

Davidson, Tyler

From: Lindsey Menard <lindsey.menard@casella.com>
Sent: Monday, September 9, 2024 3:59 PM
To: DES: SolidWasteInfo; Davidson, Tyler; Colby, Jaime; Daun, Mary
Cc: Kimberly Crosby; Joe Gay; Kevin Roy
Subject: NCES 9/9/24 Incident Report and Biweekly Report on Secondary Flows
Attachments: 9 9 24 Secondary Incident Report FNL.pdf; NCES LOD September 9 Secondary Flow Update FNL (2024 09 09)_.pdf

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Lindsey Menard

Environmental Engineer
Casella Waste Systems, Inc.

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ESTABLISHED 1975

September 9, 2024

Tyler Davidson
NH Department of Environmental Services
Solid Waste Management Bureau
29 Hazen Dr. / P.O. Box 95
Concord, NH 03302-0095

**RE: North Country Environmental Services, Inc.
Lined Landfill Facility – Bethlehem, New Hampshire
NHDES Letter of Deficiency No. 24-006 Item #2**

Dear Mr. Davidson,

North Country Environmental Services writes to provide an update as required by Item 2 in the Letter of Deficiency No. SWMB 24-006 dated June 14, 2024 (LOD). As of September 7, 2024, the flow and 30-day average flows in the secondary leachate collection system exceeded 25 gallons per acre per day in Pump Station #2 as noted in the table below:

Pump Station #3		Pump Station #2		Pump Station #1		Pump Station #4	
Date	30 Day Average Gal/AC/Day	Date	30 Day Average Gal/AC/Day	Date	30 Day Average Gal/AC/Day	Date	30 Day Average Gal/AC/Day
8/25/2024	7.23	8/25/2024	39.82	8/25/2024	20.78	8/25/2024	3.07
8/26/2024	7.63	8/26/2024	39.05	8/26/2024	17.48	8/26/2024	3.07
8/27/2024	7.22	8/27/2024	37.91	8/27/2024	17.48	8/27/2024	3.09
8/28/2024	6.81	8/28/2024	34.16	8/28/2024	17.48	8/28/2024	3.09
8/29/2024	7.21	8/29/2024	32.64	8/29/2024	17.48	8/29/2024	3.09
8/30/2024	7.19	8/30/2024	30.83	8/30/2024	20.85	8/30/2024	3.09
8/31/2024	7.57	8/31/2024	29.36	8/31/2024	19.36	8/31/2024	3.09
9/1/2024	7.16	9/1/2024	28.25	9/1/2024	17.33	9/1/2024	3.09
9/2/2024	6.75	9/2/2024	26.76	9/2/2024	17.33	9/2/2024	3.09
9/3/2024	7.13	9/3/2024	25.73	9/3/2024	17.33	9/3/2024	3.09
9/4/2024	7.10	9/4/2024	25.36	9/4/2024	20.81	9/4/2024	3.09
9/5/2024	7.10	9/5/2024	25.23	9/5/2024	20.81	9/5/2024	3.09
9/6/2024	7.07	9/6/2024	24.86	9/6/2024	17.42	9/6/2024	3.09
9/7/2024	7.07	9/7/2024	25.25	9/7/2024	17.42	9/7/2024	3.09

While conducting an investigation into the cause of increased flows, it was determined that the overliner for Stage IV, Phase I, which has both a primary and a secondary leachate collection system, had been penetrated via the drilling of several landfill gas wells, including GW-202, drilled on February 7, 2024. Reference is made to NCES's September 6, 2024 Incident Report for further detail. Because the sump for the overliner's secondary is plumbed to the Stage IV, Phase I, secondary, it is apparent that the placement and operation of GW-202 has been a substantial contributing factor to the increased leachate flows. NCES will supplement its reporting concerning this LOD, with a detailed explanation of how GW-202 contributed to the increased leachate flows in the Stage IV, Phase I, secondary system, as we provide updated reporting to NHDES concerning the September 6, 2024 Incident Report.

We also wish to acknowledge NHDES's August 30, 2024 request for additional information, and will provide a response to that request on or before October 1, 2024.

Thank you for your attention to this matter. If you have any questions or concerns, please contact me at (802) 651-5454.

Sincerely,

NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.



Kim Crosby
Director of Environmental Compliance

- c. Kevin Roy, NCES (via email w/ enc.)
- Bruce Grover, NCES (via email w/ enc.)
- Lindsey Menard, NCES (via. email w/ enc.)
- Joe Gay, NCES (via. email w/ enc.)