

**Crowley,Chris**

#2

**From:** Clark James <anthony.james@casella.com>  
**Sent:** Thursday, January 25, 2024 3:59 PM  
**To:** Crowley,Chris  
**Cc:** St Armand,David; McNeill, Fred; Robinson, Robert  
**Subject:** FW: Application for Industrial Wastewater Discharge  
**Attachments:** NCES Permit Application City of Manchester 2023 \_ update 1.25.24.pdf

Good Afternoon, Chris,

I have attached a revised permit application for the leachate generated by Casella's NCES landfill that provides a more specific volume estimate in loads and gallons/day. The volume does fluctuate based on seasonal variations in precipitation at the landfill, construction activities, transport trailer size, etc. Currently, we are requesting capacity for up to three loads/day, and we would be willing to deliver additional volume subject to the City's review and approval once it has had the opportunity to evaluate how the leachate performs in the plant's process.

As I discussed with Dave, Casella has an immediate need for leachate treatment capacity because our primary outlet, the Hall Street WWTP in Concord, New Hampshire, is suspending all leachate acceptance from February 3, 2024 through February 13, 2024. Please let me know if you have any questions or concerns as you review the application. We are eager to get an approval in place to assist us with capacity during Concord's shut down, but are also interested in pursuing a longer-term, leachate disposal agreement with the City that would provide greater redundancy for the landfill while also providing a consistent revenue stream for the city. We can also explore options for adjusting the cake disposal rates based on the City's ability to provide single-site or regional leachate management capacity to Casella if that is of interest to Fred and Rob.

Please let me know if you have any questions or need additional information.

Thank you for your consideration and best regards,

**Clark James**  
Director of Logistics  
Casella Resource Solutions

755 Banfield Road  
Suite 201  
Portsmouth, New Hampshire 03801-6609  
p. 207.347.3606 | c. 207.205.0499 | w. [casellaorganics.com](http://casellaorganics.com)

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**From:** Clark James  
**Sent:** Thursday, January 25, 2024 11:30 AM  
**To:** St Armand,David <dstarmand@manchesternh.gov>; Robinson, Robert <RRobinson@manchesternh.gov>  
**Cc:** Crowley,Chris <CCrowley@manchesternh.gov>  
**Subject:** FW: Application for Industrial Wastewater Discharge

Good Morning, Dave.

I received your voicemail. I'll call you in a few minutes.

I believe that Chris already has a permit application that Casella submitted in November of 2023 (attached for reference).

Please let me know if any additional information is required and we will compile it and submit it ASAP.

**Clark James**

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**From:** Lindsey Menard <[lindsey.menard@casella.com](mailto:lindsey.menard@casella.com)>

**Sent:** Friday, November 17, 2023 1:28 PM

**To:** [ccrowley@manchesternh.gov](mailto:ccrowley@manchesternh.gov)

**Cc:** Joe Gay <[John.Gay@casella.com](mailto:John.Gay@casella.com)>; Kevin Roy <[Kevin.Roy@casella.com](mailto:Kevin.Roy@casella.com)>; Clark James <[anthony.james@casella.com](mailto:anthony.james@casella.com)>

**Subject:** Application for Industrial Wastewater Discharge

Good afternoon,

Please see attached application for NCES and GSL leachate disposal at Manchester WWTP. Please let us know if you have any questions.

Thank you,

**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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## Crowley,Chris

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**From:** Clark James <[anthony.james@casella.com](mailto:anthony.james@casella.com)>  
**Sent:** Friday, January 26, 2024 9:51 AM  
**To:** Crowley,Chris  
**Cc:** St Armand,David; McNeill, Fred; Robinson, Robert; Lundsted,Benjamin  
**Subject:** RE: [External] RE: Application for Industrial Wastewater Discharge

Thank you, Chris. We appreciate the City's willingness to support New Hampshire's waste management disposal infrastructure.

**Clark James**  
Director of Logistics  
Casella Resource Solutions

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**From:** Crowley,Chris <[CCrowley@manchesternh.gov](mailto:CCrowley@manchesternh.gov)>  
**Sent:** Friday, January 26, 2024 7:22 AM  
**To:** Clark James <[anthony.james@casella.com](mailto:anthony.james@casella.com)>  
**Cc:** St Armand,David <[dstarmand@manchesternh.gov](mailto:dstarmand@manchesternh.gov)>; McNeill, Fred <[fmcneill@manchesternh.gov](mailto:fmcneill@manchesternh.gov)>; Robinson, Robert <[RRobinson@manchesternh.gov](mailto:RRobinson@manchesternh.gov)>; Lundsted,Benjamin <[blundsted@manchesternh.gov](mailto:blundsted@manchesternh.gov)>  
**Subject:** [External] RE: Application for Industrial Wastewater Discharge

Good morning Clark,

Thank you for the latest updated information. I will finishing writing the authorized discharge permit and after the management team reviews it you should have it next week.

There are some special conditions that need to be finalized.

Sincerely,  
Chris

Christopher J. Crowley  
Pretreatment Supervisor  
City of Manchester, Environmental Protection Division  
300 Winston Street, Manchester NH. 03103  
(W) 603-624-6513 (C) 603-235-6627

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**Sent:** Thursday, January 25, 2024 3:59 PM  
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**Cc:** St Armand,David <[dstarmand@manchesternh.gov](mailto:dstarmand@manchesternh.gov)>; McNeill, Fred <[fmcneill@manchesternh.gov](mailto:fmcneill@manchesternh.gov)>; Robinson, Robert

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**Cc:** Joe Gay <[John.Gay@casella.com](mailto:John.Gay@casella.com)>; Kevin Roy <[Kevin.Roy@casella.com](mailto:Kevin.Roy@casella.com)>; Clark James <[anthony.james@casella.com](mailto:anthony.james@casella.com)>  
**Subject:** Application for Industrial Wastewater Discharge

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Thank you,

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Environmental Engineer  
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Timothy J. Clougherty  
Public Works Director

Owen P. Friend-Gray, P.E.  
Deputy Public Works Director

Frederick J. McNeill, P.E.  
Chief Engineer



*Commission*  
Kathleen Sullivan, Chair  
Arthur Gatzoulis, Co-Chair  
Mark MacKenzie  
Amber Nicole Cannan  
Andre Parent

**CITY OF MANCHESTER**  
*Department of Public Works*  
*Environmental Protection Division*

January 31, 2024

John Gay  
Casella - Engineer  
NCES Landfill and future GSL Landfill / Casella  
581 Trudeau Road, Bethlehem, NH 03574

Subject: NCES Landfill and future GSL Landfill Authorized Discharge Permit No. 1001

Dear Mr. Gay:

Enclosed is the Class I Industrial User Discharge Permit No. 1001, issued by City of Manchester, Environmental Protection Division (EPD) on January 31, 2024. Permit No.1001 authorizes NCES Landfill and future GSL Landfill / Casella to discharge landfill leachate from the landfill at Bethlehem NH located at 581 Trudeau Road. The current permit cycle is February 1, 2024 to January 31, 2029.

A requirement of the permit 5-year cycle is for NCES Landfill and future GSL Landfill / Casella to conduct quarterly self-monitoring sampling of the leachate from the landfill. It is recommended that self-monitoring sampling be performed early in each monitoring period. This will ensure that Periodical Compliance Reports are not submitted late. It is the permittee's RESPONSIBILITY to ensure that all information is complete and accurate and those analytical results are summarized in an accompanying PCR Summary Sheet.

Sampling Monitoring Points are designated at the tanker truck(s). Refer to Page 7 Section L of the permit for more details.

The City will institute a discharge fee based on strength of concentration from the latest sampling results submitted.

Carefully review the enclosed Industrial Sewer User Permit No. 1001. The Permittee is granted a thirty-day petition period, during which time the Permittee may direct any concerns regarding the permit conditions to EPD. If the permit conditions are acceptable, please sign the Signature Sheet on Page 2 and the Acknowledgement Signature sheet on Page 16. Please return Page 16 to the EPD.

The person who signs the Signature Sheet shall be deemed the Signature Authority. That person shall then assume the responsibility of signing all correspondence and reports. Once the signature sheet is returned, all terms and conditions of Permit No. 1001 shall become binding.

If you have any questions regarding any provision of the new permit, please contact me at (603) 624-6513 or [ccrowley@manchesternh.gov](mailto:ccrowley@manchesternh.gov).

Sincerely,

Christopher J. Crowley  
Pretreatment Supervisor

Enclosures  
CC File

Frederick J. McNeill, P.E., Chief Engineer, EPD  
Robert Robinson P.E., WWTP Superintendent, EPD  
Benjamin Lundsted, P.E., CSO/CMOM Programs Coordinator, EPD



## SAMPLE

### *Company Letter Head*

#### MEMORANDUM:

To: City of Manchester Environmental Protection Division (EPD)

From: \_\_\_\_\_

Date: \_\_\_\_\_

Re: Delegation of Signature Authority for Chain of Custody Forms & Industrial User Reports

I, \_\_\_\_\_, Title \_\_\_\_\_ of Company name \_\_\_\_\_ and address \_\_\_\_\_ hereby authorize the following individuals to sign the Chain of Custody Forms & our Industrial Periodical Compliance Report to the City of Manchester Environmental Protection Division (EPD). Below are the present representatives that are allowed to sign documents on behalf of the company.

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Periodical Compliance Report (PCR) shall include the following as described in 40 CFR 403.12, as well as similar reports required by New Hampshire and local approved control authorities.

- Baseline Monitoring Reports 40 CFR 403.12 (b)
- Report on Compliance with Categorical Pretreatment Standard Deadline 40 CFR 403.12 (d)
- Periodic Reports on Continued Compliance 40 CFR 403.12 (E)

Signature & Title \_\_\_\_\_