



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

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(603) 271-2900 FAX (603) 271-2456



April 27, 1999

Mr. Larry Lackey, Vice President
North Country Environmental Services
Permits, Compliance & Engineering
16 State Street
Montpelier, Vermont 05602

**SUBJECT: NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL
QUARTERLY REPORT - FIRST QUARTER 1999**

Dear Mr. Lackey:

The Department of Environmental Services (Department) is in receipt of the Subject document dated April 14, 1999 which was prepared by North Country Environmental Services (NCES). After reviewing the report the Department has the following concerns/comments regarding the data:

1. The year identified in the tables of the summary sheet (page 1 of the report) states 1998. This should be corrected to identify 1999 as the year the data was generated.
2. The leachate generation tables should identify the year for each month.
3. Secondary leachate flows for January in Stage I, Phase 2 and February in Stage I, Phase 3 were above the reporting levels required by the New Hampshire Solid Waste Rules Env-Wm 2506.08(k). NCES is reminded of its responsibility to report to the Department within one week of identifying the rate. In a telephone conversation with NCES the Department was informed NCES was pursuing an explanation for these flow rates and would provide the Department with the results of the investigation.
4. In each of the monthly reports there were several days where the tank volume did not change. Please provide an explanation.
5. In Stage I, Phase 3 volume of leachate generated appears no different from the volume of leachate generated in Stage I, Phase 1 and 2. Please explain why the flow rate has not improved with the installation of the capping system.
6. Please explain the reduction in leachate volume in the Stage I, Phase 3 tank from December 31, 1998 to January 1, 1999. The report shows that no leachate was removed from this tank during this period.
7. The report shows that leachate was stored in the contingency tank throughout the three-month period at volumes ranging from 2,634 to 18,942 gallons. NCES is reminded that this tank is to be used for emergency storm events and not for long-term storage of leachate. The remaining leachate in the contingency tank is to be removed immediately.

Mr. Larry Lackey, Vice President
**NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL
QUARTERLY REPORT - FIRST QUARTER 1999**

NHDES Letter dated April 27, 1999

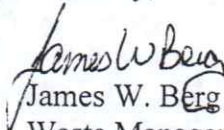
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8. Please include with future reports the location where each load of leachate from the Trudeau landfill is being disposed.
9. Stage II, Phases 1 and 2 have flow meters as part of the design for managing leachate. Please include in future reports the daily readings from all the flow meters used at the facility.
10. Please explain the reporting process for the secondary leachate flows generated by the landfill. It may be beneficial to include this as a footnote across the bottom of each monthly report.
11. The landfill gas monitoring data did not include the quarterly monitoring at the gas monitoring probes surrounding the landfill. Please provide this data.

Some of the items presented above have been discussed with NCES during a telephone conversation April 20, 1999. As agreed to by NCES, the Department will look for the information required by the quarterly reporting obligations to be submitted monthly rather than quarterly starting with the April 1999 report. The Department will look for NCES to address each of the above items with the submission of the April 1999 report.

If there are any questions regarding this letter please contact me at the Solid Waste Management Bureau, Waste Management Division at 863-1125 (M, W & F in the Grantham office) and at 271-2925 (T & Th in the Concord office).

Sincerely,


James W. Berg

Waste Management Specialist III
Solid Waste Management Bureau

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cc: Richard Reed, SWMB
Michael McCluskey, PDRS
John Cotton, SWMB
BOS, Town of Bethlehem
Bethlehem, NCES file/DB