



March 31, 2015

Wayne A. Wheeler, P.E.
Solid Waste Management Bureau
NH Department of Environmental Services
29 Hazen Drive P.O. Box 95
Concord, NH 03302-0095

Dear Sir:

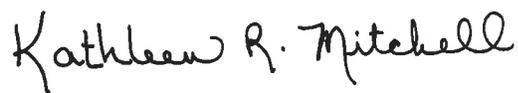
The Casella/Bestway facility in Belmont located above an aquifer currently handles recycling materials and construction debris. Despite its sensitive location, the responsible parties are operating in a vacuum pretending the water source doesn't exist. Casella has stated that they "self-monitor", but reports for public review are not available, and there are no test wells on site. Belmont officials state that they cannot "regulate any specifics" regarding a solid waste facility. It has been reported that NHDES will monitor regularly if there is a complaint. That didn't quite happen after the 2007 fire when four portable toilet trucks and two dozen portable toilets were destroyed. DES merely phoned the Casella management and took their word that everything was okay. At least the Belmont fire department showed concern about the run-off. Later, the Water Division of DES made a telephone call to Casella and accepted their word that the blue portapotty liquid flowing down the road was just "perfumed water". Then in 2012, a picture of firefighters hosing down the trash outside the facility (and away from the oil-water separator) appeared in a local paper, which was the only way residents learned that there had been another problem. Who knows how many incidents have occurred that were not visible from the road, or didn't have a visit from the fire department? Currently, there is no way of ever knowing if anything is leaching into the aquifer and surrounding soils because there is no active/regular monitoring.

When I have taken materials to the facility, no one checked what I was bringing. They merely weighed my vehicle and accepted my money. So, I am concerned to think that Casella will be quadrupling the amount of materials collected, including municipal solid waste (MSW) without any systematic oversight. Trash bags full of pet wastes, human wastes, rotting food, pool chemicals, batteries, and whatever else anyone wants to dispose of will be brought to the site where Casella assures us they will be safe. But will they monitor the leachate generated by the MSW and leaking trash trucks bringing waste to the site? How would anyone know if leachate is entering the water supply? What happens if hazardous waste should be delivered? Who will make sure that it is handled properly? I find it interesting that Belmont High School is listed as a hazardous waste generator on the One Stop website, but Casella is not.

NHDES officials keep stating that they only are looking at the solid waste application and not at the fact that the plant is located above an aquifer that provides drinking water to three communities. No one seems to want to accept responsibility; no one is willing to be held accountable. Yet, your agency is responsible for the permit that will allow Casella to expand production with little regard for any unexpected consequences that affect the aquifer. By allowing them to increase the tonnage and types of materials brought to the facility, the odds of accidents increase. The location on a stratified aquifer with sandy soil means that any leachate will sink directly into the ground and on to the aquifer. The chances of discovering leaks are slim unless there are test wells on the site that are actually monitored on a regular basis, with accompanying reports. If, as a result of your permit approval, the aquifer ends up tainted, you will be a part of the problem. Given that Casella has only put aside \$17,000 for plant closure, one can guess that they don't have much money saved for any tragic spills.

The most responsible action would be to deny the Casella permit and encourage them to find a site located away from an important drinking water source. Given that NHDES seems reluctant to take a stand in this case, at least, be proactive and mandate onsite test wells and outside monitoring of those wells as part of the permit. Drinking water is too precious a commodity to be ignored or disregarded because your division has put on blinders and is pretending the aquifer is someone else's problem.

Sincerely,

A handwritten signature in black ink that reads "Kathleen R. Mitchell". The signature is written in a cursive, flowing style.

Kathleen R. Mitchell
416 Calef Hill Road
Tilton, NH 03276

WASTE MANAGEMENT DIVISION

IRSPILL
200412025
Belmont

Record of Telephone Conversation

Date of Conversation: 10/16/07 Time: 8:49 PM a.m./p.m.
Bureau Staff: David Leathers Title: E-IV
Other Party's Name: NHSP - Dispatcher Telephone #: _____
Affiliation/Company: New Hampshire State Police
Site: Best Way - Disposal. Industrial Park Drive Rt 190 Belmont

SUMMARY OF CONVERSATION

NHSP Dispatch called me and requested I contact Lakes Region Fire Dispatch RE: A fire at Bestway Disposal. 8:51 I called Lakes Region at 528-9111. I was placed on a conference call with Deputy Chief McGarty. He advised his agency was at the scene fighting a fire which has involved several motor vehicles including several delivery trucks and a 1500 gallon diesel fuel tanker. The fire has been extinguished and no fuel from the tanker or other vehicles involved in the fire has been released. Initially Belmont fire was concerned about the run-off water but no petroleum is in it. Some of a blue material in several porta-pottys involved was released. The management of the facility has advised them the liquid used in the porta-pottys is bio degradable. No DES assistance is required. I advised them to contact me if the status changes.

10/17/07 1:30 PM I spoke with Rick Skarinka of Water Division at DES. I informed about the blue porta potty liquid. He will follow up on this.

10/17/07 1:42 PM Rick Skarinka called back. He said he spoke with Kevin McKinney of Bestway Disposal (224-5854). He was advised the blue material is a perfumed water. MSDS to be sent to Rick. Mr. McKinney advised him that no fuel was released from the vehicles and it has been dumped out of the 1500 gallon truck and recovered.

Where is it going?

Allenstown facility NHD510199813

Belmont facility _____

no manifests have been filed with DES

At the hearing The applicant stated that when they find hazardous waste they remove it from the stream and have it picked up for hazardous waste disposal. I could not locate and manifests for the transportation of these hazardous wastes nor records to show that their received at the final destination. This is true of the Allenstown facility as well. The applicant invited the public to visit the facility as a model for how the Belmont facility will be operated.

The allenstown application does not show any finical assurance

In 2007 on this site there was a fire involving several vehicles including spill releasing blue liquid from stored portapoties. It appears that no sampling of the discharge was performed. A known common ingredient of this liquid is GLUTARALDEHYDE that was not collected and disposed of.

Potential Chronic Health Effects: CARCINOGENIC EFFECTS: Classified A4 (Not classifiable for human or animal.) by ACGIH [Glutaraldehyde]. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. [Glutaraldehyde]. Mutagenic for bacteria and/or yeast. [Glutaraldehyde]. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Classified Reproductive system/toxin/female, . 2 Reproductive system/toxin/male [SUSPECTED] [Glutaraldehyde]. The substance may be toxic to blood, the reproductive system, liver, mucous membranes, spleen, central nervous system (CNS), Urinary System. Repeated or prolonged exposure to the substance can produce target organs damage. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection. Repeated exposure to a highly toxic material may produce general deterioration of health by an accumulation in one or many human organs.

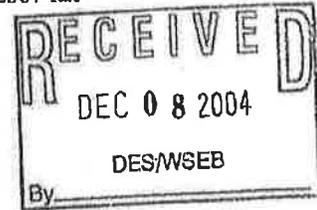
At the hearing the question if there was a storage tank for leachate David replied no the next question was if leachate will be put into the sewer system the answer was no When asked where the leachate will go the applicant did not know. It is BMP to use clay or impervious surfaces to protect areas around transfer stations from becoming contaminated. This provides a safety mechanism for any leachant that comes from processing collected waste. The site for the proposed collection of waste has highly permeable soil types with ground water flowing at depths near the surface. The direction of flow from this location is towards the 3 municipal well heads that provide water for three communities.

Leachate is hazardous waste,

When we prepare chicken, turkey, beef we are warned about bacteria and we disinfect areas afterward. We throw these scraps and paper towels contaminated into the trash into the trash. We dispose of old food into trash and it gets moldy and grows more bacteria. We put diapers from babies, the ill, the elderly into the trash. We empty Kitty litter and chemical substances and other liquids that contain toxic carcinogenic and flammable liquids into the trash. Perfumes, makeup, oil CFLs with mercury, unused prescriptions, deodorizers the list goes on. These items are placed into a truck and are compressed over and over until we create what is known as leachant or in the trade also known as garbage. This is leachant will not only be spread on the location of the transfer station it will be spread along the rt 140 corridor which is located over the aquifer next to the well heads. The state and municipalities have taken precautions to protect this area from salt. Leachate is extremely toxic and the increased traffic of fully compacted loads leaking leachate is a threat to water supplies to three communities, The area that this aquifer supplies is highly dependent on tourist revenue at restaurants hotels campgrounds. Nh des is known for its proactive approach towards protecting our water supplies and lands. The economic impact of closing contaminated wells would be devastating. Imagine the costs to the state and municipality if they had to provide the 800,000 gallons that are used from this water source daily. This is not a "not in my backyard" plea. This is clearly a not in our water aquifer plea. The communities can work together with the applicant to find a location suitable and set up better protections we strongly feel that the applicant should look into other locations that would provide better safeguards.



Nobis Engineering, Inc.
 18 Chenell Drive
 Concord, NH 03301
 (603) 224-4182 tel
 (603) 224-2507 fax



Letter of Transmittal

TO: Mitch Locker, Water Division
 NHDES
 29 Hazen Drive
 Concord, NH 03302-0095

DATE: 12/2/04
FILE NO: 76280.00

RE: Bestway Disposal, Industrial Drive, Belmont, NH

We are sending you the following via:

<input type="checkbox"/> Next Day Service	<input checked="" type="checkbox"/> U.S. Mail
<input type="checkbox"/> Second Day Service	<input type="checkbox"/> Hand Delivery
<input type="checkbox"/> Certified Mail	<input type="checkbox"/> Other:

No.	Copies	Date	Description
1	1	12/2004	Registration and Notification Form for Floor Drains and Discharges to Groundwater Form

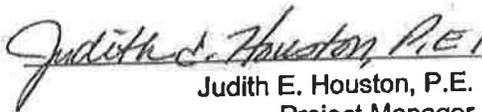
These are Transmitted:

<input checked="" type="checkbox"/> For your use	<input type="checkbox"/> For Review and Comment
<input type="checkbox"/> As Requested	<input type="checkbox"/> Other:

REMARKS: Mitch:

Attached please find the Floor Drain Registration and Notification Form and locus map, for a proposed industrial site in Belmont, NH. The floor drain is proposed to discharge via an oil/water separator to the municipal sewer. Per my 12/1/04 discussion with Sarah Pillsbury, a site plan and MSDSs have not been provided. Please contact me with any questions or comments, or if additional information is required. Thank you.

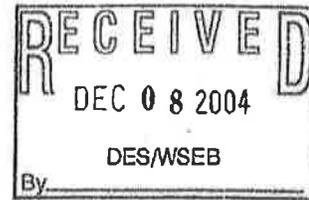
COPY TO: File 76280.00

SIGNED: 
 Judith E. Houston, P.E.
 Project Manager

200412025/Belmont



STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
WATER DIVISION
29 HAZEN DRIVE, PO BOX 95
CONCORD, NEW HAMPSHIRE 03302-0095
(603) 271-2858



REGISTRATION AND NOTIFICATION FORM FOR FLOOR DRAINS AND DISCHARGES TO GROUNDWATER

Facility Information

Facility Name: Bestway Disposal
Address: Industrial Drive
Property Deed Reference Book: 805 Page: 399 Tax Map: 235 Lot # 43
City: Belmont State: ME Zip: 03220

Facility Owner Information

Owner Name: BBI Waste Industries, Inc. Phone Number: (207) 934-3880
Mailing Address: P.O. Box 510
City: Old Orchard Beach State: ME Zip: 04064
E-mail: _____
Contact: Archie St. Hilaire

Property Owner Information (complete only if different from facility owner)

Owner Name: _____ Phone Number: () _____
Mailing Address: _____
City: _____ State: _____ Zip: _____
E-mail: _____

Facility Operator's Information (complete only if different from facility owner)

Owner Name: _____ Phone Number: () _____
Mailing Address: _____
City: _____ State: _____ Zip: _____
E-mail: _____

Contact Person Information (complete only if different from facility owner)

Owner Name: _____ Phone Number: () _____
Mailing Address: _____
City: _____ State: _____ Zip: _____
E-mail: _____

Application for Discharge of Non-Domestic Wastewater (complete the following page if your wastewater does *not* contain regulated contaminants and (if a floor drain) you *do not* store or use regulated contaminants in the area served by the drain.

Please provide a complete description of the facility and type of waste or wastewater handled at the facility served by the floor drain or other non-domestic wastewater discharge. Attach a locus map (i.e. USGS map).
Facility is a construction and demolition debris processing facility. Floor drain will receive wastewater from the truck maintenance garage.

Please describe the wastewater characteristics, including analytical results if available: Wastewater will be primarily intermittent vehicle rinse water. An oil/water separator has been installed.

Please describe the materials and products used at the facility which may be included in the wastewater. Attach material safety data sheet as required in 29 CFR Part 1910 Section 1200 for all products that may be constituents of the discharge. Antifreeze, grease, hydraulic and motor oils will be stored in secondary containment in this area of the facility.

Please describe the disposal method (how the wastewater is discharged and where). Attach a sketch of any infiltration structures, and/or dimensions of any injection well proposed to be used.
The wastewater will discharge into the public sanitary sewer system after passing through an oil/water separator.

Please provide the discharge rate (gpm) or discharge volume (gpd), and schedule for periodic discharges:
Vehicle wastewater - 66 gpd; intermittently

Floor Drain Registration - (complete if you intend to keep a floor drain open that currently contains regulated contaminants or is located in an area where they are used or stored). I intend to (check one):

- Eliminate regulated contaminants from the wastewater or (if a floor drain) eliminate regulated contaminants from the area served by the floor drain.
- If a floor drain, complete the *Discharge Well and Floor Drain Pre-Closure Notification Form* if you are closing floor drain(s). When drain is closed, send verification of closure with date and photos of sealed drain to DES.
- Connect the drain or discharge line to municipal sanitary sewer in accordance with the DES and local regulations by during construction, prior to operation (date). (spring/summer 2005)
- Connect drains to a registered holding tank which meets DES requirements (See DES fact sheet, "Holding Tanks for Floor Drains," and file Holding Tank Registration form) by _____ (date)

Vehicle Dust and Salt Rinsing - (Complete if you are registering a vehicle/equipment related dust and salt, wash and rinse water discharge to the ground)

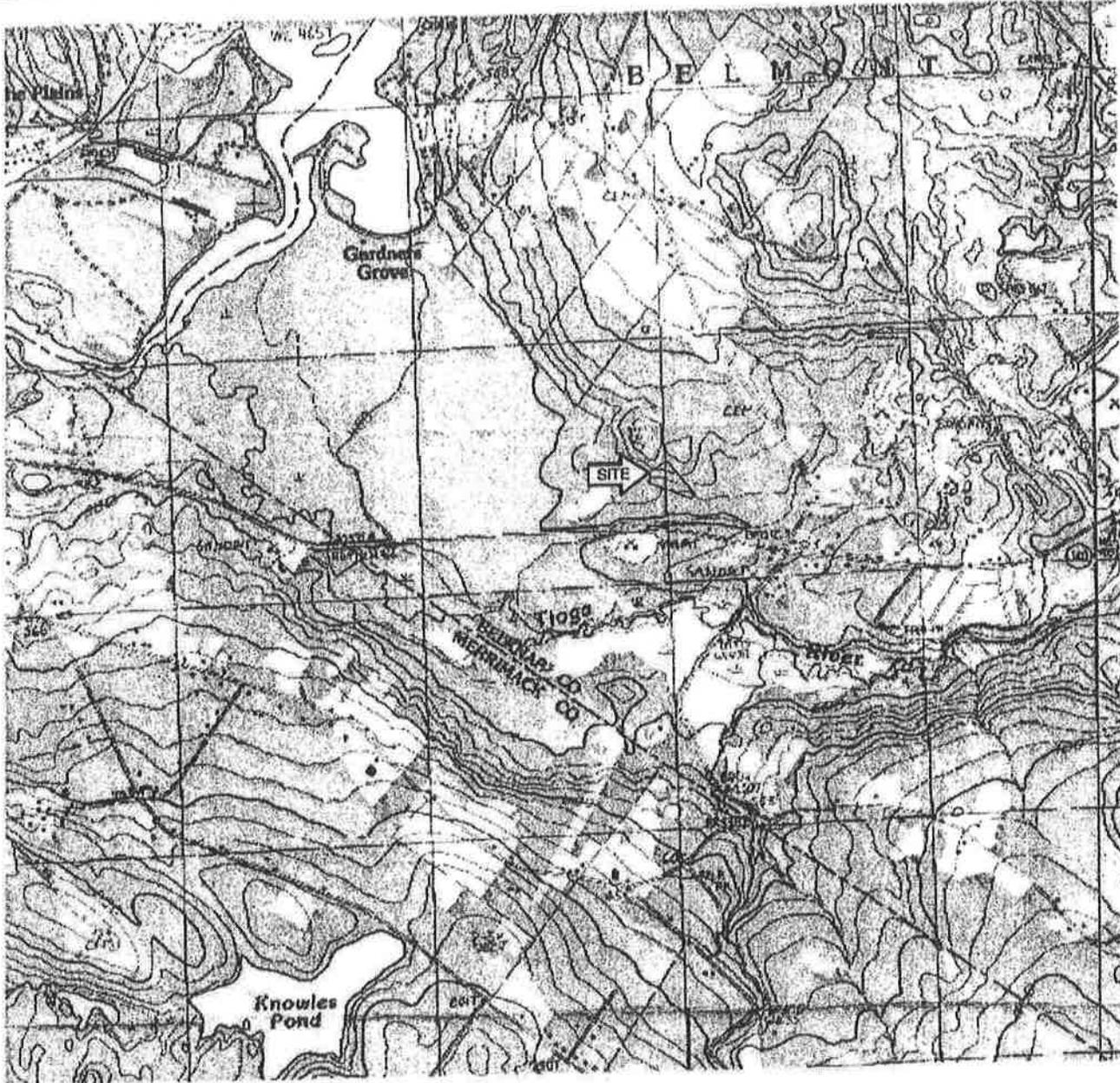
- a. Submit a plan of the site including structures, drainage, wetlands, location of rinsing activities, holding tank(s) etc.
- b. Submit a description of the activities including rinse and/or wash equipment, vehicle types, wash frequency, etc.
- c. Conduct all site activities using Best Management Practices (Env-WS 421).
- d. Describe where the facility conducts steam cleaning, high power washing of undercarriages, engines, and other potential vehicle contaminants and the disposal method of this contaminated wastewater:

To the best of my knowledge, the information I have provided on and with this form is true and correct. I will notify DES if I do not act according to the intentions I have stated on this form. I will also notify DES at least 30 days prior to sealing a floor drain or closing a discharge well.

Signature of Facility Owner

Date Signed

Page 2 of 2



NORTH

USGS TOPOGRAPHIC MAP
 NORTHFIELD, NEW HAMPSHIRE
 1987

APPROXIMATE SCALE
 1 INCH = 2,000 FEET



Nobis Engineering, Inc.
 18 Chencell Dr.
 Concord, NH 03302-2890
 Tel (603) 224-4182
 Fax (603) 224-2507
 www.nobisengineering.com



QUADRANGLE LOCATION

FIGURE 1

LOCUS PLAN
 BESTWAY DISPOSAL
 INDUSTRIAL DRIVE
 BELMONT, NEW HAMPSHIRE

PROJECT 76280.00

OCTOBER 2004



BELMONT LAND USE OFFICE

PLANNING BOARD

Monday, February 23, 2015
Belmont Corner Meeting House
Belmont, New Hampshire

Members Present: Chairman Peter Harris; Ward Peterson, Claude Patten and Michael LeClair.
Members Absent: Jon Pike Ex-Officio, Rick Segalini Jr. and Douglas Sanborn.
Staff: Candace Daigle and Elaine Murphy.

The chairman opened the meeting at 7p.m.

OTHER BUSINESS:

BOARD'S ACTION-MINUTES:

MOTION: On a motion by W. Peterson, seconded by M. LeClair, it was voted to approve the minutes of the January 26, 2015 meeting as submitted. (3-0-1) C. Patten abstained

STAFF REPORT:

CHRIS CLEVELAND TAX LOT 117-006:

Chris Cleveland came in for a change of tenant for a woodworking shop at 752 Union Road previously occupied by Norm's Auto. He will be going before the Zoning Board on February 25th to change from one nonconforming use to another. He will then come before the Planning Board for site plan approval.

LED CONSTRUCTION LLC TAX LOT 116-031:

Mr. DeDucca has been to ARC and will be coming before the Board for a one year extension for his subdivision on Sand Circle.

PENQUIN MARKET 3 LLC TAX LOT 122-058:

The former D&D market has sold to Penguin Market 3. They have applied for a change of tenant and the Town has a request to sign off on their license to sell beer, wine and cigarettes.

COPART TAX LOT 205-054:

Copart wanted to work in the big metal building currently on site. While doing the pre-renovation plans they hired an engineer to review the building who determined that the building was in poor shape. As a result of the structural engineer's finding they determined that they would like to replace the building instead. The building would be in the same or smaller footprint.

M. LeClair stated that he would like to see the plans. C. Daigle that there are no site changes. P. Harris stated that the new building would improve safety and have to meet today's building and fire codes. C. Daigle stated they are not adding additional stories upstairs or down.

It was the consensus of the Board that this is a minor change and can be done at staff level and does not require site plan.

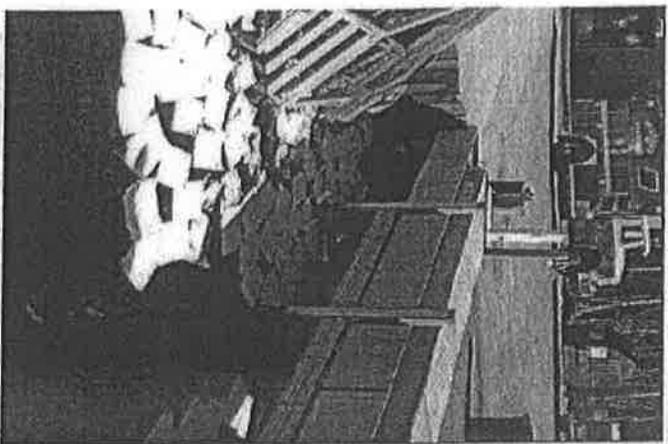
BESTWAY TAX LOT 235-043

On January 26th the Planning Board conditionally approved Bestway's site plan and they are working toward plan signing. On January 30th an anonymous complaint was received via email stating "repeated stormwater sample testing failures; extreme problem". C. Daigle forwarded the email to Mr. David Allen who stated that he would look into it. The engineering firm's letter explained that under NPDES permit they have to do quarterly sample stormwater runoff. Two samples in 2013 failed for sediment from the open bank. They took corrective actions regrading a portion of the yard, cleaned the inlet, removed every third concrete block barrier to better facilitate sheet flow to the detention pond, grass-lined swale at the outlet. The 2014 sample again failed sediment quality. Exceedances are not a permit violation, but are used by facility to determine effectiveness of BMPs and whether further action is necessary. As required test results have been submitted to EPA. Exceedances were chemical oxygen demand, total suspended solids, aluminum, copper and iron due to high levels of suspended sediment entering the pond from stormwater running across the site.

Bestway has recently purchased the lot to the southeast of them and will provide sufficient room for a successful stormwater management facility to be constructed. They had previously budgeted for this construction in their 2015 budget and will be making application to the Town for the related site plan approval. As they are preparing their site plan for submission soon for 2015 construction of the stormwater facility the Board could wait for that plan, or require them to hold off the MSW until they get that approval or do a compliance hearing. DES has accepted their MSW permit application as complete and they are required to hold a public hearing before they get final approval from the State.

M. LeClair outlined the runoff he has noticed when he has visited the site and thought that they should come back to the Board. If they grant the MSW how will the Board make sure the conditions are met? C. Daigle stated that they are not creating any disturbance and they are working in good faith with EPA. P. Harris wanted to know the time period they are working with that they can bring the applicant back for a compliance hearing. C. Daigle stated the applicant is budgeting the work in the 2015 season. M. LeClair stated the Board wants to go on record that they can reopen the approval if need be. C. Daigle stated EPA is the enforcement agency for stormwater management. She stated that she could send Bestway a letter outlining the Board's concerns.

It was the consensus of the Board that a letter be sent to Bestway outlining their concerns and to have the applicant continue to work with EPA on stormwater management.



A fire in Gifford on Tuesday. (Gifford Fire photo)

Into big lake at Gifford yacht club

It took the fire out of the water. Crews from Reliable Crane Service of Lunenburg and the fire department were able to secure a cable around the boat and it was removed from the water at 2:00 p.m. Crews set the barge on its side and will upright it today.

The New Hampshire Department of Environmental Services, Porton Environmental Services of Pa-

Barnstead rate up 13¢

BARNSTEAD — The New Hampshire Department of Revenue Administration has set the 2012 property tax rate at \$27.56, an increase of 13 cents.

The total amount to be raised by taxation increased by \$111,190, from \$10,684,450 to \$10,795,640. The assessed valuation rose by \$2,314,587, from \$463,974,093 to \$466,288,680.

The town portion of the tax rate increased 39 cents to \$5.50 and the county tax by eight cents to \$1.49 while the local school tax fell 20 cents to \$14.10 and state education tax 14 cents to \$2.47.

from preceding page

after the section noticed the church had been burglarized overnight.

Senior Karen Jell Pearson said yesterday the church was ready for their annual Snow Flake Village Fair and the section arrived at the building just before 5 a.m.

He said a pane of glass was broken from the rear door and it appeared someone had reached through the broken glass and opened the door.

Pearson said the burglar or burglars also broke a glass in the nursery and went through the director's desk. He said they broke in one of the doors of the kitchen and stole about \$40 small bills and change that was

Fire at Bestway facility produces mess but not much damage

By Adam D'Amico
THE LOCAL DAILY

BELMONT — A fire that started in a waste removal truck that was parked in a maintenance garage yesterday afternoon created smoke and a mess but no injuries or serious damage. The incident occurred at about 1 p.m. at a transfer station on Industrial Drive operated by Bestway Disposal Services.

Paul St. Hilaire, one of the owners of the company, said the front-loading garbage truck was parked in the maintenance garage to have work done on its front brakes and, while that was being done, a second mechanic began to replace the light bar on the rear of the container.

The driver who pulled the truck into the garage should have ensured the container was empty, said St. Hilaire. The mechanic should also have verified there were no containers in the truck, he added. However, those steps were skipped over, apparently because there was a modest amount of mixed recycling in the truck when the mechanic began grinding on the rear of the truck to prepare the installation of a new light bar. St. Hilaire said, "we were repairing a truck, they were recycling on the back of it, there was some material in the back of it that ignited."

Because one of the front wheels was already off the truck for the brake job, workers couldn't see the fire. Instead, they focused on



Thom McWhinney Fire Lieutenant Sean Velvaine sprays water mixed with a fire-suppressing foam over recycling materials that were inadvertently ignited yesterday afternoon by a worker working on a Bestway Disposal Services garbage truck. The incident occurred at a transfer facility in Belmont. (Local Daily Staff photo/Adam D'Amico)

about a 50,000-gallon cistern for such an event.

Responding fire fighters "did a great job," said St. Hilaire, and the fire was knocked down before it could cause any significant damage. Poveris explained that firefighters utilized a fire-suppressing foam agent to saturate the materials in the truck, greatly reducing the chance fire re-

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