



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

VIA EMAIL

July 18, 2014

John Gay, Engineering Manager
North Country Environmental Services, Inc.
220 Avenue B
Williston, VT 05495
Email: john.gay@casella.com

**SUBJECT: BETHLEHEM- North Country Environmental Services Lined Landfill, 581 Trudeau Rd.;
Type IA Permit Modification Application for Stage V, Permit # DES-SW-SP-03-002, prepared by CMA Engineers, Inc.; Ref.: WMD Doc Log #s 13337, 13390, 13419, 13423, 13477, and 13883**

Dear Mr. Gay:

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 315 for a technical review of the completed application:

Operating Plan

1. No revised Appendix A, H, and I cover sheets were included. Please explain.
2. In Section 2.1, under Certified Waste Derived Product (CWDP) Processed C&D, it states to refer to Appendix H. Appendix H of the Operating Plan is the Asbestos section, and no mention of C&D is listed. Please explain. Please also list the number for this CWDP.
3. In Section 2.1, CWDP Merrimack Coal Fly Ash is listed. However, it is not one of the DES-approved CWDPs; it is a Certificate for Direct Reuse. Please explain why this Certificate of Direct Reuse is listed.
4. In Section 7.0, a Level IV Operator is mentioned. The Solid Waste Operator rules have been revised and the Level IV designation is no longer used. Please update this section to incorporate the rules in <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-sw1600-adpt-pstd.pdf>.

Closure Plan

5. In Part V of the Application, in the Closure Cost Estimate, per Env-Sw 1403.02(g)(2), qualified professional oversight of all closure activities is required. Please explain if this cost

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is included. A link to the new Financial Assurance Requirements, as of July 1, 2014, is <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-sw1400-adpt-pstd.pdf>.

6. In the Closure Cost Estimate, per Env-Sw 1403.02(g)(7), the cost of replacing 20% of the active gas collection system is required. Please explain if this is included.

Closure Plan Drawings

7. The callouts on Sheet C2 do not leader to specific features. Please explain.

Please address the above comments by submitting one 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.

Until the Department has completed its technical review, there may be additional comments. In the meantime, if you have any questions, please contact me.

Sincerely,



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