

November 30, 2022

Austin Mills
NH Department of Environmental Services
Solid Waste Management Bureau
29 Hazen Dr. / P.O. Box 95
Concord, NH 03302-0095

**RE: NCES Lined Landfill Stage IV, V, VI
Lined Landfill Facility – Bethlehem, New Hampshire
Response to NH DES Facility Inspection and Deficiency Report – 11/2/2022**

Dear Mr. Mills,

North Country Environmental Services (NCES) writes to provide a response to the November 2, 2022, inspection report for the NCES Landfill Facility located in Bethlehem, New Hampshire. We have reiterated these items listed in your electronic mail notification and provide our response in **bold** print.

1. Env-Sw 806.03 (c)

Requirement: At landfills receiving MSW, cover material shall be placed over all exposed waste no less frequently than at the end of each operating day.

Observation: NHDES Inspectors arrived at the facility at approximately 5:30AM on 11/2/2022 to conduct a limited facility inspection. The facility gate was closed and there was no indication of activity on site. The first operator opened the gate at approximately 5:40AM and NHDES inspectors entered the facility. At approximately 5:50AM, Bruce Grover and Kevin Roy, both of Casella, met with NHDES inspectors who were then escorted to the working face to view the application of daily cover from the day before. Upon arrival to the working face, geosynthetic tarps, natural soils and other alternate daily cover types were observed to be covering the majority of waste with some waste flagging issues seen. There were 3 areas of concern observed to contain uncovered wastes:

Area #1: Downslope from the termination of geosynthetic tarp coverage, there were small berms of primarily intermediate cover material containing intermixed wastes observed. These berms were beyond the reach of the geosynthetic tarping used as daily cover and did not appear to be covered otherwise. The wastes appeared to have been uncovered and mixed with intermediate cover during prior cover stripping operation in order to conduct subsequent lifts. The berms were intermittent in nature and did not span the whole width of the active area.

Area #2: There was a single gap in the geosynthetic tarping system measuring approximately 3 feet by 10 feet. No cover material was observed to be applied to this waste.

Area #3: The tipping area from the day before was discovered to contain some small areas of waste not exhibiting application of cover material.

NCES collected photographs of daily and intermediate cover applied at the end of each day from November 2, 2022 through November 11, 2022. The photographs were emailed to you as verification

that acceptable levels of daily cover is being applied by the facility. Based on the email received from you to the NCES Landfill General Manager (dated November 14, 2022) the photos provided confirmation of compliance for deficiencies identified in the November 2, 2022 inspection and deficiency report.

If you have any questions or concerns, please contact me at (802) 585-0551.

Sincerely,

NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.



John Gay
Permits, Compliance, & Engineering

- c. Kevin Roy, NCES (via email w/ enc.)
Bruce Grover, NCES (via email w/ enc.)

From: Mills, Austin
To: Bruce Grover; kevin.roy@casella.com; JOHN.GAY@CASELLA.COM
Cc: Jones, Emily; Colby, Jaime
Subject: RE: NH DES Landfill Facility Inspection - 11/2/2022
Date: Monday, November 14, 2022 2:30:00 PM

Good Afternoon,

Thank you for the submission of photos showing appropriate daily cover application from 11/3/2022 to 11/11/2022. This email serves as confirmation of compliance for the deficiencies identified in the inspection and deficiency report dated 11/2/2022.

Thank you,

Austin Mills, Waste Management Specialist

NH Dept. of Environmental Services, Solid Waste Management Bureau
29 Hazen Drive / P.O. Box 95
Concord, NH 03302-0095
Email: Austin.S.Mills@des.nh.gov / Phone: (603) 848-2424

From: Mills, Austin
Sent: Monday, November 7, 2022 9:32 AM
To: Bruce Grover <bruce.grover@casella.com>; kevin.roy@casella.com; JOHN.GAY@CASELLA.COM
Cc: Jones, Emily <EMILY.M.JONES@des.nh.gov>; Colby, Jaime <Jaime.M.Colby@des.nh.gov>
Subject: NH DES Landfill Facility Inspection - 11/2/2022

Good Morning

Thank you for taking the time to help facilitate / participate in the inspection of NCES Landfill Stage 4,5,6 on 11/2/2022. During the inspection, items were identified as being non-compliant with NH Statute RSA 149-M, applicable rules in Env-Sw 100-2000 and/or the most recently issued permit. An inspection report, complete with a list of out-of-compliance items, is attached to this email.

In order to regain compliance with applicable statutes and rules, please review the attached report. It contains specific requirements and timelines to correct the deficiencies. Please complete the outlined requirements identified at the end of the attached report and forward evidence (written proof, copies of documents, photographs, etc.) of compliance to myself (Austin.S.Mills@des.nh.gov) no later than the dates outlined in the report. Failure to adequately correct the identified items and forward evidence of correction by the required date may result in administrative action in accordance with the Department's Compliance Assurance Response Policy.

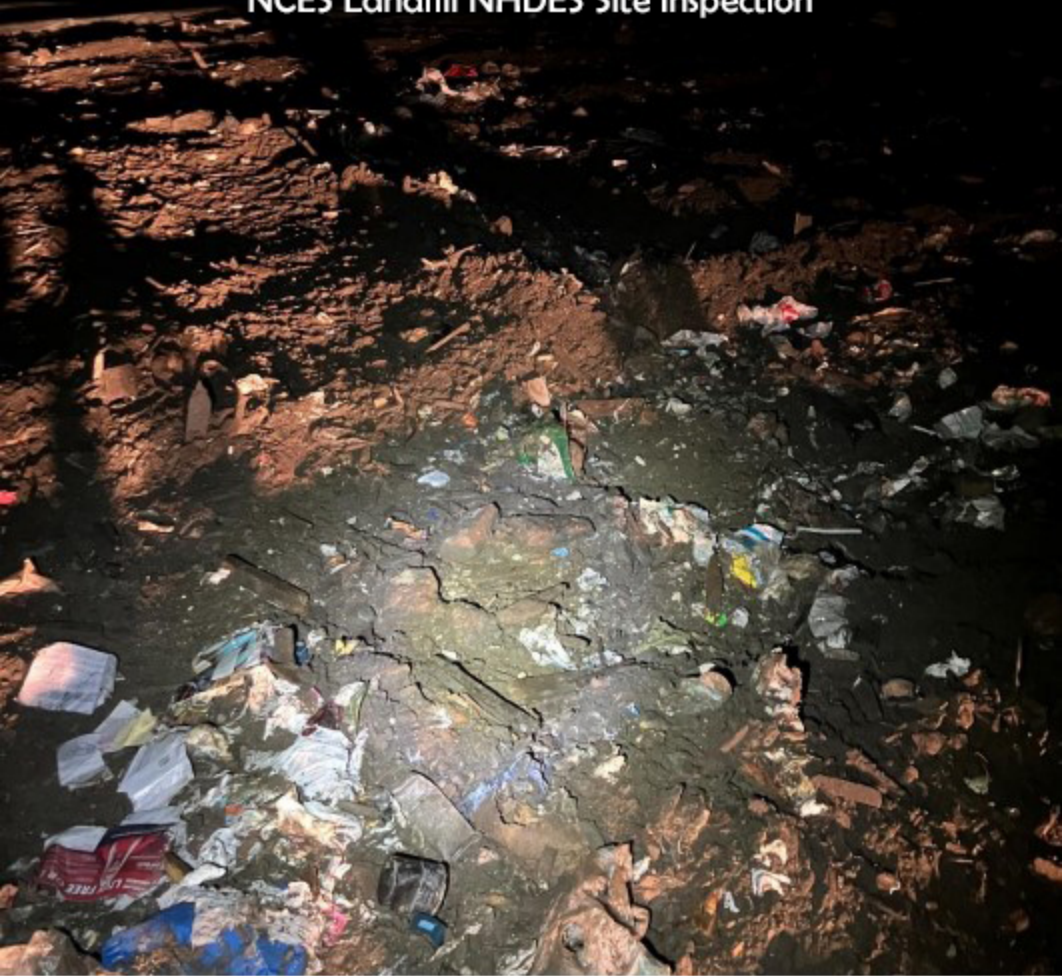
If you have any questions, please do not hesitate to contact us.

Thank you in advance for your timely response to this matter.

Austin Mills, Waste Management Specialist

NH Dept. of Environmental Services, Solid Waste Management Bureau
29 Hazen Drive / P.O. Box 95
Concord, NH 03302-0095
Email: Austin.S.Mills@des.nh.gov / Phone: (603) 848-2424

Tipping area uncovered waste Nov 2 2022
NCES Landfill NHDES Site Inspection




Base of geosynthetic tarping system with intermediate cover
mixed with waste
NCE5 Landfill NHDES Site Inspection Nov 2 2022



Gap in geosynthetic tarping system
NCES Landfill NHDES Site Inspection Nov 2 2022



A photograph taken at night showing a landfill site. In the upper left, a white vehicle with its headlights on is parked on a dark, uneven surface. The foreground is dominated by a large, messy pile of discarded waste, including plastic bags, crumpled paper, and other debris, illuminated by a bright light source. The background is dark, suggesting a large, open area of land.

Tipping area uncovered waste Nov 2, 2022
NCES Landfill NHDES Site Inspection