

From: [Mills, Austin](#)
To: [Bruce Grover](#); "kevin.roy@casella.com"; "JOHN.GAY@CASELLA.COM"
Cc: [Jones, Emily](#); [Colby, Jaime](#)
Subject: NH DES Landfill Facility Inspection - 11/2/2022
Date: Monday, November 7, 2022 9:32:00 AM
Attachments: [NCES Daily Cover Inspection and Deficiency Report 11-2-2022.pdf](#)

Good Morning

Thank you for taking the time to help facilitate / participate in the inspection of NCES Landfill Stage 4,5,6 on 11/2/2022. During the inspection, items were identified as being non-compliant with NH Statute RSA 149-M, applicable rules in Env-Sw 100-2000 and/or the most recently issued permit. An inspection report, complete with a list of out-of-compliance items, is attached to this email.

In order to regain compliance with applicable statutes and rules, please review the attached report. It contains specific requirements and timelines to correct the deficiencies. Please complete the outlined requirements identified at the end of the attached report and forward evidence (written proof, copies of documents, photographs, etc.) of compliance to myself (Austin.S.Mills@des.nh.gov) no later than the dates outlined in the report. Failure to adequately correct the identified items and forward evidence of correction by the required date may result in administrative action in accordance with the Department's Compliance Assurance Response Policy.

If you have any questions, please do not hesitate to contact us.

Thank you in advance for your timely response to this matter.

Austin Mills, Waste Management Specialist

NH Dept. of Environmental Services, Solid Waste Management Bureau
29 Hazen Drive / P.O. Box 95
Concord, NH 03302-0095
Email: Austin.S.Mills@des.nh.gov / Phone: (603) 848-2424



Solid Waste Facility Limited Inspection Report

for landfills except permit exempt, PbN, R&D and Emergency Permit landfills

A. GENERAL INFORMATION		
Facility Name: NCES Lined Landfill Stage 4, 5, 6	Date of Inspection: 11/2/2022	
Permittee Name: North Country Environmental Services Inc.	Nature of Inspection: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Re-inspection <input type="checkbox"/> Requested <input type="checkbox"/> Complaint	
Permit #: DES-SW-SP-03-002		
Facility Location: 581 Trudeau Rd., Bethlehem, NH		
Operating Hours Per Approved Operating Plan of Record: 6:00AM to 6:00PM M-F, 7:00AM to 12:00PM Saturday		
NHDES Inspector(s): Austin Mills, Mary Daun, Jaime Colby		
Attendees: Bruce Grover - Casella, Kevin Roy - Casella		
Photos taken: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Open enforcement actions at the facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B. LIMITED OPERATIONAL CHECKS		Details:
Env-Sw 806.03 (c)	At landfills receiving MSW, cover material is placed over all exposed waste no less frequently than at the end of each operating day.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Env-Sw 806.03 (d)	Facility employs one or more of the following daily cover types (approved in rule or certified waste derived product approved for landfill cover and contained in operating plan)	
	1. Natural soils	<input checked="" type="checkbox"/> Used <input type="checkbox"/> Not Used
	2. Geosynthetic Tarps	<input checked="" type="checkbox"/> Used <input type="checkbox"/> Not Used
	3. 50/50 C&D and Soil CWDP	<input checked="" type="checkbox"/> Used <input type="checkbox"/> Not Used
	4. Casting Sands	<input checked="" type="checkbox"/> Used <input type="checkbox"/> Not Used
	5.	<input type="checkbox"/> Used <input type="checkbox"/> Not Used
	6.	<input type="checkbox"/> Used <input type="checkbox"/> Not Used
	7.	<input type="checkbox"/> Used <input type="checkbox"/> Not Used
	8.	<input type="checkbox"/> Used <input type="checkbox"/> Not Used
	9.	<input type="checkbox"/> Used <input type="checkbox"/> Not Used
Env-Sw 1105.08 (A)	All active and routine facility operations including waste disposal, facility inspections, maintenance, repairs, and monitoring, occur between hours identified above under normal non-emergency circumstances, unless otherwise permitted.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Env-Sw 1105.06 (a) (9)	Permittee compiles and maintains the following records at the facility: (9) Record of complaints received and related response actions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

C. NON-COMPLIANT ITEMS IDENTIFIED DURING INSPECTION

CITATION	DESCRIPTION <i>(Use separate page, if necessary)</i>	
1. Env-Sw 806.03 (c)	<p>Requirement: At landfills receiving MSW, cover material shall be placed over all exposed waste no less frequently than at the end of each operating day.</p> <p>Observation: NHDES Inspectors arrived at the facility at approximately 5:30AM on 11/2/2022 to conduct a limited facility inspection. The facility gate was closed and there was no indication of activity on site. The first operator opened the gate at approximately 5:40AM and NHDES inspectors entered the facility. At approximately 5:50AM, Bruce Grover and Kevin Roy, both of Casella, met with NHDES inspectors who were then escorted to the working face to view the application of daily cover from the day before. Upon arrival to the working face, geosynthetic tarps, natural soils and other alternate daily cover types were observed to be covering the majority of waste with some waste flagging issues seen. There were 3 areas of concern observed to contain uncovered wastes:</p> <p>Area #1: Downslope from the termination of geosynthetic tarp coverage, there were small berms of primarily intermediate cover material containing intermixed wastes observed. These berms were beyond the reach of the geosynthetic tarping used as daily cover and did not appear to be covered otherwise. The wastes appeared to have been uncovered and mixed with intermediate cover during prior cover stripping operation in order to conduct subsequent lifts. The berms were intermittent in nature and did not span the whole width of the active area.</p> <p>Area #2: There was a single gap in the geosynthetic tarping system measuring approximately 3 feet by 10 feet. No cover material was observed to be applied to this waste.</p> <p>Area #3: The tipping area from the day before was discovered to contain some small areas of waste not exhibiting application of cover material.</p>	
<p>Corrections: Beginning daily on 11/7/2022 and continuing through 11/11/2022, please submit to the email below evidence of complete daily cover application to all wastes landfilled during the previous working day.</p>		<p align="center">Deficiency Correction Due By: 11/7/2022 to 11/11/2022</p>
<p>NHDES Inspector: <i>(print)</i> Austin Mills, Waste Management Specialist</p>		<p>Signature:</p>
<p>Phone: 603-848-2424</p>		<p>Email: Austin.S.Mills@des.nh.gov</p>

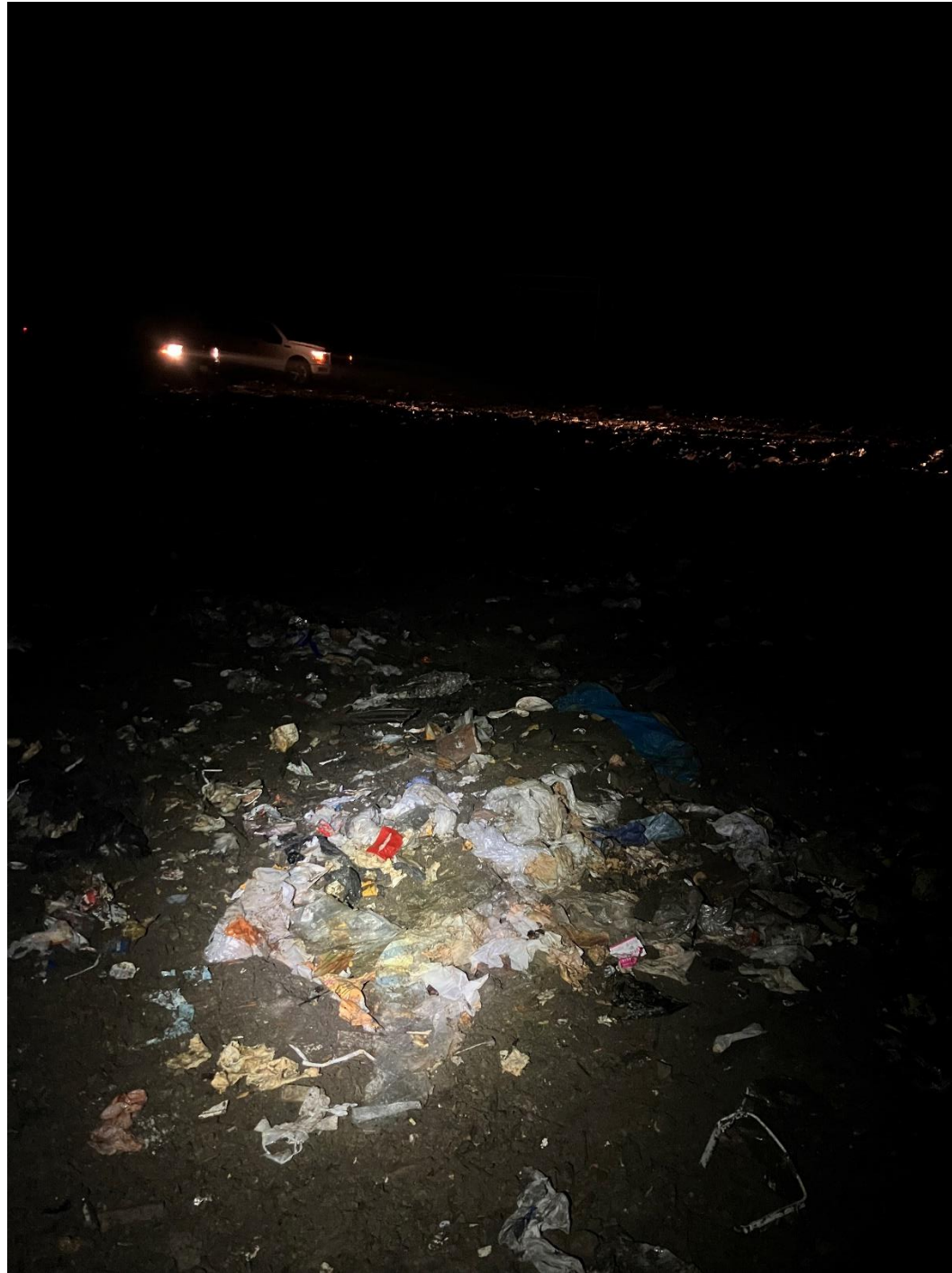
Attachment A – Photograph Log

Photograph Information			
Date of Photographs	11/2/2022	Photographer	Austin Mills
Camera Used	iPhone SE		
Photograph Number	Description		
IMG_1294	Tipping area uncovered waste		
IMG_1303	Tipping area uncovered waste		
IMG_1298	Base of geosynthetic tarping system with intermediate cover mixed with waste		
IMG_1299	Base of geosynthetic tarping system with intermediate cover mixed with waste		
IMG_1302	Gap in geosynthetic tarping system		

IMG_1294



IMG_1303



IMG_1298



IMG_1299



IMG_1302

