



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL ONLY

February 26, 2015

David Allen, Market Area Manager
Casella Waste Management of Massachusetts, Inc.
53 Pelham Road
Salem, NH 03079
Email: david.allen@casella.com

SUBJECT: **Allenstown-** Allenstown Transfer Station, 104 River Road; Type IA Permit Modification Application Completeness, Permit # DPHS-SW-85-009; Ref.: WMD Doc Log #s 15652, 15653 and 15885

Dear Mr. Allen:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has completed a review of the above-cited Type IA permit modification application. In accordance with the requirements of the New Hampshire Solid Waste Rules (Rules), the following information must be provided to satisfy the provisions of Env-Sw 304.07 for a technical review.

A. Application

In Section 3, the proposed approved design capacity would be 750 tons per day. The facility will average 500 tons per day, with a maximum daily tonnage of 750 tons per day and a maximum weekly tonnage of 3,000 tons. Env-Sw 102.09 defines "approved design capacity" as the average weekly tonnage to be received at the facility during the quarter in which the most waste is anticipated to be received.

The Department would prefer the facility permit state that the approved design capacity is 3,000 tons per week and the approved storage capacity (Env-Sw 102.11) is 500 tons. Please indicate if these limitations are acceptable or not.

B. Closure plan

1. Section 2 must include the "discrete" closure activities to be undertaken re: removal of MSW, C&D, Recyclables, any remaining fuel, drums & other fluid containers, dumpsters, trailers, equipment, facility records, decommissioning of AST [if needed], litter pick up, etc., including the estimated length of time the activity will take.
2. Section 3 should include stored waste oils from equipment on site, prohibited waste still on site, litter, etc. Also, there is no mention of white goods. Please include.
3. Section 4 should either contain the Solid Waste Rule reference for a "Notice of Intent to Close", or include the text from the Rules.
4. Section 5 needs greater detail for MSW and if a portion of the C&D waste will be sent for recycling or only disposal (refer to Bestway Disposal Services/Belmont cost estimate), recyclables to a P/T or larger recycler. Waste fluids, special and hazardous wastes, etc.

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should also be included. In addition, include procedures undertaken by staff to remove and clean site.

5. Section 7 should include submitting AFR even if only operated for a portion of the last calendar year.
6. Section 9 – Closure Cost Estimate
 - a. Please fill in the permitted amount, quantity SPR and Quantity Non-SPR columns as applicable.
 - b. Estimate mentions BFI Hooksett facility, which is closed. Please revise.
 - c. Please include costs from disposal destinations not owned by Casella Waste Management, Inc.
 - d. There is a line item for the disposal of universal wastes, but the list of prohibited wastes in the Operating Plan includes universal wastes. Please explain.
 - e. There is a line item for the disposal of bulky waste/white goods, but there is no mention of these wastes in the Operating Plan and very little is mentioned in the Closure Plan. Please explain.
 - f. There may also be some small costs for waste fluids, etc. that were not included in the closure estimate. Please include.
 - g. The quantity of waste stored should be the same as the approved storage capacity as explained above. Please refer to the cost estimate submitted for Bestway Disposal Services/Belmont where the total quantity equals the approved storage capacity.

Please address the above comments by submitting an electronic copy and one paper copy of the required information. Be certain to note the revision date on each replacement page. Continued review of your application will commence upon receipt of this information.

If you have any questions, please contact me.

Sincerely,



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