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March 30, 2015

Commissioner Burack
New Hampshire Department of Environmental Services
29 Hazen Drive
Concord, NH 03301

RE: Modification of I-A Permit for Bestway Waste Transfer Facility Located off Route 140, Belmont

Dear Commissioner Burack :

The Belknap County Conservation District (BCCD) has significant concerns regarding modification of the I-A Permit for the Bestway Transfer Facility on Route 140. It appears that there are potential consequences for the pending expansion and a need for a closer and more thorough investigation. Without this consideration BCCD could not support such a project.

The Bestway transfer site lies on top of a shallow stratified drift aquifer; a fragile resource where water pools and flows underground to recharge an aquifer which is as close as a few feet below the ground surface. Drinking water supplies for the towns of Belmont, Northfield and Tilton are drawn from this shallow aquifer with local people using 800,000 gallons per day. In the case of Northfield, the public water intake is only 3000 feet from the Bestway site.

The Bestway plan indicates a desired increase to the transfer station's capacity from 153 tons to 600 tons of solid waste per day, bringing in trash from other areas. Potential for contaminants reaching the drinking water supply for the three communities mentioned would increase significantly with this proposed expansion of the Bestway transfer station.

Based on review of the permit application, the materials included in the proposed Bestway Operating Plan, and in the information presented at the DES Public Hearing in Belmont, New Hampshire on March 26, 2015 there appears to be insufficient attention to the protection of the aquifer, or acknowledgement of its importance as the primary drinking water source for three towns. The Bestway permit application makes no mention of the aquifer and offers no measures to monitor drinking water quality with test wells adjacent to the tipping and fuel storage/fueling areas. Although Bestways Operating Plan outlines basic measures to identify and separate out contaminants and other illegal materials observed in collected waste, what is their procedures if spills occur? The Plan does not identify monitoring procedures if toxins or contaminants go undetected and wind up in the waste stream. Since only the tipping area and fueling area have concrete pads, the graveled roadways, public recycling bins and all surrounding areas on the Bestway site are open for penetration of contaminants into the aquifer.

In addition, there is a bond in place to cover potential costs for closing the Bestway facility, but there is no bond to address the more critical concern if Bestway causes damage to water quality in the aquifer that renders the water quality unsuitable as a source of drinking water for the three towns. The Bestway Plan does not address the Lakes Region Planning Commission's Best Management Practices for the Tri-Town Aquifer.

BCCD's mission is to help landowners, communities and other organizations conserve soil, water and the natural resources of Belknap County. One of our roles is to identify critical natural resource conservation issues. Clearly, the stratified drift aquifer potentially affected by the Bestway facility is one of those key resources in Belknap County. We are strong advocates of sustainable resource use and economic development, but in this case since the potential risk to the aquifer is not adequately addressed, it is our recommendation to deny the submitted permit application to modify I-A Permit for Bestway Waste Transfer Facility.

Sincerely,



**John Hodsdon, Chairman
Belknap County Conservation District Board of Supervisors**

Cc:

**Ms. Ruth Money, Chairman - Belmont Board of Selectmen
Mr. Ken Knowlton, Chairman - Belmont Conservation Commission
Mr. Peter Harris, Chairman - Belmont Planning Board
Ms. Pat Consentino, Chairman - Tilton Board of Selectmen
Mr. Scott Davis, Chairman - Tilton-Northfield Water District
The Honorable Shari LeBreche, New Hampshire House Representative - Belmont
The Honorable Michael Sylvia, New Hampshire House Representative - Belmont
The Honorable Dennis Fields, New Hampshire House Representative - Sanbornton, Tilton
The Honorable Brian Gallagher, New Hampshire House Representative - Sanbornton, Tilton
The Honorable Robert Fisher, New Hampshire House Representative - Belmont, Laconia**