Orr&Reno

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August 5, 2025

Kelly Ayotte, Governor
State House
107 North Main Street
Concord, NH 03301

Robert A. Scott, Commissioner
New Hampshire Dept. of Environmental Services
29 Hazen Drive
Concord, NH 03301

Re: North Country Environmental Services' Bethlehem Landfill, Permit No. DES-SW-SP-03-00, Complaint and Request for Investigation

Dear Governor Ayotte and Commissioner Scott:

I am writing to you on behalf of Save Forest Lake and Jon Swan, advocates in opposition to Casella's efforts to extend the life of the North Country Environmental Services (NCES) landfill in Bethlehem, N.H., and construct a new landfill in Dalton, N.H. Specifically, I am following up on my April 16, 2025 letter to NHDES Commissioner Robert Scott, in which I laid out my case for why NCES is, or soon would be, in violation of its Stage VI expansion permit.[1] Commissioner Scott has not been responsive to my request that the Department undertake an investigation and analysis of these facts to determine whether NCES is in compliance with its Stage VI Operating Permit. Therefore, I am including you on this correspondence in the hope that you will review these matters and instruct DES to act on this request for an investigation into the status of NCES in relation to its Stage VI permit.

The Permit conditions for Stage VI allowed NCES to use a maximum of 1.24M cubic yards, *see* April 16, 2025 Letter, Exhibit B at 1 (Section III, Modification). As of December 31, 2024, NCES had used up approximately 1.159M cubic yards of that capacity. *Id.* In 2025 Quarter One (Q1), NCES tipped an additional 33,843.96 tons, or 44,532 cubic yards of that capacity. See, attached Q1 Report. Based on the NCES most

[1] My April 16, 2025 letter, with exhibits, was contemporaneously copied to the Office of the Governor and is of record.

recent, July 29, 2025 Quarter Two (Q2) report, NCES had taken in another 47,043 tons, or 61,889 cubic yards of solid waste. See, attached Q2 report. Based on the permitted conversion rate of .76 tons per cubic yard, that constitutes 61,899 cubic yards of solid waste in Q2 2025. This means that as of today, NCES has tipped 1.267M cubic yards of solid waste into a landfill that has only been permitted to receive 1.24M cubic yards of solid waste. Every day brings more trash in violation of the terms and conditions of the Stage VI operating permit, which ostensibly permits solid waste to be delivered to NCES through 2026.

Exceeding the consumption of permitted tonnage will have environmental and financial impacts. It may be possible that the excess tonnage consumed by NCES is, or will be causing stress to the liner systems, which were only designed for the permitted tonnage. NCES is an interconnected, multi-layered series of expansions atop other portions of a 30+-year-old landfill. By maximizing fill beyond the permitted parameters, NCES may be stressing the critical liner system that was intended to contain the landfill's leachate and prevent it from leaching into the environment and the Ammonoosuc River watershed.

In your role as Governor, with oversight over the Department of Environmental Services, it is your responsibility to enforce compliance with the terms and conditions of the Stage VI operating permit. I am requesting that you instruct the Department to undertake an investigation and analysis of these facts to determine whether NCES is in compliance with its Stage VI Operating Permit. If NCES is not in compliance, I am requesting that you require the Department take measures to terminate the delivery of solid waste to the NCES facility in Bethlehem. For reference, I commend to you Pamela Hoyt-Denison's Notice of Findings, dated February 18, 2021, regarding NCES Bethlehem's non-compliance with its permit preceding the approval of Stage VI. *See* April 16, 2025 letter at Exhibit H. It is difficult to see how we are not at the same juncture now with Stage VI.

Furthermore, I would draw your attention to the following matters which remain to be resolved and/or addressed by the Department, despite their alarming significance, which when considered in the whole, should be grounds for permit revocation:

1. June 14, 2024 **Letter of Deficiency No. SWMB 24-006**, "*violations related to leachate management, and leachate data collection and reporting*".

2. September 16, 2024 **NCES Incident Report**, *Stage IV Overlay Liner penetrations, for periods 09/09/2014-06/27/2024.*

3. May 22, 2025 **NCES Landfill April 2025 Notification of Water Quality Results,** *notification of April tri-annual sampling results at NCES and comparison of groundwater results to background values for PFAS analytes.*

We are requesting a response to this investigation request by August 31, 2025.

Very truly yours,

Jeremy D. Eggleton

JDE/mem
Attachments
cc: NH Executive Council
Town of Bethlehem Board of Selectmen

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: **Q1 2025 Report**

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2025	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
January	300,256	12,907	398,334	2,780	91,936	3,081	8,885
February	222,556	9,754	287,563	2,980	72,382	3,246	650
March	323,393	10,306	483,063	4,976	107,358	3,322	4,858
Q1 Total	**846,205**	**32,967**	**1,168,960**	**10,736**	**271,676**	**9,649**	**14,393**

3. Rainfall Data:

Month of 2025	Rainfall (Inches)	Snowfall (inch)
January	1.19	14.17
February	0.98	27.62
March	6.47	13.28
Q1 Total	**8.64**	**55.07**

4. Monthly quantity of Waste Tonnage:

Month of 2025	Quantity (tons)
January	12,856.52
February	10,180.80
March	10,806.64
Q1 Total	**33,843.96**

NORTH COUNTRY ENVIRONMENTAL SERVICES
January 1, 2025 THROUGH January 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
1/2/2025	282.36	311.07	-	-	-	52.85	-	-	-	-	-	-	646.28
1/3/2025	396.73	348.54	-	-	-	63.76	-	-	19.68	69.17	-	-	897.88
1/4/2025	88.52	83.61	-	-	-	-	-	-	-	-	-	-	172.13
1/6/2025	265.08	343.34	-	-	-	31.81	14.62	-	-	-	-	-	654.85
1/7/2025	335.06	275.29	-	-	-	32.16	17.89	-	-	7.82	-	-	668.22
1/8/2025	312.29	280.23	-	-	-	42.93	-	-	-	-	-	-	635.45
1/9/2025	242.18	159.17	-	-	-	62.05	-	-	-	28.85	-	-	492.25
1/10/2025	309.14	289.27	-	-	-	65.72	-	-	16.42	-	-	-	680.55
1/13/2025	250.17	240.73	-	-	-	65.90	-	-	-	-	-	-	556.80
1/14/2025	359.56	223.06	-	-	-	61.23	15.17	-	-	11.15	-	-	670.17
1/15/2025	240.00	229.57	-	-	-	62.59	-	-	-	-	-	-	532.16
1/16/2025	234.64	128.96	-	-	-	62.07	-	-	-	20.51	-	-	446.18
1/17/2025	242.81	234.18	-	-	-	62.67	-	-	-	-	-	-	539.66
1/20/2025	299.47	183.20	-	-	-	63.53	-	-	-	-	-	-	546.20
1/21/2025	306.38	107.08	-	-	-	58.42	-	-	13.98	9.79	-	-	495.65
1/22/2025	227.80	271.68	-	-	-	36.33	-	-	-	-	-	-	535.81
1/23/2025	251.90	116.87	-	-	-	49.91	-	-	-	44.92	-	-	463.60
1/24/2025	288.71	140.83	-	-	-	63.72	-	-	-	-	-	-	493.26
1/27/2025	327.08	261.53	-	-	-	49.74	9.05	-	-	-	-	-	647.40
1/28/2025	233.72	216.19	-	-	-	62.15	8.29	-	-	13.20	-	-	533.55
1/29/2025	194.49	228.93	-	-	-	45.23	-	-	40.48	-	-	-	509.13
1/30/2025	184.27	170.87	-	-	-	44.20	8.86	-	30.97	37.22	-	-	476.39
1/31/2025	263.94	234.53	-	-	-	62.57	1.91	-	-	-	-	-	562.95
Grand Total	6,136.30	5,078.73	-	-	-	1,201.54	75.79	-	121.53	242.63	-	-	12,856.52

NORTH COUNTRY ENVIRONMENTAL SERVICES
February 1, 2025 THROUGH February 28, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
2/3/2025	234.59	159.94	-	-	-	63.22	-	-	-	-	-	-	457.75
2/4/2025	185.08	159.15	-	-	-	61.78	8.16	-	-	26.17	-	-	440.34
2/5/2025	290.06	232.76	-	-	-	48.93	-	-	-	-	-	-	571.75
2/6/2025	175.32	136.26	-	-	-	62.48	-	-	-	-	-	-	374.06
2/7/2025	206.26	124.83	-	-	-	63.11	-	-	19.47	-	-	-	413.67
2/10/2025	321.93	209.76	-	-	-	31.74	-	-	-	-	-	-	563.43
2/11/2025	224.04	118.42	-	-	-	50.42	7.20	-	-	65.08	-	-	465.16
2/12/2025	246.09	224.46	-	-	-	43.57	-	-	-	-	-	-	514.12
2/13/2025	216.04	88.74	-	-	-	50.19	-	-	-	-	-	-	354.97
2/14/2025	228.14	183.72	-	-	-	36.17	-	-	-	29.37	-	-	477.40
2/17/2025	262.01	113.82	-	-	-	30.73	-	-	15.31	-	-	-	421.87
2/18/2025	305.38	210.28	-	-	-	31.53	10.95	-	-	261.47	-	-	819.61
2/19/2025	179.53	220.47	-	-	-	31.09	8.73	-	-	251.29	-	-	691.11
2/20/2025	236.10	112.74	-	-	-	32.44	9.08	-	-	205.72	-	-	596.08
2/21/2025	275.59	125.60	-	-	-	31.09	-	-	-	-	-	-	432.28
2/24/2025	336.28	264.37	-	-	-	31.46	-	-	-	27.88	-	-	659.99
2/25/2025	230.98	202.56	-	-	-	31.33	7.62	-	48.89	32.67	-	-	554.05
2/26/2025	234.37	189.38	-	-	-	46.14	-	-	-	-	-	-	469.89
2/27/2025	202.86	168.38	-	-	-	31.10	-	-	-	29.12	-	-	431.46
2/28/2025	227.01	209.13	-	-	-	35.67	-	-	-	-	-	-	471.81
Grand Total	**4,817.66**	**3,454.77**	-	-	-	**844.19**	**51.74**	-	**83.67**	**928.77**	-	-	**10,180.80**

NORTH COUNTRY ENVIRONMENTAL SERVICES
March 1, 2025 THROUGH March 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
3/3/2025	189.76	166.40	-	-	-	62.69	-	-	-	-	-	-	418.85
3/4/2025	177.32	255.93	-	-	-	31.17	9.48	-	-	42.41	-	-	516.31
3/5/2025	140.69	272.94	-	-	-	42.89	-	-	-	-	-	-	456.52
3/6/2025	163.87	198.25	-	-	-	35.78	-	-	18.97	14.74	-	-	431.61
3/7/2025	312.32	251.04	-	-	-	-	-	-	-	-	-	-	563.36
3/10/2025	231.49	151.32	-	-	-	31.49	-	-	-	-	-	-	414.30
3/11/2025	202.54	279.68	-	-	-	31.17	15.90	-	-	38.06	-	-	567.35
3/12/2025	270.02	212.13	-	-	-	47.24	-	-	-	18.14	-	-	547.53
3/13/2025	186.83	144.76	-	-	-	30.94	-	-	14.49	-	-	-	377.02
3/14/2025	315.18	161.59	-	-	-	31.84	-	-	-	-	-	-	508.61
3/17/2025	259.37	277.28	-	-	-	30.25	-	-	-	-	-	-	566.90
3/18/2025	192.98	161.13	-	-	-	29.51	8.41	-	-	31.42	-	-	423.45
3/19/2025	196.90	176.82	-	-	-	48.29	-	-	-	-	-	-	422.01
3/20/2025	183.30	297.64	-	-	-	35.62	-	-	-	-	-	-	516.56
3/21/2025	281.45	209.48	-	-	-	31.86	-	-	20.13	-	-	-	542.92
3/24/2025	309.66	219.57	-	-	-	32.33	-	-	-	-	-	-	561.56
3/25/2025	306.43	168.91	-	-	-	64.95	8.82	-	31.86	33.98	-	-	614.95
3/26/2025	247.72	275.00	-	-	-	13.97	-	-	31.60	-	-	-	568.29
3/27/2025	225.51	264.97	-	-	-	37.07	-	-	-	33.40	-	-	560.95
3/28/2025	290.22	200.43	-	-	-	33.46	-	-	14.50	27.05	-	-	565.66
3/31/2025	323.48	276.97	-	-	-	33.50	-	-	-	27.98	-	-	661.93
Grand Total	**5,007.04**	**4,622.24**	**-**	**-**	**-**	**736.02**	**42.61**	**-**	**131.55**	**267.18**	**-**	**-**	**10,806.64**

Quarterly Summary Report

Facility: North Country Environmental Services Landfill
581 Trudeau Road
Bethlehem, NH 03574

Permit No: DES.SW.SP.03.002
GWP. 198704033.B.003

Report Date: **Q2 2025 Report**

1. Landfill Gas Monitoring:

See attached Weekly Monitoring Chart and Gas Well Monitoring Program

2. Leachate Management Data:

Month of 2025	Pump Station #1		Pump Station #2		Pump Station #3		Pump Station #4
	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Primary (Gallons)	Secondary (Gallons)	Secondary (Gallons)
April	364,776	14,918	600,395	5,020	129,560	4,581	2,480
May	366,939	9,346	609,099	6,158	128,561	3,008	1,935
June	309,456	9,515	499,849	6,295	121,497	1,602	1,145
Q2 Total	**1,041,171**	**33,779**	**1,709,343**	**17,473**	**379,618**	**9,191**	**5,560**

3. Rainfall Data:

Month of 2025	Rainfall (Inches)	Snowfall (inch)
April	14.63	2.58
May	8.47	0.00
June	13.37	0.00
Q2 Total	**36.47**	**2.58**

4. Monthly quantity of Waste Tonnage:

Month of 2025	Quantity (tons)
April	14,272.77
May	15,840.86
June	16,929.67
Q2 Total	**47,043.30**

NORTH COUNTRY ENVIRONMENTAL SERVICES
April 1, 2025 THROUGH April 30, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
4/1/2025	282.25	347.32	-	-	-	31.28	30.17	-	-	27.37	-	-	718.39
4/2/2025	155.38	310.90	-	-	-	47.42	16.63	-	-	27.44	-	-	557.77
4/3/2025	249.37	241.28	-	-	-	53.12	-	-	-	-	-	-	543.77
4/4/2025	302.34	324.85	-	-	-	31.34	-	-	-	27.98	-	-	686.51
4/7/2025	221.23	250.11	-	-	-	31.39	-	-	17.29	422.78	-	-	942.80
4/8/2025	281.95	253.61	-	-	-	31.79	6.56	-	-	409.91	-	-	983.82
4/9/2025	213.79	250.76	-	-	-	46.01	-	-	-	9.71	-	-	520.27
4/10/2025	187.35	268.11	-	-	-	36.86	10.41	-	-	17.03	-	-	519.76
4/11/2025	237.64	249.29	-	-	-	36.15	-	-	-	-	-	-	523.08
4/14/2025	227.26	316.70	-	-	-	31.31	10.75	-	-	28.45	-	-	614.47
4/15/2025	250.97	214.83	-	-	-	31.68	-	-	15.21	16.26	-	-	528.95
4/16/2025	209.46	388.00	-	-	-	47.95	3.65	-	-	153.71	-	-	802.77
4/17/2025	200.95	273.76	-	-	-	24.43	-	-	-	273.28	-	-	772.42
4/18/2025	241.98	209.76	-	-	-	58.75	8.84	-	-	21.72	-	-	541.05
4/21/2025	253.96	299.54	-	-	-	31.44	-	-	-	-	-	-	584.94
4/22/2025	229.76	295.70	-	-	-	28.17	-	-	16.00	17.94	-	-	587.57
4/23/2025	258.23	317.62	-	-	-	33.63	6.95	-	32.11	-	-	-	648.54
4/24/2025	275.47	248.62	-	-	-	17.61	-	-	-	10.63	-	-	552.33
4/25/2025	301.93	383.10	-	-	-	35.15	-	-	-	-	-	-	720.18
4/28/2025	229.58	306.67	-	-	-	34.97	-	-	-	-	-	-	571.22
4/29/2025	323.51	288.68	-	-	-	34.36	8.65	-	-	17.20	-	-	672.40
4/30/2025	237.07	368.85	-	-	-	40.72	-	-	33.12	-	-	-	679.76
Grand Total	**5,371.43**	**6,408.06**	**-**	**-**	**-**	**795.53**	**102.61**	**-**	**113.73**	**1,481.41**	**-**	**-**	**14,272.77**

NORTH COUNTRY ENVIRONMENTAL SERVICES
May 1, 2025 THROUGH May 31, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
5/1/2025	245.82	274.00	-	-	-	39.64	-	-	20.64	13.11	-	-	593.21
5/2/2025	208.78	304.75	-	-	-	34.64	-	-	-	-	-	-	548.17
5/5/2025	338.46	353.64	-	-	-	33.46	10.91	-	-	157.61	-	-	894.08
5/6/2025	220.52	285.81	-	-	-	32.34	6.09	-	-	126.91	-	-	671.67
5/7/2025	414.38	286.80	-	-	-	48.31	-	-	-	-	-	-	749.49
5/8/2025	349.23	581.65	-	-	-	34.27	-	-	-	14.17	-	-	979.32
5/9/2025	340.69	463.97	-	-	-	34.96	-	-	18.13	-	-	-	857.75
5/12/2025	357.13	432.47	-	-	-	54.17	-	-	-	-	-	-	843.77
5/13/2025	373.19	323.41	-	-	-	37.67	12.13	-	-	36.51	-	-	782.91
5/14/2025	312.19	252.02	-	-	-	47.78	-	-	-	-	-	-	611.99
5/15/2025	264.36	307.13	-	-	-	51.17	10.00	-	-	12.85	-	-	645.51
5/16/2025	332.43	283.53	-	-	-	46.47	-	-	17.64	-	-	-	680.07
5/19/2025	378.24	348.21	-	-	-	34.05	-	-	-	-	-	-	760.50
5/20/2025	290.34	410.80	-	-	-	49.67	6.54	-	-	15.49	-	-	772.84
5/21/2025	282.72	373.00	-	-	-	45.04	-	-	-	30.64	-	-	731.40
5/22/2025	229.90	304.55	-	-	-	45.66	-	-	12.09	15.95	-	-	608.15
5/23/2025	439.43	283.86	-	-	-	35.23	9.46	-	-	-	-	-	767.98
5/27/2025	421.80	325.41	-	-	-	40.07	-	-	33.07	-	-	-	820.35
5/28/2025	292.75	305.94	-	-	-	33.09	-	-	-	-	-	-	631.78
5/29/2025	283.67	230.32	-	-	-	57.47	11.71	-	13.54	37.29	-	-	634.00
5/30/2025	476.27	319.64	-	-	-	48.55	-	-	21.55	0.98	-	-	866.99
5/31/2025	213.95	174.98	-	-	-	-	-	-	-	-	-	-	388.93
Grand Total	**7,066.25**	**7,225.89**	**-**	**-**	**-**	**883.71**	**66.84**	**-**	**136.66**	**461.51**	**-**	**-**	**15,840.86**

NORTH COUNTRY ENVIRONMENTAL SERVICES
June 1, 2025 THROUGH June 30, 2025
DAILY TONS MATERIAL SUMMARY
INBOUND ONLY

Sum of Tons	MATERIAL DESC												
Date In	MSW	C&D	Bulky Load	Wood Ash	Soils for Disposal	Sludge	Industrial Waste	Grit & Screenings	Foundry Sand	Cover Material	Road Base	Other	Grand Total
6/2/2025	389.42	350.61	-	-	-	34.31	-	-	-	-	-	-	774.34
6/3/2025	289.19	459.38	-	-	-	49.79	4.51	-	-	12.67	-	-	815.54
6/4/2025	296.30	477.98	-	-	-	35.88	-	-	-	-	-	-	810.16
6/5/2025	332.29	345.50	-	-	-	36.35	-	-	14.02	39.90	-	-	768.06
6/6/2025	391.73	394.66	-	-	-	45.25	-	-	-	-	-	-	831.64
6/9/2025	344.33	409.64	-	-	-	31.69	-	-	-	-	-	-	785.66
6/10/2025	378.20	382.60	-	-	-	34.24	10.16	-	-	36.18	-	-	841.38
6/11/2025	311.65	323.83	-	-	-	41.24	-	-	-	-	-	-	676.72
6/12/2025	269.38	353.31	-	-	-	31.26	8.88	-	12.06	14.57	-	-	689.46
6/13/2025	383.09	344.05	-	-	-	30.90	10.61	-	-	-	-	-	768.65
6/16/2025	385.84	348.74	-	-	-	31.36	-	-	-	-	-	-	765.94
6/17/2025	364.29	343.91	-	-	-	35.55	5.64	-	-	23.23	-	-	772.62
6/18/2025	300.05	410.48	-	-	-	63.48	-	-	-	-	-	-	774.01
6/19/2025	306.35	441.01	-	-	-	64.63	-	-	-	11.66	-	-	823.65
6/20/2025	375.53	330.03	-	-	-	49.89	-	-	-	-	-	-	755.45
6/23/2025	392.80	523.79	-	-	-	65.55	-	-	-	-	-	-	982.14
6/24/2025	390.71	349.61	-	-	-	65.90	12.03	-	15.89	114.35	-	-	948.49
6/25/2025	329.01	485.30	-	-	-	68.19	-	-	-	258.64	-	-	1,141.14
6/26/2025	265.82	377.96	-	-	-	43.33	-	-	-	74.34	-	-	761.45
6/27/2025	363.11	361.82	-	-	-	58.90	-	-	-	-	-	-	783.83
6/30/2025	261.95	346.53	-	-	-	50.86	-	-	-	-	-	-	659.34
Grand Total	**7,121.04**	**8,160.74**	**-**	**-**	**-**	**968.55**	**51.83**	**-**	**41.97**	**585.54**	**-**	**-**	**16,929.67**