



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

**VIA EMAIL ONLY**

October 7, 2021

North Country Environmental Services, Inc.  
Joe Gay  
P.O. Box 9  
Bethlehem, NH 03574  
Email: [john.gay@casella.com](mailto:john.gay@casella.com)

**Subject: North Country Environmental Services, Inc., 581 Trudeau Road, Bethlehem, NH  
Solid Waste Permit No. DES-SW-SP-003-002**

**Acknowledgment of Submittal: INCIDENT REPORT PURSUANT TO NHDES  
ADMINISTRATIVE ORDER 21-010 WMD, report dated August 30, 2021**

Dear Mr. Gay:

The New Hampshire Department of Environmental Services, Waste Management Division (NHDES) acknowledges receipt of North Country Environmental Services (NCES) incident report and relocation plan, as required pursuant to NHDES Administrative Order 21-010 (the AO). After review of the document, NHDES has determined that additional information, as detailed below, is needed regarding the assessment of hazards, the measures taken to prevent recurrence, and to describe the waste relocation plan.

**(1) Assessment of Actual or Potential Hazards**

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. Additional information is needed for NHDES to review the assertions made in the submittal. Please provide the following engineering evaluations for the current landfill configuration:

- Stability analyses, to include global stability for the static and seismic conditions as well as sloughing (e.g., infinite slope); and
- Settlement analyses, to include estimated rates of settlement for the top deck and side slopes and projections of when waste (including cover materials but excluding final cap consistent with Env-Sw 102.10) will settle to the permitted limits identified in Condition (7) of the Permit Modification dated October 9, 2020.

Please also provide engineering reviews, analyses, and conclusions regarding the compatibility of the current landfill configuration with the facility's:

- Leachate management system's design capabilities and limitations;
- Storm water management system's design capabilities and limitations; and
- Landfill gas management system's design capabilities and limitations.

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## **(2) Measures to Reduce, Eliminate and Prevent Recurrence**

Env-Sw 1005.09(c)(5) requires that the incident report include measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation. Please provide details of the preventative measures NCES has taken or will take to assure additional overfills will not occur in this or other phases of the landfill.

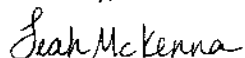
## **(3) Waste Relocation Plan**

AO Item 2.b. requires a waste relocation plan. The incident report submitted on August 30, 2021 included a preliminary relocation plan that provided a general idea of how waste would be managed if waste relocation proceeds. However, additional information indicating the location and sequence of waste placement is necessary. The plan, as submitted, cannot be implemented without additional details and considerations. NHDES anticipates that a final waste relocation plan will be prepared consistent with and include items similar to those for a fill sequencing plan (see Env-Sw 805.11) Waste relocation plan sequencing must be developed in consideration of the landfill's stability, and the capabilities and limitations of the leachate and storm water management systems.

Please provide the additional information as identified above in items 1-3, in writing, ***as soon as possible***.

Should you have any questions or concerns related to this letter and the instructions provided herein, please contact me using the information provided in the signature below. Thank you again for your continued efforts, as we work towards compliance of the facility.

Sincerely,



Leah McKenna, Administrator  
Solid Waste Management Bureau  
Waste Management Division  
Email: [leah.l.mckenna@des.nh.gov](mailto:leah.l.mckenna@des.nh.gov)

cc: Mark Johnson, Casella Waste Systems, email: [mark.johnson@casella.com](mailto:mark.johnson@casella.com)  
Kevin Roy, Casella Waste Systems, email: [kevin.roy@casella.com](mailto:kevin.roy@casella.com)  
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