



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

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August 22, 1997

Mr. Larry B. Lackey, P.E.
North Country Environmental Services, Inc.
16 State Street
Montpelier, VT 05602



**SUBJECT: BETHLEHEM - NORTH COUNTRY ENVIRONMENTAL SERVICES
LANDFILL: MONITORING DATA FOR DETENTION PONDS;
CONSTRUCTION AND MONITORING DATA FOR MW-701; AND APRIL
1997 WATER-QUALITY MONITORING RESULTS (DES #870433)**

Dear Mr. Lackey:

The Department of Environmental Services (Department) has reviewed the subject reports. Data on the detention ponds and MW-701 were received on July 23, 1997, and data on the April monitoring results were received on July 28. As you know, the April monitoring results were due June 15, over 40 days before they actually arrived. The Department reminds North Country Environmental Services (NCES) that timely submission of required documents is necessary to remain in compliance with the terms of the Groundwater Management and Release Detection Permit (Permit). Please be certain that the information arrives on time in the future.

The Department is particularly concerned about the presence of VOCs in detention ponds No. 2 and No. 3, and the presence of lead and chromium in all three ponds. However, we will reserve further comments until we have reviewed the July analyses. The Department anticipates receiving the July results within the next 25 days.

The analytical data for MW-701 for two sampling rounds (April and June) did not include Safe Drinking Water Act metals as requested. These analyses must be done promptly, with two analyses completed by early November. Please be advised that the Department may have additional comments following review of the July results.

The Department is concerned about the analytical results for VOCs for MW-406U and L. Sanborn, Head & Associates (SHA) suggest that the April samples for MW-406L and MW-406U may have been reversed. Perhaps there is a possibility of mislabeling those samples with samples from the 600-series wells. More important, the Department is extremely concerned by the manner in which the reported information was handled. As required by the Groundwater Protection Rules and the Permit, this matter should have been reported to the Department within 10 days of your knowledge of the results. The correct course of action was to immediately resample the appropriate wells. The decision by NCES to wait until the July sampling round was not in keeping with the manner the Department would have handled the situation if it had been properly advised of the findings. The Department insists that NCES follow the rules in the future. Line graphs for each VOC that has been detected in MW-405U and L and MW-406U and L are to be included in the September summary.

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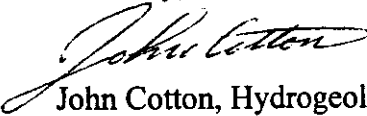
The cover letter with the Permit Revision, dated January 3, 1996, requested "that information from the material descriptions in logs of the monitoring wells in the 400 and 600 series be used to update the geologic cross sections that were included in the March 1987 report by GZA GeoEnvironmental, Inc . . . These updated cross sections can be included in the next annual report in September 1996." The cross sections were not included in that annual report and are to be included in the September 1997 report. The data from MW-701 shall also be used.

The existing Groundwater Management and Release Detection Permit expires on November 8, 1997. As you know, Condition 2 of that Permit requires that an application to renew the Permit be submitted 90 days prior to the expiration date. NCES' failure to meet this requirement represents an outstanding obligation as well as a permit violation. The application for permit renewal must include a thorough review of water quality conditions over the previous 5-year period. The annual September summary for this year may be incorporated in the 5-year review provided that the Department receives the application for permit renewal by September 30, 1997.

NCES presently holds NPDES Baseline Industrial Storm Water Permit No. NH R00A283 (not NH R004283) which expires on September 9, 1997. Under EPA rules, NCES will have to file a Notice of Intent (enclosed) for a NPDES Multisector Permit before that date. Additional information may be obtained from Thelma Hamilton (EPA, Region I Storm Water Coordinator) at (617) 565-3569, or calling the EPA Consultant at (202) 260-7786 and specifying that NCES needs copies of the general rules, rules for Sector L, and the fact sheet (all from the Federal Register).

The items in the preceding paragraphs reflect a need for NCES to become more proactive with respect to operating in compliance with the terms of the Groundwater Management and Release Detection Permit. Should you have questions, please contact me at the Department at (603) 271-2925.

Sincerely,



John Cotton, Hydrogeologist
Waste Management Division

enclosure

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cc: John Regan, HWRB
Richard Reed, SWMB
Pamela Sprague, P&DRS
Robert Watts, NCES
Town of Bethlehem, Board of Selectmen
HWRB File