

From: [McKenna, Leah](#)
To: JOHN.GAY@CASELLA.COM
Cc: [DES: Solid Waste Management Bureau Enforcement; Colby, Jaime](#)
Subject: NHDES response to NCES 6/24/24 and 7/15/24 submittals
Date: Friday, August 30, 2024 8:42:00 AM

Good morning,

NHDES is in receipt of NCES's June 24, 2024 and July 15, 2024 submittals in response to [LOD No. SWMB 24-006](#) (LOD). NHDES has identified that the documents submitted lack required information, and as such the NHDES is requesting additional information in order to make a more complete determination of compliance, as detailed below and summarized at the bottom of this email:

Action Item #1

NHDES has reviewed the [incident reports](#) relating to hydraulic head elevations on the primary liner and 30-day average secondary leachate collection system flow rates, respectively, as requested in Action Items 1(a) and 1(b) of the LOD:

- 7/1/2023 – 6/12/2024 Primary Liner Incident Report:
 - **Item 10, The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities - Section incomplete.**
 - Please provide a list identifying the dates, pump stations, and values of primary liner hydraulic head levels recorded during this timeframe, as well as the regulatory threshold referenced. In lieu of providing the aforementioned list, you may provide a listing of the specific tables/pages and quarterly reports in which these values can be found.
- 8/31/2023 – 6/12/2024 Secondary Flows Incident Report:
 - **Item 10, The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities - Section incomplete.**
 - Please provide a list identifying the dates, pump stations, and values of 30-day average secondary flow rates greater than 25 gallons per acre per day (G/A/D) and 100 G/A/D recorded during this timeframe and re-submit the revised reports.
 - Please provide a list identifying each date that a secondary flow rate exceeded 100 G/A/D, the pump station at which the exceedance occurred, and the recorded secondary flow rate.
 - **Item 12, Assessment of actual or potential hazards to the environment, safety and human health related to the incident – Section incomplete.**
 - Env-Sw 1005.09(c)(4)(d) requires an assessment of actual or potential hazards to the environment, safety, and human health related to the incident. Provide the required assessment.

Action Item #2

NHDES has identified that the secondary flow rates in the July 15 response are inconsistent with data previously provided by NCES.

- For each pump station, please provide a table with secondary flow rate measurements starting June 1, 2024, and rolling 30-day averages starting no later than July 1, 2024.
- Please identify any changes or updates to Facility operations implemented to reduce secondary leachate flow rates.

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Action Item #3

The July 15 response included a design analysis of the leachate collection and storage system, as well as a list of operational and maintenance improvements NCES has made or intends to make. The response did not include the requested analysis of the cause(s) of the excess leachate head on the liner (leachate head >12 inches on the liner, excluding sumps), which NHDES requested include an evaluation of the leachate collection, storage and disposal system capacity as well as proposed operational and maintenance changes.

- Please provide the requested analysis of the cause(s) of excess leachate head on the liner, including the requested leachate system evaluation.
 - For clarity, NHDES anticipates that the leachate system evaluation will review the conditions immediately prior to and during the time of excess leachate head, including an assessment of the quantity of leachate in storage, the capacity of the system to manage additional leachate during the subject time period, the rates at which leachate could be removed from the liner system and leachate storage tanks, and a review of precipitation events during the subject time period, including a comparison to design storm precipitation (i.e., 25-year storm event, 100-year storm event). A mass balance analysis on select dates during the subject time period is one of many suitable approaches to conducting the requested evaluation.

NHDES notes that certain pumps were required to be upgraded as part of the Stage VI Phase II construction project in accordance with the Type IA permit modification application initially received March 24, 2020 and approved October 9, 2020.

- Please confirm the make and model of pumps in use at all pump stations for both primary and secondary leachate systems, including:
 - Dates of pump upgrades that occurred on or after the start of Stage VI Phase II construction.

Further, NCES identified in its response a list of items/activities that are “planned or completed.”

- Please identify which items/activities have been completed and which are planned.
 - Include a site plan identifying areas of the facility where improvements have been completed or are planned, as appropriate.
 - Please also identify how the system described in the last bullet point in the July 15 response is different than the existing system.

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Action Item #4

The investigation report/response action plan for Pump Station #2 is incomplete. The purpose of the investigation is to identify the potential cause(s) of elevated secondary flow rates and the response action(s) needed to address those flows. The report provided focuses almost exclusively on the discovery of a single hole along the Stage II / Stage VI Phase II connection, but it also mentions bench

testing of secondary pump station flow meters and a planned camera inspection of secondary leachate pipes.

- Please provide a detailed description of the investigation performed in response to the elevated secondary flow rates per Env-Sw 806.09(e)-(f). In this description, please provide the dates of the investigation, who performed the investigation, and where/how the investigation was performed. Ensure that all potential causes investigated have been described in the report/plan.
- Please provide the equation(s), assumption(s), and input value(s) used to estimate the 3,000 gallons per day of potential flow through the ¼-inch hole.
- Provide a description of how flow meter bench testing is performed and the results of the testing.
- Provide the results of the camera inspection.
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Action Item #5

No comments at this time.

Please provide the information requested above by October 1, 2024. If you have any questions/concerns, please reach out to Tyler Davidson at 603-271-0674 or swmbenforcement@des.nh.gov.

Thank you,
Leah

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