

Orr&Reno

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December 3, 2025

John M. Formella, Attorney General
NH Department of Justice
Office of the Attorney General
1 Granite Place South
Concord, NH 03301

Re: Request for Investigation of the NCES Landfill in Bethlehem

Dear Attorney General Formella:

I write on behalf of my client, Jon Swan and Save Forest Lake, requesting an investigation of the NCES Landfill in Bethlehem for its refusal to comply with the terms and conditions of the NHDES facility operating permit. My client alleges that the NCES facility has exceeded its permitted capacity as of June 30, 2025.

This ongoing issue has been reported to Commissioner Robert Scott of NHDES (the Department) and continues to remain unaddressed. By abdicating its regulatory and enforcement responsibilities, in allowing for exceedances of the design limitations of the facility as detailed within both the March 17, 2020 Stage VI expansion permit application and October 9, 2020 Stage VI Operating Permit, the Department is placing the health and safety of the citizens of the Town of Bethlehem, downstream communities, and the surrounding environment at risk.

As of the end of the second quarter (Q2) of 2025, June 30, the NCES Landfill has received 961,480.38 Tons or 1,265,105.76 Cubic Yards (CY) of waste since January 1, 2021, according to the data submitted by NCES to both the Department and the Town of Bethlehem. The current Stage VI Operating Permit, approved October 9, 2020, specifies that "*The permittee shall limit airspace use to a maximum of 230,200 cubic yards per year, inclusive of cover materials, and preserve for use during calendar year 2026 no less than 150,000 cubic yards of capacity[.]*" (emphasis added). Thus, NCES is limited to 230,200 cubic yards, or 175,000 tons of waste, per year, using a conversion rate of .76, with a maximum of 943,000 Tons or 1.24 million CY of permitted capacity. This limit is also specifically spelled out in the October 9, 2020 "Application Review Summary" at page 44. As a result, the NCES Landfill has exhausted its permitted capacity, approximately 1.5 years short of its minimum permitted life of December 31, 2026.

The Department strictly administered these waste deposit limits at the NCES facility through Stage V of the permitting history. For example, on February 18, 2021, the Department sent a Notice of Findings (“NOF”) to NCES regarding facility capacity (Stages I-V). In the NOF, the Department noted that it had reviewed: the 2019 annual facility report, and supplements; the monthly facility reports for 2020; and the monthly facility report for January 2021 for the landfill at the NCES facility. The Department stated that the purpose of the review was to determine compliance with the capacity limitations of the landfill at the Facility set out in Conditions (3) and (8) of the Permit, as modified on August 15, 2014, for development of Stage V in accordance with the operating approval issued on December 23, 2015. In the NOF, NHDES reached a preliminary finding that NCES had exceeded the landfill capacity under the then-current operating approval; and requested additional information from NCES before NHDES made a final determination. According to the department, *14,397 cubic yards was the estimated remaining NCES Stage V capacity, as of January 1, 2021*. NCES exceeded its permitted capacity by **10,509 cubic yards** as of the end of January, 2021, according to the department-issued Notice of Findings. But where a 10,509 CY exceedance prompted an investigation and findings in 2021, an exceedance greater by an order of magnitude is now taking place with regard to Stage VI, with no action from the Department.

The same methodology used by the Department in its 2021 exceedance determination should apply at this time, particularly since the only new factor in the equation is the added capacity and design for the approved October 9, 2020 Stage VI expansion. Thus, the Department should have arrived at the same conclusion as it did on February 18, 2021 in its Notice of Findings. The NCES Landfill has exceeded the permitted capacity provided by the Stage VI expansion.

To be specific, at the end of the second quarter of 2025 (“Q2”) on June 30, 2025, NCES has landfilled 1,012,513.19 Tons, or 1,332,254.20 cubic yards, of waste into an expansion area designed and permitted for a maximum waste capacity of 943,000 tons, or 1,241,000 cubic yards. This is approximately 1.5 years short of its minimum permitted life of December 31, 2026, meaning that every day’s worth of dumping, tipping and discharge into the NCES landfill compounds the exceedance breach.

If allowed to remain open through the end of 2026, it is estimated that 270,000 Tons of non-permitted waste will be landfilled at NCES, in exceedance of the Stage VI Operating Permit as designed.

By exceeding the maximum design parameters approved in the October 9, 2020 Stage VI Operating Permit, there exist valid concerns about the long-term safety and stability of the facility due to such extreme exceedances of the permitted tonnage and the potential for landfill instability, liner and piping damage, and excessive leachate generation.

I am asking on behalf of Mr. Swan and Save Forest Lake that the Department of Justice review these materials with the Department of Environmental Services and Commissioner Scott. The Department has not explained its failure to abide by its own previously-applied standards for waste management at NCES. It is critical that the Department enforce its own permits and orders, lest applicants—particularly applicants dealing every day with solid waste and leachate producing facilities—conclude that the State of New Hampshire will not defend its own permit conditions.

Alleged Violations

1. NCES violated Env-Sw 806.02(g) and the Permit, as modified, by filling waste in exceedance of the permitted capacity of the landfill at the NCES Bethlehem Facility, as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.
2. NCES violated Env-Sw 102.09(a) and the Permit, as modified, by exceeding the average weekly tonnage reported as anticipated to be received at the facility during the quarter in which the most waste is anticipated to be received, as identified in Condition 31(c) of the modification dated October 9, 2020.
3. NCES violated Env-Sw 1005.01(a), and the Permit, as modified, by exceeding the capacity limits specified in its permit, as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.
4. NCES violated Env-Sw 1005.01(b); and the Permit, as modified, by operating the landfill in a manner inconsistent with the design limitations of the Facility, as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.
5. NCES violated Env-Sw 1105.04(a); and the Permit, as modified, by failing to operate the Facility in compliance with the Solid Waste Rules, and the terms and conditions of the Permit, as modified.
6. NCES violated Env-Sw 1005.09; and the Permit, as modified, by failing to notify NHDES of the violations of the Solid Waste Rules, and the Permit, as modified.
7. NCES violated Env-Sw 102.54(a) and (c), and the Permit, as modified, by exceeding the design capacity and the design volume; as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.
8. NCES violated Env-Sw 102.55 and Env-Sw 1005.01(b), and the Permit, as modified, by exceeding the design storage capacity, expressed in cubic yards and tons, which a facility is designed to store, and failing to operate in a manner consistent with the design limitations of the

facility, as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.

9. NCES violated Env-Sw 102.56, and the Permit, as modified, by exceeding the design volume, the maximum in-place volume of waste, including cover materials, to be received at a landfill during its active life, as identified in Conditions 27(a), 27(b), and 31(c), as well as Section III of the modification dated October 9, 2020.

Yearly exceedances of the annual permitted fill rate (175,000 Tons)

2021

The "Waste Received" Quarterly Reports for NCES 2021 tonnage totaled **227,038.07 Tons**.

The tonnage reported to the Town of Bethlehem for Host Community Agreement (HCA) purposes in 2021 was **227,037.75 Tons**.

2022

The "Waste Received" Quarterly Reports for NCES 2022 tonnage totaled **219,763.25 Tons**.
The tonnage reported to the Town of Bethlehem for Host Community Agreement purposes in 2022 was **219,763 Tons**.

2023

The "Waste Received" Quarterly Reports for NCES 2023 tonnage totaled **221,227.82 Tons**.
The tonnage reported to the Town of Bethlehem for Host Community Agreement purposes in 2023 was **221,227.82 Tons**.

2024

The "Waste Received" Quarterly Reports for NCES 2024 tonnage totaled: **212,563.98 Tons**.
The tonnage reported to the Town of Bethlehem for Host Community Agreement purposes in 2024 was **212,563.98 Tons**.

2025

NCES Q1 (Jan, Feb, March) 2025 Report: **33,843.96 tons**

NCES Q2 (April, May, June) 2025 Report: **47,043.30 tons**

NCES Q3 (July, August, September) 2025 Report: **51,032.81 tons**

NCES Q1-Q3 2025 Reports: 131,920.07 Tons

Town of Bethlehem for NCES HCA, Q1-Q3 2025: 131,920.07 Tons

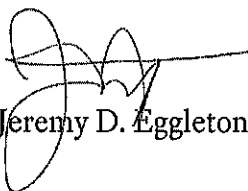
Total HCA Bethlehem Reported Tonnage 2021-Q3 2025: 1,012,512.87 Tons

**Total NCES Facility Report "Waste Received" Tonnage, 2021-September 30, 2025:
1,012,513.19 Tons or, using the .76 conversion rate, 1,332,254.20 cubic yards**

October 9, 2020 NCES Stage VI permitted capacity: 943,000 tons/1,241,000 cubic yards

In total, this discrepancy comprises at least 57,995.59 Tons/76,309.98 Cubic Yards (CY).

Yours very truly,



Jeremy D. Eggleton

JDE/mem
Enclosures

cc: Commissioner Robert Scott, NHDES
Office of the Governor
Chairperson, House Environment & Agriculture Committee

5708033

**2019-2024 NCES Waste Received
and Waste Origin Reports**

6. Facility Operator Information (Env-Sw 1105.13(c))

Name	Certificate Number	Expiration Date	Still Working at Facility as of December 31?
1. See attached		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No

☒ Additional Facility Operator Information is attached to this Annual Facility Report.

7. Waste and Recyclables Received & Shipped (Env-Sw 1105.13(e), Env-Sw 1105.13(f))**Type of Waste**

Note: Universal Wastes and Used Oil are included in Section 11, so do not enter them here.

<input checked="" type="checkbox"/> Ash	<input type="checkbox"/> Electronic Waste	<input checked="" type="checkbox"/> Scrap Metal
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Food Waste	<input type="checkbox"/> White Goods
<input checked="" type="checkbox"/> Bulky Waste	<input type="checkbox"/> Infectious Waste	<input checked="" type="checkbox"/> Other: Approved Special Waste
<input checked="" type="checkbox"/> C&D Debris	<input checked="" type="checkbox"/> Municipal Solid Waste	<input checked="" type="checkbox"/> Other:
<input checked="" type="checkbox"/> Contaminated Soil	<input type="checkbox"/> Recyclable Materials	<input checked="" type="checkbox"/> Other:

Quantity of Waste

Quantity of Waste Received		Quantity of Waste Shipped	
Non-Recyclable Waste Received:		Non-Recyclable Waste Shipped:	
From NH Sources	233487.63 tons	To NH Destinations	0 tons
From Out-of-State Sources	113345.11 tons	To Out-of-State Destinations	0 tons
Total Received	346832.74 tons	Total Shipped	0 tons
Recyclables Received:		Recyclables Shipped:	
From NH Sources	59.96 tons	To NH Destinations	tons
From Out-of-State Sources	tons	To Out-of-State Destinations	56.57 tons
Total Received	59.96 tons	Total Shipped	tons

8. Estimated Quantity of Waste Stored at the Facility as of December 31, 2019 (Env-Sw 1105.13(i))

Type of Waste	Quantity Onsite as of Dec. 31	Type of Waste	Quantity Onsite as of Dec. 31
Ash	tons	Municipal Solid Waste	tons
Asbestos	tons	Recyclable Materials	tons
Bulky Waste	tons	Scrap Metal	5.39 tons
C&D Debris	tons	White Goods	tons
Contaminated Soil	tons	Other:	
Electronic Waste	tons	Other:	
Food Waste	tons	Other:	
Infectious Waste	tons	Other:	

ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN

CALENDAR YEAR	2019
PERMITTEE	North Country Environmental Services, Inc.
FACILITY NAME	NCES Landfill
PERMIT NO.	DES-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)										ADC
	MSW-R	MSW-C/I	CDD	INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS	
New Hampshire	94,753.50	0.00	120,890.77	0.00	0.00	104.22	3,378.79	53.26	756.85	219,937.39	13,550.24
Vermont	3,733.78	0.00	667.84	0.00	0.00	0.00	0.00	0.00	216.98	4,618.60	658.16
Massachusetts	28,908.95	0.00	13,434.36	0.00	0.00	0.00	22,353.97	1,080.91	2,953.58	68,731.77	37,788.78
Maine	6.38	0.00	1.59	0.00	0.00	0.00	0.00	0.00	7.87	15.84	1,390.97
Rhode Island	0.00	0.00	0.00	0.00	0.00	0.00	11.10	0.00	38.34	49.44	9.22
Connecticut	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	62.92	62.92	7.86
New Jersey	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.55	11.55	0.00
										0.00	
										0.00	
Totals	127,402.61	0.00	134,994.56	0.00	0.00	104.22	25,743.86	1,134.17	4,048.09	293,427.51	53,405.23

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, and ash other than ash from household stoves. See Env-Sw 103.47.

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

6. Facility Operator Information [Env-Sw 1105.13(c)]

Name	Certificate Number	Expiration Date	Still Working at Facility as of December 31?
1. See attached		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.		/ /	<input type="checkbox"/> Yes <input type="checkbox"/> No

☒ Additional Facility Operator Information is attached to this Annual Facility Report.

7. Waste and Recyclables Received & Shipped [Env-Sw 1105.13(e) / Env-Sw 1105.13(f)]**Type of Waste**

Note: Universal Wastes and Used Oil are included in Section 11, so do NOT enter them here.

<input checked="" type="checkbox"/> Ash	<input type="checkbox"/> Electronic Waste	<input type="checkbox"/> Recyclable Materials
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Food Waste Composted Onsite	<input type="checkbox"/> Scrap Metal
<input checked="" type="checkbox"/> Bulky Waste	<input type="checkbox"/> Food Waste Transferred to Composter/Processor	<input type="checkbox"/> White Goods
<input checked="" type="checkbox"/> C&D Debris	<input type="checkbox"/> Infectious Waste	<input checked="" type="checkbox"/> Other: Approved Special Waste
<input checked="" type="checkbox"/> Contaminated Soil	<input checked="" type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> Other:

Quantity of Waste

Quantity of Waste Received		Quantity of Waste Shipped	
C&D Debris Received:		C&D Debris Shipped:	
From NH Sources	96,992.57 tons	To NH Destinations	0 tons
From Out-of-State Sources	5,961.67 tons	To Out-of-State Destinations	0 tons
Total Received	102,954.24 tons	Total Shipped	0 tons
Recyclables Received:		Recyclables Shipped:	
From NH Sources	49.14 tons	To NH Destinations	tons
From Out-of-State Sources	tons	To Out-of-State Destinations	49.14 tons
Total Received	49.14 tons	Total Shipped	49.14 tons
Mixed Solid Waste/General Refuse Received:		Mixed Solid Waste/General Refuse Shipped:	
From NH Sources	88,075.54 tons	To NH Destinations	0 tons
From Out-of-State Sources	53,912.76 tons	To Out-of-State Destinations	0 tons
Total Received	141,988.30 tons	Total Shipped	0 tons

ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN

CALENDAR YEAR 2020
PERMITTEE North Country Environmental Services, Inc.
FACILITY NAME NCES Landfill
PERMIT NO. DES-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)										ADC
	MSW-R	MSW-C/I	CDD	INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS	
New Hampshire	77,770.06	0.00	96,992.57	0.00	0.00	9.46	1,727.36	100.45	568.57	177,168.47	7,899.64
Vermont	3,236.98	0.00	1,409.87	0.00	0.00	0.00	0.00	453.84	0.00	5,100.69	0.00
Massachusetts	854.18	0.00	4,538.26	0.00	0.00	0.00	15,414.99	193.81	519.54	21,520.78	32,714.20
Maine	0.00	0.00	13.54	0.00	0.00	0.00	0.00	0.00	0.00	13.54	280.29
Rhode Island	0.00	0.00	0.00	0.00	0.00	0.00	212.71	0.00	0.00	212.71	0.00
Connecticut	0.00	0.00	0.00	0.00	0.00	0.00	0.00	32.22	0.00	32.22	0.00
										0.00	
										0.00	
										0.00	
Totals	81,861.22	0.00	102,954.24	0.00	0.00	9.46	17,355.06	780.32	1,088.11	204,048.41	40,894.13

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris,

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

6. Solid Waste Facility Operator Information [[Env-Sw 1105.13\(c\)](#)]

Name	Certificate Number	Expiration Date	Still Working at Facility as of December 31?
1. See Attached			<input type="checkbox"/> Yes <input type="checkbox"/> No
2.			<input type="checkbox"/> Yes <input type="checkbox"/> No
3.			<input type="checkbox"/> Yes <input type="checkbox"/> No
4.			<input type="checkbox"/> Yes <input type="checkbox"/> No
5.			<input type="checkbox"/> Yes <input type="checkbox"/> No

☒ Additional Solid Waste Facility Operator Information is attached to this Annual Facility Report.

7. Waste and Recyclables Received & Shipped [[Env-Sw 1105.13\(e\)](#) / [Env-Sw 1105.13\(f\)](#)]**Type of Waste**

Note: Universal Wastes and Used Oil are included in Section 11, so do NOT enter them here.

<input checked="" type="checkbox"/>	Ash	<input type="checkbox"/>	Electronic Waste	<input type="checkbox"/>	Recyclable Materials
<input type="checkbox"/>	Asbestos	<input type="checkbox"/>	Food Waste Composted Onsite	<input type="checkbox"/>	Scrap Metal
<input checked="" type="checkbox"/>	Bulky Waste	<input type="checkbox"/>	Food Waste Transferred to Composter/Processor	<input type="checkbox"/>	White Goods
<input checked="" type="checkbox"/>	C&D Debris	<input type="checkbox"/>	Infectious Waste	<input checked="" type="checkbox"/>	Other: Approved Special Waste
<input checked="" type="checkbox"/>	Contaminated Soil	<input checked="" type="checkbox"/>	Municipal Solid Waste	<input type="checkbox"/>	Other:

Quantity of Waste

Quantity of Waste Received		Quantity of Waste Shipped	
C&D Debris Received:		C&D Debris Shipped: <input type="checkbox"/> Recycled <input type="checkbox"/> Disposed	
From NH Sources	88,212.75 tons	To NH Destinations	0 tons
From Out-of-State Sources	180.71 tons	To Out-of-State Destinations	0 tons
Total Received	88,393.46 tons	Total Shipped	0 tons
Recyclables Received:		Recyclables Shipped:	
From NH Sources	100.33 tons	To NH Destinations	0 tons
From Out-of-State Sources	0 tons	To Out-of-State Destinations	100.33 tons
Total Received	100.33 tons	Total Shipped	100.33 tons
Mixed Solid Waste/General Refuse Received:		Mixed Solid Waste/General Refuse Shipped:	
From NH Sources	101,574.12 tons	To NH Destinations	0 tons
From Out-of-State Sources	37,070.49 tons	To Out-of-State Destinations	0 tons
Total Received	138,644.61 tons	Total Shipped	0 tons

ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN**CALENDAR YEAR**

2021

PERMITTEE

North Country Environmental Services, Inc.

FACILITY NAME

North Country Environmental Services, Inc.

PERMIT NO.

DWS-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)									
	MSW-R	MSW-C/I	CDD	TREATED INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS
NH	90,036.97		88,212.75			100.61	985.12	21.46	617.47	179,974.38
VT	2,295.87		155.19						33.05	2,484.11
ME	29.90						16.37			46.27
RI							226.33			226.33
CT										0.00
MA	288.56		25.52				9,374.20		1,349.33	11,037.61
										0.00
										0.00
										0.00
Totals	92,651.30	0.00	88,393.46	0.00	0.00	100.61	10,602.02	21.46	1,999.85	193,768.70

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, and ash other than ash from household stoves. See Env-Sw 103.47.

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

TREATED INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

6. Solid Waste Facility Operator Information [Env-Sw 1105.13(c)]

Was the facility exempt from having certified Solid Waste Facility Operators working at the facility during the Reporting Year? ☐ Yes ☒ No

If Yes, cite the reason for the exemption: _____

If No, complete the table below:

Name	Certificate Number	Expiration Date	Still Working at Facility as of December 31?
1. See Attached			<input type="checkbox"/> Yes <input type="checkbox"/> No
2.			<input type="checkbox"/> Yes <input type="checkbox"/> No
3.			<input type="checkbox"/> Yes <input type="checkbox"/> No
4.			<input type="checkbox"/> Yes <input type="checkbox"/> No
5.			<input type="checkbox"/> Yes <input type="checkbox"/> No

☒ Additional Solid Waste Facility Operator Information is attached to this Annual Facility Report.

7. Waste and Recyclables Received & Shipped [Env-Sw 1105.13(e) / Env-Sw 1105.13(f)]**Type of Waste**

Note: Universal Wastes and Used Oil are included in Section 11, so do NOT enter them here.

<input checked="" type="checkbox"/> Ash	<input type="checkbox"/> Electronic Waste	<input type="checkbox"/> Recyclable Materials
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Food Waste Composted Onsite	<input type="checkbox"/> Scrap Metal
<input checked="" type="checkbox"/> Bulky Waste	<input type="checkbox"/> Food Waste Transferred to Composter/Processor	<input type="checkbox"/> White Goods
<input checked="" type="checkbox"/> C&D Debris	<input type="checkbox"/> Infectious Waste	<input checked="" type="checkbox"/> Other: Approved Special Waste
<input checked="" type="checkbox"/> Contaminated Soil	<input checked="" type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> Other:

Quantity of Waste

Quantity of Waste Received		Quantity of Waste Shipped	
C&D Debris Received:		C&D Debris Shipped: <input type="checkbox"/> Recycled <input type="checkbox"/> Disposed	
From NH Sources	92,683.65 tons	To NH Destinations	0 tons
From Out-of-State Sources	191.84 tons	To Out-of-State Destinations	0 tons
Total Received	92,875.49 tons	Total Shipped	0 tons
Recyclables Received:		Recyclables Shipped:	
From NH Sources	58.48 tons	To NH Destinations	0 tons
From Out-of-State Sources	0 tons	To Out-of-State Destinations	58.48 tons
Total Received	58.48 tons	Total Shipped	58.48 tons
Mixed Solid Waste/General Refuse Received:		Mixed Solid Waste/General Refuse Shipped:	
From NH Sources	85,430.84 tons	To NH Destinations	0 tons
From Out-of-State Sources	3504.28 tons	To Out-of-State Destinations	0 tons
Total Received	88,935.12 tons	Total Shipped	0 tons

ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN

CALENDAR YEAR	2022
PERMITTEE	North Country Environmental Services, Inc.
FACILITY NAME	North Country Environmental Services, Inc.
PERMIT NO.	DWS-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)									
	MSW-R	MSW-C/I	CDD	TREATED INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS
NH	85,430.84	0.00	92,683.65	0.00	0.00	0.00	718.26	0.00	640.01	179,472.76
VT	2,968.11	0.00	132.58	0.00	0.00	0.00	0.00	0.00	0.00	3,100.69
ME	0.00						0.00			0.00
RI	0.00						0.00			0.00
CT	0.00									0.00
MA	536.17		59.26				9,290.96	495.35	0.00	10,381.74
										0.00
										0.00
										0.00
Totals	88,935.12	0.00	92,875.49	0.00	0.00	0.00	10,009.22	495.35	640.01	192,955.19

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, and ash other than ash from household stoves. See Env-Sw 103.47.

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

TREATED INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

6. Solid Waste Facility Operator Information

Was the facility exempt from having certified Solid Waste Facility Operators working at the facility during the Reporting Year? ☐ Yes ☒ No

If Yes, cite the reason for the exemption: _____

If No, complete the table below:

Name	Certificate Number	Expiration Date	Still Working at Facility as of December 31?
1. See Attached			<input type="checkbox"/> Yes <input type="checkbox"/> No
2.			<input type="checkbox"/> Yes <input type="checkbox"/> No
3.			<input type="checkbox"/> Yes <input type="checkbox"/> No
4.			<input type="checkbox"/> Yes <input type="checkbox"/> No
5.			<input type="checkbox"/> Yes <input type="checkbox"/> No

☐ Additional Solid Waste Facility Operator Information is attached to this Annual Facility Report.

7. Waste and Recyclables Received & Shipped**Type of Waste**

Note: Universal Wastes and Used Oil are included in Section 11, so do NOT enter them here.

<input checked="" type="checkbox"/>	Ash	<input type="checkbox"/>	Electronic Waste	<input type="checkbox"/>	Recyclable Materials
<input type="checkbox"/>	Asbestos	<input type="checkbox"/>	Food Waste Composted Onsite	<input type="checkbox"/>	Scrap Metal
<input checked="" type="checkbox"/>	Bulky Waste	<input type="checkbox"/>	Food Waste Transferred to Composter/Processor	<input type="checkbox"/>	White Goods
<input checked="" type="checkbox"/>	C&D Debris	<input type="checkbox"/>	Infectious Waste	<input checked="" type="checkbox"/>	Other: Approved Special Waste
<input checked="" type="checkbox"/>	Contaminated Soil	<input checked="" type="checkbox"/>	Municipal Solid Waste	<input type="checkbox"/>	Other:

Quantity of Waste

Quantity of Waste Received		Quantity of Waste Shipped	
C&D Debris Received:		C&D Debris Shipped: <input type="checkbox"/> Recycled <input type="checkbox"/> Disposed	
From NH Sources	89,124.67 tons	To NH Destinations	0 tons
From Out-of-State Sources	523.50 tons	To Out-of-State Destinations	0 tons
Total Received	89,648.17 tons	Total Shipped	0 tons
Recyclables Received:		Recyclables Shipped:	
From NH Sources	41.34 tons	To NH Destinations	0 tons
From Out-of-State Sources	0 tons	To Out-of-State Destinations	41.34 tons
Total Received	41.34 tons	Total Shipped	41.34 tons
Mixed Solid Waste/General Refuse Received:		Mixed Solid Waste/General Refuse Shipped:	
From NH Sources	85,282.49 tons	To NH Destinations	0 tons
From Out-of-State Sources	3,483.03 tons	To Out-of-State Destinations	0 tons
Total Received	88,765.52 tons	Total Shipped	0 tons

Total Tonnage 178,413.69

ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN

CALENDAR YEAR	2023
PERMITTEE	North Country Environmental Services, Inc.
FACILITY NAME	North Country Environmental Services, Inc.
PERMIT NO.	DWS-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)									
	MSW-R	MSW-C/I	CDD	TREATED INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS
NH	85,282.49		89,124.67			114.05	3,572.74		753.02	178,846.97
VT	3,483.03		523.50							4,006.53
MA							11,133.88		8.04	11,141.92
RI										0.00
										0.00
										0.00
										0.00
										0.00
										0.00
Totals	88,765.52	0.00	89,648.17	0.00	0.00	114.05	14,706.62	0.00	761.06	193,995.42

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, and ash other than ash from household stoves. See Env-Sw 103.47.

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

TREATED INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

Construction & Demolition (C&D) Debris: Non-putrescible building material, and rubble resulting from the construction, remodeling, repair or demolition of structures or roads, including for example: bricks, concrete and other masonry materials; wood, wall coverings, plaster, dry wall; plumbing, fixtures, non-asbestos insulation and roofing shingles; asphaltic pavement; glass; plastics that are not sealed in a manner that conceals other wastes; and electrical wiring and components, incidental to any of the above and containing no hazardous liquid or metals.

The term does not include asbestos waste, garbage, corrugated container board, electrical fixtures containing hazardous liquids such as fluorescent light ballasts or transformers, furniture, appliances, tires, drums and containers, and fuel tanks.

Contaminated Soil: Soil containing any regulated contaminant (see Env-Or 600), other than naturally occurring substances at naturally occurring or background levels, at a concentration that has the potential to adversely affect human health or the environment. This includes petroleum (e.g., gas, oil) impacted gravel, sand, silt, clay and loam.

Electronic Waste: Includes computer monitors, laptops, cathode ray tubes (CRTs), liquid crystal displays (LCDs), plasma and LCD televisions, printers, cellphones, copiers, fax machines, other video display devices, and video-display media recorders/players (e.g., DVD players, VCRs).

Food Waste: Food waste collected separately from other waste types. Food wastes include vegetable matter, bakery products, vegetable oils, dairy and dairy byproducts, and meat and meat byproducts.

Infectious Waste: Any waste which, because of its infectious nature, may cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed. Typically, this type of waste is generated from a medical facility where it is managed as "red bag" waste.

Municipal Solid Waste or "MSW": Refers to a variety of non-hazardous waste generated at residences, commercial or industrial establishments, and institutions, commonly referred to as "trash" or "refuse." Excludes C&D debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, yard waste, hazardous waste, universal waste, used oil, and ash sources other than household stoves.

Recyclable Materials: Materials that can be used to produce marketable goods, including clear and colored glass, aluminum, ferrous and nonferrous metal containers, plastics, corrugated cardboard and paper.

Scrap Metal: Metal parts, bars, rods, sheets, or wire, or metal bits and pieces that may be combined together with bolts or solder, for example, radiators, aluminum window frames, lawn furniture, pipes and fittings.

White Goods: Discarded household appliances, including clothes washers and dryers, stoves, microwaves, refrigerators, freezers, dishwashers and air conditioners.

Other: Any solid waste that does not fit into one of the types listed above.

[Env-Sw 100](#)

[Env-Or 600](#)

Check all that apply.

Ash

Bulky Waste

C&D Debris

Contaminated Soil

Municipal Solid Waste

Other: Approved Special Waste

Quantity of Waste

Provide the quantity of C&D debris, recyclables, and mixed solid waste/general refuse (non-recyclable wastes) received and shipped, in tons. C&D debris is any C&D separately collected and shipped for disposal or recycling. Recyclables are those materials sent to a recycling facility, such as a materials recovery facility, or directly to market for reuse. Non-recyclable wastes are wastes sent for processing at an incinerator or disposal at a landfill.

Note: Facilities that only weigh waste when it is shipped offsite may have the same tonnages in the Received At Facility and Shipped By Facility Action Types if there is no storage onsite as of December 31 of the Reporting Year.

If quantities are in units other than tons, use the conversion chart to estimate tonnages.

[Units Conversion Chart](#)

Quantity of Waste

Waste Type	Action Type	Source/Destination	Waste Quantity	Units
C&D Debris	Received at facility	From NH Sources	90874.60	tons

Waste Type	Action Type	Source/Destination	Waste Quantity	Units
C&D Debris	Received at facility	From Out-of-State Sources	392.84	tons
C&D Debris	Shipped by facility	To NH Destinations	0.00	tons
C&D Debris	Shipped by facility	To Out-of-State Destinations	0.00	tons
Recyclables	Received at facility	From NH Sources	17.25	tons
Recyclables	Received at facility	From Out-of-State Sources	0.00	tons
Recyclables	Shipped by facility	To NH Destinations	0.00	tons
Recyclables	Shipped by facility	To Out-of-State Destinations	17.25	tons
Mixed Solid Waste / General Refuse	Received at facility	From NH Sources	82481.75	tons
Mixed Solid Waste / General Refuse	Received at facility	From Out-of-State Sources	1674.51	tons
Mixed Solid Waste / General Refuse	Shipped by facility	To NH Destinations	0.00	tons
Mixed Solid Waste / General Refuse	Shipped by facility	To Out-of-State Destinations	0.00	tons

C&D Debris Shipped

Disposed

Bypass and Residual Waste

Provide the quantity of bypass waste, residual waste and/or leachate that the facility generated and shipped to in-state and out-of-state destinations, as well as that quantity that remains stored on-site as of the end of the Reporting Year.

Bypass waste is typically associated with processing & treatment facilities. The term means any waste delivered to the reporting facility that it could not process or treat and therefore had to divert to another facility for proper handling. The term includes downtime waste, excess waste, and unsuitable waste. Examples of bypass wastes include tires or banned electronic waste removed prior to waste incineration, or bulky goods such as mattresses removed from C&D debris before processing, or MSW that cannot be incinerated because of a temporary shutdown of the incinerator.

Residual waste is typically associated with processing & treatment facilities, and landfills. The term means solid waste remaining after processing, treatment or disposal, or as a by-product of the same. The term includes leachate, decomposition gases and waste-derived products that are NOT certified for distribution and use pursuant to Env-Sw 1500. Examples of residual wastes include ash that is generated from incineration, C&D fines with no market value generated during processing of C&D debris, oversized/non-degradable particles and debris removed after the composting process, or or non-metal material received at scrap metal facilities that was deconstructed/stripped at the facility from waste items containing metal. A separate line is provided for residual waste leachate because it is traditionally measured by volume (e.g., gallons).

[Env-Sw 1500](#)

Did your facility generate and ship any Bypass or Residual waste in the Reporting Year?

Yes

Waste Type	Action Type	Source/Destination	Waste Quantity	Units
Bypass Waste	Generated	NONE PROVIDED	0.00	tons
Bypass Waste	Shipped by facility	To NH Destinations	0.00	tons
Bypass Waste	Shipped by facility	To Out-of-State Destinations	0.00	tons
Bypass Waste	Stored Onsite as of Dec 31	NONE PROVIDED	0.00	tons
Residual Waste	Generated	NONE PROVIDED	0.00	tons
Residual Waste	Shipped by facility	To NH Destinations	0.00	tons
Residual Waste	Shipped by facility	To Out-of-State Destinations	0.00	tons
Residual Waste	Stored Onsite as of Dec 31	NONE PROVIDED	0.00	tons
Leachate	Generated	NONE PROVIDED	15344231.00	gallons
Leachate	Shipped by facility	To NH Destinations	12820751.00	gallons
Leachate	Shipped by facility	To Out-of-State Destinations	2253480.00	gallons
Leachate	Stored Onsite as of Dec 31	NONE PROVIDED	44873.00	gallons

Nork, Michael

From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Thursday, July 3, 2025 1:31 PM
To: Nork, Michael; Marc Morgan
Cc: Colby, Jaime
Subject: RE: [External] RE: NHDES Request to Landfill Permittees for 2024 Disposal Data
Attachments: CY2024 Q1 NCES Daily Material Tons Tracking.pdf; CY2024 Q2 NCES Daily Material Tons Tracking.pdf; CY2024 Q3 NCES Daily Material Tons Tracking.pdf; CY2024 Q4 NCES Daily Material Tons Tracking.pdf

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Yes it is all ADC – that number does include foundry sand and road base which we classify as ADC. I have attached the numbers submitted with our quarterly facility reports which show the breakout of those materials if you need it.

Thank you, let me know if you have any other questions.

Lindsey Menard
Environmental Manager

Permits, Compliance, & Engineering (PCE)
1855 VT Route 100, Hyde Park, VT 05655
c. 802-585-0551
e. lindsey.menard@casella.com • w. [casella.com](https://www.casella.com)

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From: Nork, Michael <Michael.A.Nork@des.nh.gov>
Sent: Thursday, July 3, 2025 12:18 PM
To: Lindsey Menard <lindsey.menard@casella.com>; Marc Morgan <marc.morgan@casella.com>
Cc: Colby, Jaime <Jaime.M.Colby@des.nh.gov>
Subject: RE: [External] RE: NHDES Request to Landfill Permittees for 2024 Disposal Data

Received -- thank you, Lindsey.

Just a clarification – the far right column on the table is supposed to be for materials used as alternate daily cover, but the column header on the copy you sent was altered to read “BUD.” Am I correct that the tons shown in that column were only used as ADC?

I appreciate the quick response; thanks again.

Mike

From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Thursday, July 3, 2025 11:24 AM
To: Nork, Michael <Michael.A.Nork@des.nh.gov>; Marc Morgan <marc.morgan@casella.com>
Cc: Colby, Jaime <Jaime.M.Colby@des.nh.gov>
Subject: RE: [External] RE: NHDES Request to Landfill Permittees for 2024 Disposal Data

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Hi Mike,

See attached. We did use this to fill out the annual report, apologies if I missed the location to upload it to the submission.

Let me know if you need anything else, thanks!

Lindsey Menard
Environmental Manager

Permits, Compliance, & Engineering (PCE)
1855 VT Route 100, Hyde Park, VT 05655
c. 802-585-0551
e. lindsey.menard@casella.com • w. casella.com

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From: Nork, Michael <Michael.A.Nork@des.nh.gov>
Sent: Thursday, July 3, 2025 11:17 AM
To: Lindsey Menard <lindsey.menard@casella.com>; Marc Morgan <marc.morgan@casella.com>
Cc: Colby, Jaime <Jaime.M.Colby@des.nh.gov>
Subject: [External] RE: NHDES Request to Landfill Permittees for 2024 Disposal Data

Hi Lindsey & Marc,

I am compiling 2024 disposal data for the Biennial Solid Waste Report, and just noticed that the annual facility report for NCES did not include a waste summary table as requested.

Would it be possible to compile the tonnages on the attached spreadsheet and send back to me by next Friday 7/11?

Many thanks for your help,
Mike

Michael Nork (he/him)
Supervisor - Materials Management, Education & Planning Section
Solid Waste Management Bureau

NH Department of Environmental Services
(603) 271-2906 michael.a.nork@des.nh.gov

NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question) [NHDES Customer Service Satisfaction Survey](#)

From: Nork, Michael
Sent: Tuesday, January 28, 2025 11:52 AM
To: 'LAFLEURJ@NASHUANH.GOV' <LAFLEURJ@NASHUANH.GOV>; 'SANTOSD@NASHUANH.GOV' <SANTOSD@NASHUANH.GOV>; 'CHRISTOPHER.KILMER@LEBANONNH.GOV' <CHRISTOPHER.KILMER@LEBANONNH.GOV>; 'ERICA.DOUGLAS@LEBANONNH.GOV' <ERICA.DOUGLAS@LEBANONNH.GOV>; 'SOLID.WASTE@LEBANONNH.GOV' <SOLID.WASTE@LEBANONNH.GOV>; 'ASMITH@CONWAYNH.ORG' <ASMITH@CONWAYNH.ORG>; 'PAULD@CONWAYNH.ORG' <PAULD@CONWAYNH.ORG>; 'CONWAY@CONWAYNH.ORG' <CONWAY@CONWAYNH.ORG>; 'LRIENDEAU@AVRRDD.ORG' <LRIENDEAU@AVRRDD.ORG>; 'sharon@avrrdd.org' <sharon@avrrdd.org>; 'MARC.MORGAN@CASELLA.COM' <MARC.MORGAN@CASELLA.COM>; 'SAMUEL.NICOLAI@CASELLA.COM' <SAMUEL.NICOLAI@CASELLA.COM>; 'Kimberly.Crosby@casella.com' <Kimberly.Crosby@casella.com>; 'SDOWALIB@WM.COM' <SDOWALIB@WM.COM>; 'SPOGGI@WM.COM' <SPOGGI@WM.COM>; 'bmagnusson@wm.com' <bmagnusson@wm.com>
Cc: Jones, Emily <EMILY.M.JONES@des.nh.gov>; Colby, Jaime <Jaime.M.Colby@des.nh.gov>; Filiau, Laura <LAURA.J.FILIAU@des.nh.gov>; McKenna, Leah <LEAH.L.MCKENNA@des.nh.gov>
Subject: NHDES Request to Landfill Permittees for 2024 Disposal Data

Dear Solid Waste Landfill Permittees:

In an effort to assure consistent reporting of disposal data, NHDES is requesting that permittees complete the attached table for the 2024 reporting year. You may submit the completed table as an attachment to your 2024 annual facility report, which is due by March 31, 2025. If you have already submitted the table with your annual facility report, please disregard this message.

For your convenience, the table is provided in two formats: a PDF and an unlocked spreadsheet. Please do not add more waste types to the spreadsheet, but instead identify the best fit for each of the waste types your facility receives. Add notes if needed.

If you have any questions or difficulties with this request, please contact me (Michael.A.Nork@des.nh.gov) or Jaime Colby (Jaime.M.Colby@des.nh.gov).

Thank you for your attention to this matter.
Best regards,

Michael Nork (he/him)
Supervisor - Materials Management, Education & Planning Section
Solid Waste Management Bureau
NH Department of Environmental Services
(603) 271-2906 michael.a.nork@des.nh.gov

NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question) [NHDES Customer Service Satisfaction Survey](#)

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ANNUAL WASTE RECEIPTS BY STATE OF ORIGIN

CALENDAR YEAR 2024
PERMITTEE North Country Environmental Services, Inc.
FACILITY NAME North Country Environmental Services, Inc.
PERMIT NO. DWS-SW-SP-03-002

STATE OF ORIGIN	WASTE TYPE (TONS)									
	MSW-R	MSW-C/I	CDD	TREATED INFECTIOUS	ASBESTOS	ASH	SLUDGE	C-SOIL	OTH SPW	TOTAL RECEIPTS
NH	82,481.75		90,874.60			32.00	2,050.32		2,267.83	177,706.50
VT	1,523.69		392.84						293.37	2,209.90
MA	150.82						3,102.18		3,317.01	6,570.01
Totals	84,156.26	0.00	91,267.44	0.00	0.00	32.00	5,152.50	0.00	5,878.21	186,486.41

Note:

(1) Tonnages indicate those tons received and disposed or otherwise used within the landfill's approved design volume.

(2) "Municipal solid waste" means solid waste generated at residences, commercial or industrial establishments and institutions, but excluding construction and demolition debris, automobile scrap and other motor vehicle waste, infectious waste, asbestos waste, contaminated soil and other absorbent media, and ash other than ash from household stoves. See Env-Sw 103.47.

Legend for Waste Types:

MSW-R = Municipal solid waste from residential sources

MSW-C/I = Municipal solid waste from commercial and industrial sources

CDD = Construction and demolition debris (see Env-Sw 102.42)

TREATED INFECTIOUS = Treated infectious waste (see Env-Sw 103.28 and Env-Sw 904)

ASBESTOS = Non-friable and friable asbestos-containing waste (see Env-Sw 102.14 and Env-Sw 901)

ASH = Ash residue remaining after combustion of various materials in an incinerator or other device

SLUDGE = Sludges from various water, wastewater and air pollution control processes

C-SOIL = Soil with contamination (e.g., petroleum, other substances) that is disposed or soil otherwise unsuitable for use as ADC (see Env-Sw 903)

OTH SPW = Any other waste received that is not categorized above, including industrial process wastes. Includes paper mill sludge and grit & screenings.

TOTAL RECEIPTS = Sum of all waste receipts, which should be equal to the summation of all waste received as shown in this table (excluding ADC)

ADC = Soils and other materials permitted for use as alternative daily cover (see Env-Sw 806.03)

2020-3-17 NCES Stage VI Permit Application

Section VI. Impact Evaluation

Per the Type I Permit Modification form, the following responses are given to the five enumerated considerations. As an overview, this Type I-A permit modification will provide additional disposal capacity in an area designated as Stage VI. The new disposal capacity requires a Public Benefit Determination as it exceeds the approved capacity of Stage IV as set forth in the standard permit issued by the Department in 2003 and subsequently modified, most recently in 2014 for Stage V.

- (1) The effect the modification will have on facility function, capacity, life expectancy, service type, and service area.**

The modification request proposes no change to the facility function, service type, and service area. With this modification, the total capacity and life expectancy of Stage VI will extend the site life through 2026 filling at an average rate of 175,000 tons per year.

- (2) The effect the modification will have on the environment, public health, and public safety.**

The proposed modification will have no change in effect on the environment, public health, and public safety.

- (3) The effect the modification will have on the state's ability to achieve the goals and objectives specified in RSA 149-M:2, namely achieving a 40% minimum weight reduction in the solid waste stream on a per capita basis by the year 2000 and avoiding the disposal of recyclable materials in a lined landfill with a leachate collection system.**

The effect the modification will have on the state's ability to achieve the goals and objectives specified in RSA 149-M:2 is addressed in Part 4.0 of Section VII, the Public Benefit Demonstration.

- (4) The effect the modification will have on establishing and maintaining integrated waste management systems consistent with the hierarchy of waste management methods in RSA 149:M (the methods, in descending order of preference as specified in RSA 149-M:3, are: source reduction; recycling and reusing; composting; waste-to-energy (including incineration), incineration without energy recovery; and landfilling.**

The effect the modification will have on establishing and maintaining integrated waste management systems are addressed in Part 4.0 of Section VII of the Public Benefit Demonstration.

- (5) Consistency with the state solid waste management plan and the applicable district plan, pursuant to RSA 149-M12 I(b).**

**2020-10-9 NCES Stage VI Facility
Operating Plan**

FACILITY OPERATING PLAN

This Facility Operating Plan (Plan) is for the North Country Environmental Services, Inc. (NCES) landfill facility located on Trudeau Road in Bethlehem, New Hampshire. The purpose of this Plan is to describe the operating requirements for the facility in accordance with the New Hampshire Solid Waste Rules. A copy of this Plan is to be maintained at the facility.

1.0 FACILITY IDENTIFICATION

The facility is owned and operated by NCES. The current mailing address and telephone number for the facility are:

**North Country Environmental Services, Inc.
581 Trudeau Road, PO Box 9
Bethlehem, NH 03574
Telephone (603) 869-3366
Facsimile (603) 869-2152**

The facility is a lined landfill comprised of five Stages. Stages I, II, III, IV & V were permitted by the New Hampshire Department of Environmental Services (NHDES) in 1987, 1989, 2000, 2003, & 2015 (Permit Nos. DES-SW-87-022, DES-SW-89-009, DES-SW-SP-00-003, and DES-SW- SP-03-002), respectively. The approved design capacity for Stages I – V is: 8,535,000 cubic yards. The Stage VI design capacity is 1,241,000 cubic yards. The facility is anticipated to receive 3,350 tons of waste on average per week.

The facility is a commercial disposal facility and has no restricted service area.

1.1 Facility History

The site has been an active solid waste facility since 1976 when a town resident began landfilling in his unlined soil borrow pit. The site was later acquired and operated by Sanco, Inc. Sanco received a permit for the first double-lined landfill in New Hampshire in 1987. In 1989 Sanco sold the facility to Consumat Sanco, Inc. The waste from the unlined landfill was excavated and replaced in the lined landfill. In the early 1990s a subsidiary of Casella Waste Systems, Inc.

**2020-10-9 NHDES Application Review
Summary NHES Stage VI Expansion**

Application Review Summary				
Facility	NCES Landfill	Reviewed by	Jaime M. Colby, P.E	
Location	581 Trudeau Road, Bethlehem, NH	Checked by	Pamela Hoyt-Denison, P.E.	
Permit No.	DES-SW-SP-03-002	Review Date	Completed October 9, 2020	
Application	Type I-A Modification – Landfill Expansion (Stage VI resubmittal)	Application No.	2020-47865	Page 44 of 48

- A statewide shortfall in existing permitted disposal capacity is conservatively projected by NHDES to not occur until after 2025. NCES did not make a time based projection in the Application.
- The proposed facility would provide disposal capacity for NH generated waste during a time period that the data show the state has excess disposal capacity, as well as a time period when the state has a disposal capacity shortfall.

Therefore, in conclusion pursuant to RSA 149-M:11,V(d), NHDES has determined that a capacity shortfall exists during the planning period for the proposed type of facility (i.e., landfill), which is satisfied by the proposed facility for one year based on the applicant's commitment to operate the facility through December 31, 2026. Thus, the proposed facility satisfies a need for disposal capacity within the planning period.

Returning, then, to the assessment and determination required of NHDES pursuant to RSA 149-M:11,III(a), the department must determine whether there is a *"...short- and long-term need for a solid waste facility of the proposed type, size, and location to provide capacity to accommodate solid waste generated within the borders of New Hampshire, which capacity need shall be identified as provided in paragraph V."*

The type, size, and location of the facility for which this determination is made, is as follows:

Facility Type: Lined solid waste landfill, with an unlimited service area;

Size: New Footprint = Approximately 5.71 acres;
Capacity = 1,241,000 cubic yards or roughly 943,000 tons;
Fill rate = 175,000 tons per year, operating through December 31, 2026.

Location: Bethlehem, NH

To summarize, NCES seeks a permit for new landfill capacity to be operated during a period of time that the state initially has excess permitted disposal capacity and extending for one year into the period of time that the state is projected to have disposal capacity need. NCES proposes to decrease its disposal rate compared to the facility's current waste disposal rate in Stage V, and accept no more than 175,000 tons per year.

Determination re—RSA 149-M:11,III(a): NHDES finds that the proposed facility – a landfill in Bethlehem, NH operating at a rate of not more than 175,000 tons per year through December 31, 2026, providing about 943,000 tons of capacity during a time period that the state is projected to have a disposal capacity need – meets the criterion in RSA 149-M:11,III(a).

To ensure that capacity provided by the expansion remains available to satisfy the capacity need, NHDES has established permit conditions that limit the maximum airspace usage to 230,200 cubic yards per year and that require the facility to remain operational through December 31, 2026 (see Condition (27)). Adjustments to the facility's design required by the permit as noted in Condition (30) of the permit modification may reduce the total capacity of the facility by an undetermined volume, creating uncertainty in the annual allowable airspace usage while maintaining compliance with facility life expectancy (December 31, 2026) and this public benefit determination. To that end, NHDES has granted 230,200 cubic yards of airspace use per year (as requested by NCES at 175,000 tons per year converted using NCES' conversion rate presented in the application of 1,520 lbs/cy); however, NHDES has set the 230,200 cubic yards per year as the maximum airspace usage permitted and does not allow for averaging year-to-year. Additionally, the permit requires the facility to operate ---regardless of any design capacity reduction---through at least December 31, 2026 and preserving for use during calendar year 2026, no less than 150,000 cubic yards of capacity.

**2020-10-9 NHDES Application Review
Summary NHES Stage VI Expansion (2)**

Application Review Summary				
Facility	NCES Landfill	Reviewed by	Jaime M. Colby, P.E	
Location	581 Trudeau Road, Bethlehem, NH	Checked by	Pamela Hoyt-Denison, P.E.	
Permit No.	DES-SW-SP-03-002	Review Date	Completed October 9, 2020	
Application	Type I-A Modification – Landfill Expansion (Stage VI resubmittal)	Application No.	2020-47865	Page 2 of 48

PROJECT DESCRIPTION

North Country Environmental Services, Inc. (NCES) owns and operates a solid waste landfill (Landfill) of the same name located at 581 Trudeau Road in Bethlehem, NH. The Landfill is a commercial facility with an unlimited service area, and is regulated under Solid Waste Permit No. DES-SW-SP-03-002. NCES submitted an application in March 2020 to modify Permit No. DES-SW-SP-03-002 to authorize an expansion of the Landfill, referred to as “Stage VI”. This is a resubmittal of Application No. 2019-36785 for expansion into the same footprint (that application was withdrawn by NCES in February 2020). In the resubmitted application, NCES requested the following modifications:

- Increase landfill footprint by 5.71 acres (Phase I, aka Stage VI-South: 3.35 acres; and Phase II, aka Stage VI-East: 2.36 acres);
- Increase landfill approved design volume by 1.241 million cubic yards;
- Increase landfill “life through 2026 filling at an average rate of 175,000 tons per year”¹;
- Addition of two abutting properties owned by NCES to the regulated Facility; and
- Final approval of the construction-level plans and technical specifications for Stage VI Phase I (3.35 acres).

Proposed activities in the permit application required to accommodate the expansion include:

- Relocating the facility access road, certain monitoring points, and other associated infrastructure;
- Constructing earthen berms/embankments to support the waste containment system;
- Removing the final cap installed on the eastern slope and the temporary HDPE cover installed on the southern slope of the existing facility;
- Excavating areas of waste (up to approximately 28 feet deep) to allow connection of new leachate collection, liner, and landfill gas systems to existing systems;
- Constructing additional geomembrane liner systems; and
- Constructing additional stormwater, leachate and landfill gas infrastructure.

NHDES reviewed the application to determine whether the proposed activity meets all applicable criteria for issuance of a permit modification as specified in the New Hampshire Solid Waste Rules (the Rules, Env-Sw 100 et seq.), in effect on the date of the final decision on the application. The results of the review are summarized herein, on a rule by rule basis. The reader can obtain a copy of the cited rules from the NH Office of Legislative Services (see <http://gencourt.state.nh.us/rules/default.htm>).

NHDES is approving the application, with conditions. NHDES notes that portions of the approved expansion (Stage VI, Phase II) are based upon preliminary plans (e.g., design drawings) and, as stated in this review, NHDES is requiring specific additional information be included in the various subsequent application(s) required by the NH Solid Waste Rules, Env-Sw 100 et seq., (Rules) for obtaining approval of final plans.

Submittals

- North Country Environmental Services, Inc. (17 March 2020). *Application for a Type I-A Modification to a Solid Waste Management Facility Permit (Parts 1 and 2)*. Received March 24, 2020. Assigned WMD Log No. 2020-47865-01.
- North Country Environmental Services, Inc. (3 April 2020). *Application for a Type I-A Modification – Replacement Page to Operating Plan and Stamped Cross-section Drawings (S-1 and S-2)*. Received April 3, 2020. Assigned WMD Log No. 2020-47865-02.
- CMA Engineers, Inc. (6 April 2020). *Application for a Type I-A Modification – Notification Letters (Ammonoosuc*

¹ See Application, Part 1, PDF p. 21 (WMD Log No. 2020-47865-01). See herein Attachment A, *Public Benefit Determination*, for further discussion.

**2020-10-9 Permit Conditions NCES
Stage VI**



Financial Assurance

(25) **Financial Assurance Requirements:** The permittee shall provide and continually maintain financial assurance in accordance with:

- (a) The Solid Waste Management Act, RSA 149-M;
- (b) Env-Sw 1005.08, Env-Sw 1400, and other applicable Rules;
- (c) The Approved Financial Assurance Plan of Record identified in Condition (26) herein; and
- (d) The terms and conditions of this permit.

(26) **Approved Financial Assurance Plan:** The Approved Financial Assurance Plan of Record for this facility is the financial assurance plan consisting of: Evergreen National Indemnity Company Insurance Policies No. 850599 in the amount of \$8,153,800 and No. 850600 in the amount of \$8,345,875; the Standby Trust Agreement between North Country Environmental Services, Inc. and Keybank National Association established September 18, 2013; and the last most recent closure cost estimate prepared pursuant to Env-Sw 1400.

Determination of Public Benefit:

(27) It is the determination of NHDES under RSA 149-M:11,X that operation of this facility provides a substantial public benefit, as required by RSA 149-M:11,III and IV, when facility operations conform to the following conditions:

- (a) The permittee shall limit airspace use to a maximum of 230,200 cubic yards per year, inclusive of cover materials, and preserve for use during calendar year 2026 no less than 150,000 cubic yards of capacity.
- (b) The permittee shall operate the facility through at least December 31, 2026.
- (c) The permittee shall make available disposal capacity for New Hampshire generated solid waste for the entire operating life of the facility.
- (d) The permittee shall, for each calendar year in which the facility operates:
 - 1. demonstrate that the sources, in aggregate, from which the permittee accepted municipal solid waste (MSW) and construction and demolition (C&D) debris for disposal achieved a minimum 30 percent waste diversion rate to more preferred methods other than landfilling as outlined in the hierarchy in RSA 149-M:3. If a minimum 30 percent diversion rate cannot be demonstrated, then the permittee shall submit to NHDES by July 1 of the following year a waste diversion report which presents the permittee's evaluation of:
 - a. the actual MSW and C&D debris waste diversion rate achieved;
 - b. the primary factors affecting the waste diversion rate; and
 - c. the practicable measures that the permittee will undertake to improve the diversion rate and an implementation schedule for doing so.
 - 2. the demonstration required under Condition (27)(a)1 above shall not be required to include certain sub-types of MSW and C&D debris waste based upon a demonstration by the permittee that there are no environmentally safe or economically sound diversion alternatives to landfilling such wastes.
- (e) The permittee shall assist 10 or more New Hampshire solid waste generators, inclusive of at least 5 New Hampshire municipalities, per year with establishing or improving programs that assist in the implementation of the goals and hierarchy under RSA 149-M:2 and RSA 149-M:3, respectively.

**2021 – Q3 2025 NCES HOST Fee
Payment to Bethlehem**

	2021	2022	2023	2024	2025
Jan	19925	10397.65	15610.09	15763.66	12856.52
Feb	13169.08	10268.05	12298.83	15676.37	10180.8
Mar	17820	11883.03	14983.3	13117.28	10806.64
Apr	24851.03	15268.22	18283.48	15978.91	14272.77
May	20136.67	18584.58	18968.79	19595.08	15840.86
Jun	22818.35	20239.5	19651.94	19149.27	16929.67
Jul	22050.76	23343.49	19076.92	18575.28	
Aug	24687.19	26250.01	22875.52	19744.98	
Sep	22776.33	22398.33	16990.43	17619.27	
Oct	16979.33	21861.6	19170.89	23379.62	
Nov	10811.24	19770.21	25980.22	16462.39	
Dec	11012.77	19498.58	17337.41	17501.87	
	227037.75	219763.25	221227.82	212563.98	80887.26
host fee .75	144507.83	144716.4	145496.58	139864.83	57218.33
ton based					
on host fee	192677.11	192955.2	193995.44	186486.44	76291.11
dif muni wast	34360.64	26808.05	27232.38	26077.54	4596.15

**North Country Environmental Services
2025**

Month	Total Landfill Tonnage	Less Exempt Tonnage	Taxable Tonnage	HCF Per Ton	Per Ton HCF
January	12,856.52	364.16	12,492.36	\$0.75	\$9,369.27
February	10,180.80	1,012.44	9,168.36	\$0.75	\$6,876.27
March	10,806.64	398.73	10,407.91	\$0.75	\$7,805.93
April	14,272.77	1,595.14	12,677.63	\$0.75	\$9,508.22
May	15,840.86	598.17	15,242.69	\$0.75	\$11,432.02
June	16,929.67	627.51	16,302.16	\$0.75	\$12,226.62
July	17,849.40	1,384.18	16,465.22	\$0.75	\$12,348.92
August	15,369.76	888.49	14,481.27	\$0.75	\$10,860.95
September	17,813.65	557.24	17,256.41	\$0.75	\$12,942.31
October			0.00	\$0.75	\$0.00
November			0.00	\$0.75	\$0.00
December			0.00	\$0.75	\$0.00
Totals	131,920.07	7,426.06	124,494.01		\$93,370.51
1st Quarter	33,843.96	1,775.33	32,068.63		\$24,051.47
2nd Quarter	47,043.30	2,820.82	44,222.48		\$33,166.86
3rd Quarter	51,032.81	2,829.91	48,202.90		\$36,152.18
4th Quarter	0.00	0.00	0.00		\$0.00
	131,920.07	7,426.06	124,494.01		\$93,370.51

Prepared By: Baylee Thompson
 Baylee Thompson
 NEWS, Inc. Division Controller

10.9.25
 Date

**2021- Q3 2025 NCES Monthly Then
Quarterly Facility Wast Tonnage Reports**

Monthly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002 (Stage V)
GWP. 198704033.B.003

Report Date: 2021-02-04

1. Landfill Gas Monitoring:

Gas monitoring is measured with a meter on a quarterly and weekly basis
(See attached Weekly Monitoring Chart and Gas Well Monitoring Program)

2. Leachate Management Data:

Month of 2021	Month of Generation for Stage III		Generation for Stage IV Phase I & Stage V	Generation for Stage IV Phase I	Generation for Stage IV Phase II		Generation for Stage V
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
January	126,746	48	292,178	60	1,050,225	25	0

3. Rainfall Data:

Month of 2021	Rainfall (Inches)	Snowfall (inch)
January	0.15	23.58

4. Monthly quantity of Waste Tonnage:

Month of 2021	Quantity (tons)
January	19,925.00

Monthly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002 (Stage V)
GWP. 198704033.B.003

Report Date: 2021-03-03

1. Landfill Gas Monitoring:

Gas monitoring is measured with a meter on a quarterly and weekly basis
(See attached Weekly Monitoring Chart and Gas Well Monitoring Program)

2. Leachate Management Data:

Month of 2021	Month of Generation for Stage III		Generation for Stage IV Phase I & Stage V	Generation for Stage IV Phase I	Generation for Stage IV Phase II		Generation for Stage V
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
February	118,288	17	221,079	48	434,451	12	7

3. Rainfall Data:

Month of 2021	Rainfall (Inches)	Snowfall (inch)
February	0.77	22.51

4. Monthly quantity of Waste Tonnage:

Month of 2021	Quantity (tons)
February	13,169.08

Monthly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002 (Stage V)
GWP. 198704033.B.003

Report Date: 2021-04-11

1. Landfill Gas Monitoring:

Gas monitoring is measured with a meter on a quarterly and weekly basis
(See attached Weekly Monitoring Chart and Gas Well Monitoring Program)

2. Leachate Management Data:

Month of 2021	Month of Generation for Stage III		Generation for Stage IV Phase I & Stage V	Generation for Stage IV Phase I	Generation for Stage IV Phase II		Generation for Stage V
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
March	103,462	21	288,373	40	1,262,226	11	5

3. Rainfall Data:

Month of 2021	Rainfall (Inches)	Snowfall (inch)
March	2.87	2.69

4. Monthly quantity of Waste Tonnage:

Month of 2021	Quantity (tons)
March	17,820

Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002 (Stage V)
GWP. 198704033.B.003

Report Date: July 2021 (Q2 2021 Report)

1. Landfill Gas Monitoring:

Gas monitoring is measured with a meter on a quarterly and weekly basis
(See attached Weekly Monitoring Chart and Gas Well Monitoring Program)

2. Leachate Management Data:

Month of 2021	Month of Generation for Stage III		Generation for Stage IV Phase I & Stage V	Generation for Stage IV Phase I	Generation for Stage IV Phase II		Generation for Stage V
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
April	112,926	30	285,420	35	810,354	22	1
May	121,712	23	311,748	44	637,196	10	4
June	191,213	17	267,931	38	457,202	9	1

3. Rainfall Data:

Month of 2021	Rainfall (Inches)	Snowfall (inch)
April	2.61	18.56
May	2.01	0.00
June	2.62	0.00

4. Monthly quantity of Waste Tonnage:

Month of 2021	Quantity (tons)
April	24,851.03
May	20,136.67
June	22,818.35

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q3 2021 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month	Pump Staion #1		Pump Station #2		Pump Station #3		Pump Station #4 (Stage V)
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
July	685,380	9,319	219,564	11,941	177,255	9,264	1,248
August	404,243	6,482	204,647	8,094	130,433	2,942	750
September	378,346	4,482	175,796	6,245	88,087	2,550	781
Q3 Total	1,467,969	20,283	600,007	26,280	395,775	14,756	2,779

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (inch)
July	11.59	0.00
August	2.68	0.00
September	6.68	0.00
Q3 Total	20.95	0.00

4. Monthly quantity of Waste Tonnage:

Month	Quantity (tons)
July	22,050.76
August	24,687.19
September	22,776.33
Q3 Total	69,514.28

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q4 2021 Report

1. Landfill Gas Monitoring:

(See attached Weekly Monitoring Chart and Gas Well Monitoring Program)

2. Leachate Management Data:

Month	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4 (Stage V)
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
October	451,839	225	186,125	183	56,896	66	16
November	363,826	271	256,736	179	50,361	68	12
December	356,062	294	270,478	177	54,287	68	22
Q4 Total	1,171,727	790	713,339	539	161,544	202	50

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (inch)
October	7.21	0.00
November	3.82	5.60
December	1.09	12.42
Q4 Total	12.12	18.02

4. Monthly quantity of Waste Tonnage:

Month	Quantity (tons)
October	16,979.33
November	10,811.24
December	11,012.77
Q4 Total	38,803.34

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q1 2022 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4 (Stage V)
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
January	353,681	8,055	261,179	4,985	68,035	2,132	510
February	515,937	8,356	307,065	4,665	58,001	2,023	634
March	509,475	7,148	351,874	5,698	82,182	2,248	710
Q1 Total	1,379,093	23,559	920,118	15,348	208,218	6,403	1,854

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (inch)
January	0.70	17.28
February	0.73	25.22
March	1.63	10.36
Q1 Total	3.06	52.86

4. Monthly quantity of Waste Tonnage:

Month	Quantity (tons)
January	10,397.65
February	10,268.05
March	11,883.03
Q1 Total	32,548.73

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002 (Stage V)
GWP. 198704033.B.003

Report Date: Q2 2022 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month	Pump Station #1		Pump Station #2		Pump Station #3		Generation for Stage V
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
April	531,860	9,611	417,778	6,358	83,590	2,663	614
May	478,089	8,058	322,231	6,892	98,558	2,530	597
June	462,136	9,869	246,247	8,100	117,197	2,789	529
Q2 Total	1,472,085	27,538	986,256	21,350	299,345	7,982	1,740

3. Rainfall Data:

Month of 2022	Rainfall (Inches)	Snowfall (inch)
April	4.52	0.65
May	1.76	0.00
June	2.04	0.00
Q2 Total	8.32	0.65

4. Monthly quantity of Waste Tonnage:

Month of 2022	Quantity (tons)
April	15,268.22
May	18,584.58
June	20,239.50
Q2 Total	54,092.30

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q3 2022 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month	Pump Station #1		Pump Station #2		Pump Station #3		Generation for Stage V
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
July	331,884	8,071	230,253	5,349	133,425	2,342	728
August	337,001	7,762	173,507	4,319	104,110	1,741	371
September	330,722	10,622	200,357	4,076	88,722	2,380	606
Q3 Total	999,607	26,455	604,117	13,744	326,257	6,463	1,705

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (inch)
July	2.41	0.00
August	3.65	0.00
September	5.34	0.00
Q3 Total	11.40	0.00

4. Monthly quantity of Waste Tonnage:

Month of 2022	Quantity (tons)
July	23,343.49
August	26,250.01
September	22,398.33
Q3 Total	71,991.83

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q4 2022 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month	Pump Station #1		Pump Station #2		Pump Station #3		Generation for Stage V
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
October	343,419	7,541	258,569	3,660	78,906	1,897	549
November	327,712	8,387	258,921	3,920	75,372	1,913	524
December	349,563	6,851	378,321	4,295	70,809	2,561	0
Q4 Total	1,020,694	22,779	895,811	11,875	225,087	6,372	1,073

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (Inches)
October	2.42	0.00
November	3.02	0.20
December	2.75	6.62
Q4 Total	8.19	6.82

4. Monthly quantity of Waste Tonnage:

Month	Quantity (tons)
October	21,861.60
November	19,770.21
December	19,498.58
Q4 Total	61,130.39

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q1 2023 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2023	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4 (Stage V)
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
January	403,676	10,374	422,494	5,606	90,850	2,288	454
February	352,622	3,244	394,036	5,249	84,801	2,144	0
March	426,968	15,523	419,661	5,936	96,985	2,479	366
Q1 Total	1,183,266	29,141	1,236,191	16,791	272,636	6,911	820

3. Rainfall Data:

Month	Rainfall (Inches)	Snowfall (inch)
January	0.95	19.97
February	0.55	9.94
March	0.00	17.31
Q1 Total	1.50	47.22

4. Monthly quantity of Waste Tonnage:

Month of 2023	Quantity (tons)
January	15,610.09
February	12,298.83
March	14,983.30
Q1 Total	42,892.22

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q2 2023 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2023	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
April	392,186	12,056	405,606	7,205	97,725	2,066	494
May	404,203	11,820	375,255	6,661	108,029	1,638	255
June	538,510	13,983	323,836	5,688	118,151	2,043	2,469
Q2 Total	1,334,899	37,859	1,104,697	19,554	323,905	5,746	3,218

3. Rainfall Data:

Month of 2023	Rainfall (Inches)	Snowfall (inch)
April	1.71	2.51
May	0.76	0.00
June	4.81	0.00
Q2 Total	7.28	2.51

4. Monthly quantity of Waste Tonnage:

Month of 2023	Quantity (tons)
April	18,283.48
May	18,968.79
June	19,651.94
Q2 Total	56,904.21

Monthly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q3 2023 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2023	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
July	569,365	14,034	599,601	7,205	856,289	5,344	1,710
August	512,333	14,749	482,568	10,664	649,147	3,092	860
September	463,175	13,905	390,330	11,308	332,700	1,995	476
Q3 Total	1,544,873	42,688	1,472,499	29,177	1,838,136	10,431	3,046

3. Rainfall Data:

Month of 2023	Rainfall (Inches)	Snowfall (inch)
July	3.45	0.00
August	5.97	0.00
September	2.08	0.00
Q3 Total	11.50	0.00

4. Monthly quantity of Waste Tonnage:

Month of 2023	Quantity (tons)
July	19,076.92
August	22,875.52
September	16,990.43
Q3 Total	58,942.87

Monthly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q4 2023 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2023	Pump Station #3		Pump Station #2		Pump Station #1		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
October	93,577	5,266	426,031	32,991	689,549	13,919	675
November	0	0	461,143	24,065	685,587	14,432	696
December	51,888	18,267	912,947	56,949	580,167	14,778	440
Q4 Total	145,465	23,532	1,800,121	114,005	1,955,303	43,129	1,811

3. Rainfall Data:

Month of 2023	Rainfall (Inches)	Snowfall (inch)
October	3.82	0.05
November	0.67	5.28
December	4.39	7.35
Q4 Total	8.88	12.68

4. Monthly quantity of Waste Tonnage:

Month of 2023	Quantity (tons)
October	19,170.89
November	25,980.22
December	17,337.41
Q4 Total	62,488.52

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q1 2024 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2024	Pump Station #3		Pump Station #2		Pump Station #1		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
January	273,581	15,847	1,051,571	87,320	579,728	18,746	1,399
February	197,161	4,535	664,636	42,372	557,309	17,086	542
March	245,372	16,803	668,764	83,593	637,145	19,056	1,460
Q1 Total	716,114	37,184	2,384,971	213,284	1,774,182	54,888	3,402

3. Rainfall Data:

Month of 2024	Rainfall (Inches)	Snowfall (inch)
January	2.15	20.89
February	0.00	2.72
March	5.54	21.51
Q1 Total	7.69	45.12

4. Monthly quantity of Waste Tonnage:

Month of 2024	Quantity (tons)
January	15,763.66
February	15,676.37
March	13,117.28
Q1 Total	44,557.31

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q2 2024 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2024	Pump Station #3		Pump Station #2		Pump Station #1		Pump Station #4
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
April	107,605	21,899	1,052,545	150,665	580,053	32,709	10,146
May	167,097	7,507	1,202,808	50,717	728,840	25,330	2,417
June	306,222	3,269	608,951	20,028	596,844	16,802	1,295
Q2 Total	580,924	32,675	2,864,304	221,410	1,905,737	74,841	13,858

3. Rainfall Data:

Month of 2024	Rainfall (Inches)	Snowfall (inch)
April	1.40	8.50
May	2.52	0.00
June	4.83	0.00
Q2 Total	8.75	8.50

4. Monthly quantity of Waste Tonnage:

Month of 2024	Quantity (tons)
April	15,978.91
May	19,595.08
June	19,149.27
Q2 Total	54,723.26

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q3 2024 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2024	Pump Station #3		Pump Station #2		Pump Station #1		Pump Station #4
	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Primary (Gallons)	Secondary (G/A/D)	Secondary (G/A/D)
July	190,233	2,612	511,773	22,553	477,785	15,225	811
August	182,017	2,358	595,616	12,185	429,184	15,390	925
September	147,940	2,506	422,183	5,828	365,979	13,027	601
Q3 Total	520,190	7,476	1,529,572	40,566	1,272,948	43,642	2,337

3. Rainfall Data:

Month of 2024	Rainfall (Inches)	Snowfall (inch)
July	8.94	0.00
August	5.88	0.00
September	1.73	0.00
Q3 Total	16.55	0.00

4. Monthly quantity of Waste Tonnage:

Month of 2024	Quantity (tons)
July	18,575.28
August	19,744.98
September	17,619.27
Q3 Total	55,939.53

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q4 2024 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2024	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
October	321,342	13,188	375,300	6,114	125,358	2,325	1,153
November	288,445	13,152	339,585	2,963	76,812	2,808	777
December	303,611	11,821	418,696	3,196	75,829	2,577	2,808
Q4 Total	913,398	38,161	1,133,581	12,273	277,999	7,710	4,738

3. Rainfall Data:

Month of 2024	Rainfall (Inches)	Snowfall (inch)
October	1.99	3.50
November	2.74	6.00
December	11.23	12.71
Q4 Total	15.96	22.21

4. Monthly quantity of Waste Tonnage:

Month of 2024	Quantity (tons)
October	23,379.62
November	16,462.39
December	17,501.87
Q4 Total	57,343.88

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q1 2025 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2025	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
January	300,256	12,907	398,334	2,780	91,936	3,081	8,885
February	222,556	9,754	287,563	2,980	72,382	3,246	650
March	323,393	10,306	483,063	4,976	107,358	3,322	4,858
Q1 Total	846,205	32,967	1,168,960	10,736	271,676	9,649	14,393

3. Rainfall Data:

Month of 2025	Rainfall (Inches)	Snowfall (inch)
January	1.19	14.17
February	0.98	27.62
March	6.47	13.28
Q1 Total	8.64	55.07

4. Monthly quantity of Waste Tonnage:

Month of 2025	Quantity (tons)
January	12,856.52
February	10,180.80
March	10,806.64
Q1 Total	33,843.96

NORTH COUNTRY ENVIRONMENTAL SERVICES
January 1, 2025 THROUGH January 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
1/2/2025	282.36	311.07	-	-	-	52.85	-	-	-	-	-	-	646.28
1/3/2025	396.73	348.54	-	-	-	63.76	-	-	19.68	69.17	-	-	897.88
1/4/2025	88.52	83.61	-	-	-	-	-	-	-	-	-	-	172.13
1/6/2025	265.08	343.34	-	-	-	31.81	14.62	-	-	-	-	-	654.85
1/7/2025	335.06	275.29	-	-	-	32.16	17.89	-	-	7.82	-	-	668.22
1/8/2025	312.29	280.23	-	-	-	42.93	-	-	-	-	-	-	635.45
1/9/2025	242.18	159.17	-	-	-	62.05	-	-	-	28.85	-	-	492.25
1/10/2025	309.14	289.27	-	-	-	65.72	-	-	16.42	-	-	-	680.55
1/13/2025	250.17	240.73	-	-	-	65.90	-	-	-	-	-	-	556.80
1/14/2025	359.56	223.06	-	-	-	61.23	15.17	-	-	11.15	-	-	670.17
1/15/2025	240.00	229.57	-	-	-	62.59	-	-	-	-	-	-	532.16
1/16/2025	234.64	128.96	-	-	-	62.07	-	-	-	20.51	-	-	446.18
1/17/2025	242.81	234.18	-	-	-	62.67	-	-	-	-	-	-	539.66
1/20/2025	299.47	183.20	-	-	-	63.53	-	-	-	-	-	-	546.20
1/21/2025	306.38	107.08	-	-	-	58.42	-	-	13.98	9.79	-	-	495.65
1/22/2025	227.80	271.68	-	-	-	36.33	-	-	-	-	-	-	535.81
1/23/2025	251.90	116.87	-	-	-	49.91	-	-	-	44.92	-	-	463.60
1/24/2025	288.71	140.83	-	-	-	63.72	-	-	-	-	-	-	493.26
1/27/2025	327.08	261.53	-	-	-	49.74	9.05	-	-	-	-	-	647.40
1/28/2025	233.72	216.19	-	-	-	62.15	8.29	-	-	13.20	-	-	533.55
1/29/2025	194.49	228.93	-	-	-	45.23	-	-	40.48	-	-	-	509.13
1/30/2025	184.27	170.87	-	-	-	44.20	8.86	-	30.97	37.22	-	-	476.39
1/31/2025	263.94	234.53	-	-	-	62.57	1.91	-	-	-	-	-	562.95
Grand Total	6,136.30	5,078.73	-	-	-	1,201.54	75.79	-	121.53	242.63	-	-	12,856.52

NORTH COUNTRY ENVIRONMENTAL SERVICES
February 1, 2025 THROUGH February 28, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												Grand Total
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	
2/3/2025	234.59	159.94	-	-	-	63.22	-	-	-	-	-	-	457.75
2/4/2025	185.08	159.15	-	-	-	61.78	8.16	-	-	26.17	-	-	440.34
2/5/2025	290.06	232.76	-	-	-	48.93	-	-	-	-	-	-	571.75
2/6/2025	175.32	136.26	-	-	-	62.48	-	-	-	-	-	-	374.06
2/7/2025	206.26	124.83	-	-	-	63.11	-	-	19.47	-	-	-	413.67
2/10/2025	321.93	209.76	-	-	-	31.74	-	-	-	-	-	-	563.43
2/11/2025	224.04	118.42	-	-	-	50.42	7.20	-	-	65.08	-	-	465.16
2/12/2025	246.09	224.46	-	-	-	43.57	-	-	-	-	-	-	514.12
2/13/2025	216.04	88.74	-	-	-	50.19	-	-	-	-	-	-	354.97
2/14/2025	228.14	183.72	-	-	-	36.17	-	-	-	29.37	-	-	477.40
2/17/2025	262.01	113.82	-	-	-	30.73	-	-	15.31	-	-	-	421.87
2/18/2025	305.38	210.28	-	-	-	31.53	10.95	-	-	261.47	-	-	819.61
2/19/2025	179.53	220.47	-	-	-	31.09	8.73	-	-	251.29	-	-	691.11
2/20/2025	236.10	112.74	-	-	-	32.44	9.08	-	-	205.72	-	-	596.08
2/21/2025	275.59	125.60	-	-	-	31.09	-	-	-	-	-	-	432.28
2/24/2025	336.28	264.37	-	-	-	31.46	-	-	-	27.88	-	-	659.99
2/25/2025	230.98	202.56	-	-	-	31.33	7.62	-	48.89	32.67	-	-	554.05
2/26/2025	234.37	189.38	-	-	-	46.14	-	-	-	-	-	-	469.89
2/27/2025	202.86	168.38	-	-	-	31.10	-	-	-	29.12	-	-	431.46
2/28/2025	227.01	209.13	-	-	-	35.67	-	-	-	-	-	-	471.81
Grand Total	4,817.66	3,454.77	-	-	-	844.19	51.74	-	83.67	928.77	-	-	10,180.80

NORTH COUNTRY ENVIRONMENTAL SERVICES
March 1, 2025 THROUGH March 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
3/3/2025	189.76	166.40	-	-	-	62.69	-	-	-	-	-	-	418.85
3/4/2025	177.32	255.93	-	-	-	31.17	9.48	-	-	42.41	-	-	516.31
3/5/2025	140.69	272.94	-	-	-	42.89	-	-	-	-	-	-	456.52
3/6/2025	163.87	198.25	-	-	-	35.78	-	-	18.97	14.74	-	-	431.61
3/7/2025	312.32	251.04	-	-	-	-	-	-	-	-	-	-	563.36
3/10/2025	231.49	151.32	-	-	-	31.49	-	-	-	-	-	-	414.30
3/11/2025	202.54	279.68	-	-	-	31.17	15.90	-	-	38.06	-	-	567.35
3/12/2025	270.02	212.13	-	-	-	47.24	-	-	-	18.14	-	-	547.53
3/13/2025	186.83	144.76	-	-	-	30.94	-	-	14.49	-	-	-	377.02
3/14/2025	315.18	161.59	-	-	-	31.84	-	-	-	-	-	-	508.61
3/17/2025	259.37	277.28	-	-	-	30.25	-	-	-	-	-	-	566.90
3/18/2025	192.98	161.13	-	-	-	29.51	8.41	-	-	31.42	-	-	423.45
3/19/2025	196.90	176.82	-	-	-	48.29	-	-	-	-	-	-	422.01
3/20/2025	183.30	297.64	-	-	-	35.62	-	-	-	-	-	-	516.56
3/21/2025	281.45	209.48	-	-	-	31.86	-	-	20.13	-	-	-	542.92
3/24/2025	309.66	219.57	-	-	-	32.33	-	-	-	-	-	-	561.56
3/25/2025	306.43	168.91	-	-	-	64.95	8.82	-	31.86	33.98	-	-	614.95
3/26/2025	247.72	275.00	-	-	-	13.97	-	-	31.60	-	-	-	568.29
3/27/2025	225.51	264.97	-	-	-	37.07	-	-	-	33.40	-	-	560.95
3/28/2025	290.22	200.43	-	-	-	33.46	-	-	14.50	27.05	-	-	565.66
3/31/2025	323.48	276.97	-	-	-	33.50	-	-	-	27.98	-	-	661.93
Grand Total	5,007.04	4,622.24	-	-	-	736.02	42.61	-	131.55	267.18	-	-	10,806.64

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q2 2025 Report

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2025	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
April	364,776	14,918	600,395	5,020	129,560	4,581	2,480
May	366,939	9,346	609,099	6,158	128,561	3,008	1,935
June	309,456	9,515	499,849	6,295	121,497	1,602	1,145
Q2 Total	1,041,171	33,779	1,709,343	17,473	379,618	9,191	5,560

3. Rainfall Data:

Month of 2025	Rainfall (Inches)	Snowfall (inch)
April	14.63	2.58
May	8.47	0.00
June	13.37	0.00
Q2 Total	36.47	2.58

4. Monthly quantity of Waste Tonnage:

Month of 2025	Quantity (tons)
April	14,272.77
May	15,840.86
June	16,929.67
Q2 Total	47,043.30

NORTH COUNTRY ENVIRONMENTAL SERVICES

April 1, 2025 THROUGH April 30, 2025

DAILY TONS MATERIAL SUMMARY

INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
4/1/2025	282.25	347.32	-	-	-	31.28	30.17	-	-	27.37	-	-	718.39
4/2/2025	155.38	310.90	-	-	-	47.42	16.63	-	-	27.44	-	-	557.77
4/3/2025	249.37	241.28	-	-	-	53.12	-	-	-	-	-	-	543.77
4/4/2025	302.34	324.85	-	-	-	31.34	-	-	-	27.98	-	-	686.51
4/7/2025	221.23	250.11	-	-	-	31.39	-	-	17.29	422.78	-	-	942.80
4/8/2025	281.95	253.61	-	-	-	31.79	6.56	-	-	409.91	-	-	983.82
4/9/2025	213.79	250.76	-	-	-	46.01	-	-	-	9.71	-	-	520.27
4/10/2025	187.35	268.11	-	-	-	36.86	10.41	-	-	17.03	-	-	519.76
4/11/2025	237.64	249.29	-	-	-	36.15	-	-	-	-	-	-	523.08
4/14/2025	227.26	316.70	-	-	-	31.31	10.75	-	-	28.45	-	-	614.47
4/15/2025	250.97	214.83	-	-	-	31.68	-	-	15.21	16.26	-	-	528.95
4/16/2025	209.46	388.00	-	-	-	47.95	3.65	-	-	153.71	-	-	802.77
4/17/2025	200.95	273.76	-	-	-	24.43	-	-	-	273.28	-	-	772.42
4/18/2025	241.98	209.76	-	-	-	58.75	8.84	-	-	21.72	-	-	541.05
4/21/2025	253.96	299.54	-	-	-	31.44	-	-	-	-	-	-	584.94
4/22/2025	229.76	295.70	-	-	-	28.17	-	-	16.00	17.94	-	-	587.57
4/23/2025	258.23	317.62	-	-	-	33.63	6.95	-	32.11	-	-	-	648.54
4/24/2025	275.47	248.62	-	-	-	17.61	-	-	-	10.63	-	-	552.33
4/25/2025	301.93	383.10	-	-	-	35.15	-	-	-	-	-	-	720.18
4/28/2025	229.58	306.67	-	-	-	34.97	-	-	-	-	-	-	571.22
4/29/2025	323.51	288.68	-	-	-	34.36	8.65	-	-	17.20	-	-	672.40
4/30/2025	237.07	368.85	-	-	-	40.72	-	-	33.12	-	-	-	679.76
Grand Total	5,371.43	6,408.06	-	-	-	795.53	102.61	-	113.73	1,481.41	-	-	14,272.77

NORTH COUNTRY ENVIRONMENTAL SERVICES

May 1, 2025 THROUGH May 31, 2025

DAILY TONS MATERIAL SUMMARY

INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
5/1/2025	245.82	274.00	-	-	-	39.64	-	-	20.64	13.11	-	-	593.21
5/2/2025	208.78	304.75	-	-	-	34.64	-	-	-	-	-	-	548.17
5/5/2025	338.46	353.64	-	-	-	33.46	10.91	-	-	157.61	-	-	894.08
5/6/2025	220.52	285.81	-	-	-	32.34	6.09	-	-	126.91	-	-	671.67
5/7/2025	414.38	286.80	-	-	-	48.31	-	-	-	-	-	-	749.49
5/8/2025	349.23	581.65	-	-	-	34.27	-	-	-	14.17	-	-	979.32
5/9/2025	340.69	463.97	-	-	-	34.96	-	-	18.13	-	-	-	857.75
5/12/2025	357.13	432.47	-	-	-	54.17	-	-	-	-	-	-	843.77
5/13/2025	373.19	323.41	-	-	-	37.67	12.13	-	-	36.51	-	-	782.91
5/14/2025	312.19	252.02	-	-	-	47.78	-	-	-	-	-	-	611.99
5/15/2025	264.36	307.13	-	-	-	51.17	10.00	-	-	12.85	-	-	645.51
5/16/2025	332.43	283.53	-	-	-	46.47	-	-	17.64	-	-	-	680.07
5/19/2025	378.24	348.21	-	-	-	34.05	-	-	-	-	-	-	760.50
5/20/2025	290.34	410.80	-	-	-	49.67	6.54	-	-	15.49	-	-	772.84
5/21/2025	282.72	373.00	-	-	-	45.04	-	-	-	30.64	-	-	731.40
5/22/2025	229.90	304.55	-	-	-	45.66	-	-	12.09	15.95	-	-	608.15
5/23/2025	439.43	283.86	-	-	-	35.23	9.46	-	-	-	-	-	767.98
5/27/2025	421.80	325.41	-	-	-	40.07	-	-	33.07	-	-	-	820.35
5/28/2025	292.75	305.94	-	-	-	33.09	-	-	-	-	-	-	631.78
5/29/2025	283.67	230.32	-	-	-	57.47	11.71	-	13.54	37.29	-	-	634.00
5/30/2025	476.27	319.64	-	-	-	48.55	-	-	21.55	0.98	-	-	866.99
5/31/2025	213.95	174.98	-	-	-	-	-	-	-	-	-	-	388.93
Grand Total	7,066.25	7,225.89	-	-	-	883.71	66.84	-	136.66	461.51	-	-	15,840.86

NORTH COUNTRY ENVIRONMENTAL SERVICES

June 1, 2025 THROUGH June 30, 2025

DAILY TONS MATERIAL SUMMARY

INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
6/2/2025	389.42	350.61	-	-	-	34.31	-	-	-	-	-	-	774.34
6/3/2025	289.19	459.38	-	-	-	49.79	4.51	-	-	12.67	-	-	815.54
6/4/2025	296.30	477.98	-	-	-	35.88	-	-	-	-	-	-	810.16
6/5/2025	332.29	345.50	-	-	-	36.35	-	-	14.02	39.90	-	-	768.06
6/6/2025	391.73	394.66	-	-	-	45.25	-	-	-	-	-	-	831.64
6/9/2025	344.33	409.64	-	-	-	31.69	-	-	-	-	-	-	785.66
6/10/2025	378.20	382.60	-	-	-	34.24	10.16	-	-	36.18	-	-	841.38
6/11/2025	311.65	323.83	-	-	-	41.24	-	-	-	-	-	-	676.72
6/12/2025	269.38	353.31	-	-	-	31.26	8.88	-	12.06	14.57	-	-	689.46
6/13/2025	383.09	344.05	-	-	-	30.90	10.61	-	-	-	-	-	768.65
6/16/2025	385.84	348.74	-	-	-	31.36	-	-	-	-	-	-	765.94
6/17/2025	364.29	343.91	-	-	-	35.55	5.64	-	-	23.23	-	-	772.62
6/18/2025	300.05	410.48	-	-	-	63.48	-	-	-	-	-	-	774.01
6/19/2025	306.35	441.01	-	-	-	64.63	-	-	-	11.66	-	-	823.65
6/20/2025	375.53	330.03	-	-	-	49.89	-	-	-	-	-	-	755.45
6/23/2025	392.80	523.79	-	-	-	65.55	-	-	-	-	-	-	982.14
6/24/2025	390.71	349.61	-	-	-	65.90	12.03	-	15.89	114.35	-	-	948.49
6/25/2025	329.01	485.30	-	-	-	68.19	-	-	-	258.64	-	-	1,141.14
6/26/2025	265.82	377.96	-	-	-	43.33	-	-	-	74.34	-	-	761.45
6/27/2025	363.11	361.82	-	-	-	58.90	-	-	-	-	-	-	783.83
6/30/2025	261.95	346.53	-	-	-	50.86	-	-	-	-	-	-	659.34
Grand Total	7,121.04	8,160.74	-	-	-	968.55	51.83	-	41.97	585.54	-	-	16,929.67

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: Q3 2025 Report

1. Landfill Gas Monitoring:

See attached Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2025	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
July	269,133	11,285	381,785	6,088	113,465	1,749	693
August	243,371	13,012	334,659	5,835	107,725	2,535	484
September	219,072	11,150	323,043	4,736	117,002	2,423	732
Q3 Total	731,576	35,447	1,039,487	16,659	338,192	6,707	1,909

3. Rainfall Data:

Month of 2025	Rainfall (Inches)	Snowfall (inch)
July	9.39	0.00
August	0.78	0.00
September	3.88	0.00
Q3 Total	14.05	0.00

4. Monthly quantity of Waste Tonnage:

Month of 2025	Quantity (tons)
July	17,849.40
August	15,369.76
September	17,813.65
Q3 Total	51,032.81

NORTH COUNTRY ENVIRONMENTAL SERVICES
July 1, 2025 THROUGH July 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
7/1/2025	301.32	322.11	-	-	-	31.57	17.69	-	16.66	32.09	-	-	721.44
7/2/2025	384.70	439.72	-	-	-	52.22	-	-	-	96.99	-	-	973.63
7/3/2025	339.45	345.72	-	-	-	43.15	-	-	-	-	-	-	728.32
7/5/2025	59.87	28.66	-	-	-	-	-	-	-	-	-	-	88.53
7/7/2025	435.70	494.49	-	-	-	30.60	-	-	-	-	-	-	960.79
7/8/2025	463.46	352.30	-	-	-	51.80	-	-	12.79	360.29	-	-	1,240.64
7/9/2025	483.24	391.55	-	-	-	75.80	-	-	-	132.59	-	-	1,083.18
7/10/2025	333.18	475.80	-	-	-	75.31	-	-	-	26.31	-	-	910.60
7/11/2025	388.72	376.67	-	-	-	58.29	-	-	32.89	-	-	-	856.57
7/14/2025	478.02	406.79	-	-	-	63.95	-	-	15.16	-	-	-	963.92
7/15/2025	265.23	352.99	-	-	-	58.48	16.83	-	-	23.64	-	-	717.17
7/16/2025	354.82	288.65	-	-	-	45.02	-	-	32.56	-	-	-	721.05
7/17/2025	274.88	367.15	-	-	-	74.89	-	-	-	12.95	-	-	729.87
7/18/2025	350.51	274.58	-	-	-	89.50	-	-	-	-	-	-	714.59
7/21/2025	356.06	315.08	-	-	-	89.37	-	-	16.15	170.34	-	-	947.00
7/22/2025	352.13	309.73	-	-	-	94.97	6.95	-	-	210.18	-	-	973.96
7/23/2025	277.55	255.49	-	-	-	74.05	7.26	-	-	73.28	-	-	687.63
7/24/2025	201.03	288.38	-	-	-	81.78	-	-	-	16.12	-	-	587.31
7/25/2025	235.32	313.17	-	-	-	97.89	-	-	15.12	-	-	-	661.50
7/28/2025	303.06	251.51	-	-	-	85.89	-	-	-	-	-	-	640.46
7/29/2025	157.51	389.75	-	-	-	102.13	10.09	-	-	54.30	-	-	713.78
7/30/2025	220.98	398.06	-	-	-	38.12	9.01	-	18.01	-	-	-	684.18
7/31/2025	153.44	292.40	-	-	-	74.71	6.97	-	-	15.76	-	-	543.28
Grand Total	7,170.18	7,730.75	-	-	-	1,489.49	74.80	-	159.34	1,224.84	-	-	17,849.40

NORTH COUNTRY ENVIRONMENTAL SERVICES
August 1, 2025 THROUGH August 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
8/1/2025	288.61	462.92	-	-	-	100.15	-	-	-	-	-	-	851.68
8/4/2025	279.54	402.53	-	-	-	103.56	-	-	-	29.42	-	-	815.05
8/5/2025	240.96	232.10	-	-	-	31.27	-	-	-	24.16	-	-	528.49
8/6/2025	216.80	333.96	-	-	-	24.55	-	-	18.00	-	-	-	593.31
8/7/2025	253.22	287.23	-	-	-	68.10	5.25	-	-	41.54	-	-	655.34
8/8/2025	322.83	371.20	-	-	-	31.67	-	-	-	27.66	-	-	753.36
8/11/2025	363.53	357.09	-	-	-	27.86	-	-	-	28.61	-	-	777.09
8/12/2025	285.93	365.10	-	-	-	17.01	-	-	-	94.60	-	-	762.64
8/13/2025	206.17	360.58	-	-	-	19.48	-	-	18.51	49.94	-	-	654.68
8/14/2025	259.22	372.34	-	-	-	63.16	6.31	-	-	150.58	-	-	851.61
8/15/2025	260.15	299.56	-	-	-	49.44	-	-	-	-	-	-	609.15
8/18/2025	351.62	424.76	-	-	-	62.93	-	-	-	89.21	-	-	928.52
8/19/2025	319.13	373.49	-	-	-	62.97	-	-	-	60.86	-	-	816.45
8/20/2025	205.55	322.89	-	-	-	45.07	6.14	-	17.55	-	-	-	597.20
8/21/2025	216.11	385.13	-	-	-	62.08	-	-	-	12.08	-	-	675.40
8/22/2025	259.62	389.33	-	-	-	61.97	8.69	-	-	26.74	-	-	746.35
8/25/2025	250.60	496.17	-	-	-	47.21	-	-	-	-	-	-	793.98
8/26/2025	262.68	366.89	-	-	-	61.78	5.59	-	-	50.14	-	-	747.08
8/27/2025	174.83	436.56	-	-	-	64.46	-	-	22.03	37.17	19.90	-	754.95
8/28/2025	264.86	298.17	-	-	-	61.02	-	-	-	12.51	-	-	636.56
8/29/2025	435.77	270.04	-	-	-	57.78	-	-	57.28	-	-	-	820.87
Grand Total	5,717.73	7,608.04	-	-	-	1,123.52	31.98	-	133.37	735.22	19.90	-	15,369.76

NORTH COUNTRY ENVIRONMENTAL SERVICES
September 1, 2025 THROUGH September 30, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
9/2/2025	412.60	371.38	-	-	-	67.53	-	-	-	-	-	-	851.51
9/3/2025	312.63	404.13	-	-	-	65.91	-	-	14.87	-	-	-	797.54
9/4/2025	304.34	441.72	-	-	-	63.04	6.81	-	-	31.74	-	-	847.65
9/5/2025	253.42	558.35	-	-	-	62.77	-	-	-	-	-	-	874.54
9/6/2025	89.13	191.19	-	-	-	-	-	-	-	-	-	-	280.32
9/8/2025	296.74	451.23	-	-	-	70.72	-	-	-	-	-	-	818.69
9/9/2025	351.14	422.85	-	-	-	62.83	-	-	12.25	20.10	-	-	869.17
9/10/2025	296.94	502.07	-	-	-	66.67	-	-	-	29.48	-	-	895.16
9/11/2025	268.38	427.42	-	-	-	66.36	-	-	-	10.66	-	-	772.82
9/12/2025	332.92	415.75	-	-	-	63.47	-	-	-	-	-	-	812.14
9/15/2025	279.44	428.01	-	-	-	79.18	-	-	-	-	-	-	786.63
9/16/2025	366.46	407.24	-	-	-	86.37	4.30	-	-	53.47	-	-	917.84
9/17/2025	257.07	432.67	-	-	-	78.62	-	-	16.54	-	-	-	784.90
9/18/2025	246.99	393.97	-	-	-	49.08	6.71	-	-	12.88	-	-	709.63
9/19/2025	322.26	307.56	-	-	-	55.72	-	-	-	-	-	-	685.54
9/20/2025	4.65	-	-	-	-	-	-	-	-	-	-	-	4.65
9/22/2025	320.46	385.18	-	-	-	31.88	-	-	-	-	-	-	737.52
9/23/2025	315.47	405.33	-	-	-	63.92	-	-	16.12	17.86	-	-	818.70
9/24/2025	311.72	382.10	-	-	-	68.63	-	-	-	-	-	-	762.45
9/25/2025	363.52	436.30	-	-	-	83.79	3.86	-	-	10.76	-	-	898.23
9/26/2025	358.82	429.20	-	-	-	13.12	-	-	-	203.78	-	-	1,004.92
9/29/2025	353.92	474.93	-	-	-	32.01	-	-	46.66	28.79	-	-	936.31
9/30/2025	301.34	527.02	-	-	-	80.41	6.74	-	-	31.28	-	-	946.79
Grand Total	6,720.36	9,195.60	-	-	-	1,312.03	28.42	-	106.44	450.80	-	-	17,813.65

2021-2-18 DES NOF Capacity Stages 1-V



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



February 18, 2021

**VIA EMAIL AND
CERTIFIED MAIL
7017 0190 0000 2379 5397
RETURN RECEIPT REQUESTED**

NOTICE OF FINDINGS - #WMD NOF 21-001

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

Attn: John Gay, E.I., Engineering Manager

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

Facility Capacity (Stages I-V)

Dear Mr. Gay:

The New Hampshire Department of Environmental Services, Waste Management Division, Solid Waste Management Bureau (NHDES) conducted a review of the 2019 Annual Facility Report¹, 2020 monthly facility reports, and January 2021 monthly facility report for North Country Environmental Services, Inc.'s (NCES') landfill located in Bethlehem, NH. The purpose of the review was to determine NCES' compliance status relative to the facility's capacity limitations specified by Conditions (3) and (8) of the facility's permit modification issued August 15, 2014 for development of Stage V and the facility's most recently issued operating approval, i.e., the approval issued on December 23, 2015 authorizing operations in the Stage V airspace.

The purpose of this letter is to: (a) notify NCES that the findings of the compliance status review indicate a potential compliance deficiency, further described below; and (b) provide an opportunity for NCES to submit any additional information that it believes NHDES should consider prior to making a final compliance determination relative to the following potential compliance deficiency.

Potential Deficiency

Failure to comply with the capacity limitations specified in Conditions (3) and (8) of the permit modification effective August 15, 2014 and the operating approval issued on December 23, 2015 relative to operation of the facility in Stages I-V.

NCES holds approval to operate in Stages I-V, such approval issued December 23, 2015. NCES does not as yet hold approval to operate in the Stage VI airspace. Operating capacity is therefore limited to that which is authorized by the August 15, 2014 permit modification for development of Stage V. Condition (8) therein specifies that operations shall occur within the permitted facility limits specified in Condition

¹ NCES' 2019 Annual Facility Report was received by NHDES on March 25, 2020, with supplements received by NHDES on September 16, 2020 and September 17, 2020.

(3). Condition (3) identifies, by reference to plans, the approved footprint and final grades of the facility encompassing Stage I-V, (i.e., the permitted airspace to which the December 23, 2015 operating approval applies). In its 2019 Annual Facility Report (AFR), NCES reported that the facility's remaining capacity as of the close of business on December 31, 2019 was approximately 331,056 cubic yards. NHDES understands that the reported remaining capacity at the end of calendar year 2019 was based in part on topographic survey data obtained on October 1, 2019 and January 7, 2020, and data from a site aerial survey performed on June 7, 2019, which were compared to the permitted final grades identified in Condition (3). According to the facility's monthly reports, the total quantity of waste received during calendar year 2020 and January 2021, was 273,252 tons. Using NCES' conversion factor of 0.8 tons/cubic yard,² this equates to NCES receiving approximately 341,565 cubic yards of waste (compacted) during the time period of calendar year 2020 and January 2021. Based on that information, NHDES estimates that the facility's permitted operating capacity was depleted prior to the end of January 2021 as shown in Table 1.

Table 1.

Month - Year	Monthly Usage (Tons)	Monthly Usage (Cubic Yards)	Remaining Capacity (Cubic Yards)
			331,056
Jan-2020	25,740	32,176	298,880
Feb-2020	15,478	19,348	279,533
Mar-2020	15,650	19,562	259,971
Apr-2020	16,522	20,652	239,319
May-2020	21,224	26,530	212,788
Jun-2020	23,852	29,815	182,974
Jul-2020	25,779	32,224	150,750
Aug-2020	29,726	37,158	113,592
Sep-2020	21,911	27,389	86,204
Oct-2020	20,010	25,012	61,191
Nov-2020	17,580	21,975	39,216
Dec-2020	19,856	24,820	14,397
Jan-2021	19,925	24,906	(10,509)
Annual Total	273,252	341,565	-

Requested Action

This finding of non-compliance is preliminary. Before NHDES makes a final compliance determination, NCES has the opportunity to provide additional information for consideration by NHDES in making that determination. Accordingly, NHDES requests NCES take the following actions in response to this Notice of Findings:

- (1) By March 5, 2021, provide any additional information for consideration by NHDES in making a final determination as to remaining Stages I-V capacity.
- (2) If the facility has no more approved operating capacity:
 - a. Immediately implement contingency measures to cease acceptance of additional waste and divert customer waste to alternative authorized facilities;

² Supplemental memorandum to the 2019 AFR, dated September 15, 2020.

- c. Immediately notify NHDES pursuant to the relevant provisions of Env-Sw 1006 and Env-Sw 1106.05;
- d. Do not resume facility operations until Stage VI capacity is approved for operation pursuant to Condition (15)³ of the permit modification effective October 9, 2020; and
- e. Provide in writing by close of business on March 5, 2021, an estimate of the airspace usage in cubic yards exceeding the permitted capacity limits of Stages I-V and the basis for that estimate.

This letter is NHDES' initial response to the potential deficiency identified during review of the facility's Annual Facility Report for 2019 and the facility's 2020/2021 monthly reports. This letter does not limit or otherwise preclude NHDES from taking enforcement action pursuant to RSA 149-M and the NH Solid Waste Rules with regards to this or other compliance deficiencies that may be identified through further review.

Please address the submittal of all information to my attention. Please submit the information via the NHDES OneStop information system, using the universal solid waste site code "123456789".

Thank you for your prompt attention to this matter.

Sincerely,



Pamela Hoyt Denison, P.E., Administrator
Waste Programs, Waste Management Division
Phone: (603) 271-2945
Email: Pamela.Hoyt-Denison@des.nh.gov

ec: Kevin Roy, NCES, email: kevin.roy@casella.com

³ NHDES has received a notice of intent to operate Stage VI Phase I; however, on February 15, 2021, NHDES notified NCES that it is withholding operating approval in accordance with Env-Sw 1105.03(e) until NCES satisfies certain prerequisites to operations.

2021-4-23 NHDES LOD WMD 21-009 NCES
Operating Deficiency – Vertical Limits



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



April 23, 2021

CERTIFIED MAIL
7015 3010 0000 1292 9459
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
No. WMD 21-009

North Country Environmental Services, Inc.
P.O. Box 9
Bethlehem, NH 03574
Email: kevin.roy@casella.com

**SUBJECT: North Country Environmental Services, Inc. Landfill, 581 Trudeau Rd., Bethlehem, NH
Solid Waste Permit No. DES-SW-SP-03-002**

Operating Deficiency – Vertical Limits

Dear Mr. Roy:

The New Hampshire Department of Environmental Services (NHDES) issues this Letter of Deficiency (LOD) to notify North Country Environmental Services, Inc. (NCES) that NHDES has identified a compliance deficiency, discussed below, concerning operation of the above referenced solid waste facility. NHDES hereby requests NCES address the deficiency in the manner specified in ***bold italic type***.

(1) Failure to operate only within the permitted vertical and lateral limits of the landfill

On February 18, 2021, NHDES issued a Notice of Findings (NOF) regarding facility capacity. In its response dated March 3, 2021, NCES provided a capacity evaluation with a plan entitled, “2020 AFR Volume Remaining” that showed NCES has placed waste outside the permitted vertical limits of the landfill by up to approximately 16 feet in the northeast area of the landfill. The permitted vertical and lateral limits of this area of the landfill are identified in Condition (3) of the permit modification dated August 15, 2014. In accordance with Condition (8) of the same permit modification, and the therein referenced NH Solid Waste Rule Env-Sw 806.02(b) which states “wastes shall be placed only within the permitted vertical and lateral limits of the landfill,” NCES must operate within the facility limits in the approved plans. A permit modification for Stage VI was approved on October 9, 2020 and slightly modified the permitted vertical limits in the subject area of the landfill, but the overfill exceeds the modified limits and operating approval for Stage VI, Phase I was not granted until March 19, 2021.

Requested Response Action:

NHDES requests that NCES immediately cease placing waste outside the vertical limits of the landfill, and promptly relocate waste to areas within the permitted vertical and lateral limits of the landfill. NHDES requests that, within 5 working days, NCES submit an incident report that includes the information required by Env-Sw 1005.09(b) and a plan and schedule for completing waste relocation to within the permitted limits approved for operation. Further, NHDES requests

updates in writing weekly on NCES' progress in relocating the waste and status of implementing measures to reduce, eliminate, and prevent a recurrence of the situation.

Please address all matters related to this Letter of Deficiency to:

Debra Sonderegger, Enforcement Coordinator
NHDES/WMD
P.O. Box 95
Concord, NH 03302-0095
Fax: 603-271-2456
Email: debra.a.snderegger@des.nh.gov
Telephone: (603) 271-0674

A copy of the New Hampshire Solid Waste Rules, Env-Sw 100 et seq. is available on the NHDES website at <http://des.nh.gov/organization/commissioner/legal/rules/index.htm> or by contacting the Public Information Center at (603) 271-2975. Statutes are available via the State of NH website, www.nh.gov.

Thank you in advance for giving this Letter of Deficiency immediate attention. Failure to respond as requested may result in enforcement action pursuant to RSA 149-M with regard to the noted deficiencies. Potential enforcement actions include issuance of an administrative order or referral to the New Hampshire Department of Justice (NHDOJ) for enforcement. Also, please be advised that issuance of this Letter of Deficiency and your response actions do not limit NHDES from seeking monetary penalties for the noted deficiencies, either administratively pursuant to RSA 149-M or by referral to NHDOJ.


Your cooperation is appreciated.

Sincerely,



Sarah Yuhas Kirn, P.G., Assistant Director
Waste Management Division
Tel.: (603) 848-8641
Email: sarah.l.yuhaskirn@des.nh.gov

Waste
Management
Division



Digitally signed by Waste Management Division
DN: cn=Waste Management Division, o=Solid
Waste Division, ou=Waste Management
Division,
email=NELSON.ORDWAY@DES.NH.GOV, c=US
Date: 2021.04.23 09:22:22 -04'00'

ec: John Gay, NCES, email: john.gay@casella.com
Gabe Boisseau, Chair-Board of Selectmen, Town of Bethlehem, email: selectman3@bethlehemnh.org
Town Clerk, Town of Bethlehem, email: townclerk@bethlehemnh.org
April Hibberd, Administrative Assistant, Town of Bethlehem, email: admin@bethlehemnh.org
NHDES Legal Unit

**2023-7-13 DES Wimsatt to NCES Response
Engineering Analysis**



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



VIA EMAIL ONLY

July 13, 2023

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

SUBJECT: North Country Environmental Services (NCES) Landfill, 581 Trudeau Rd, Bethlehem
Permit No. DES-SW-SP-03-002

Response to November 2021 Settlement Agreement

Dear John Gay,

The New Hampshire Department of Environmental Services, Waste Management Division (NHDES) has reviewed the engineering analyses submitted on November 1, 2021 in accordance with Condition (5)(a) of the [Settlement Agreement](#) between North Country Environmental Services (NCES) and NHDES executed November 23, 2021 (Settlement Agreement).

NHDES reviewed the submitted information and notes that the engineering analyses do not evaluate the "current conditions," as contemplated by the Settlement Agreement, but instead evaluate a hypothetical 2.5H:1V sideslope configuration. However, NHDES does not object to the alternative calculations of 2.5H:1V, accepting them as satisfying the needs of the required analysis.

In accordance with Condition (5)(c) of the Settlement Agreement, NHDES has determined that relocation of waste may be more harmful to the environment, human health and safety than leaving the waste in place as depicted on drawing no. 1, dated October 2021, prepared by CMA Engineers, Inc. and stamped by Robert J. Grillo, P.E. Accordingly, NHDES has determined that the waste alleged to have been placed above permitted limits at the NCES facility may remain in place.

NHDES does not waive any right to seek enforcement of the November 23, 2021 Settlement Agreement, the right to take any other action related to the alleged violations noted in the Settlement Agreement, or the right to take any other enforcement action.

www.des.nh.gov

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095
(603) 271-2925 • Fax: 271-2456 TDD Access: Relay NH 1-800-735-2964

If you have any questions regarding this correspondence, please contact me.

Sincerely,

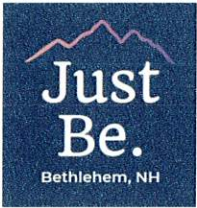


Michael J. Wimsatt, P.G., Director
Waste Management Division
Tel.: (603) 271-1997

Email: michael.j.wimsatt@des.nh.gov

cc: Kevin Roy, North Country Environmental Services, kevin.roy@casella.com
Bryan Gould, Esq., Cleveland, Waters & Bass, gouldb@cwbp.com
Joshua Harrison, Esq., NHDOJ, joshua.c.harrison@doj.nh.gov
Leah McKenna, NHDES-SWMB, leah.l.mckenna@des.nh.gov
Jaime M. Colby, P.E., NHDES-SWMB, jaimem.colby@des.nh.gov
Emily Jones, NHDES-SWMB, emily.m.jones@des.nh.gov

**2025-11-4 BOS Letter to Commissioner
Scott-NCES Capacity**



Town of Bethlehem

2155 Main Street PO Box 189
Bethlehem, NH 03574
(603) 869-3351 Fax (603) 869-2280
www.bethlehemnh.org

11/4/2025

Commissioner Robert R. Scott
New Hampshire Department of Environmental Services
29 Hazen Drive
Concord, NH 03302-0095

Subject: Request for Clarification on NCES Landfill Capacity

Dear Commissioner Scott,

The Bethlehem Select Board respectfully requests clarification from the New Hampshire Department of Environmental Services (NHDES) regarding the current and projected remaining capacity of the North Country Environmental Services (NCES) landfill located in Bethlehem, NH.

Recent discussions and reports have raised questions about the accuracy of previously reported capacity figures and the landfill's remaining operational lifespan. Given the importance of this facility to both the Town of Bethlehem and the region, the Select Board seeks to ensure that reliable and transparent data are available to inform local planning decisions and community discussions.

Specifically, the Board requests:

1. The most recent NHDES-verified data on NCES's remaining permitted airspace and estimated years of capacity under current and projected waste intake rates;
2. Any pending permit applications or modifications related to capacity expansion or operational changes; and
3. The methodology used by NHDES to verify NCES's reported capacity and compliance with its permit conditions.

We ask that this information be provided in writing or through a public briefing at the earliest opportunity. Accurate and timely information is essential for maintaining public confidence in the oversight process and for supporting responsible municipal planning.

Thank you for your attention to this matter and for your continued cooperation with the Town of Bethlehem. Please direct any correspondence to the Select Board Office at the address above or via email to admin@bethlehemnh.org.

Respectfully,

Nancy Strand

Nancy Strand,
Chair, Bethlehem Select Board

From: JustFOIA Notification <DESNH@request.justfoia.com>
Sent: Wednesday, November 12, 2025 8:01 AM
To: Mary Moritz <admin@bethlehemnh.gov>
Subject: New Hampshire Department of Environmental Services - Public Records Request RTK-2025-2774: Confirmation

You don't often get email from desnh@request.justfoia.com. [Learn why this is important](#)

Dear Requestor,

Thank you for submitting a Public Records Request on 11/12/2025.

This will acknowledge receipt of your request for:

"The Bethlehem Select Board respectfully requests clarification from the New Hampshire Department of Environmental Services (NHDES) regarding the current and projected remaining capacity of the North Country Environmental Services (NCES) landfill located in Bethlehem, NH. Recent discussions and reports have raised questions about the accuracy of previously reported capacity figures and the landfill's remaining operational lifespan. Given the importance of this facility to both the Town of Bethlehem and the region, the Select Board seeks to ensure that reliable and transparent data are available to inform local planning decisions and community discussions. Specifically, the Board requests: 1. The most recent NHDES-verified data on NCES's remaining permitted airspace and estimated years of capacity under current and projected waste intake rates; 2. Any pending permit applications or modifications related to capacity expansion or operational changes; and 3. The methodology used by NHDES to verify NCES's reported capacity and compliance with its permit conditions. We ask that this information be provided in writing or through a public briefing at the earliest opportunity. Accurate and timely information is essential for maintaining public confidence in the oversight process and for supporting responsible municipal planning. Thank you for your attention to this matter and for your continued cooperation with the Town of Bethlehem. Please direct any correspondence to the Select Board Office at the address above or via email to admin@bethlehemnh.org. "

Your Request Reference Number is: [Request Number: RTK-2025-2774](#) and your Security Key is: **05162DD8**.

Use this information to track the status of your request at any time and to receive responsive documents through the New Hampshire Department of Environmental Services JustFOIA Public Portal here: <https://desnh.justfoia.com/publicportal/home/track>.

We are currently identifying staff with responsive records and gathering the documents you requested. You will be notified when the documents are available for review and proceed with production as practicable.

Thank you,

New Hampshire Department of Environmental Services

29 Hazen Drive
Concord, NH 03301

filereview@des.nh.gov

(603)271-6688

Request #RTK-2025-2774

The Bethlehem Select Board respectfully requests clarification from the New Hampshire Department of Environmental Services (NHDES) regarding the current and projected remaining capacity of the North Country Environmental Services (NCES) landfill located in Bethlehem, NH. Recent discussions and reports have raised questions about the accuracy of previously reported capacity figures and the landfill's remaining operational lifespan. Given the importance of this facility to both the Town of Bethlehem and the region, the Select Board seeks to ensure that reliable and transparent data are available to inform local planning decisions and community discussions. Specifically, the Board requests: 1. The most recent NHDES-verified data on NCES's remaining permitted airspace and estimated years of capacity under current and projected waste intake rates; 2. Any pending permit applications or modifications related to capacity expansion or operational changes; and 3. The methodology used by NHDES to verify NCES's reported capacity and compliance with its permit conditions. We ask that this information be provided in writing or through a public briefing at the earliest opportunity. Accurate and timely information is essential for maintaining public confidence in the oversight process and for supporting responsible municipal planning. Thank you for your attention to this matter and for your continued cooperation with the Town of Bethlehem. Please direct any correspondence to the Select Board Office at the address above or via email to admin@bethlehemnh.org.

Details

Submitted

Mon, Nov 10, 2025

Status

Completed

Name of Requestor

Nancy StrKA

Name of Business/Company

Bethlehem Select Board

Email

admin@bethlehemnh.org

Phone

[603-869-3351](tel:603-869-3351)

Address

2155 Main St/Po Box 189

City

Bethlehem

State

NH

ZIP

03574

Description of Request (Please be specific with your request to narrow our search so we may respond to you quickly and efficiently.)

The Bethlehem Select Board respectfully requests clarification from the New Hampshire Department of Environmental Services (NHDES) regarding the current and projected remaining capacity of the North Country Environmental Services (NCES) landfill located in Bethlehem, NH. Recent discussions and reports have raised questions about the accuracy of previously reported capacity figures and the landfill's remaining operational lifespan. Given the importance of this facility to both the Town of Bethlehem and the region, the Select Board seeks to ensure that reliable and transparent data are available to inform local planning decisions and community discussions. Specifically, the Board requests: 1. The most recent NHDES-verified data on NCES's remaining permitted airspace and estimated years of capacity under current and projected waste intake rates; 2. Any pending permit applications or modifications related to capacity expansion or operational changes; and 3. The methodology used by NHDES to verify NCES's reported capacity and compliance with its permit conditions. We ask that this information be provided in writing or through a public briefing at the earliest opportunity. Accurate and timely information is essential for maintaining public confidence in the oversight process and for supporting responsible municipal planning. Thank you for your attention to this matter and for your continued cooperation with the Town of Bethlehem. Please direct any correspondence to the Select Board Office at the address above or via email to admin@bethlehemnh.org.

Requested Documents

File	Description ↑	Size	Upload Date
No documents have been added			
Rows per page: 10 — < >			

2025-11-26 NHDES Nork Response



RE: RE: ADC and 2023-2024 Biennial Report Question

From: "Nork, Michael" <michael.nork@des.nh.gov>
To: "Jon Swan" <jon.swan@mail.com>
Date: Nov 26, 2025 8:54:47 AM

Hi Jon, thanks for clarifying your question. Yes, you are correct that disposal data used in the excel spreadsheet that I shared with Wayne is essentially a compilation of the disposal tonnages reported by the 6 landfills on the summary table they attach to their annual facility reports. And, yes, you are correct that the totals exclude ADC.

The reason we started asking for that summary table for the 2021 reporting year is because the legislature enacted the disposal reduction goal in 2021. Because the goal applies to disposal of MSW and C&D only, we had to have a way to track progress toward the goal, and at the time, we weren't receiving a breakdown of major waste types received by each facility (at least not consistently or in an apples-to-apples format). Because the goal compares against 2018 as a baseline, we also asked facilities to provide the same tables retroactively back to 2018.

If you have further questions about the data disposal facilities are reporting, I would encourage you to reach out to staff in the Solid Waste Engineering & Permitting Section.

Hope you have a happy Thanksgiving

Mike

From: Jon Swan <jon.swan@mail.com>
Sent: Tuesday, November 25, 2025 2:37 PM
To: Nork, Michael <michael.nork@des.nh.gov>
Subject: Re: RE: ADC and 2023-2024 Biennial Report Question

EXTERNAL EMAIL WARNING! This email originated outside of the New Hampshire Executive Branch network. Do not open attachments or click on links unless you recognize the sender and are expecting the email. Do not enter your username and password on sites that you have reached through an email link. Forward suspicious and unexpected messages by clicking the Phish

Alert button in your Outlook and if you did click or enter credentials by mistake, report it immediately to helpdesk@doit.nh.gov!

Hi Mike:

Thanks for the response. I'm speaking to the Excel data you had forwarded out to NCABC, attached. The data for NCES appears to come straight from the facility waste origin report. ADC is not included, yet is included in the Waste Received Report calculations for gate tonnage/receipts. So did NCES fill 193k tons or 221k tons in 2021? You show 193k and exclude ADC. Just seems odd to me. Curious as to the rationale to add the Waste Origin Report in 2021, and in that format. Big thanks!

Thank you!

Jon Swan
25 Cashman Rd
Dalton, NH 03598
603-991-2078

Founder, Save Forest Lake
www.SaveForestLake.com
Currently writing my first book, "Saving Forest Lake"

Sent: Tuesday, November 25, 2025 at 1:27 PM
From: "Nork, Michael" <michael.nork@des.nh.gov>
To: "Save Forest Lake" <saveforestlake@yahoo.com>
Cc: "jon.swan@mail.com" <jon.swan@mail.com>
Subject: RE: ADC and 2023-2024 Biennial Report Question

Hi Jon,

ADC is not included in total annual disposal tonnages shown Section III. of the report (See footnote #3 on p. 2). ADC was only factored in for Section II., the portion of the report attempting to estimate total solid waste generation within NH (and for this, only ADC materials originating from within NH were counted).

This is because the concept of generation attempts to look wholistically at all waste generated in NH that needs management. Footnote #2 on p. 1 that you cited attempts to explain that the rationale for this is that because ADC materials are waste-derived substances that would need to be managed as solid waste if they were not otherwise used as cover material. The concept of generation is essentially "big picture" and is agnostic as to how the waste may be managed – it is just supposed to represent the total amount of waste created, regardless of whether it ultimately gets disposed, recycled, or otherwise managed through the system.

Hope that helps,

Mike

Michael Nork (he/him)

Supervisor - Materials Management, Education & Planning Section

Solid Waste Management Bureau

NH Department of Environmental Services

(603) 271-2906 michael.a.nork@des.nh.gov

NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question) [NHDES Customer Service Satisfaction Survey](#)

From: Save Forest Lake <saveforestlake@yahoo.com>

Sent: Monday, November 24, 2025 4:29 PM

To: Nork, Michael <michael.nork@des.nh.gov>; Nork, Michael <michael.a.nork@des.nh.gov>

Cc: jon.swan@mail.com

Subject: ADC and 2023-2024 Biennial Report Question

EXTERNAL EMAIL WARNING! This email originated outside of the New Hampshire Executive Branch network. Do not open attachments or click on links unless you recognize the sender and are expecting the email. Do not enter your username and password on sites that you have reached through an email link. Forward suspicious and unexpected messages by clicking the Phish Alert button in your Outlook and if you did click or enter credentials by mistake, report it immediately to helpdesk@doit.nh.gov!

Hi Mike:

Hope all is well. Question for you about the new 2023-2024 Biennial Report. Page 1, Intro, pdf page 4, it states:

"It is based on data for New-Hampshire-generated waste disposed in landfills and incinerators or used as "alternate daily cover,"2

2 Alternate daily cover describes certain waste-derived substances that landfills may use instead of virgin soils to cover exposed solid waste at the end of each working day. For the purposes of estimating New Hampshire's total waste generation, NHDES included materials used as alternate daily cover because in practical terms such materials are wastes that would need to be managed through the solid waste management system whether or not they were used as cover material."

Is ADC to be therefore included in the total tonnage reported for each facility? NCES did not include ADC in the figures you used, according to the data.

Was that an oversight? ADC is sorted out on the "Waste Origin" Report, but the Biennial Report verbiage states that ADC is included. If true, then NCES failed to include ADC in its 2021-2024 reporting to the department, or the department misread the "Waste Origin" Report submitted by NCES. The "Waste Received" Reports within each quarterly report total out to include the ADC figures.

Any clarification would be great, thanks. Happy Thanksgiving!

Thank you!

Jon Swan
25 Cashman Rd
Dalton, NH 03598
Founder, [Save Forest Lake](#)

Casella v Swan 2-Week Jury Trial (May 5, 2026) Legal Fund:
[GoFundMe](#)

Currently writing my first book: "***Saving Forest Lake***"

"Unless someone like you cares a whole awful lot, nothing is going to get better. It's not."
-The Lorax

Solid Waste Disposed at NH's Major Disposal Facilities - Breakdown of Tons Disposed From In-State Sources vs. Out-of-State Sources

Prepared by NHDES - Solid Waste Management Bureau

Compiled 11/7/2025

	2021		2022		2023		2024	
	In-state tons	Out-of-state tons	In-state tons	Out-of-state tons	In-state tons	Out-of-state tons	In-state tons	Out-of-state tons
TLR-III LF	480,172	786,906	509,688	752,968	530,398	596,200	500,935	613,080
NCES LF	179,974	13,794	179,473	13,482	178,847	15,148	177,707	8,780
Mt. Carberry LF	176,280	39,235	156,193	26,788	134,461	7,906	132,221	9,015
Lebanon Regional LF	30,189	10,986	30,846	11,407	32,554	16,162	32,166	11,561
Nashua Four Hills LF	86,489		60,544		58,442		56,142	
Lower Mt. Washington Valley LF	6,456		5,817		5,498		5,949	
Wheelabrator Concord Co. (WTE)	161,217	26,939	155,733	16,195	147,72	30,629	142,615	35,265
TOTALS	1,120,777	877,860	1,098,294	820,840	940,200	666,045	1,047,735	677,701

I. Introduction

Pursuant to New Hampshire RSA 149-M:29, II, the New Hampshire Department of Environmental Services (NHDES) has prepared this document to report on New Hampshire's progress toward reaching the solid waste disposal reduction goal established in RSA 149-M:2. This document provides additional information required by the statute, including a summary of recent activities undertaken by NHDES' Solid Waste Management Bureau.

The majority of this report covers data and information from the previous two calendar years, namely 2023 and 2024. Section X, relating to the Solid Waste Management Fund, covers fiscal years 2024-2025, which represents the State's most recently completed two-year budget cycle.

II. Generation of Solid Waste in New Hampshire

NHDES does not specifically track solid waste from the point of generation. Instead, the agency regulates the management of solid waste at permitted solid waste facilities within the state. This only provides NHDES with data on wastes managed at these facilities and does not capture all solid waste actually generated within the state. For example, some industrial, commercial, or institutional generators may use waste-hauling services that directly transport refuse and recycling to destinations outside of New Hampshire. Further, there is an indeterminable quantity of waste that is generated but never reaches a permitted solid waste facility because it is managed at the site of generation, such as through home composting, or is diverted directly to reuse, such as donation.

According to 2018 estimates from the U.S. Environmental Protection Agency (EPA), U.S. consumers generate an average of 4.9 pounds of municipal solid waste (MSW) per person per day.¹ It should be noted that EPA's estimate of MSW generation does not account for generation of other types of solid waste such as construction and demolition debris (C&D), industrial wastes and contaminated soils.

NHDES estimates that in 2024 approximately 1.8 million tons of solid waste were generated in New Hampshire, equating to a generation rate of 7.2 pounds per person per day (1.3 tons per person per year). In contrast to the EPA estimate cited above, this figure is intended to provide a more comprehensive estimate of solid wastes generated in the state. It is based on data for New-Hampshire-generated waste disposed in landfills and incinerators or used as "alternate daily cover,"² estimates of wastes exported out-of-state for disposal, as well as best-available data for wastes diverted from disposal via recycling, or other methods (including composting, C&D processing, and treatment of contaminated soils).

¹ 2018 estimates are the most recent available from EPA. For more information, refer to EPA's website: [National Overview: Facts and Figures on Materials, Wastes and Recycling](#).

² Alternate daily cover describes certain waste-derived substances that landfills may use instead of virgin soils to cover exposed solid waste at the end of each working day. For the purposes of estimating New Hampshire's total waste generation, NHDES included materials used as alternate daily cover because in practical terms such materials are wastes that would need to be managed through the solid waste management system whether or not they were used as cover material.