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Opinion: Failure at the NCES Landfill

By JON SWAN (/byline?byline=By:JON SWAN)

Published: 9/29/2023 6:03:11 AM

Modified: 9/29/2023 6:02:24 AM

Jon Swan of Dalton is the founder of [Save Forest Lake](http://www.saveforestlake.com/) (<http://www.saveforestlake.com/>).

I have some bad news to share with my fellow Granite Staters. Based on my analysis of groundwater monitoring reports, and my research of the historical record, it is my belief that we are witnessing the failure of the controversial NCES Landfill in Bethlehem.

Toxic “forever chemicals,” also known as PFAS, were detected in groundwater at 11 of 19 monitoring wells tested, according to the July 2023 Tri-Annual Groundwater Monitoring Report submitted to NHDES by Sanborn, Head and Associates (SHA) on behalf of Casella Waste Systems and the NCES Landfill.

Of particular concern is the detection and high level of PFOA. The EPA is proposing to designate PFOA as a hazardous substance (<https://www.epa.gov/superfund/proposed-designation-perfluorooctanoic-acid-pfoa-and-perfluorooctanesulfonic-acid-pfos>) under the Superfund law, which would help to hold polluters accountable for cleaning up their contamination. According to the July report, new maximum concentrations of PFOA contaminants were detected in groundwater at the two monitoring wells closest to and upgradient of the Ammonoosuc River, a mere 550 and 400 feet away.

I have recently obtained and analyzed lab test results from 2018 to 2023 for NCES landfill leachate, also known as “garbage juice,” which is trucked daily in tankers to the City of Concord wastewater treatment plant (WWTP) and the NHDES-operated Franklin WWTP. The top PFAS compounds present in NCES Landfill leachate have also been consistently detected in the groundwater at their various monitoring wells. In other words, it would appear that the NCES Landfill is failing to contain the leachate it generates, based on the data from both the NCES groundwater monitoring well reports and the NCES leachate lab results.

Like an episode of CSI, the landfill’s leachate “DNA” matches the evidence left behind at the scene of the crime. In this instance, the crime scene is the watershed of the Ammonoosuc River, downgradient of the NCES Landfill.

Unfortunately, the numerous detections of PFAS contaminants in groundwater at NCES have been downplayed in the reports submitted to NHDES since at least 2017, when PFAS testing became a requirement. I believe a false narrative has been relied upon by all parties, to dispel any concerns that the landfill may actually be leaking. Blame is consistently placed on the former Sanco unlined landfill, like an alibi, to explain the presence of contaminants in groundwater at the various monitoring wells outside of the lined landfill. A search of the July 2023 report reveals that “unlined landfill” comes up 52 times!

The problem with that narrative is the fact that the old Sanco unlined landfill was actually excavated (<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/10%207%2093%20CSI%20to%20DES%20excavation%20completed.pdf?ver=1695492194768>) by Casella Construction (<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/1%2027%2093%20Doug%20Casella%20Construction%20letter%20to%20CS.pdf?>

[ver=1695492194768](https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/8%2025%2093%20CWS%20Public%20Notice%20Trash%20Relo%20new%20state.pdf?ver=1695492194768)) in the fall of 1993. The waste was relocated to Stage I of the “state-of-the-art,” double-lined landfill, as [Casella Waste Systems boasted on August 25, 1993](https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/8%2025%2093%20CWS%20Public%20Notice%20Trash%20Relo%20new%20state.pdf?ver=1695491420529) (<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/8%2025%2093%20CWS%20Public%20Notice%20Trash%20Relo%20new%20state.pdf?ver=1695491420529>). Ironically, on November 5, 1993, Paul Sanborn, president of Sanborn, Head and Associates, (yes, the same company using the “unlined landfill” as an alibi today), [wrote to NHDES](https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/11%205%2093%20Sanborn%20Head%20to%20Reed%20DES%20Contamination.pdf?ver=1695480297722) (<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/11%205%2093%20Sanborn%20Head%20to%20Reed%20DES%20Contamination.pdf?ver=1695480297722>) to inform them of the completion of the waste-relocation project. He stated residual contamination was not present in the soils in the excavation area, thus clearing the way for NHDES approval for the development of the Stage II landfill expansion over the unlined landfill site. On December 9, 1993, Mr. James Berg of NHDES [wrote of the department’s “concurrence”](https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/12%209%2093%20DES%20Berg%20to%20CSI.pdf?ver=1695491420529) (<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/12%209%2093%20DES%20Berg%20to%20CSI.pdf?ver=1695491420529>) that “no further excavation to remove additional soils is necessary.” In other words, the unlined landfill was excavated of all trash and deemed free of contamination by both SHA and NHDES.

Fast-forward to today and I ask, which is a more plausible explanation for the continuous detections and exceedances of groundwater quality limits, for PFAS and other contaminants, at the NCES Landfill? The unlined landfill, excavated 30 years ago, and given a clean bill of health by the same engineering firm and NHDES? Or, could we be witnessing the failure of the 30-year-old “state-of-the-art” double-liner system of Stage I?

Regardless of the cause, the data does not lie. There is and has been a steady, consistent release of PFAS and other contaminants from the NCES Landfill into groundwater, all within the watershed of the Ammonoosuc River. Will the EPA investigate? I’ve sent numerous requests since NHDES appears unconcerned. Will the town of Bethlehem be home to a new Superfund site? I don’t see how it doesn’t. The fears and concerns of so many Bethlehem residents, over the years of contentious growth of this landfill, seem to now be justified, and, sadly, realized.

NHDES failed in its mission to protect the environment. Will Casella be held responsible for the expense of PFAS cleanup and remediation? We shall see, as it seems their track record of accepting responsibility is shaky at best.

It would be irresponsible for NHDES to allow the NCES Landfill to continue to operate, ensuring the continued generation of millions of gallons of leachate annually, which the monitoring reports confirm is not being contained within the lined landfill. It’s time for NHDES to do its job and close this controversial dump, and potential Superfund site, once and for all.

It would be unconscionable for NHDES to permit another one of these toxic landfills for out-of-state trash next to pristine Forest Lake and the Ammonoosuc River, endangering private, PFAS-free wells in neighboring Dalton, Littleton, Whitefield, and Bethlehem, as well as public water supplies in downstream communities.

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