<p>11. Measures employed to contain releases caused by the incident or situation:</p> <p>No release was caused by this incident</p>
<p>12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:</p> <p>Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that while liquid levels on the secondary are exceeding an action level, the magnitude of the increase is low and within the hydraulic capacity of the systems. Additionally, the primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.</p>
<p>13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:</p> <p>The permittee's investigation of this matter is ongoing, and we will implement additional measures to reduce, eliminate and prevent a recurrence of the incident or situation based on the results of the investigation when complete. The following are measures that we have taken or intend to take to eliminate and prevent a recurrence of the incident or situation, and to minimize stormwater flow into the waste mass and control generation of leachate:</p> <ul style="list-style-type: none"> • Reviewed as built and design plans; cleaned and conducted camera assessment of piping and lines. • Reviewed and assessed historical and current flow data; sampled primary and secondary flows. • Conducted field audit of secondary detection flowmeter of Pump Station 2. • Commissioned a third-party consultant investigation by CMA Engineers concerning Pump Station 2 secondary exceedance (submitted with the response to the LOD on July 15th). • Commissioned a third-party consultant leachate management evaluation by Sanborn Head & Associates (SHA) (submitted with the response to the LOD on July 15th) • Placed additional soils in select areas within approximately 13 acres on the north slope and top deck areas of the landfill to reduce the potential for ponding, along with constructing stormwater diversion berms and letdown structures. • Seeded nearly 8 acres of the landfill following installation of intermediate cover and stormwater controls, to establish vegetation in those areas. • Completed installation of the initial fluff layer in Stage VI Phase II, which will provide a sufficient waste lift (and cover) over the leachate collection system to minimize direct infiltration of stormwater into the landfill. • Installed nearly 140,000 square feet of synthetic stormwater diversion membrane over the exposed cell during the initial filling sequence to divert stormwater away from the leachate collection system. • Constructing 5.9 acres of final cap on the north slope. This work began in April 2024 and will be substantially completed by the Fall of 2024, weather permitting. This capping event along with larger capping events scheduled for 2026 and 2027 will provide further reduction in leachate generation rates. • Performed maintenance on the primary and secondary sumps which includes pulling the pumps and transducers for cleaning, service, and calibration. • Checked the placement and location of the transducers for greater accuracy in reporting leachate levels on the liner. • Secured additional leachate disposal outlets and transporters to provide redundancy and ensure

NHDES-S-05-004

capacity to effectively manage leachate generation rates as well as on-site leachate volumes. These additional disposal outlets and transporters give the landfill the flexibility needed to manage leachate demands and provide the on-site storage capacity to maintain leachate compliance levels.

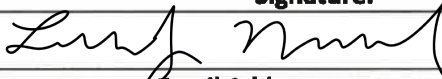
- Amended facility operating plan to provide greater flexibility for leachate hauling activities. Application for approval is pending with NHDES.
- SHA conducted a refresher training for NCEs personnel on the leachate collection & management system on July 24th.
- Established a centralized leachate sump and storage tank tracking system to provide greater visibility for routine review of leachate levels and flow rates in the primary leachate collection system, secondary detection system, and the storage tanks.

14. If measures not completed by time of report submission, expected date of completion:


In process

Section IV – Signatures

15a. Person Preparing Report:

Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:

Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

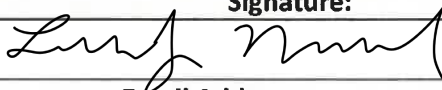
Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
August 10, 2024	August 12, 2024	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

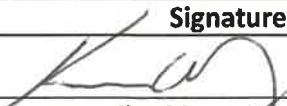
Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Compliance	Casella
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>This incident involves 12 inches or more hydraulic head on the primary liner system of Pump Station 2 on August 10th, from 6:35 a.m. until roughly 8:00 a.m.</p> <p>Heavy rainfall on August 9th and 10th lead to a power outage from approximately 7:00p.m. on August 9th until 7:00 a.m. on August 10th during which time period pumps were not able to function. Head levels were pumped down to below the reporting threshold after power was restored and have been in compliance since approximately 8:00a.m. on August 10th.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release was caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. As described below, the reported incident describes a brief period in which pumping systems were not operational, resulting in a short-duration build-up of head. Leachate continued to be managed within the primary collection system, ensuring that there was no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
NCES promptly pumped sump levels to compliance when power supply to the facility resumed. Had the outage persisted, the company would have commissioned an alternative power source for the pumps.	
14. If measures not completed by time of report submission, expected date of completion:	Incident has been resolved

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:	Email Address:	
603-361-6477	kevin.roy@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

Davidson, Tyler

From: Mills, Austin
Sent: Tuesday, August 20, 2024 3:58 PM
To: Davidson, Tyler
Subject: FW: NCES Incident Report 8/19/24
Attachments: 8 19 24 Secondary Report.pdf

Austin Mills

Solid Waste Management Bureau
NH Dept. of Environmental Services
29 Hazen Drive / P.O. Box 95
Concord, NH 03302-0095
Phone: (603) 271-2927

From: DES: SolidWasteInfo <SolidWasteInfo@des.nh.gov>
Sent: Tuesday, August 20, 2024 7:37 AM
To: Mills, Austin <Austin.S.Mills@des.nh.gov>
Subject: FW: NCES Incident Report 8/19/24

Good morning Austin, from SWInfo. ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456
***E-mail:** nelson.e.ordway@des.nh.gov



Think Green!

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From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Monday, August 19, 2024 5:46 PM
To: DES: SolidWasteInfo <solidwasteinfo@des.nh.gov>
Cc: Joe Gay <John.Gay@casella.com>; Kevin Roy <Kevin.Roy@casella.com>; Kimberly Crosby <Kimberly.Crosby@casella.com>
Subject: NCES Incident Report 8/19/24

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Lindsey Menard
Environmental Engineer
Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655
p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
8/12/2024-8/18/2024	8/19/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Compliance	Casella
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This matter involves Pump Station #2 secondary detection flows.</p> <p>The 30-day rolling average flows for the reporting period of August 12th to August 18th for Pump Station #2 secondary ranged from 45.6 to 49.1 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the incident or situation:

No release caused by this incident

12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:

Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that while liquid levels on the secondary are exceeding an action level, the magnitude of the increase is low and within the hydraulic capacity of the systems. Additionally, the primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.

13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:

The permittee's investigation of this matter is ongoing, and we will implement additional measures to reduce, eliminate and prevent a recurrence of the incident or situation based on the results of the investigation when complete. The following are measures that we have taken or intend to take to eliminate and prevent a recurrence of the incident or situation, and to minimize stormwater flow into the waste mass and control generation of leachate:

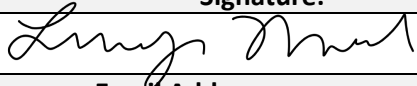
- Reviewed as built and design plans; cleaned and conducted camera assessment of piping and lines.
- Reviewed and assessed historical and current flow data; sampled primary and secondary flows.
- Field audit of secondary detection flowmeter of Pump Station 2.
- Commissioned a third-party consultant investigation by CMA Engineers concerning Pump Station 2 secondary exceedance (submitted with the response to the LOD on July 15th).
- Commissioned a third-party consultant leachate management evaluation by Sanborn Head & Associates (submitted with the response to the LOD on July 15th)
- Placed additional soils in select areas within approximately 13 acres on the north slope and top deck areas of the landfill to reduce the potential for ponding, along with constructing stormwater diversion berms and letdown structures.
- Seeded nearly 8 acres of the landfill following installation of intermediate cover and stormwater controls, to establish vegetation in those areas.
- Completed installation of the initial fluff layer in Stage VI Phase II, which will provide a sufficient waste lift (and cover) over the leachate collection system to minimize direct infiltration of stormwater into the landfill.
- Installed nearly 140,000 square feet of synthetic stormwater diversion membrane over the exposed cell during the initial filling sequence to divert stormwater away from the leachate collection system.
- Constructing 5.9 acres of final cap on the north slope. This work began in April 2024 and will be substantially completed by the Fall of 2024, weather permitting. This capping event along with larger capping events scheduled for 2026 and 2027 will provide further reduction in leachate generation rates.
- Performed maintenance on the primary and secondary sumps which includes pulling the pumps and transducers for cleaning, service, and calibration.
- Checked the placement and location of the transducers for greater accuracy in reporting leachate levels on the liner.
- Secured additional leachate disposal outlets and transporters to provide redundancy so that the

landfill has the capacity to effectively manage leachate generation rates as well as on-site leachate volumes. These additional disposal outlets and transporters give the landfill the flexibility needed to manage leachate demands and provide the on-site storage capacity to maintain leachate compliance levels.

- Amended facility operating plan to provide greater flexibility for leachate hauling activities. Application for approval is pending with NHDES.
- SHA conducted a refresher training on the leachate collection & management system on July 24th.
- Established a centralized leachate sump and storage tank tracking system to provide greater visibility for routine review of leachate levels and flow rates in the primary leachate collection system, secondary detection system, and the storage tanks.

14. If measures not completed by time of report submission, expected date of completion:	In process
-------------------------------------------------------------------------------------------------	------------

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	ON FILE
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
8/19/2024-8/25/2024	8/26/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Compliance	Casella
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This matter involves Pump Station #2 secondary detection flows.</p> <p>The 30-day rolling average flows for the reporting period of August 12th to August 18th for Pump Station #2 secondary ranged from 40.2 to 45.6 gallons per acre per day.</p>

11. Measures employed to contain releases caused by the incident or situation:

No release caused by this incident

12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:

Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that while liquid levels on the secondary are exceeding an action level, the magnitude of the increase is low and within the hydraulic capacity of the systems. Additionally, the primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.

13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:

The permittee's investigation of this matter is ongoing, and we will implement additional measures to reduce, eliminate and prevent a recurrence of the incident or situation based on the results of the investigation when complete. The following are measures that we have taken or intend to take to eliminate and prevent a recurrence of the incident or situation, and to minimize stormwater flow into the waste mass and control generation of leachate:

- Reviewed as built and design plans; cleaned and conducted camera assessment of piping and lines.
- Reviewed and assessed historical and current flow data; sampled primary and secondary flows.
- Field audit of secondary detection flowmeter of Pump Station 2.
- Commissioned a third-party consultant investigation by CMA Engineers concerning Pump Station 2 secondary exceedance (submitted with the response to the LOD on July 15th).
- Commissioned a third-party consultant leachate management evaluation by Sanborn Head & Associates (submitted with the response to the LOD on July 15th)
- Placed additional soils in select areas within approximately 13 acres on the north slope and top deck areas of the landfill to reduce the potential for ponding, along with constructing stormwater diversion berms and letdown structures.
- Seeded nearly 8 acres of the landfill following installation of intermediate cover and stormwater controls, to establish vegetation in those areas.
- Completed installation of the initial fluff layer in Stage VI Phase II, which will provide a sufficient waste lift (and cover) over the leachate collection system to minimize direct infiltration of stormwater into the landfill.
- Installed nearly 140,000 square feet of synthetic stormwater diversion membrane over the exposed cell during the initial filling sequence to divert stormwater away from the leachate collection system.
- Constructing 5.9 acres of final cap on the north slope. This work began in April 2024 and will be substantially completed by the Fall of 2024, weather permitting. This capping event along with larger capping events scheduled for 2026 and 2027 will provide further reduction in leachate generation rates.
- Performed maintenance on the primary and secondary sumps which includes pulling the pumps and transducers for cleaning, service, and calibration.
- Checked the placement and location of the transducers for greater accuracy in reporting leachate levels on the liner.
- Secured additional leachate disposal outlets and transporters to provide redundancy so that the

NHDES-S-05-004

landfill has the capacity to effectively manage leachate generation rates as well as on-site leachate volumes. These additional disposal outlets and transporters give the landfill the flexibility needed to manage leachate demands and provide the on-site storage capacity to maintain leachate compliance levels.

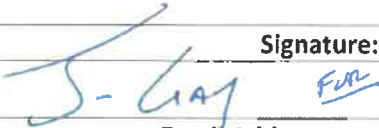
- Amended facility operating plan to provide greater flexibility for leachate hauling activities. Application for approval is pending with NHDES.
- SHA conducted a refresher training on the leachate collection & management system on July 24th.
- Established a centralized leachate sump and storage tank tracking system to provide greater visibility for routine review of leachate levels and flow rates in the primary leachate collection system, secondary detection system, and the storage tanks.

14. If measures not completed by time of report submission, expected date of completion:

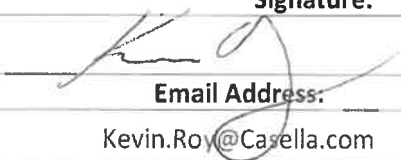
In process

Section IV – Signatures

15a. Person Preparing Report:

Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:

Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
8/26/2024-9/1/2024	9/3/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Compliance	Casella
e.			
f.			

Section III – Details														
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:														
<p>This matter involves Pump Station #2 secondary detection flows.</p> <p>The 30-day rolling average flows for the reporting period of August 26th to September 1st for Pump Station #2 secondary ranged from 28.3 to 39.1 gallons per acre per day:</p> <table style="width: 100%; border: none;"> <tr><td style="width: 15%;">8/26/2024</td><td>39.1 g/a/d</td></tr> <tr><td>8/27/2024</td><td>37.9 g/a/d</td></tr> <tr><td>8/28/2024</td><td>34.2 g/a/d</td></tr> <tr><td>8/29/2024</td><td>32.6 g/a/d</td></tr> <tr><td>8/30/2024</td><td>30.8 g/a/d</td></tr> <tr><td>8/31/2024</td><td>29.4 g/a/d</td></tr> <tr><td>9/1/2024</td><td>28.3 g/a/d</td></tr> </table>	8/26/2024	39.1 g/a/d	8/27/2024	37.9 g/a/d	8/28/2024	34.2 g/a/d	8/29/2024	32.6 g/a/d	8/30/2024	30.8 g/a/d	8/31/2024	29.4 g/a/d	9/1/2024	28.3 g/a/d
8/26/2024	39.1 g/a/d													
8/27/2024	37.9 g/a/d													
8/28/2024	34.2 g/a/d													
8/29/2024	32.6 g/a/d													
8/30/2024	30.8 g/a/d													
8/31/2024	29.4 g/a/d													
9/1/2024	28.3 g/a/d													

11. Measures employed to contain releases caused by the incident or situation:

No release caused by this incident

12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:

Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that while liquid levels on the secondary are exceeding an action level, the magnitude of the increase is low and within the hydraulic capacity of the systems. Additionally, the primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.

13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:

The permittee's investigation of this matter is ongoing, and we will implement additional measures to reduce, eliminate and prevent a recurrence of the incident or situation based on the results of the investigation when complete. The following are measures that we have taken or intend to take to eliminate and prevent a recurrence of the incident or situation, and to minimize stormwater flow into the waste mass and control generation of leachate:

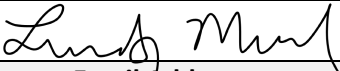
- Reviewed as built and design plans; cleaned and conducted camera assessment of piping and lines.
- Reviewed and assessed historical and current flow data; sampled primary and secondary flows.
- Field audit of secondary detection flowmeter of Pump Station 2.
- Commissioned a third-party consultant investigation by CMA Engineers concerning Pump Station 2 secondary exceedance (submitted with the response to the LOD on July 15th).
- Commissioned a third-party consultant leachate management evaluation by Sanborn Head & Associates (submitted with the response to the LOD on July 15th)
- Placed additional soils in select areas within approximately 13 acres on the north slope and top deck areas of the landfill to reduce the potential for ponding, along with constructing stormwater diversion berms and letdown structures.
- Seeded nearly 8 acres of the landfill following installation of intermediate cover and stormwater controls, to establish vegetation in those areas.
- Completed installation of the initial fluff layer in Stage VI Phase II, which will provide a sufficient waste lift (and cover) over the leachate collection system to minimize direct infiltration of stormwater into the landfill.
- Installed nearly 140,000 square feet of synthetic stormwater diversion membrane over the exposed cell during the initial filling sequence to divert stormwater away from the leachate collection system.
- Constructing 5.9 acres of final cap on the north slope. This work began in April 2024 and will be substantially completed by the Fall of 2024, weather permitting. This capping event along with larger capping events scheduled for 2026 and 2027 will provide further reduction in leachate generation rates.
- Performed maintenance on the primary and secondary sumps which includes pulling the pumps and transducers for cleaning, service, and calibration.
- Checked the placement and location of the transducers for greater accuracy in reporting leachate levels on the liner.
- Secured additional leachate disposal outlets and transporters to provide redundancy so that the

landfill has the capacity to effectively manage leachate generation rates as well as on-site leachate volumes. These additional disposal outlets and transporters give the landfill the flexibility needed to manage leachate demands and provide the on-site storage capacity to maintain leachate compliance levels.

- Amended facility operating plan to provide greater flexibility for leachate hauling activities. Application for approval is pending with NHDES.
- SHA conducted a refresher training on the leachate collection & management system on July 24th.
- Established a centralized leachate sump and storage tank tracking system to provide greater visibility for routine review of leachate levels and flow rates in the primary leachate collection system, secondary detection system, and the storage tanks.

14. If measures not completed by time of report submission, expected date of completion:	In process
-------------------------------------------------------------------------------------------------	------------

Section IV – Signatures

15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager	ON FILE
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

EXHIBIT D

Colby, Jaime

From: Kimberly Crosby <Kimberly.Crosby@casella.com>
Sent: Friday, September 6, 2024 3:51 PM
To: Colby, Jaime; Daun, Mary
Cc: McKenna, Leah
Subject: NCES Incident Reported
Attachments: 9 6 2024 NCES Incident Report.pdf

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good Afternoon –

Attached is the Incident Report for NCES. Please feel free to reach out if you should need additional information or have any questions.

Have a great weekend,

Kim Crosby, CES

Director of Environmental Compliance

Permits, Compliance & Engineering

408 East Montpelier Road, Montpelier, VT 05602

c. 802-585-5442

e. kimberly.crosby@casella.com • w. casella.com

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
09/09/2014-06/27/2024	9/6/2024	Kim Crosby
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.	Kim Crosby	Director of Compliance	NCES
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>While conducting an investigation into the cause of increased flows in the landfill liner secondary system discussed in the June 24, 2024 Letter of Deficiency No. SWMB 24-006, Casella's investigators determined that the overliner for Stage IV, Phase I, which has both a primary and a secondary leachate collection system, had been penetrated via the drilling of landfill gas well GW-202 on February 7, 2024. The overliner was required as part of a Stage IV permit issued to NCES in 2003 because the underlying Stage I double liner did not include a geotextile overlay for enhanced leachate travel time because geotextile was not required when the Stage I liner was placed. In 2013, NCES applied for and received a waiver for an overliner for an adjacent lift of waste over the Stage I liner. Casella's investigators learned that NCES's on-site manager and its overseeing company engineer mistakenly concluded that in light of the 2013 waiver the existing overliner could be treated as decommissioned. The investigators also learned that beginning in 2014 and continuing until early this year NCES's landfill gas management consultant oversaw the installation of eleven LFG management wells (enumerated with installation</p>

and decommissioning dates below) that penetrated both liners of the overliner system to extract LFG from the waste mass beneath the overliner. Casella's investigation also revealed that GW-202 has been pulling leachate from the waste mass underlying the overliner and discharging a significant portion of the leachate into the secondary collection system of the overliner. Because the sump for the overliner's secondary is plumbed to the Stage IV, Phase I, secondary, it is apparent that the placement and operation of GW-202 has been a substantial contributing factor to the increased leachate flows in the base liner system and particularly the Stage IV, Phase I, secondary. NCES will supplement this report and its response to the June 24, 2024, LOD, with a detailed explanation of how these gas wells have contributed to the increased leachate flows in the Stage IV, Phase I, secondary system.

Well Number	Installation Date	Decommissioning Date
GW-88	9/9/2014	12/2017
GW-102	4/24/2015	3/2019
GW-103	4/23/2015	12/2020
GW-105	4/30/2015	7/2024
GW-113	5/12/2016	10/2022
GW-134	8/18/2018	5/2023
GW-146	9/17/2020	ACTIVE
GW-148	9/15/2020	2/2024 NOTE: GW-202 drilled as a replacement
GW-172	4/27/2023	ACTIVE
GW-202	2/7/2024	ACTIVE
GW-206	6/27/2024	ACTIVE

Of the eleven wells identified, 146, 172, 202 and 206, remain active for gas collection in the area of the overliner.

11. Measures employed to contain releases caused by the incident or situation:	
<p>No release to the environment was caused by these incidents. As mentioned above, there is a double-liner system beneath the overliner that is intact and functioning as designed. All secondary detection liquids are captured and managed in the leachate collection system and transported off site for treatment.</p>	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
<p>Casella's investigation has concluded that while liquid levels on the base liner secondary are exceeding an action level, the magnitude of the increase is within the hydraulic capacity of the systems. Additionally, the Stage I primary and secondary leachate systems are functioning properly, and leachate is being managed in a manner that has prevented a release to the environment. Leachate passing through the penetrations in the overliner have no pathway to the environment and are instead captured by the Stage I liner.</p>	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
<p>To reduce the secondary leachate flows in the areas of the gas wells discussed, NCES proposes to seal off wells 202, 146 and 148 via the use of a cement and bentonite grout mix to an elevation above the area of penetration. Sealing and grouting will put a thin grout down the center tube running down the entire column of each well. The grout mixture will push out of the perforated piping and into the stone pack around the edge of the overliner, sealing off the penetration area.</p> <p>NCES will ensure that all personnel and third party contractors are notified of the existence and status of the overliner, i.e., that it is not out of service and must not be further damaged.</p>	
14. If measures not completed by time of report submission, expected date of completion:	October 2024

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Compliance	<i>Kim Crosby</i>
Phone Number:	Email Address:	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
North Country Environmental Services, Inc.	Director of Compliance	<i>Kim Crosby</i>
Phone Number:	Email Address:	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

Davidson, Tyler

From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Monday, September 9, 2024 3:59 PM
To: DES: SolidWasteInfo; Davidson, Tyler; Colby, Jaime; Daun, Mary
Cc: Kimberly Crosby; Joe Gay; Kevin Roy
Subject: NCES 9/9/24 Incident Report and Biweekly Report on Secondary Flows
Attachments: 9 9 24 Secondary Incident Report FNL.pdf; NCES LOD September 9 Secondary Flow Update FNL (2024 09 09)_.pdf

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Lindsey Menard

Environmental Engineer
Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655
p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
9/2/2024-9/7/2024	9/9/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574


Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.	Kim Crosby	Director of Environmental Compliance	Casella
e.			
f.			

Section III – Details										
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:										
<p>This incident or situation concerns secondary detection flows in excess of the compliance threshold. Reporting below concerns Pump Station #2. Reporting will be supplemented on or before October 1, 2024, to address the request of NHDES for additional information dated 08/30/2024. The 30-day rolling average flows for the reporting period of September 2nd to September 7th for Pump Station #2 secondary ranged from 24.9 to 26.8 gallons per acre per day with the action rate falling below 25 g/a/d on September 6th:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">9/2/2024</td> <td>26.8 g/a/d</td> </tr> <tr> <td>9/3/2024</td> <td>25.7 g/a/d</td> </tr> <tr> <td>9/4/2024</td> <td>25.4 g/a/d</td> </tr> <tr> <td>9/5/2024</td> <td>25.2 g/a/d</td> </tr> <tr> <td>9/6/2024</td> <td>24.9 g/a/d</td> </tr> </table>	9/2/2024	26.8 g/a/d	9/3/2024	25.7 g/a/d	9/4/2024	25.4 g/a/d	9/5/2024	25.2 g/a/d	9/6/2024	24.9 g/a/d
9/2/2024	26.8 g/a/d									
9/3/2024	25.7 g/a/d									
9/4/2024	25.4 g/a/d									
9/5/2024	25.2 g/a/d									
9/6/2024	24.9 g/a/d									

9/7/2024 25.3 g/a/d

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
<p>Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that while liquid levels on the secondary were exceeding an action level, the magnitude of the increase is low and within the hydraulic capacity of the systems. Additionally, the primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.</p>	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
<p>In addition to measures previously reported, the permittee has determined that repairs to the damaged overliner system in Stage IV will reduce, eliminate and prevent a recurrence of this incident or situation. Reference is made to the NCES Incident Report submitted on September 6, 2024.</p>	
14. If measures not completed by time of report submission, expected date of completion:	In process

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Environmental Compliance	
Phone Number:	Email Address:	
802-224-0105	kim.crosby@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Subject: FW: NCES Incident Report 9/13/24 Primary
Date: Friday, September 13, 2024 3:50:19 PM
Attachments: [Incident Report 9 13 24 Pump Station 2 Primary.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good afternoon Austin, fyi, ty neo (Have a great weekend). neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Friday, September 13, 2024 3:34 PM
To: DES: SolidWasteInfo <solidwasteinfo@des.nh.gov>; Daun, Mary <Mary.F.Daun@des.nh.gov>; Colby, Jaime <Jaime.M.Colby@des.nh.gov>
Cc: Kimberly Crosby <Kimberly.Crosby@casella.com>; Joe Gay <John.Gay@casella.com>; Kevin Roy <Kevin.Roy@casella.com>

Subject: NCES Incident Report 9/13/24 Primary

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Lindsey Menard

Environmental Engineer

Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655

p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)


Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
9/11/24 1:10p.m. - 9/12/24 11:15a.m.	9/13/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	John Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Bruce Grover	Operations Manager	NCES
d.			
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>This matter involves Pump Station #2.</p> <p>From Wednesday September 11, 2024 at approximately 1:10p.m. until Thursday September 12, 2024 at 9:10 a.m., Pump Station #2 went offline due to construction related activities involving the ongoing capping project when a contractor inadvertently hit conduit with an excavator. During this time period, Pump Station #2 Primary was unable to pump and the sump level reached 60.59 inches.</p> <p>The repair was finished mid-morning and the pumps were turned back on. Sump levels returned to compliance at 11:15 a.m. on Thursday September 12.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release was caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual and potential hazards to the environment, safety and human health related to the incident were assessed and determined to be absent.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
New conduit and wires were installed. The conduit was marked with tape to provide identification to contractors and facility employees who may dig in this area in the future.	
14. If measures not completed by time of report submission, expected date of completion:	Completed

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Environmental Compliance	
Phone Number:	Email Address:	
802-224-0105	kimberly.crosby@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Subject: FW: NCES Incident Report 10/11/24
Date: Monday, October 14, 2024 7:54:50 AM
Attachments: [10_11_24_NCES_Primary_Incident_Report.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good morning Austin, fyi via SWInfo. ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Friday, October 11, 2024 5:39 PM
To: DES: SolidWasteInfo <solidwasteinfo@des.nh.gov>
Cc: Joe Gay <John.Gay@casella.com>; Kimberly Crosby <Kimberly.Crosby@casella.com>
Subject: NCES Incident Report 10/11/24

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Lindsey Menard

Environmental Engineer

Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655

p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)


Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
10/10/24 - 10/11/24	October 11, 2024	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Joe Gay	Engineer	Casella
b.	Kevin Roy	General Manager	Casella
c.	Bruce Grover	Operations Manager	Casella
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>This is regarding 12 inches or more of hydraulic head on the primary liner system of Pump Station #2 on October 10th, 2024 from 9:05 p.m. until October 11, 2024 at 7:35a.m.</p> <p>On the afternoon of October 10th NCES had Gates Electric on site testing the pump station #2 secondary flowmeter. After the test was completed, the pumps were not turned back on, resulting in head on the liner. Site staff turned pumps back on in the morning and the pump station returned to compliance.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No releases to the environment occurred.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. For a brief period of time, the pumpin Pump House 2 had not been turned back on after flowmeter testing had been conducted causing leachate to exceed the regulatory threshold. Once the pump was turned back, the level returned to compliance. Leachate continues to be managed within the primary leachate collection system, and we have ensured that there has been no release of leachate outside the lined area of the landfill, and that leachate is being managed in a manner that is fully protective of groundwater and the environment.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
The pump was turned back on and sump levels are back in compliance below the regulatory threshold. The site has discussed the incident with Gates Electric to ensure they will continue to check in with NCES staff before leaving the site, and NCES staff will do a walk-through of the pump stations after Gates Electric has completed any work or testing to ensure pumps have been turned back on.	
14. If measures not completed by time of report submission, expected date of completion:	Incident has been resolved.

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kevin Roy	General Manager/Casella	
Phone Number:	Email Address:	
603-361-6477	Kevin.Roy@Casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#); [Daun, Mary](#)
Subject: FW: NCES Incident Report 11.6.24
Date: Thursday, November 7, 2024 7:52:55 AM
Attachments: [Incident Report 11 6 24 Pump Station 3 Primary.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good morning from SWInfo, ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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Website: des.nh.gov

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From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Wednesday, November 6, 2024 5:02 PM
To: DES: SolidWasteInfo <SolidWasteInfo@des.nh.gov>
Cc: Kimberly Crosby <Kimberly.Crosby@casella.com>; Bruce Grover <bruce.grover@casella.com>;
Melissa Stevens <melissa.stevens@casella.com>
Subject: NCES Incident Report 11.6.24

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Lindsey Menard

Environmental Engineer

Casella Waste Systems, Inc.

1855 VT Route 100, Hyde Park, VT 05655

p. 802.851.6606 | c. 802.585.0551

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)


Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
11/6/24	11/6/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Bruce Grover	Operations Manager	NCES
b.	Kim Crosby	Director of Compliance	NCES
c.			
d.			
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>This matter involves Pump Station #3.</p> <p>On Wednesday November 6, 2024 at approximately 10:40a.m. until 10:55 a.m., Pump Station #3 was shut off due to routine sampling. During this time period, the Pump Station #3 Primary sump level reached 52.167 inches.</p> <p>The pump was promptly turned back on when staff became aware of the issue. Sump levels returned to compliance at 11:05 a.m. on Wednesday November 6.</p> <p>Kim Crosby, Director of Compliance at Casella, made the required verbal notification to Jaime Colby at NHDES at 11:08 a.m. A voicemail message explaining the incident was provided.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that the primary sump level in Pump House 3 exceeded compliance limits for less than a 1/2 hour during routine sampling. The primary leachate systems are functioning properly, and the secondary liner system is doing its job, in that there has been no release of leachate outside the lined area of the landfill, and leachate is being managed in a manner that is fully protective of groundwater and the environment.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
The pump was turned back on as soon as staff were notified of the issue. The sump level is back in compliance. Going forward, NCES personnel will be more diligent about monitoring the sump levels when pumps need to be shut off for routine sampling operations.	
14. If measures not completed by time of report submission, expected date of completion:	Measures are complete.

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Environmental Compliance	
Phone Number:	Email Address:	
802-224-0105	kimberly.crosby@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.



Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities

Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)


Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.


Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
11/7/24 6:50 a.m.	11/8/24	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road, Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O. Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Bruce Grover	Operations Manager	NCES
b.	Kim Crosby	Director of Compliance	NCES
c.	Robert cox	Director of Landfill Operations	NCES
d.			
e.			
f.			

Section III – Details
<p>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</p> <p>On Thursday November 7, 2024 at approximately 6:50 a.m. NCES staff identified a small subsurface oxidation (SSO) in the lined portion of the stormwater diversion down chute on the south side of the landfill.</p> <p>The immediate area was covered with a thick layer of soil to cutoff of any oxygen infiltration in order to smother the SSO. Stormwater has been temporarily diverted, and landfill gas wells (vertical and horizontal) in the immediate area have been turned off pending completion of our assessment of this matter.</p> <p>Robert Cox, Director of Landfill Operations, called Jaime Colby on the day of the event and also provided an email notification containing contextual photos to help explain the incident.</p>

11. Measures employed to contain releases caused by the incident or situation:	
No release caused by this incident	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Our assessment indicates that the SSO was contained and has been extinguished.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
<p>The small SSO was smothered with a thick layer of soil. Temperatures in the immediate area will continue to be monitored, and LFG well readings will be performed.</p> <p>LFG Wellfield Consultant Blue Granite will be on site on Friday, November 8th, to evaluate the tuning of the LFG wells in the immediate area.</p>	
14. If measures not completed by time of report submission, expected date of completion:	Measures are complete, monitoring continues.

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	
Phone Number:	Email Address:	
802-585-0551	lindsey.menard@casella.com	

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Environmental Compliance	
Phone Number:	Email Address:	
802-224-0105	kimberly.crosby@casella.com	

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

From: [DES: SolidWasteInfo](#)
To: [Mills, Austin](#)
Cc: [Jones, Emily](#)
Subject: FW: Incident Report
Date: Friday, November 22, 2024 3:30:24 PM
Attachments: [11 22 24 Primary Incident Report Submission FNL.pdf](#)
[image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Fyi, ty neo

Nelson E. Ordway, Executive Secretary
New Hampshire Department of Environmental Services,
Waste Management Division, Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603.271.2925
fax: 603.271.2456

*E-mail: nelson.e.ordway@des.nh.gov



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From: Melissa Stevens <melissa.stevens@casella.com>
Sent: Friday, November 22, 2024 2:51 PM
To: DES: SolidWasteInfo <SolidWasteInfo@des.nh.gov>
Cc: Kimberly Crosby <Kimberly.Crosby@casella.com>; Lindsey Menard <lindsey.menard@casella.com>
Subject: Incident Report

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

On behalf of North Country Environmental Services, Inc., I have attached for submission to NHDES an Incident Report addressing an incident that occurred on November 20 -21, 2024.

Thank you, and please reach out with any questions or concerns.

Melissa Stevens

Associate General Counsel
25 Greens Hill Lane, Rutland, VT 05701
p. 802.772.2201 • c. 802-417-9661
e. melissa.stevens@casella.com • w. casella.com

CASELLA WASTE SYSTEMS, INC.

RECYCLING • SOLUTIONS • ORGANICS • COLLECTION • ENERGY • LANDFILLS

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Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities Waste Management Division, SWMB



RSA/Rule: [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
1. Date & Time of Incident / Situation:	2. Date of Report Submission to NHDES:	3. Name of Person Preparing Report:
11/20/24 - 11/21/24	November 22, 2024	Lindsey Menard
4. Facility Name:	5a. Affected Area Within Facility	5b. Physical Address, Town / City:
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road Bethlehem, NH 03574
6. NHDES SW Permit Number:	7. Permittee Name on Permit:	8. Mailing Address:
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
9. Persons:			
	Name:	Title:	Affiliation:
a.	Bruce Grover	Operations Manager	Casella
b.	Kim Crosby	Director of Compliance	Casella
c.	Robert Cox	Director of Landfill Operations	Casella
d.			
e.			
f.			

Section III – Details
10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:
<p>On November 20, 2024 at approximately 3:10 PM the site experienced an exceedance of head on the liner at Pump Station #3. Site staff responded immediately upon notification and determined that third party electricians were needed to diagnose the malfunction. Electricians arrived on site within 30 minutes to diagnose. The sump was manually pumped down, and the electricians temporarily resolved the issue for the night, but were unable to determine the root cause of the malfunction. Further evaluation the following day by the electrical contractor and site staff determined the cause to be a single loose signal wire connection at a terminal triggering a pump safety inhibit which prevented the pump from pumping. The connection was fixed and checked, and pumping returned to normal service. During the malfunction, levels exceeded the one foot threshold for short durations, approximately two hours overall, as troubleshooting and diagnostics occurred. These overages were from 3:10 pm to 3:30 pm on November 20, and 9:10 am to 9:30 am and 10:40 am to 12:10 pm on November 21. Overall, the site and electrical contractor responded quickly and the electrical contractor was successful in diagnosing and</p>

correcting the malfunction. The system pump inhibit performed as designed, preventing pumping as programmed to assure safety while the malfunction due to a loose signal wire connection was occurring. The electrical contractor will be returning to site to complete a preventative wire connection check to assure tight connections of signal and electrical wiring before winter.

Kim Crosby, Director of Compliance at Casella, provided verbal notification to NHDES at 7:00 p.m. via voicemail message to Jaime Colby.

11. Measures employed to contain releases caused by the incident or situation:	
No releases to the environment occurred.	
12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:	
Actual or potential hazards to the environment, safety, and human health related to the incident were assessed and determined to be absent. Leachate continues to be managed within the primary leachate collection system, and we have ensured that there has been no release of leachate outside the lined area of the landfill, and that leachate is being managed in a manner that is fully protective of groundwater and the environment.	
13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:	
Site personnel will continue to monitor to ensure that the pump has returned to full function, and that sump levels remain in compliance, below the regulatory threshold.	
14. If measures not completed by time of report submission, expected date of completion:	N/A

Section IV – Signatures		
15a. Person Preparing Report:		
Name:	Title / Affiliation:	Signature:
Lindsey Menard	Environmental Analyst	<i>Lindsey Menard</i>
Phone Number:		Email Address:
802-585-0551		lindsey.menard@casella.com

15b. Permittee:		
Name:	Title / Affiliation:	Signature:
Kim Crosby	Director of Environmental Compliance	<i>Kimberly Crosby</i>
Phone Number:		Email Address:
802-585-5442		kimberly.crosby@casella.com

Form Submittal Instructions:

Submit the completed report in PDF via email to SolidWasteInfo@des.nh.gov.

Davidson, Tyler

From: Davidson, Tyler
Sent: Tuesday, August 6, 2024 10:48 AM
To: Kevin Roy; Bruce Grover; john.gay@casella.com; Kimberly Crosby
Cc: Colby, Jaime; Daun, Mary
Subject: NCES Incident Reports - Primary Liner Leachate Levels - June 18, 2024 and July 16, 2024
Attachments: NCES Incident Report - June 18, 2024 (Primary).pdf; NCES Incident Report - July 16, 2024 (Primary).pdf

Dear Permittee:

On June 18, 2024 and July 16, 2024 the New Hampshire Department of Environmental Services (NHDES) received written incident reports for the NCES Landfill in response to primary liner leachate levels in excess of the regulatory limits. These reports are attached.

Based on a completeness review conducted by NHDES, the reports do not include all of the information specified in Env-Sw 1005.09 and cannot be accepted because the following sections were missing or incomplete, as detailed below:

- Item 12, Assessment of actual or potential hazards to the environment, safety and human health related to the incident – Section incomplete. Env-Sw 1005.09(c)(4)(d) requires an assessment of actual or **potential** hazards to the environment, safety, and human health related to the incident. An assessment of the potential hazards that could result from, or that are indicated by, elevated leachate flows in the primary leachate collection system is warranted in this section for all attached incident reports.

Please revise the report(s) to include the missing information and **re-submit the reports** by Monday, August 12, 2024. The reporting form is available [online](#). If you have any questions, please contact me by email at tyler.j.davidson@des.nh.gov or by phone at (603) 271-0674.

Sincerely,

Tyler J. Davidson
Compliance Assurance Section
NHDES, Solid Waste Management Bureau

Davidson, Tyler

From: Davidson, Tyler
Sent: Tuesday, August 6, 2024 10:38 AM
To: Kevin Roy; Bruce Grover; john.gay@casella.com; Kimberly Crosby
Cc: Colby, Jaime; Daun, Mary
Subject: NCES Incident Reports - Secondary Flows - June 12, 2024 through August 5, 2024
Attachments: NCES Incident Report - June 12, 2024 (Secondary).pdf; NCES Incident Report - June 18, 2024 (Secondary).pdf; NCES Incident Report - June 24, 2024 (Secondary).pdf; NCES Incident Report - July 2, 2024 (Secondary).pdf; NCES Incident Report - July 26, 2024 (Secondary).pdf; NCES Incident Report - July 29, 2024 (Secondary).pdf; NCES Incident Report - August, 5, 2024 (Secondary).pdf

Dear Permittee:

From June 12, 2024 through August 5, 2024 the New Hampshire Department of Environmental Services (NHDES) received seven written incident reports for the NCES Landfill in response to elevated flow rates within the secondary leachate collection system. These reports are attached.

Based on a completeness and technical review conducted by NHDES, the reports do not include all of the information specified in Env-Sw 1005.09 and cannot be accepted because the following sections were missing or incomplete, as detailed below:

- **Item 10, The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities - Section incomplete.** For all attached incident reports, it is unclear if this is the rolling 30-day average of secondary leachate flows required by Env-Sw 806.08(d)(4).
- **Item 12, Assessment of actual or potential hazards to the environment, safety and human health related to the incident – Section incomplete.** Env-Sw 1005.09(c)(4)(d) requires an assessment of actual or **potential** hazards to the environment, safety, and human health related to the incident. For all attached incident reports, an assessment of the potential hazards that could result from, or that are indicated by, elevated leachate flows in the secondary leachate collection system is warranted in this section.
- **Item 13, Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation – Section Incomplete.**
 - For the incident reports submitted on June 12, June 18, June 24, and July 2, 2024, the information provided in this section appears to identify potential causes of the elevated flows, but does not discuss measures to reduce, eliminate, and prevent a recurrence of the situation.
 - For the incident reports submitted on July 26, July 29, and August 5, 2024, the Permittee only submitted a statement that investigation into the matter is ongoing. In addition to this statement, information regarding timing (i.e., when is the investigation expected to be completed?), as well as an acknowledgement that additional or future measures will be implemented based on the results of the investigation, would be warranted in this section. Additionally, any measures to reduce, eliminate, or prevent a recurrence of the situation that have been conducted prior to report submittal (e.g., check pumps and transducers, etc.) should be listed in this section.

Please revise the report(s) to include the missing information and **re-submit the reports** by Monday, August 12, 2024. The reporting form is available [online](#). If you have any questions, please contact me by email at tyler.j.davidson@des.nh.gov or by phone at (603) 271-0674.

Sincerely,

Tyler J. Davidson
Compliance Assurance Section
NHDES, Solid Waste Management Bureau