



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

**VIA EMAIL ONLY**

February 26, 2015

David Allen, General Manager  
Blow Bros., dba Bestway Disposal Services  
53 Pelham Road  
Salem, NH 03079  
Email: [david.allen@casella.com](mailto:david.allen@casella.com)

**SUBJECT: Belmont-** Bestway Disposal Construction & Debris Processing and Single Stream Recycling Transfer Station, 43 Industrial Drive; Type IA Permit Modification Application, Permit # DES-SW-SP-05-002; Ref.: WMD Doc Log #s 15636, 15637, 15887, 15888

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 will not exceed 503 tons per day, with a not to exceed peak of 600 tons per day. 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.

Therefore, the Department would prefer the facility permit state that the approved design capacity is 3,018 tons per week and the approved storage capacity (Env-Sw 102.11) is 655 cubic yards. Please indicate if these limitations are acceptable or not.

**B. Operating Plan**

1. The Operating Plan needs to be updated to reflect actual conditions. There are references in the Plan indicating that some sections have not been revised since the facility was constructed.
2. In Section 1.0, please verify the permittee address and phone number. The address of Blow Bros. listed on the Secretary of State website is 25 Greens Hill Lane, Rutland VT 05701. In addition, the address of the property owner, Trash Lady, LLC, listed on the NH

[www.des.nh.gov](http://www.des.nh.gov)  
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(603) 271-2925 • TDD Access: Relay NH 1-800-735-2964



Secretary of State website is 43 Industrial Drive, Belmont NH 03220. Please verify if the addresses listed in Section 1.0 are correct.

3. In Section 1.0, page 5, reference is made to Env-Wm 314 and Env-Wm 2100. Please update references.
4. In Section 2.2, please identify what an “appropriate facility” is and/or the “appropriate” regulations based on the type of waste encountered.
5. In Section 3.2, second para., please update the rule reference.
6. In Section 3.3, please explain how BDS will manage a BDS container with prohibited waste, if it is not allowed to bring the container to the facility. The Operating Plan should list licensed special/hazardous waste contractors and phone numbers if needed.
7. Sections 5.1 and 5.2.3 describe a 1,000 gallon above-ground diesel storage tank. However, a 3,000 gallon tank was installed in 2012 according to the DES Above-Ground Storage Tank Program. Please revise.
8. Section 5.2.1 discusses hot loads. Env-Sw 404.03(a) (3) requires a hot load and segregation area. Please submit an updated site plan showing the hot load area, overnight truck parking area, above-ground fuel tank, on-site well, facility gate and facility sign locations, etc.
9. In Section 5.2.2, please reference the location where pest control company contact information is located.
10. Section 5.2.3 describes various storage tanks, etc. However, information on the DES One Stop describes storage tanks of different sized than those listed. Please verify sizes and substances. In addition, this section should be updated as required.
11. Section 5.2.7 should reference a list which contains contact information for contractors to be called for removal of oil contaminated soil.
12. Section 5.2.7, second para., states that funnels and drip pans will be used wherever possible. Please confirm if they are used and how spills are prevented and refer to SPCC Plan if applicable.
13. Section 5.2.7 mentions oil/water separator will be cleaned per NHDES requirements, but doesn't explain what these requirements are. Please describe.
14. Section 5.2.7, page 16, the release scenarios section needs to be updated.
15. Section 6.0 Contingency Plan, page 18 should refer to Env-Sw 1005.09.

16. Section 7.0 Employee Training should be updated.

17. Appendix A

- a. Asbestos section should reference Part Env-Sw 901 of the Solid Waste Rules and Asbestos BMP. In addition, please revise the asbestos abatement program phone number to 271-1373.
- b. "Bio-medical Wastes" should be revised to "Infectious Waste" and include a reference to Part Env-Sw 904 of the Solid Waste Rules. Section should be expanded to include waste spill clean-up, use of protective clothing, gloves, sharps, etc.

### **C. 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.
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, C&D, and recyclables. Waste fluids, special and hazardous wastes, etc. 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 confirm that the quantity of non-SPR of 503 tons is equivalent to the 655 cy of storage as described in Section III of the application.
  - b. Please fill in the permitted amount, quantity SPR and Quantity Non-SPR columns as applicable.
  - c. Estimate mentions BFI Hooksett facility, which is closed. Please revise.
  - d. The total closure cost exceeds \$50,000 requiring providing a line item for "qualified professional oversight".
  - e. As listed on cost estimate form and according to the past 3 AFRs, the facility also transfers electronic waste and tires requiring the closure estimate to include these items.
  - f. There should be for waste fluids, etc. that were not included in the closure estimate. Please include.

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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,



Wayne A. Wheeler, P.E.  
Solid Waste Management Bureau  
Tel: (603) 271-5185  
Fax: (603) 271-2456  
E-mail: [wayne.wheeler@des.nh.gov](mailto:wayne.wheeler@des.nh.gov)

ec: K. Jeanne Beaudin, Belmont Town Administrator, Email: [townadministrator@belmontnh.org](mailto:townadministrator@belmontnh.org)  
Toni King, PE, Casella Waste Systems; Email: [toni.king@casella.com](mailto:toni.king@casella.com)  
Michael Penney, PE, GeoInsight, Email: [mcpenney@geoinc.com](mailto:mcpenney@geoinc.com)  
Aaron Beckner, PE, GeoInsight, Email: [atbeckner@geoinc.com](mailto:atbeckner@geoinc.com)  
Doug Kemp, NHDES, Email: [douglas.kemp@des.nh.gov](mailto:douglas.kemp@des.nh.gov)