

December 18, 2024

**Via email**

Joint Legislative Committee on Administrative Rules (JLCAR)  
[adminrules@leg.state.nh.us](mailto:adminrules@leg.state.nh.us)

**Re: Request for Revised Objection  
Public Testimony in Opposition to NHDES Rulemaking: Env-Sw 800 – Landfill  
Requirements (OLS Notice Number 2024-74)**

Esteemed Members of the Joint Legislative Committee on Administrative Rules (JLCAR):

I write in support of and concurrence with the December 17, 2024 letter to the Committee by Attorney Amy Manzelli of BCM Environmental & Land Law LLC and her conclusion that:

*“The Committee correctly performed its statutory duty to apply Legislative oversight to the administrative rulemaking process when it determined the Env-Sw 800 Final Proposed Rules are:*

- 1. contrary to the public interest due to a lack of responsiveness to the public, pursuant to RSA 541-A:12, IV(c) and Committee Rule 403.01(a)(2),*
- 2. designed to benefit the administrative convenience of the agency to the detriment of the public, pursuant to RSA 541-A:13, IV(c) and Committee Rule 403.01(g), and*
- 3. contrary to the legislative intent of RSA 149-M:1, the purpose statement of the enabling solid waste statute.*

*The Department responded to the Committee’s preliminary objection only to provide more explanation, so, **none of those three bases have been cured.** In particular, the specific nature of the Department’s lack of responsiveness to the public is the Department’s inability to show it overruled public comments on the merits because the peer-reviewed science in the record does not support the Env-Sw 800 Final Proposed Rules. **As such, in this instance, the Committee should make a final objection to the rules on the same three grounds.**”*

I agree wholeheartedly with Attorney Manzelli’s conclusion and recommendation to the Committee. Please, issue a final objection to the final, proposed rules. Why is it that we seemingly only have two options, approve these, or resort to the older, expired rules? Why not strive to get it right? Sadly, there is a strong level of distrust amongst the public for the department (NHDES). For many of us involved in the six-year fight to save Forest Lake from an unwanted, unneeded landfill, it is deeply disturbing that we are having to argue for stronger, protective regulations to protect public health and the environment.

Last fall, prior to his departure from NHDES, former Assistant Commissioner Mark Sanborn pulled me into a conference room for an impromptu meeting (I was there for a 91-A RTK file review). Mr. Sanborn was very blunt in sharing with me that the culture at NHDES is one in which they strive to get to a “YES” with applicants, and have a strong dislike for telling applicants “NO”. I found that to be a very disturbing admission, yet based on the history of the department, I was not surprised. My research of the 30-year old NCES Landfill in Bethlehem is filled with many such disturbing revelations about the department and its relationship with industry.

I am attaching a series of documents with my testimony, as I would like to bring your attention to what I believe is a serious issue relating to the rules and the failure of the department to enforce them. It makes me wonder as to what the actual point of having rules is, if the department is going to be selective in enforcement?

I do intend to be in Concord tomorrow for the scheduled meeting; however, I fear I may not have an opportunity to share my thoughts and the attached documents with the Committee, so I am sharing all of this with you today. I would certainly welcome the opportunity to address the Committee tomorrow, but I also understand it may be a long day for you.

On September 24, 2024, the department sent a “Request For More Information” (RFMI) letter to Casella, relative to a permit modification to update the facility operating plan, relative to leachate management. I have highlighted item one of the request from the department, seeking “*written agreements of no less than two locations for leachate treatment or disposal to manage the quantity of leachate generated by the facility during its active life* **consistent with Env-Sw 806.05(b)(3), pursuant to Env-Sw 1105.11**”.

On October 14, 2024, I submitted a 91-A RTK request, seeking a copy of such written agreements for the NCES Landfill, which according to the department, is a requirement. You can imagine my surprise when the response I received to my request was that the department had no documents responsive to my request.

**Env-Sw 806.05(b)(3)** requires that “No less than 2 locations for leachate treatment or disposal shall be available by written agreement to manage the quantity of leachate generated by the facility during its active life.” Furthermore, **Env-Sw 1105.10(b)** requires that “A facility shall obtain and maintain access to at least 2 authorized locations where adequate capacity exists to handle the type and quantity of all residual waste, excluding landfill decomposition gas, that the facility shall regularly generate during its operating and post-closure periods.”

I have also attached “Estimated Post-Closure Monitoring/Maintenance Costs” for both the NCES Landfill and the proposed Granite State Landfill (GSL), as provided to the department by Casella. As you can read in both documents, leachate generation is estimated for 30 years post closure of each facility. Thus, the NCES Landfill is required to have two written agreements for leachate treatment or disposal during active life, which it doesn’t, AND, during its post-closure period, which it doesn’t. The same applies for the proposed GSL development in Bethlehem at Douglas Drive, next to Forest Lake State Park in Dalton.

Again, what is the point of having rules if they are not to be enforced?

There’s a reason why these Final Proposed Rules are subject to so much public scrutiny. There is a strong lack of trust in the department and its intentions. Many of us involved in the fight to save Forest Lake are deeply troubled by the actions of the department over the course of this fight. We feel the department has been captured by industry. I hope all of this is not lost on the members of the Committee, and that you will hold the department accountable for its failure to abide by its own mission statement. It’s truly disturbing that economic considerations are being used by the department as a justification for allowing potential harm to the environment and the health and safety of the citizens of the State of New Hampshire. I hope that is not lost on the Committee.

In closing, I have been deeply involved in the fight to save Forest Lake from an unwanted, unneeded landfill for going on seven years now. As many of you have witnessed over the years, I am not alone in my opposition to the permitting of this proposed landfill development for PFAS-laden trash from out-of-state. Many of us who have been deeply involved are extremely frustrated by the opposition of NHDES to our ongoing, tireless, and costly efforts to protect our beloved and pristine lake and our private drinking wells from the threat of contamination posed by the importation of PFAS-contaminated waste into an area extensively tested to be free from such contamination. Please, do the right thing for the citizens and the environment of New Hampshire.

Please make this letter and its supporting attachments a part of your record on this matter.

Respectfully,

A handwritten signature in cursive script that reads "Jon Swan".

Jon Swan, Founder  
Save Forest Lake



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

**Robert R. Scott, Commissioner**



**VIA EMAIL ONLY**

September 24, 2024

John Gay, Engineer  
North Country Environmental Services, Inc.  
1855 VT Route 100  
Hyde Park, VT 05655  
Email: [john.gay@casella.com](mailto:john.gay@casella.com)

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

**Incomplete Application – Request for Additional Information**

Application for Type II Permit Modification to update Facility Operating Plan; initially received June 26, 2024; and assigned Application No. 2024-70547

Dear John Gay:

The New Hampshire Department of Environmental Services, Waste Management Division (NHDES) has reviewed the above-cited application by which North Country Environmental Services, Inc. (NCES) seeks approval of an updated operating plan to include provisions for hauling leachate outside normal operating hours during extenuating circumstances at the NCES landfill in Bethlehem, NH. In accordance with the requirements of the New Hampshire Solid Waste Rules, Env-Sw 100 et seq. (Rules), NHDES has determined that the application is **incomplete**.

Please address the following comments to satisfy the provisions of Env-Sw 300, and clarify aspects of the application in support of making a technical review pursuant to Env-Sw 304.07:

1. As an attachment to the operating plan, provide the written agreements of no less than two locations for leachate treatment or disposal to manage the quantity of leachate generated by the facility during its active life consistent with Env-Sw 806.05(b)(3), pursuant to Env-Sw 1105.11.
2. In accordance with Env-Sw 1105.08(b), provide information that demonstrates the facility will not successfully operate within the normal window of 6 a.m. to 6 p.m., and the proposed alternative hours will not result in problems relating to safety, access control, or nuisances (e.g., noise, spills, vectors, odors, insects, litter, dust). Note that the information is to be part of the application, and not necessarily embedded in the operating plan.

Please address the above comment and submit your response by concurrently submitting one hardcopy and one electronic copy to NHDES. Submit the electronic version through the NHDES OneStop Data Provider portal using the site code "123456789." Please also designate "Application No. 2024-70547" on both the e-submittal and the paper copy.

Pursuant to Env-Sw 304.04, *Incomplete Applications*, review of your application is suspended until the additional requested information is received. Note that, pursuant to Env-Sw 304.05(d), you must submit all of the information required to complete the application within one year of the date of the application was initially determined to be incomplete to avoid having the application become dormant and be deemed denied by rule. This letter serves as the initial determination that the application is incomplete.

Please provide the requested information as soon as practicable.

[www.des.nh.gov](http://www.des.nh.gov)

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095  
(603) 271-2925 • Fax: 271-2456 TDD Access: Relay NH 1-800-735-2964

John Gay, Engineer  
NCES Landfill, Bethlehem, NH  
Permit No. DES-SW-SP-03-002  
Type II Permit Modification Application (Operating Plan) – Request for Additional Information  
September 24, 2024  
Page 2 of 2

If you have any questions regarding this correspondence, please contact me.

Sincerely,



Mary F. Daun, P.E.  
Solid Waste Management Bureau  
Tel: (603) 271-8573  
Email: [mary.f.daun@des.nh.gov](mailto:mary.f.daun@des.nh.gov)

Waste  
Management  
Division

Digitally signed by Waste  
Management Division  
Date: 2024.09.24  
08:03:41 -04'00'

cc: Kevin Roy, NCES, email: [kevin.roy@casella.com](mailto:kevin.roy@casella.com)  
Adam Sandahl, P.E., CMA, email: [asandahl@cmaengineers.com](mailto:asandahl@cmaengineers.com)  
Jaime Colby, P.E., NHDES-SWMB



--- Please respond above this line ---



Re: Public Records Disclosure Request No. R005689-101424

Dear Jon Swan,

New Hampshire Department of Environmental Services received a public records request from you on October 14, 2024. Your request described the following records:

"I write in response to the department's September 24, 2024 letter to Mr. Gay of Casella Waste Systems, relative to the NCES Landfill, attached, with the subject line:

"Incomplete Application – Request for Additional Information  
Application for Type II Permit Modification to update Facility Operating Plan; initially received June 26, 2024; and assigned Application No. 2024-70547"

In that letter, you wrote:

"In accordance with the requirements of the New Hampshire Solid Waste Rules, Env-Sw 100 et seq. (Rules), NHDES has determined that the application is incomplete.

Please address the following comments to satisfy the provisions of Env-Sw 300, and clarify aspects of the application in support of making a technical review pursuant to Env-Sw 304.07:

1. As an attachment to the operating plan, provide the written agreements of no less than two locations for leachate treatment or disposal to manage the quantity of leachate generated by the facility during its active life consistent with Env-Sw 806.05(b)(3), pursuant to Env-Sw 1105.11."

Being that you cite Env-Sw 806.05(b)(3) and Env-Sw 1105.11 as conditions required for the department to make a determination on the permit application for the modification of the NCES Landfill facility operating plan, I would ask whether or not the facility CURRENTLY meets those conditions?

I have copied and pasted, as well as attached and highlighted, verbiage from Env-Sw 806.05(b)(3), which requires a facility to have no less than 2 locations for leachate disposal available by written agreement to manage leachate generated during its active life. According to Casella's Granite State Landfill (GSL) wetlands permit application, page 13 of section 3.3 Project Summary, attached, they inform the department that the NCES Landfill is to be "filled in 2027/2028".

Does the department have two current, written agreements for NCES leachate disposal through 2027/2028?

If so, might I obtain copies for my records? If not, is this not a current violation of Env-Sw 806.05(b)(3)?

Env-Sw 806.05 Leachate Management Requirements

(b) As part of a facility's operating plan, a leachate management plan shall be developed and implemented at all lined landfills, based on the following criteria:

(3) No less than 2 locations for leachate treatment or disposal shall be available by written agreement to manage the quantity of leachate generated by the facility during its active life

Also, according to Env-Sw 1105.10, it would appear that leachate disposal agreements need to be in place for the NCES Landfill through 2057/2058, since Env-Sw 1105.10(b) includes POST-CLOSURE periods. I have attached an excerpted copy of the NCES "Estimated Post-Closure Monitoring/Maintenance Costs" report, dated March 17, 2023, highlighting those portions dealing with leachate generation, estimated over a 30-year period following closure in 2027/2028, attached.

Does the department have two current, written agreements for NCES leachate disposal through 2057/2058?

If so, might I obtain copies for my records? If not, is this also not a current violation of Env-Sw 1105.10(b)?

Env-Sw 1105.10 Management of Residual Waste.

(a) Facility operations shall include provisions to properly manage residual waste.

(b) A facility shall obtain and maintain access to at least 2 authorized locations where adequate capacity exists to handle the type and quantity of all residual waste, excluding landfill decomposition gas, that the facility shall regularly generate during its operating and post-closure periods.

Lastly, Env-Sw 1105.11, which was cited in the department's September 24, 2024 RFMI letter to Mr. Gay, requires the NCES Landfill to have a "residual waste management plan", which is to include the information required in Env-Sw 1105.10, as stated above.

According to the NCES Operating Plan, Section 4.0, Residual Waste Management, attached, it is simply stated:  
"Leachate management is conducted consistent with New Hampshire Solid Waste Rules Env-Sw 806.08"

However, according to Env-Sw 806.08, the requirements specified within Env-Sw 1100 are to be met by the facility. **Nowhere within the NCES Residual Waste Management Plan, nor in the appendices, is documentation provided which satisfies the requirements of Env-Sw 1100, as detailed above.**

It is also stated within the NCES Residual Waste Management plan that "Leachate which is pumped into tankers for off-site disposal will be disposed of at one or more of the permitted facilities listed below, which may be amended from time to time." **This seemingly implies that no such agreements exist and leachate disposal arrangements are fluid.**

Env-Sw 806.08 Inspections, Maintenance, Monitoring and Reporting Requirements.

(a) This section establishes requirements, in addition to those requirements specified in Env-Sw 1000 and Env-Sw 1100, for inspecting, maintaining and monitoring landfills

Env-Sw 1105.11 Operating Plan Content and Format.

e. The procedure by which the quantity and destination of all outgoing waste and certified waste-derived products shall be determined and recorded;

(4) Section 4, titled "residual waste management plan," shall provide a detailed description of how all residual waste, if any, shall be managed by the facility, including the information specified in a. through d. below

c. Information to demonstrate how the provisions of Env-Sw 1105.10 shall be met; and

d. Quality assurance/quality control provisions, to assure that the wastes to be transferred shall be acceptable to the receiving facility

In closing, **it would appear that the NCES facility is not currently in compliance with Env-SW 806.05(b)(3) nor Env-Sw 1105.11, unless the department already has "written agreements of no less than two locations for leachate treatment or disposal to manage the quantity of leachate generated by the facility during its active life consistent with Env-Sw 806.05(b)(3), pursuant to Env-Sw 1105.11" for the NCES facility. I would add Env-Sw 1105.10, which includes the post-closure period, unless, of course, the department has written agreements provided by Casella/NCES, covering NCES leachate disposal through 2057/2058.**

On a related note, I would assume the same standard will apply to the Casella-proposed Granite State Landfill (GSL) in Dalton and Bethlehem. However, I have not seen any written agreements for leachate disposal for the proposed GSL facility within the various permit applications submitted. If the department happens to have such **agreements for GSL leachate disposal, which should be at a minimum of 18 years, through 2046, or through 2076, if Env-Sw 1105.10(b) is to be complied with, could you please provide me with a copy for my records?**

I appreciate your attention to this matter and hope you had a wonderful weekend!"

**New Hampshire Department of Environmental Services has reviewed its files and has determined there are no records responsive to your request.**

If you have questions you may contact my office at (603)271-2919.

Sincerely,

Sarah Chance  
File Review Coordinator  
Commissioner's Office  
(603)271-2919

*NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question)*

<https://onlineforms.nh.gov/app/?allowAnonymous=true#/formversion/8ec9787c-f388-4634-a077-d86312c318f3?formtag=NHDES-C-07-010>

To monitor the progress or update this request please log into the [NHDES Public Records Center](#)



## NEW HAMPSHIRE CODE OF ADMINISTRATIVE RULES

- b. Contribute to the deterioration of leachate quality at lined landfills;
- c. Cause groundwater contamination at unlined landfills; or
- d. Pose a hazard to human health through skin contact or respiration; and

(3) The material itself:

- a. Is not a hazardous waste;
- b. Is physically and chemically consistent in nature; and
- c. Contains no free liquids.

(c) At landfills receiving MSW, cover material shall be placed over all exposed waste no less frequently than at the end of each operating day.

(d) Subject to the requirements in (b) above, the following materials shall be approved as working face cover material:

(1) Natural soils; and

(2) The following alternate materials, provided that use of the material is approved as part of the facility operating plan or approved as a type III permit modification pursuant to Env-Sw 315:

- a. Geosynthetic tarps;
- b. Casting sands;
- c. A waste certified for distribution and use as landfill cover pursuant to the provisions of Env-Sw 1500; and
- d. Contaminated soil, subject to the requirements of Env-Sw 903.05.

Source. #5172, eff 7-1-91; ss by #6535, INTERIM, eff 7-1-97, EXPIRES: 10-29-97; ss by #6619-B, eff 10-29-97; ss by #6894-B, eff 12-1-98; (See Revision Note at chapter heading for Env-Sw 800); ss by #8459, eff 10-28-05 (formerly Env-Wm 2506.03); ss by #10597, eff 7-1-14

Env-Sw 806.04 Operating Standards for Groundwater and Surface Water Monitoring. A water quality monitoring program shall be implemented at all landfills, if required pursuant to the provisions of RSA 485-C.

Source. #5172, eff 7-1-91; ss by #6535, INTERIM, eff 7-1-97, EXPIRES: 10-29-97; ss by #6619-B, eff 10-29-97; (See Revision Note at chapter heading for Env-Sw 800); ss by #8459, eff 10-28-05 (formerly Env-Wm 2506.04); ss by #10597, eff 7-1-14

### Env-Sw 806.05 Leachate Management Requirements.

(a) Leachate generated at a lined landfill shall be managed either:

- (1) By collecting and removing it from the liner system(s) to an approved treatment or disposal facility as described in (b) through (e), below; or
- (2) Pursuant to an approval to use an innovative alternative leachate management system as described in (f) through (l), below.



(b) As part of a facility's operating plan, a leachate management plan shall be developed and implemented at all lined landfills, based on the following criteria:

(1) Routine facility operations, including operations during the 25-year storm event, shall not result in more than one foot of hydraulic head on the liner system(s);

(2) The quantity of leachate generated at the facility shall be limited to the extent possible, by properly planning the sequenced development of the facility, properly managing stormwater infiltration and inflow, minimizing the active area of the landfill and applying cover in accordance with Env-Sw 806.03;

(3) No less than 2 locations for leachate treatment or disposal shall be available by written agreement to manage the quantity of leachate generated by the facility during its active life, except as provided in (4) below;

(4) Facilities that are directly connected to permitted wastewater treatment facility need only to provide one location for leachate management, other than the treatment facility;

(5) The recirculation of leachate shall be prohibited at ash monofills;

(6) At MSW landfills, leachate recirculation shall be allowed if approved by the department subject to (7) below, as part of the facility's operating plan prepared pursuant to Env-Sw 1105; and

(7) The practice of leachate recirculation shall:

a. Not adversely affect the quality of the leachate so as to preclude its acceptance at waste water treatment facilities listed in the leachate management plan;

b. Not cause the facility to operate in excess of 12 inches of hydraulic head on the liner under routine operations including the 25-year storm event;

c. Not result in a loss of structural stability;

d. Not be adversely affected by weather conditions, such as freezing temperatures or periods of heavy rainfall; and

e. Provide a benefit to facility operations, exclusive of any short or long-term economic benefit which may be associated with postponing leachate collection and removal.

(c) Storage capacity shall be required to contain the leachate generated by the precipitation from the 100-year storm event in accordance with Env-Sw 805.06.

(d) A pumping and removal schedule shall be incorporated into facility operations to assure the availability of storage capacity.

(e) Regularly-scheduled inspections and routine maintenance of the leachate collection and removal systems shall be established as part of the facility's operating plan to limit clogging of the systems and to otherwise assure the functional integrity of the systems.

(f) The permittee of a landfill having a leachate collection system designed and constructed to maintain less than a 30-cm depth of leachate on the liner may apply for approval to use innovative alternative leachate management methods which vary from the requirements of (a) through (e), above, and the run-on control systems in 40 CFR 258.26(a)(1), July 1, 2009, or the liquids restrictions in 40 CFR 258.28(a), July 1, 2009, or both.

Source. #6619-B, eff 10-29-97; (See Revision Note at chapter heading for Env-Sw 1100); ss by #8459, eff 10-28-05 (formerly Env-Wm 2805.09); ss by #10598, eff 7-1-14

**Env-Sw 1105.10 Management of Residual Waste.**

(a) Facility operations shall include provisions to properly manage residual waste.

(b) A facility shall obtain and maintain access to at least 2 authorized locations where adequate capacity exists to handle the type and quantity of all residual waste, excluding landfill decomposition gas, that the facility shall regularly generate during its operating and post-closure periods.

(c) A residual waste shall not be distributed for use unless certified for distribution and use in accordance with Env-Sw 1500.

Source. #6619-B, eff 10-29-97; (See Revision Note at chapter heading for Env-Sw 1100); ss by #8459, eff 10-28-05 (formerly Env-Wm 2805.10); ss by #10598, eff 7-1-14

**Env-Sw 1105.11 Operating Plan Content and Format.**

(a) A facility operating plan shall provide sufficient detail to allow the certified operator and other trained facility personnel to operate the facility in compliance with RSA 149-M, the permit and the solid waste rules without further explanation or guidance.

(b) The operating plan shall be prepared as a loose leaf document to facilitate amendment as specified in Env-Sw 315.

(c) Each page of the operating plan shall bear the date of preparation or last revision, as applicable, and the facility name, location and permit number, if a permit is issued for the facility at the time that the operating plan or a modification thereto is prepared.

(d) The content and organizational format of the operating plan shall be as follows:

(1) Section 1, titled “facility identification,” shall identify:

- a. The facility name, mailing address, location by street address and municipality, and permit number;
- b. The type of the facility;
- c. The capacity of the facility;
- d. The facility service type;
- e. The facility service area; and
- f. The name, address and telephone number of the permittee, property owner, and operator;

(2) Section 2, titled “authorized and prohibited waste,” shall provide a list of:

- a. The specific waste types the facility which shall be authorized to receive; and
- b. The specific waste types the facility shall not be authorized to receive;

(3) Section 3, titled “routine operations plan,” shall provide a detailed description of how the daily operations of the facility will be conducted to assure that the facility will be operated in accordance with the solid waste rules, including a description of:

- a. Hours of operations;

## NEW HAMPSHIRE CODE OF ADMINISTRATIVE RULES

- b. Facility access control and on-site traffic patterns;
- c. Waste acceptance and rejection procedures, including unloading, sorting and inspection procedures;
- d. The procedure by which the quantity and source(s) of all wastes received by the facility shall be determined and recorded;
- e. The procedure by which the quantity and destination of all outgoing waste and certified waste-derived products shall be determined and recorded;
- f. The storage time and capacity limits for all wastes received by the facility and the procedures by which the limits shall be monitored to assure compliance therewith;
- g. All collection, storage, transfer, processing, treatment and disposal methods and procedures employed by the facility for managing waste following receipt; and
- h. For facilities that process or treat waste, the methods or procedures for managing bypass waste and the quality assurance/quality control procedures relating to the management of processed or treated waste;

(4) Section 4, titled “residual waste management plan,” shall provide a detailed description of how all residual waste, if any, shall be managed by the facility, including the information specified in a. through d. below, or if the facility will not generate any residual waste, a statement so indicating:

- a. The type and estimated quantity of all residual wastes to be generated by the facility;
- b. How such wastes shall be managed at the facility prior to removal;
- c. Information to demonstrate how the provisions of Env-Sw 1105.10 shall be met; and
- d. Quality assurance/quality control provisions, to assure that the wastes to be transferred shall be acceptable to the receiving facility;

(5) Section 5, titled “facility maintenance, inspection and monitoring plan,” shall identify all routine maintenance, inspection and monitoring requirements necessary to assure the integrity of facility operations, including a description of the measures to be undertaken to monitor and inhibit the following:

- a. Spontaneous combustion;
- b. Other fire hazards;
- c. Vector production;
- d. Generation of methane, hazardous, or explosive gases;
- e. Odors;
- f. Dust;
- g. Windblown litter;
- h. Leachate; and
- i. Spills;

(6) Section 6, titled “contingency plan,” shall:

- a. Identify all reasonably foreseeable emergencies, such as fire, explosion, operator injury, and the like, based on the type of facility and wastes being handled;

Table 1  
**Estimated Post-Closure Monitoring/Maintenance Costs**  
**North Country Environmental Services, Inc.**  
**Mar-23**

Task		Annual Cost Years 1-5	Annual Cost Years 6-10	Annual Cost Years 11-20	Annual Cost Years 21-30
I-a	Water Quality Monitoring	\$ 45,000.00	\$ 36,000.00	\$ 26,000.00	\$ 26,000.00
I-b	Repair of Monitoring Wells	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00
II-a	Landfill Gas Migration Monitoring	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00
II-b	Landfill Gas Collection System O&M	\$ 154,110.00	\$ 91,810.00	\$ 44,810.00	\$ 30,810.00
II-c	Replacing 20% of the Active Gas Collection System	\$ 15,900.00	\$ 15,900.00	\$ 15,900.00	\$ 15,900.00
III	Settlement Monitoring	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 700.00
IV-a	Leachate/Condensate Disposal	\$ 230,200.00	\$ 159,100.00	\$ 107,300.00	\$ 87,200.00
IV-b	Leachate Monitoring	\$ 4,800.00	\$ 4,800.00	\$ 3,200.00	\$ 3,200.00
IV-c	Leachate Pump Station O&M	\$ 25,300.00	\$ 18,100.00	\$ 15,700.00	\$ 14,100.00
V	Air Quality Monitoring	\$ 125,300.00	\$ 63,000.00	\$ 33,000.00	\$ 18,000.00
VI	Repair & Site Maintenance Costs	\$ 12,800.00	\$ 11,000.00	\$ 7,750.00	\$ 6,000.00
VII	Inspections	\$ 12,500.00	\$ 8,500.00	\$ 8,500.00	\$ 8,500.00
VIII	Other	\$ -	\$ -	\$ -	\$ -
IX	10% Contingency	\$ 64,000.00	\$ 42,200.00	\$ 27,600.00	\$ 22,100.00
<b>TOTAL</b>		<b>\$ 703,410.00</b>	<b>\$ 463,910.00</b>	<b>\$ 303,260.00</b>	<b>\$ 243,010.00</b>

Notes:

A summary of the assumptions made in developing the estimate is attached

Costs presented are in 2023 dollars

Costs are based on our experience and data and information provided by NCES. Actual costs may vary.

Table 1  
**Estimated Post-Closure Monitoring/Maintenance Costs**  
**Granite State Landfill, LLC**  
**Jul-23**

Task		Annual Cost Years 1-5	Annual Cost Years 6-10	Annual Cost Years 11-20	Annual Cost Years 21-30
I-a	Water Quality Monitoring	\$ 60,000.00	\$ 45,000.00	\$ 30,000.00	\$ 30,000.00
I-b	Repair of Monitoring Wells	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00
II-a	Landfill Gas Migration Monitoring	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00
II-b	Landfill Gas Collection System O&M	\$ 178,400.00	\$ 124,700.00	\$ 59,300.00	\$ 39,300.00
II-c	Replacing 20% of the Active Gas Collection System	\$ 30,200.00	\$ 30,200.00	\$ 30,200.00	\$ 30,200.00
III	Settlement Monitoring	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 700.00
IV-a	Leachate/Condensate Disposal	\$ 571,200.00	\$ 252,300.00	\$ 175,600.00	\$ 153,600.00
IV-b	Leachate Monitoring	\$ 4,800.00	\$ 4,800.00	\$ 3,200.00	\$ 3,200.00
IV-c	Leachate Pump Station O&M	\$ 25,300.00	\$ 18,100.00	\$ 15,700.00	\$ 14,100.00
V	Air Quality Monitoring	\$ 126,000.00	\$ 63,000.00	\$ 33,000.00	\$ 18,000.00
VI	Repair & Site Maintenance Costs	\$ 14,600.00	\$ 11,000.00	\$ 7,750.00	\$ 6,000.00
VII	Inspections	\$ 12,500.00	\$ 8,500.00	\$ 8,500.00	\$ 8,500.00
VIII	Other	\$ -	\$ -	\$ -	\$ -
IX	10% Contingency	\$ 103,700.00	\$ 57,200.00	\$ 37,800.00	\$ 31,500.00
<b>TOTAL</b>		<b>\$ 1,140,700.00</b>	<b>\$ 628,800.00</b>	<b>\$ 415,050.00</b>	<b>\$ 346,100.00</b>

Notes:

A summary of the assumptions made in developing the estimate is attached

Costs presented are in 2023 dollars

Costs are based on our experience and data and information provided by GSL. Actual costs may vary.