

## Davidson, Tyler

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**From:** DES: Solid Waste Management Bureau Enforcement  
**Sent:** Monday, June 24, 2024 9:51 AM  
**To:** Kimberly Crosby  
**Cc:** Kevin Roy; Joe Gay; Colby, Jaime  
**Subject:** RE: NCES Incident Reports

Good morning Ms. Crosby,

This has been received and noted – thank you for the clarification.

Kind regards,

**Tyler J. Davidson, Enforcement Program Coordinator**

NH Dept. of Environmental Services  
Solid Waste Management Bureau  
29 Hazen Drive / P.O. Box 95  
Concord, NH 03302-0095  
Email: [tyler.j.davidson@des.nh.gov](mailto:tyler.j.davidson@des.nh.gov) / Phone: (603) 271-0674

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**From:** Kimberly Crosby <Kimberly.Crosby@casella.com>  
**Sent:** Friday, June 21, 2024 4:23 PM  
**To:** DES: Solid Waste Management Bureau Enforcement <swmbenforcement@des.nh.gov>  
**Cc:** Kevin Roy <Kevin.Roy@casella.com>; Joe Gay <John.Gay@casella.com>; Colby, Jaime <Jaime.M.Colby@des.nh.gov>  
**Subject:** RE: NCES Incident Reports

**EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.**

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Good Afternoon (again) Mr. Davidson,

Please reference the attached sumps diagrams as the most recent version, the version sent earlier today had an incorrect/conflicting date on it. Sorry about that.

Thanks you,

**Kim Crosby, CES**

Director of Environmental Compliance

**Permits, Compliance & Engineering**

408 East Montpelier Road, Montpelier, VT 05602  
c. 802-585-5442  
e. [kimberly.crosby@casella.com](mailto:kimberly.crosby@casella.com) • w. [casella.com](http://casella.com)

**CASELLA**

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**From:** Kimberly Crosby <[Kimberly.Crosby@casella.com](mailto:Kimberly.Crosby@casella.com)>

**Sent:** Friday, June 21, 2024 1:45 PM

**To:** [swmbenforcement@des.nh.gov](mailto:swmbenforcement@des.nh.gov)

**Cc:** Kimberly Crosby <[Kimberly.Crosby@casella.com](mailto:Kimberly.Crosby@casella.com)>; Kevin Roy <[Kevin.Roy@casella.com](mailto:Kevin.Roy@casella.com)>; Joe Gay <[John.Gay@casella.com](mailto:John.Gay@casella.com)>; [Jaime.M.Colby@des.nh.gov](mailto:Jaime.M.Colby@des.nh.gov)

**Subject:** NCES Incident Reports

Good Afternoon Mr. Davidson,

Attached are incident reports 1(a) & 1(b) for North Country Environmental Services, Inc.. Please feel free to reach out with any questions.

Thank you,

**Kim Crosby, CES**

Director of Environmental Compliance

**Permits, Compliance & Engineering**

408 East Montpelier Road, Montpelier, VT 05602

c. 802-585-5442

e. [kimberly.crosby@casella.com](mailto:kimberly.crosby@casella.com) • w. [casella.com](http://casella.com)

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# Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities



Waste Management Division, SWMB

**RSA/Rule:** [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
<b>1. Date &amp; Time of Incident / Situation:</b>	<b>2. Date of Report Submission to NHDES:</b>	<b>3. Name of Person Preparing Report:</b>
7/1/2023-6/12/2024 (periodic incidents)	6/21/24	Kim Crosby
<b>4. Facility Name:</b>	<b>5a. Affected Area Within Facility</b>	<b>5b. Physical Address, Town / City:</b>
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road Bethlehem, NH 03574
<b>6. NHDES SW Permit Number:</b>	<b>7. Permittee Name on Permit:</b>	<b>8. Mailing Address:</b>
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
<b>9. Persons:</b>			
	<b>Name:</b>	<b>Title:</b>	<b>Affiliation:</b>
a.	Joe Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Kim Crosby	Director of Compliance	Casella
d.			
e.			
f.			

Section III – Details
<p><b>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</b></p> <p>For the period beginning July 1, 2023, through June 12, 2024, leachate at times exceeded the regulatory threshold on the primary liner system.</p>

**11. Measures employed to contain releases caused by the incident or situation:**

No releases to the environment occurred.

**12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:**

No potential hazards to the environment, safety and human health occurred as a result of the incidents. The accumulation of leachate on the primary liner creates a highly attenuated hazard (meaning potential for harm) to the environment in the sense that increased hydraulic head can increase the chance of a leak through the liner if there is an imperfection in the liner. The hazard is very remote, however, because not only would there have to be an imperfection that escaped detection upon liner installation and inspection and sufficient head to force leachate through the imperfection, but any such leachate would be contained by the secondary liner where there is typically no hydraulic head. Increased flows in the secondary system from construction-related infiltration of stormwater or dewatering would also dilute contaminants in any such leachate beyond non-detectable levels after which it would be removed from the secondary liner system. In short, the redundancies incorporated in the design of modern landfills by rule have successfully eliminated releases to the environment from the liner systems for all practical purposes.

**13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:**

NCES has and is in the process of taking the following measures to reduce, eliminate and prevent recurrence:

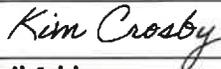
1. NCES is submitting a Type II permit modification to NHDES on June 21, 2024 to extend the Facility's operating hours for the ability to haul leachate beyond the current permitted hours.
2. NCES has obtained disposal capacity at additional wastewater treatment facilities.
3. NCES has contracted with additional haulers to haul more leachate off-site.
4. NCES has evaluated the level of the transducers in all of the sumps and has re-calculated the actual depth of leachate on the liner that occurred during this time period using the known transducer levels (see attached drawings prepared by SHA).
5. NCES has requested a meeting with NHDES to discuss how levels are being reported at the site and to establish appropriate reporting of such levels.
6. NCES will report exceedances using the NHDES Incident Report Form within the time prescribed by rule.
7. As observed by DES staff on June 11, 2024, NCES deployed temporary scrim in the new cell on April 22, 2024 to minimize stormwater infiltration into the leachate collection system until a fluff layer was completed (in progress). In addition, NCES has placed additional intermediate cover, hydroseeded areas, and incorporated additional stormwater controls to minimize stormwater infiltration into the landfill. NCES is in the process of capping approximately six acres which will reduce the amount of leachate generated at the site (ongoing).
8. NCES will provide additional training on leachate management systems, operations and the requirements of the rules to the Operations Team (to be completed by early July 2024).

In addition to the action items listed above, site wide calibration of sump levels and telemetry adjustments are being made and cleaning of the leachate collection systems will be completed by the end of June.

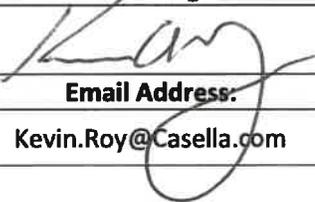
<b>14. If measures not completed by time of report submission, expected date of completion:</b>	See above
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**Section IV – Signatures**

**15a. Person Preparing Report:**

<b>Name:</b>	<b>Title / Affiliation:</b>	<b>Signature:</b>
Kim Crosby	Director of Compliance	
<b>Phone Number:</b>	<b>Email Address:</b>	
802-585-5442	kimberly.crosby@casella.com	

**15b. Permittee:**

<b>Name:</b>	<b>Title / Affiliation:</b>	<b>Signature:</b>
Kevin Roy	General Manager/Casella	
<b>Phone Number:</b>	<b>Email Address:</b>	
603-361-6477	Kevin.Roy@Casella.com	

**Form Submittal Instructions:**

Submit the completed report in PDF via email to [SolidWasteInfo@des.nh.gov](mailto:SolidWasteInfo@des.nh.gov).



# Incident Report Form for Solid Waste Management Facilities – Permitted and Permit-Exempt Facilities



Waste Management Division, SWMB

**RSA/Rule:** [Env-Sw 1005.09\(c\)](#)

Instructions: Complete form in its entirety, utilizing additional pages, as necessary. Maps and diagrams are recommended for clarity. A written report is due within 5 working days of the incident / situation date. Form meets the requirements of Env-Sw 1005.09(c) for “written report” if completed in its entirety and submitted in accordance with submission timeframe requirements.

Section I – General Information		
<b>1. Date &amp; Time of Incident / Situation:</b>	<b>2. Date of Report Submission to NHDES:</b>	<b>3. Name of Person Preparing Report:</b>
8/31/2023-6/12/2024 (periodic incidents)	6/21/24	Kim Crosby
<b>4. Facility Name:</b>	<b>5a. Affected Area Within Facility</b>	<b>5b. Physical Address, Town / City:</b>
North Country Environmental Services	North Country Environmental Services	581 Trudeau Road. Bethlehem, NH 03574
<b>6. NHDES SW Permit Number:</b>	<b>7. Permittee Name on Permit:</b>	<b>8. Mailing Address:</b>
DES-SW-SP-03-002	North Country Environmental Services	P.O.Box 9 Bethlehem, NH 03574

Section II – Parties Involved in Incident / Situation			
<b>9. Persons:</b>			
	<b>Name:</b>	<b>Title:</b>	<b>Affiliation:</b>
a.	Joe Gay	Engineer	NCES
b.	Kevin Roy	General Manager	NCES
c.	Kim Crosby	Director of Compliance	Casella
d.			
e.			
f.			

Section III – Details
<b>10. The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities:</b>
For the period beginning 8/31/23 through 6/12/24 at pump stations 1, 2, 3 & 4, flow rates in the secondary collection system at times exceeded 25 g/a/d over a rolling 30-day average.

<b>11. Measures employed to contain releases caused by the incident or situation:</b>	
Flow rates in the secondary leachate collection system did not result in a release to the environment.	
<b>12. Assessment of actual or potential hazards to the environment, safety and human health related to the incident:</b>	
No hazards to the environment, safety or human health occurred.	
<b>13. Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation:</b>	
<p>NCES has implemented operational improvements and capping identified in a separate Incident Report on leachate levels in the landfill's primary liner system. These measures will substantially diminish the production of leachate in the primary system. When leachate storage reaches capacity, the priority is removing leachate from the storage tank and primary liner, and pumping of liquid in the secondary system is deferred. The operational and capping initiatives NCES is implementing, together with the emergency approval of extended operating hours for leachate removal, has resulted in the removal of accumulated leachate and enabled NCES to resume its ordinary pumping of liquid in the secondary system, preventing flow rates above permissible levels. NHDES approval of NCES's June 21, 2024, application to amend its operating plan to extend operating hours for leachate load-out and transportation will enable NCES to maintain regular pumping of liquid in the secondary system, thereby preventing a recurrence of the incident.</p>	
<b>14. If measures not completed by time of report submission, expected date of completion:</b>	6/21/2024

Section IV – Signatures		
<b>15a. Person Preparing Report:</b>		
<b>Name:</b>	<b>Title / Affiliation:</b>	<b>Signature:</b>
Kim Crosby	Director of Compliance	<i>Kim Crosby</i>
<b>Phone Number:</b>	<b>Email Address:</b>	
802-585-5442	kimberly.crosby@casella.com	

<b>15b. Permittee:</b>		
<b>Name:</b>	<b>Title / Affiliation:</b>	<b>Signature:</b>

Kevin Roy	General Manager/Casella	
<b>Phone Number:</b>	<b>Email Address:</b>	
603-361-6477	Kevin.Roy@Casella.com	

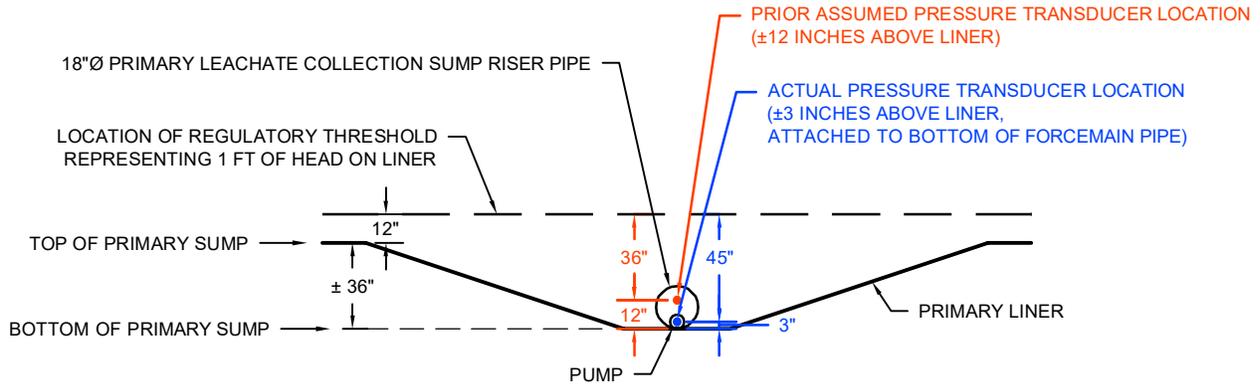
***Form Submittal Instructions:***

Submit the completed report in PDF via email to [SolidWasteInfo@des.nh.gov](mailto:SolidWasteInfo@des.nh.gov).

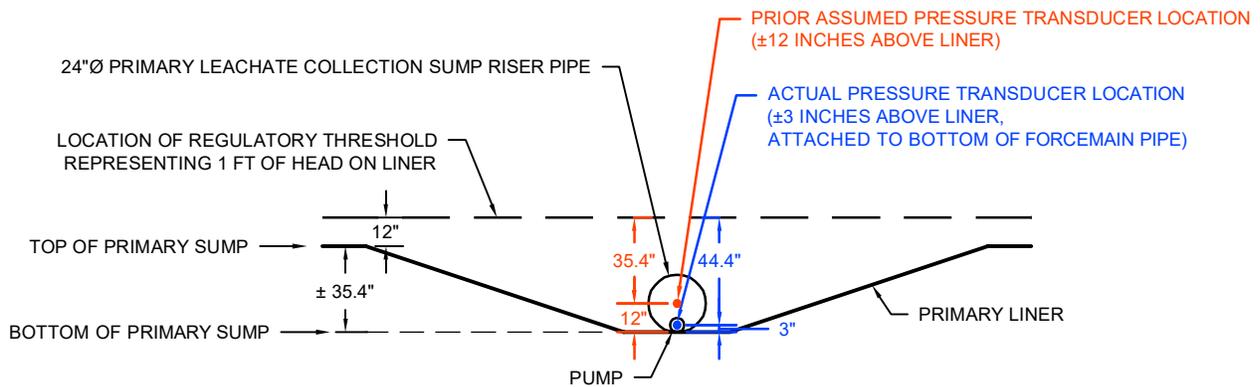
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NOTE:

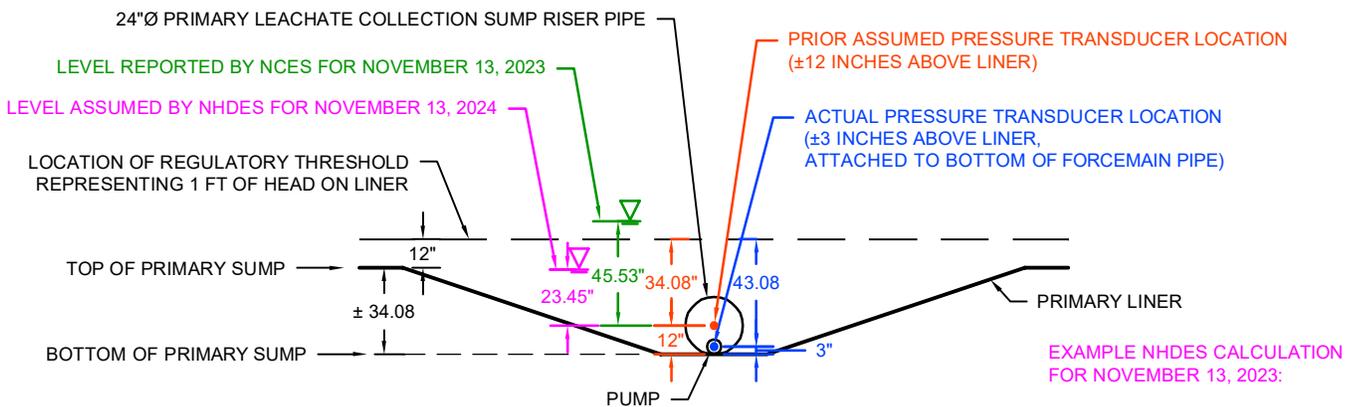
1. THE CROSS SECTIONS SHOWN ARE INTENDED TO BE DIAGRAMMATIC.
2. THE SUMP DEPTHS SHOWN WERE CALCULATED BASED ON RECORD DRAWING INFORMATION FOR EACH SUMP.



**STAGE III PRIMARY SUMP SCHEMATIC**



**STAGE IV PHASE I PRIMARY SUMP SCHEMATIC**



**STAGE IV PHASE II PRIMARY SUMP SCHEMATIC**

NCES LANDFILL  
BETHLEHEM, NEW HAMPSHIRE

NCES LANDFILL  
SUMP DIAGRAMS



NOT TO SCALE

DRAWN BY:RLC

FILE NO. 2493.25

DATE: JUNE 2024

CHECKED BY:BJB

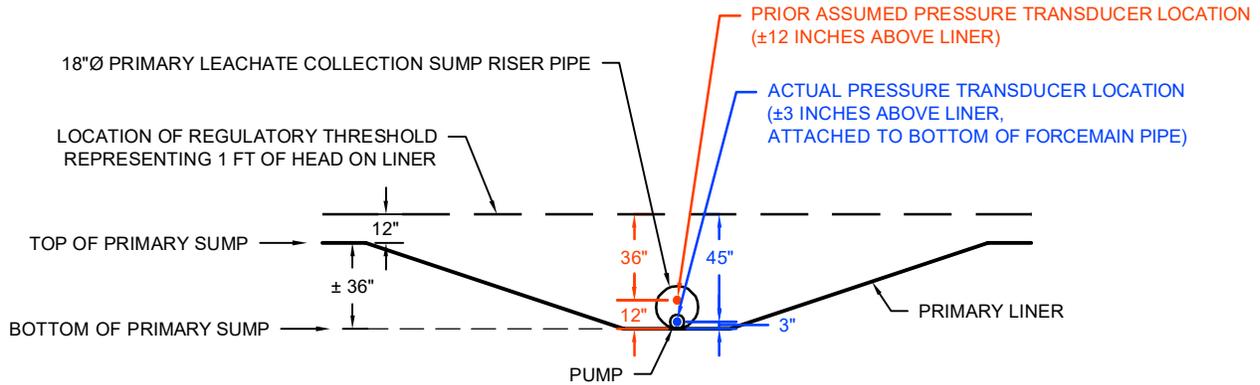
FIGURE NO. 1

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PLOT DATE: 6-21-24

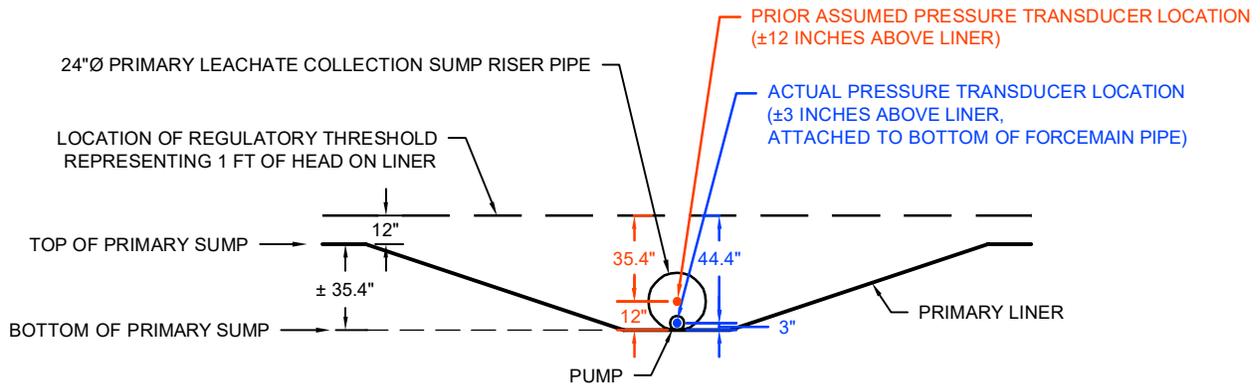
©2024 SANBORN HEAD & ASSOCIATES, INC.

NOTE:

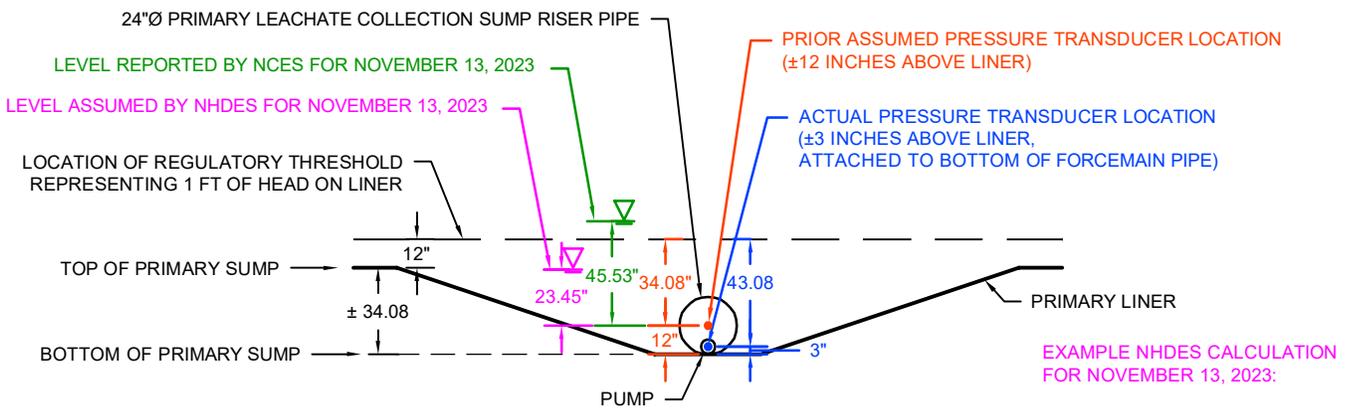
1. THE CROSS SECTIONS SHOWN ARE INTENDED TO BE DIAGRAMMATIC.
2. THE SUMP DEPTHS SHOWN WERE CALCULATED BASED ON RECORD DRAWING INFORMATION FOR EACH SUMP.



**STAGE III PRIMARY SUMP SCHEMATIC**



**STAGE IV PHASE I PRIMARY SUMP SCHEMATIC**



**STAGE IV PHASE II PRIMARY SUMP SCHEMATIC**

NCES LANDFILL  
BETHLEHEM, NEW HAMPSHIRE

NCES LANDFILL  
SUMP DIAGRAMS



NOT TO SCALE

DRAWN BY:RLC

FILE NO. 2493.25

DATE: JUNE 2024

CHECKED BY:BJB

FIGURE NO. 1

FILE: P:\14100s\174-08\Graphics Files\CAD\Work\Sumps\Sump Diagrams.dwg  
LAYOUT: 8.5X11  
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PLOT DATE: 6-21-24