



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

July 28, 2020

VIA EMAIL ONLY

North Country Environmental Services, Inc.
1855 VT Route 100
Hyde Park, VT 05655
Email: john.gay@casella.com

Attn: John Gay, E.I., Engineering Manager

**Subject: North Country Environmental Services, Inc. Landfill
581 Trudeau Road, Bethlehem, NH
Permit No. DES-SW-SP-03-002**

2019 Annual Facility Report, received March 25, 2020 – Incomplete

Dear Mr. Gay:

The New Hampshire Department of Environmental Services, Waste Management Division, Solid Waste Management Bureau (NHDES) has completed a preliminary review of the 2019 Annual Facility Report (AFR) submitted by North Country Environmental Services, Inc. (NCES) for operation of the subject facility during 2019. NHDES has determined the AFR is incomplete. Please submit an amended and complete AFR to address and include all of the following:

1. Section 5 – Facility Status (Env-Sw 1105.13(d)): The report states the estimated remaining life of the facility is “+/- 1 year” as of March 31, 2020 and the estimated remaining permitted capacity (in cubic yards) is “+/- 331,000 cy” as of December 31, 2019. The report is for the 2019 calendar year. Therefore, it should provide the estimated remaining life of the facility on that basis (December 31, 2019 vs. March 31, 2020). The analysis of remaining capacity must be determined based on a site survey, per Env-Sw 806.08(j)(2)b. Please confirm by providing the analysis and supporting site survey information, stamped by a qualified licensed professional in accordance with RSA 310-A.
2. Section 7 – Waste and Recyclables Received & Shipped (Env-Sw 1105.13(e), Env-Sw 110513(f)): All three “other” boxes are checked, but the waste type is provided only for the first checked box. Confirm that the 2 additional boxes were checked in error, or provide the specific waste type associated with each.
3. Section 10 – Facilities Producing Certified Waste-Derived Products (Env-Sw 1105.13(h)): No waste-derived products are listed; however, certification of compliance related thereto is checked. If the facility produced and/or distributed certified waste derived products during 2019, identify the waste-

www.des.nh.gov

PO Box 95, 29 Hazen Drive, Concord, NH 03302-0095

Telephone: (603) 271-2925 Fax: (603) 271-2456 TDD Access: Relay NH 1-800-735-2964

North Country Environmental Services, Inc.

Ref: **North Country Environmental Services, Inc. Landfill**

July 28, 2020

Page 2 of 2

derived products for which compliance certification is provided. If the facility did not produce or distribute certify waste derived products during 2019, clarify by skipping this section.

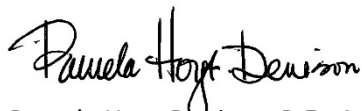
4. Section 12 – Summary and Assessment of Environmental Monitoring (Env-Sw 1105.013(j)): The cited rule requires a summary and assessment of environmental monitoring performed at the facility. The form provides the option (which NCEC checked) to list all submitted documents by date of submission and document title, such documents to be those that provide the requested assessment of environmental monitoring. However, NCEC did not list any documents by date of submission and document title, as needed to complete the section as “checked”, nor does NHDES find an attached summary and assessment of environmental monitoring for calendar year 2019, which is the other reporting alternative (not checked). Please provide the list or attach a summary and assessment of environmental monitoring.

5. Section 13 – Public Benefit Discussion (Env-Sw 1105.13(k)): The information submitted in response to the requirement to provide a discussion of how facility operations satisfied the public benefit requirement specified in the permit, does not address the public benefit requirement for operation of Stage V. The submitted information appears to be a copy of the public benefit demonstration for proposed Stage VI. Please submit a discussion of public benefit that explicitly provides the information required by Env-Sw 1105.13(k) as well as Condition (13)(c) of the Facility’s solid waste permit dated August 15, 2014 relative to operation of Stage V during 2019.

Please submit the amended 2019 AFR, including all information requested above, by August 14, 2020.

Thank you in advance for your prompt attention to this matter. If you have questions, please contact me.

Sincerely,



Pamela Hoyt-Denison, P.E., Administrator

Waste Programs

Waste Management Division

(603) 271-2945

Pamela.hoyt-denison@des.nh.gov