

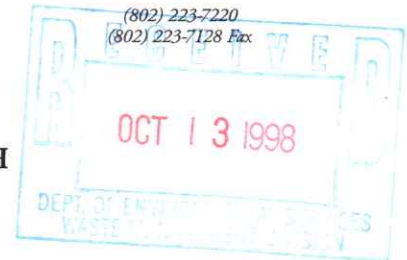


North Country Environmental Services, Inc.

October 8, 1998

16 State Street  
Montpelier, Vermont 05602

Mr. Mike Gilfoy, PE  
NH Department of Environmental Services  
6 Hazen Drive  
Concord, NH 03301-0509



RE: North Country Environmental Services, Inc. - Bethlehem, NH  
Leachate Results - July 15, 1998

Dear Mr. Gilfoy:

We send the above mentioned results to the City of Concord's wastewater treatment facility to fulfil our quarterly sampling requirements. The City of Concord notified us in a September 9, 1998 letter (enclosed) that the sample for Stage I Phase III could be characterized as hazardous waste under NHDES Hazardous Waste Rules, Chapter 400, section 404.01(b)(2).

When we were informed of this situation immediately re-sampled and called Jim Berg to inform him of the sampling results and our re-sample. The lab results from the re-sampling was consistent with the historical data indicating a non-hazardous waste. As you know Larry Lackey and myself met with you, Jim Berg, Mike Sills, Scott Shillaber (Sanborn, Head & Associates) and Dan Dudley to discuss leachate and other issues on September 25, 1998. After reviewing the historical results (enclosed) we believe the results from the sampling on July 15, 1998 for Stage I Phase III were an anomaly.

We will continue to monitor leachate for compliance with 404.01(b)(2) and as proposed by Jim Berg, we will start weekly sampling of Stage I Phase III leachate for the next four weeks. We will send you a report on the results with recommendations for future monitoring. If you have any comments, please do not hesitate to contact me at (802) 223-7220.

Sincerely,  
NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.

Robert A. Watts  
Permits, Compliance and Engineering

TOWN: Bethlehem  
PROJECT: NCES Landfill  
LETTER/DATA/PERMIT/FA/OTHER:

Encl.

- cc: Mike Sills, New Hampshire Department of Environmental Services
- Jim Berg, New Hampshire Department of Environmental Services
- Jon A. Bushold, City of Concord Wastewater Treatment Plant
- James W. Bohlig, North Country Environmental Services, Inc. (w/o encl.)
- Larry B. Lackey, North Country Environmental Services, Inc.
- Donald Monahan, North Country Environmental Services, Inc. (w/o encl.)
- Scott Shillaber, Sanborn, Head and Associates, Inc. (w/o encl.)



# City of Concord, New Hampshire

GENERAL SERVICES DEPARTMENT  
125 Hall Street  
03301-3472

CASELLA WASTE  
MANAGEMENT, INC.

SEP 17 1998

RECEIVED  
STATE STREET

**JOE ANDREWS**  
SUPERINTENDENT  
PUBLIC PROPERTIES

**MICHAEL HANSCOM**  
SUPERINTENDENT  
WASTEWATER PLANT

603-225-8691  
FAX: 603-224-2532

September 9, 1998

Mr. Robert Watts  
North Country Environmental Services, Inc.  
16 State Street  
Montpelier, VT 05602

Subject: Impact of Hazardous Waste Rules on Landfill Leachate

Dear Mr. Watts:

We have reviewed your most recent report dated September 1, 1998 on the testing of landfill leachate samples from your facility. It is our understanding that the Stage 1 Phase 3 leachate can be characterized as hazardous waste under the State of NH, DES Hazardous Waste Rules, Chapter 400, section 404.01(b)(2) which deals with hazardous waste mixtures. The summed total concentration of acetone, methylene chloride, methyl ethyl ketone, and toluene in the sample dated 07/15/98 exceeded the mixture rule's limit of 100 parts per million.

We can no longer accept for treatment at the Hall St. WWTF any leachate from Stage 1, Phase 3 of the NCES landfill in Bethlehem, NH. Please be further advised that no leachate characterized as hazardous waste will be accepted for treatment. We understand that you will be retesting leachate from this specific area of the landfill and will be contacting the State for further information on how the hazardous waste designation for leachate affects your trucking requirements.

If you have any questions, please call me at (603) 225-8691. Thank you for your cooperation.

Sincerely,

Jon A. Bushold  
Laboratory Supervisor

JAB  
cc: file\NCES0998  
Michael Hanscom  
John Forrestall

**North Country Environmental Services, Inc.**  
**Leachate Data Stage I Phase III**

Parameter/ Sample Date	2/27/96	4/15/96	11/12/96	4/1/97	7/7/97	11/13/97	4/15/98	7/15/98	9/10/98
<b>Gallons/acre/day</b>	<b>394</b>	<b>548</b>	<b>434</b>	<b>582</b>	<b>427</b>	<b>257</b>	<b>335</b>	<b>285</b>	<b>242</b>
Chloride (mg/l)	1,000	1,000	2,900	2,460	2,240	2,390	2,840	2,600	
Sulfate (mg/l)	770	770	1,900	2,130			<50	2,000	
Chromium (mg/l)	1.50		0.40	0.73	0.83	0.60	0.96	0.90	
Iron (mg/l)	2,000		1,800				1,800	2,300	
COD (mg/l)	22,000	22,000	29,000	36,200	37,900	31,700	47,200	45,000	
Chloromethane (mg/l)							300	550	
Chloroethane (ug/l)							750	2,200	
Acetone (ug/l)	9,000	7,800	26,000	23,000	18,300	1,300	31,400	50,200	17,800
2-Butanone (MEK) (ug/l)	17,000	10,000	35,000	37,200	28,900	21,100	45,100	62,700	25,300
Methylene Chloride (ug/l)	600	400	700	662	688	410	690	660	310
Toluene (ug/l)	400	500	500	746	468	328	230	270	190
<b>Total P&amp;U (mg/l)</b>	<b>27.0</b>	<b>18.7</b>	<b>62.2</b>	<b>61.6</b>	<b>48.4</b>	<b>23.1</b>	<b>77.4</b>	<b>113.8</b>	<b>43.6</b>