



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

603-271-3503 FAX 603-271-2867

TDD Access: Relay NH 1-800-735-2964



October 18, 1994

Mr. John Hackler, Chief

Solid Waste Section

USEPA

JFK Federal Building

Boston, MA 02203-2211

**SUBJECT: NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL  
BETHLEHEM, NEW HAMPSHIRE  
J. HACKLER LETTER DATED OCTOBER 6, 1994**

Dear Mr. Hackler:

Thank you for your letter to Doctor O'Brien dated October 6, 1994 whereby you request background information regarding the North Country Environmental Services, Inc. Landfill (formerly known as the Consumat Sanco, Inc. Landfill) located in Bethlehem, New Hampshire. We appreciate your interest in the facility which was prompted by Mrs. Sarah Mike's recent inquiry to your office regarding the landfill. I can assure you that the New Hampshire Department of Environmental Services (Department) and the Town through its Board of Selectmen have been actively involved with the facility since its inception, especially so since permitting the lined sections of the landfill. The State has given close scrutiny to all aspects of operation of the landfill including water quality monitoring, waste placement, waste relocation and proposals to expand the facility. To help you understand the progressive development of the landfill during the last 18 years, I am providing the following history of the site and am attaching a small sketch showing each of the areas and their relationship to one another.

The original unlined 3.82 acre landfill (see attached map) was permitted/constructed in 1976; followed by construction of an abutting one acre single lined extension which operated until 1987. In 1987, permit number DES-SW-87-022 was issued by the Department for the so-called Stage I area, a double HDPE lined landfill with leachate collection and leak detection systems. Construction approvals and operation approvals for each of the four phases in Stage I were granted progressively from 1987 to 1993. While Stage I was being physically developed, then owner Roy Sanborn obtained a permit for Stage II. That permit (# DES-SW-89-009) was issued in 1989 for a seven acre area abutting the northeasterly side of the Stage I landfill and included additional waste placement (vertical lift) over Stage I. The seven acre area encompassed

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Concord, N.H. 03302-2033  
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WASTE MANAGEMENT DIV.  
6 Hazen Drive  
Concord, N.H. 03301  
Tel. 603-271-2900  
Fax 603-271-2456

WATER RESOURCES DIV.  
64 No. Main Street  
P.O. Box 2008  
Concord, N.H. 03302-2008  
Tel. 603-271-3406  
Fax 603-271-6588

WATER SUPPLY & POLLUTION CONTROL DIV.  
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Mr. John Hackler  
NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL  
BETHLEHEM, NEW HAMPSHIRE  
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the footprint of the original unlined and single lined landfills. As a condition of developing the Stage II Landfill, the State required the owners to remove the unlined and single lined landfills.

Consumat Sanco, Inc., which had purchased the landfill from Roy Sanborn continued to operate it under the existing permit. In the fall of 1993 Consumat Sanco, Inc. completed the excavation of all waste from the old unlined landfill and the old single lined landfill. The excavated waste was placed in the double lined landfill known as Stage I.

In 1994, Consumat Sanco, Inc. was sold to New England Waste Systems, Inc. (NEWS), which renamed the corporation "North Country Environmental Services, Inc." (NCES). NCES has made application to the Department for construction approval for Phase I of Stage II. Included in the Stage II permit is the previously mentioned vertical lift over Stage I; it is that area that NCES has requested to use first. At present, the Department is reviewing an application for a permit modification which requests operation of this area.

A groundwater impact, believed to be associated with the unlined landfill, has been identified at the site and has been closely monitored by the Department through the terms of the Groundwater Management Permit issued for the site. Since completion of the waste relocation project in 1993, the groundwater quality in the "100 series" wells that monitor the old landfill area has continued to receive attention by the Department, the permittee and their consultants, the Town authorities, and a number of other individuals. Most recently, as part of the on-going Stage II construction application review process, the Department requested NCES to conduct a full evaluation of the hydrogeologic and water quality issues at the site to be certain that the contamination does not reflect a problem with the Stage I section of the landfill. The Department is currently in the process of reviewing that evaluation and obviously will not approve construction of Stage II, including placing additional materials over Stage I, until it is confident that the groundwater issues have been properly addressed.

The Town of Bethlehem Board of Selectmen, who have always been fully informed regarding the State's permitting process and monitoring of the facility, has recently raised several concerns with groundwater and other matters. The concerns raised by the Selectmen are as follows:

1. the 100 series groundwater monitoring wells continue to show elevated levels of Volatile Organic Compounds (VOCs);

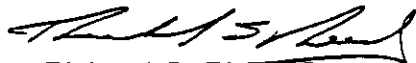
Mr. John Hackler  
**NORTH COUNTRY ENVIRONMENTAL SERVICES LANDFILL**  
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- ②. the site has been contaminated for at least 10 years and is once again leaking into the Ammonoosuc River;
- ③. the double lined containment system failed in at least two different areas as early as 1990;
- ④. part of the double-lined 18 acre facility (Stage I) was built with materials now considered unsafe; and,
- ⑤. the leachate collection system doesn't work.

The Department was already in the process of reviewing most of these issues when it received the inquiry from the Selectmen, and has regularly monitored the performance of the facility during its operational life. Because the permittee wants to expand the facility operation, the Department is now conducting an in-depth review of a considerable amount of technical and legal information relating to the landfill to be certain that proper conclusions are reached. The Department wants to be certain it carries out its review in detail. The Department is in the process of developing a response to the specific issues raised by Town Selectmen and will prepare a similar response to Mrs. Sarah Mike, who shares many of the same concerns. We will be happy to provide you with a copy of the response once it is complete.

I hope that the information contained in this letter will enable you to respond to Mrs. Mike, and that you will tell her that the State will provide a further response to her once the on-going review of these matters has been completed. In the interim, if you have any questions please do not hesitate to call me or James Berg at 603-271-2925.

Sincerely,



Richard S. Reed, Supervisor

Waste Management Compliance Bureau

PJO/RSR/neo/hkirttr

Attachment: Sketch and Data Sheets

cc: Bethlehem Selectmen  
Philip J. O'Brien, Ph.D., Director, WMD  
Anne E. Renner, Esquire, NHDOJ  
Pamela H. Sprague, PADRS  
Richard S. Reed, SWCS  
James W. Berg, SWCS  
NCES Bethlehem File/DB  
James W. Bohlig, NCES

# SOLID WASTE FACILITY DATA SHEET



Waste Management Division  
6 Hazen Drive, Concord, NH 03301

**Facility:** Consumat-Sanco, Inc. - Stage I Landfill

**Type:** Double-Lined Solid Waste Landfill

**Location:** Trudeau Road, Bethlehem, New Hampshire

**Owner/Permittee:** Consumat-Sanco, Inc.

**Permit No.:** DES-SW-87-022

**Date Issued:** June 30, 1987

**Date Operational:** November 1987

**Type Waste:** Municipal Solid Waste, Asbestos, Ash

**Daily Rate:** Approximately 300 TPD

**Service Area:** Commercial

**Total Acres:** 18 Acres/(4 Phase Concept)  
Volume = 1,300,000 cy

**Total Acres Constructed:** 18 Acres

**Total Acres Operational:** 14± Acres

**Total Area Capped:** None

**Estimated Remaining Life:** 2 - 3 Years

**Description/Comments:** Phase IV (the terminal phase of the facility) has been constructed, but approval to operate has not yet been granted. An estimated 140,000 cy of the Phase IV capacity is dedicated to receive MSW to be removed from adjacent unlined landfill.

Date: May 5, 1993



# SOLID WASTE FACILITY DATA SHEET



Waste Management Division  
6 Hazen Drive, Concord, NH 03301

**Facility:** Consumat-Sanco, Inc. - **Stage II Landfill**

**Type:** Double-Lined Solid Waste Landfill

**Location:** Trudeau Road, Bethlehem, New Hampshire

**Owner/Permittee:** Consumat-Sanco, Inc.

**Permit No.:** DES-SW-89-009      **Date Issued:** April 24, 1989

**Date Operational:** Not constructed

**Type Waste:** Municipal Solid Waste

**Daily Rate:** Approximately 300 TPD

**Service Area:** Commercial

**Total Acres:** 7 Acres/(2 Phase Concept)  
Volume = 710,000 cy

**Total Acres Constructed:** None

**Total Acres Operational:** None

**Total Area Capped:** None

**Estimated Remaining Life:** 6 - 7 Years

**Description/Comments:** This facility is to occupy an area which now includes an inactive, unlined landfill and will also occupy airspace over the so-called Stage I landfill (see Permit No. DES-SW-87-022). Removal of the unlined landfill is a pre-construction requirement and is now on-going.

**Date:** May 5, 1993



*NOTE:  
This plan was  
color-coded for  
EPA*

105.15 Ac

B-101

B-103 S&D

PHASE II

1977  
EXTENSION  
AREA

B102 S&D

STAGE II  
AREA TO BE REUSED  
AFTER EXCAVATION

PHASE I

2.6 Ac

STAGE I  
19 Ac

1.1 AC  
ASPH. PAVT

7.1 AC  
PHASE I  
IN OPERATION

4.0 Ac  
PHASE IV  
ON HOLD

4.0 Ac  
PHASE II  
IN OPERATION

2.0 AC  
PHASE III  
ON HOLD

LOT 4

150276201  
MAP 409 / LOT 25

1.101.28 S&D  
1.101.28 S&D

CLEARING  
DUMP  
PIT

100' SETBACK LINE  
100' SETBACK LINE  
100' SETBACK LINE

WATER  
PIT

Rebar  
Pit

182.79' 115 112 120.77' 214.78' 124.38' 124.38' 142.51' 547.93' 211.09' 586.54' 24' W 5.77' 29' 12" 112.79' 114.11'



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

OPTIONAL FORM NO. 10 (7-89)

FAX TRANSMITTAL

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October 6, 1994

Philip J. O'Brien, Ph.D., Director  
Waste Management Division  
Department of Environmental Service  
6 Hazen Drive, Health/Welfare Building  
Concord, N.H. 03301-2456

PHILIP O'BRIEN J. HACKLER  
DIF DES 617-573-9670  
603-271-2456 617-570-9662  
NSN 7540-01-317-708 5028-101 GENERAL SERVICES ADMINISTRATION

Dear Dr. O'Brien,

Our purpose in sending this letter is to seek information concerning the New England Waste Systems (NEWS), Inc. Landfill located in Bethlehem, N.H. We are currently in receipt of a letter dated Sept. 29, 1994 addressed to John Devillars, Regional Administrator, EPA-New England, prepared by Mrs. Sarah Mike. This letter contains a number of attachments which pertain to the landfill.

In this letter Mrs. Mike has requested intervention by the EPA on behalf of the town and citizens of Bethlehem concerning releases of contaminants from the landfill to the environment and also seeks regulatory enforcement as it relates to proper landfill management. A quick review of some of the data sent to us by Mrs. Mike suggests a groundwater plume of hazardous organic constituents may be present in the subsurface and may, in fact, be currently discharging to surface waters through a nearby seep. The information which was submitted was insufficient to respond appropriately.

We have no information concerning this facility and are requesting background information from your office to assist in our response. Two members of your staff Ms. Pamela Sprague and Mr. Kevin Hopkins are both cited in the attachments submitted with the above mentioned letter. Could you review the situation and provide us with some appropriate background information. Your earliest response would be appreciated as we are required to respond by Oct. 19, 1994 to Mrs. Mike. To facilitate this request, when you have assembled your information, please contact Mr. Chuck Franks (Tel. (617)573-9678) of my staff. Thank you for your consideration concerning this request.

Sincerely,  
*John Hackler*  
John Hackler, Chief  
Solid Waste Section



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C. FRANKS FAX # 617-573-9662