

## Davidson, Tyler

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**From:** Lindsey Menard <lindsey.menard@casella.com>  
**Sent:** Friday, January 30, 2026 2:57 PM  
**To:** Davidson, Tyler  
**Cc:** Kim Crosby; Samuel Nicolai; Melissa Stevens; Bob Cox; Marc Morgan  
**Subject:** NCES LOD #SWMB 26-001 Workplan and Response  
**Attachments:** NCES LOD Response 1.30.26.pdf

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Good afternoon,

Please find attached response to LOD # SWMB 26-001, which includes the required updated site survey and capacity analysis as well as the plan and schedule for waste relocation.

Feel free to reach out with any questions.

Thank you,

**Lindsey Menard**  
Environmental Manager

**Permits, Compliance, & Engineering (PCE)**  
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January 30, 2026

Tyler J. Davidson, Enforcement Program Coordinator  
NH Department of Environmental Services  
Solid Waste Management Bureau  
29 Hazen Dr. / P.O. Box 95  
Concord, NH 03302-0095  
[swmbenforcement@des.nh.gov](mailto:swmbenforcement@des.nh.gov)

**RE: North Country Environmental Services, Inc.  
Lined Landfill Facility – Bethlehem, New Hampshire  
Response to NHDES Letter of Deficiency No. SWMB 26-001**

Dear Mr. Davidson,

Pursuant to the requirements of the January 16, 2026 Letter of Deficiency (LOD) for the Landfill Facility owned and operated by North Country Environmental Services, Inc. (NCES) and located in Bethlehem, New Hampshire, we are providing a plan and schedule for waste relocation as requested. Please be aware that, notwithstanding NCES's compliance with this LOD, NCES does not waive and expressly reserves any rights or claims it may have.

**LOD Item #1**

An updated site survey plan is provided in Attachment 1, required by LOD Item #1, based on the annual flyover completed on January 6, 2026. This survey indicates a remaining facility capacity of 246,600 cubic yards, and 38,700 cubic yards of material above the top of waste grading plan. Note that this material includes both cover soils and the approved stockpiles of cover soil and BUD materials stored on the top deck of the landfill.

**LOD Item #2**

A written incident report as required by Condition #2 of the LOD was submitted to NHDES on 01/26/2026.

**LOD Item #3**

NCES proposes to use the updated survey data from January 6, 2026 to relocate approximately 38,700 cubic yards of soil materials and/or waste materials from the top deck of the landfill. The precise quantity of material relocated will depend on the depths of cover soil in the identified areas. However, the new grading will include a minimum of one foot of intermediate cover soil and will be at or below the top-of-waste grades shown on the facility surveys.

**Plan for Relocation**

NCES will temporarily relocate the soil cover and BUD stockpiles currently stored on the top deck to be the footprint of Stage VI Phase II prior to material relocation activities. Generally, the work will begin in the southernmost area of the top deck and progress northward. Material removed from the top deck will be placed in either the daily operating workforce, or in nearby top deck areas that are below the top-of-waste grades. Excess clean soil cover materials identified during the work will be utilized as daily cover at the workforce or in other disturbed areas, NCES will track the amount of material being relocated through truck counts and surveys to ensure that all material is placed in the appropriate locations.

Throughout the project, NCES will follow the Odor Control Plan submitted with the Type II Permit Modification for the Cap 5 Closure Project. After all work is completed, the site will be surveyed and the results submitted to NHDES.

### **Reporting**

NCES will continue to submit surveys every other month until facility closure as required by Condition #1 of the LOD. The first of these surveys is included in Attachment 1.

Following the successful material relocation, NCES will submit to NHDES an additional site survey with the newly established grades.

### **Planned Schedule**

NCES plans to begin relocating material with internal equipment beginning in mid-February, weather permitting. NCES expects that the contractor selected for the Cap 5 construction work will supplement internal equipment upon mobilization to the site in March. NCES estimates that the total project will take four to six weeks, depending on weather conditions and contractor availability. However, all work will be completed prior to the April 30, 2026 deadline indicated in the LOD.

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

Sincerely,

**NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.**



Lindsey Menard  
Permits, Compliance, and Engineering

- c.      Samuel Nicolai, NCES (via. email w/ enc.)
- Kim Crosby, NCES (via. email w/ enc.)
- Marc Morgan, NCES (via. email w/ enc.)
- Melissa Stevens, NCES (via. email w/ enc.)
- Bob Cox, NCES (via. email w/ enc.)

Attachments:      Revised Site Survey  
                         Odor Control Plan for Cap 5 Closure Project



35 Bow Street  
Portsmouth, NH 03801

Project: NCES Landfill  
Project No: 665  
Date: 01/22/26  
Calc. By: ATR  
Chkd. By: AJS  
Sheet: 1 of 1

## NCES - 12/31/25 Volume Remaining Calculation Bethlehem, New Hampshire

### Volume Remaining Calculation

Surface 1 January 6, 2026 Site Survey  
Surface 2 Permitted Top of Waste Closure Grades 3(V):1(H)

Volume Remaining based on January 6, 2026 Survey **246,600 CY** (REFER TO CMA VOLUME  
REMAINING FIGURE)

### NCES Scale Material Report (1/1/26 to 1/6/26)

Net Tons **1,462 TONS**  
Compaction Rate **0.80 CY/TON**  
Conversion to CY **1,828 CY**

### Calculated Volume Remaining on December 31, 2025

$$246,600 + 1,828 = 248,428 CY$$

(1/6/26 Survey) (1/1/26-1/6/26)



### Notes:

- Upper surface is top of waste grades from the Stage VI closure plan, with 3:1 side slopes.
- Lower surface is developed from drone survey performed by Firmatek on January 6, 2026.
- The Horizontal datum is the New Hampshire State plane coordinate system (NAD83) and the Vertical datum is the North American Vertical datum of 1988 (NAVD88).
- The volume calculation is based on a comparison of the above surfaces.

### Capacity Notes:

Remaining Capacity  
Gross calculated volume remaining:  
Sum of all (+) tick marks 246,600 CY

Pre-Settlement  
Gross calculated pre-settled waste:  
Sum of all Top (-) tick marks (38,700 CY)  
Sum of all Side Slope (-) tick marks (87,400 CY)

### Legend:

- January 6, 2026 2' Contour
- January 6, 2026 10' Contour
- Top of Waste Closure Grades
- Approximate Property Line
- Limit of Landfill District V Zone
- Spot Remaining Fill Thickness (ft)
- Spot Pre-Settlement Thickness (ft)
- Anchor Trench
- Volume Boundary
- Stockpile Areas

North County Environmental Services Bethlehem New Hampshire		date: January 2026	designed by:
project no:	865	drawn by:	ATR
file name:		approved by:	AJS
scale:	100'	scale:	200'
scale:	1 = 100'	scale:	1 = 200'
January 6, 2026 Volume Update		drawing no.	1
January 6, 2026 Volume Remaining		sheet:	1 of 1
		by:	
		date:	
		revision:	
		no.:	
		by:	
		date:	
		revision:	
		no.:	

*Cap 5 Closure Project*  
**ODOR CONTROL PLAN**

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**PART 1**      **GENERAL**

**1.01 REQUIREMENTS INCLUDED**

- A. This Odor Control Plan has been prepared to organize and supplement in a single document the contract requirements for controlling emission of odors during the Contractor's excavation and relocation of waste materials.
- B. The project includes excavation of waste and relocation required to access the anchor trench for the Cap 5 closure project.
- C. Contractor shall coordinate with the Owner for relocation of waste materials to the active filling area and as required for working around the existing landfill gas collection system piping and structures.
- D. Contractor shall coordinate with the Owner for the Owner's daily evaluation of odor migration off-site. If odors are noted or reported by the Owner or the public, Contractor may be required to enhance the use of the soil cover and odor neutralizing agents or other protocol.
- E. Odor complaints from the public are to be received at the facility by calling (603) 969-3366. The Facility Manager, Marc Morgan, will be responsible for coordinating with the Contractor to mitigate odor complaints.

**1.02 RELATED REQUIREMENTS**

- A. Section 02222 – Excavation
- B. Section 02223 – Filling
- C. Section 13001 – Site Safety and Contingency Work Plan Outline

**PART 2**      **PRODUCTS**

**2.01 MATERIALS**

- A. Daily Cover – Contractor shall cover the open waste surface with soil cover or other NHDES approved methods at the end of each working day.
- B. Odor Neutralizing Agents – The odor neutralizing agents shall be manufactured by New Waste Concepts, Inc., or approved equivalent. Products and equipment shall include liquid Odor Ranger

for application to the waste face, and SWAT RF mobile dispensing equipment or approved equivalent.

1. Contractor shall submit proposed odor neutralizing agents and dispensing equipment to the Engineer for review prior to commencing waste relocation activities.
2. Contractor shall have on-site the neutralizing liquid to apply to the waste materials each day and setup the mobile mist dispensing equipment and neutralizer, for use as needed.

D. Spray-on Daily or Intermediate Covers – Spray-on Intermediate Covers shall be manufactured by ConCover, Topcoat, Posi-Shell or an approved equivalent. The Contractor shall follow the manufacturer's recommendations for proper mix ratios, setting times and application rates, and fully cover exposed waste.

## **PART 3 EXECUTION**

### **3.01 PREPARATION**

- A. Prepare stockpile of cover soils for placement over excavated wastes in advance of excavation. Mobilize spray on daily or intermediate cover and odor neutralizing materials and application equipment.
- B. Waste excavation may be restricted by the Owner during periods when winds are out of the east-southeast or strong enough to carry potential odors well off-site.

### **3.02 EXCAVATION**

- A. Excavation of Unclassified Waste Material: Any excavation of existing intermediate cover material and waste material will be completed in accordance with the Site Safety and Contingency Work Plan developed by the Contractor, in accordance with Section 13001. Excavated waste materials shall be relocated to the active filling area for placement and compaction by the Owner.
- B. Excavation of waste materials shall be performed in a timely manner which controls odors, dust, vectors, and migration of waste. Contractor shall install a minimum of 6" of soil cover, or spray-on cover, at the end of each day. Waste shall be completely covered with no waste exposed.
- C. Owner shall spread and compact the relocated waste materials using the same protocol as daily waste disposal operations that include installing a minimum of 6" soil cover over the placed waste materials at the end of each day. Waste shall be completely covered with no waste exposed.

### 3.03 ODOR CONTROL DURING WASTE EXCAVATION

- A. The Contractor shall limit the amount of time that waste is exposed to the extent practical. There shall be no exposed waste at the end of each working day.
- B. In order to prevent potential odors from moving off-site, Contractor shall apply the liquid neutralizing agent over the waste materials during waste excavation, as needed to mitigate odors, and prior to application of spray on intermediate cover and installation of the temporary tarp.
- C. In addition to 3.03B above, Contractor may need to operate a mobile misting station during waste excavation, as recommended by the manufacturer, to further mitigate odor generation and migration.
- D. Coordinate with the Owner to monitor the LFG collection system on a daily basis for gas quality and vacuum during waste relocation.
- E. Coordinate with the Owner for their evaluation of odors off-site on a daily basis, with reconnaissance to all areas surrounding the excavation and relocation area. If odors are noted or reported, Contractor may be required to enhance the use of the waste cover placement and odor neutralizing agents.
- F. If the facility receives an odor complaint, in accordance with the Operating Plan, NCES will implement an odor inspection to confirm the odors at the alleged source and if necessary to identify the source of the odor. For those persons who may be calling during hours when the facility is not open, the call is automatically forwarded to an answering service which will contact an NCES representative. The NCES representative will follow the procedures outline above.
- G. The facility maintains a log of odor complaints in its Operating Plan. The completed form provides a log of the time and place odors were noted, and identifies the response implemented by the facility.

### 3.04 ODOR CONTROL DURING WASTE RELOCATION

- A. Limit the area of waste placement each day to the minimum area practical and cover the area with a minimum 6" of daily soil cover. Waste shall be completely covered with no waste exposed. In order to prevent potential odors from moving off-site, Owner shall apply odor neutralizing agents over the waste during waste placement, prior to installation of the daily soil cover materials.
- B. The Owner shall operate its mobile misting station in the waste relocation area to further mitigate odor generation and migration.
- C. Monitor the LFG collection system on a daily basis for gas quality and vacuum during waste relocation.

- D. Coordinate with the Contractor for the evaluation of odors off-site on a daily basis, with reconnaissance to all areas surrounding the excavation and relocation area. If odors are noted or reported, Contractor and/or Owner may be required to enhance the use of the soil placement and odor neutralizing agents.

**END OF SECTION**