



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

VIA EMAIL ONLY

February 28, 2024

John Gay, Region Engineer
Granite State Landfill, LLC
1855 VT Route 100
Hyde Park, VT 05655
Email: John.Gay@casella.com

SUBJECT: Proposed Granite State Landfill (GSL), 172 Douglas Drive, Dalton, NH

Incomplete Application – Request for Additional Information

Standard Permit Application – Granite State Landfill, received October 31, 2023 and assigned Application No. 2023-66600

Dear John Gay:

The New Hampshire Department of Environmental Services, Waste Management Division (NHDES) has reviewed the above-cited application by which Granite State Landfill, LLC. seeks approval for a solid waste landfill in Dalton, NH. In accordance with the requirements of the New Hampshire Solid Waste Rules, Env-Sw 100 et seq. (Rules), NHDES has determined that the application is **incomplete**.

The subject application consists of the following documents:

- Granite State Landfill, LLC. (16 October 2023). Volume 1, Sections I-IV, Identification, Facility Description, Status of Other Permits/Approvals, and Legal Notifications and Agreements. Received October 31, 2023. Assigned WMD Log No. 2023-66600-01.
- Granite State Landfill, LLC. (16 October 2023). Volume 2, Part 1, Section V, Site Report with Attachments V(1)-V(4). Received October 31, 2023. Assigned WMD Log No. 2023-66600-02.
- Granite State Landfill, LLC. (16 October 2023). Volume 2, Part 2, Section V, Site Report Attachments V(5)-V(6). Received October 31, 2023. Assigned WMD Log No. 2023-66600-03.
- Granite State Landfill, LLC. (16 October 2023). Volume 3, Section VI, Preliminary Facility Design Plans and Specifications. Received October 31, 2023. Assigned WMD Log No. 2023-66600-04.
- Granite State Landfill, LLC. (16 October 2023). Volume 4, Section VII, Operating Plan. Received October 31, 2023. Assigned WMD Log No. 2023-66600-05.
- Granite State Landfill, LLC. (16 October 2023). Volume 5, Sections VIII-X, Closure Plan, Financial Report, and Performance History. Received October 31, 2023. Assigned WMD Log No. 2023-66600-06.
- Granite State Landfill, LLC. (16 October 2023). Volume 6, Sections XI-XIII, Public Benefit, Signatures, and Fee Calculation Form. Received October 31, 2023. Assigned WMD Log No. 2023-66600-07.
- Granite State Landfill, LLC. (16 October 2023). Volume 7, Full Size Plans for Design Drawings and Closure Plan. Received October 31, 2023. Assigned WMD Log No. 2023-66600-08.
- CMA Engineers, Inc. (8 December 2023). Supplemental Submittal – Certified Mail Receipts. Received December 12, 2023. Assigned WMD Log No. 2023-66600-09.

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- CMA Engineers, Inc. (3 January 2024). Supplemental Submittal – Certified Mail Receipts. Received January 3, 2024. Assigned WMD Log No. 2023-66600-10.
- CMA Engineers, Inc. (6 February 2024). Supplemental Submittal – Certified Mail Receipts, and Additional Information for Hydrogeological Report, Traffic Study Report, and Geotechnical Report. Received February 8, 2024. Assigned WMD Log No. 2023-66600-11.
- CMA Engineers, Inc. (12 February 2024). Supplemental Submittal – Delivery Confirmations. Received February 12, 2024. Assigned WMD Log No. 2023-66600-12.

Please address the following comments to satisfy the provisions of Env-Sw 300, and clarify aspects of the application in support of making a technical review pursuant to Env-Sw 304.07:

1. Provide proof of notification that the information required by Env-Sw 316 has been submitted to the New Hampshire Department of Justice (NHDOJ) as required by Env-Sw 314.03(a)(10). Ensure that copies of all signed registered letter receipts or signed acknowledgements of receipt are included in the permit application as required by Env-Sw 314.08(b)(3).
2. Identify all local permits or approvals which are or may be required for the proposed facility, and provide the status of each, as required by Env-Sw 314.07.
3. Facility Identification and Landowner Agreement.
 - a. The application does not consistently identify which property lot numbers the facility is proposed to occupy. Specifically, the parcels listed in Section I(2), Facility Identification, of Volume 1 are not consistent with the “Candidate Land” shown in Section IV, Attachment IV(3), Landowner Agreement. Additionally, the tax maps provided in Figure 1 of Section V, Site Report, in Volume 2, Part 1, do not correspond with the proposed property lines provided in Figures 2, 7, 14 and 15 of the Site Report or with the “Candidate Land” in the Landowner Agreement. Pursuant to Env-Sw 314.04, Env-Sw 314.09 and Env-Sw 314.10, identify the lot(s) on which the facility is proposed to be located, and provide an updated Landowner Agreement and plans, as needed.
 - b. The Landowner Agreement (Section IV, Attachment IV(3) of Volume 1) is redacted in such a manner that NHDES is unable to evaluate certain requirements of the Rules. Pursuant to Env-Sw 314.09, provide a landowner agreement that demonstrates the requirements in Env-Sw 804.06 and Env-Sw 1003.03 can be met. In addition, provide relevant legal agreements regarding access to and from the proposed facility, which NHDES understands is proposed to be located on landlocked parcels.
 - c. Pursuant to Env-Sw 314.13 and Env-Sw 1102.02, provide a demonstration that other activities conducted on-site will not interfere with operation of the proposed landfill. Specifically, identify how co-existing activities such as the sand and gravel facility and a proposed drag strip will not interfere with operating the proposed landfill in compliance with the Rules.
4. Traffic Discussion and Study. The Traffic Discussion does not adequately address all requirements of Env-Sw 314.10(b)(6), Env-Sw 1004.02 and Env-Sw 1005.03. The Traffic Discussion references the Traffic Study in Attachment V(5) of Volume 2 Part 2. The Traffic Study does not include information to support a 25% increase of traffic volume from the North Country Environmental Services, Inc. landfill in Bethlehem. Provide information on how this increase was determined.
5. Site Report. Pursuant to Env-Sw 314.10(b)(7), address the following comments.
 - a. Provide proposed methods and materials for filling wetlands, in keeping with a dredge and fill permit, to accompany the proposed locations shown on Figure 6 and the description provided in

- Attachment V(2) of Section V, Site Report. Provide sufficient information to demonstrate compliance with Env-Sw 804.02(d), Env-Sw 805.03(b), Env-Sw 805.03(c), and Env-Sw 805.03(f).
- b. For purposes of demonstrating compliance with Env-Sw 804.02(b) and Env-Sw 805.08, provide proposed locations, materials and specifications for the surface water and groundwater monitoring systems. Include sufficient information to demonstrate that release detection, characterization, and remediation can be conducted prior to a release having an adverse effect on a water supply.
 - c. In accordance with Env-Sw 804.03, the applicant must demonstrate that the landfill and leachate storage units are proposed to be located in areas where potential adverse effects to surface water quality due to a discharge of contaminants can be prevented or minimized and mitigated by facility design. The description provided in Section V, Site Report, Attachment V(2) did not address the discharge of contaminants from the landfill. Provide a demonstration addressing contaminant discharge from the landfill, including leachate outbreaks that reach the stormwater management system.
 - d. The infrastructure leachate loadout area shown in Figure G&D-5, depicts a catch basin and piping directing any releases to a lined pond. During the January 24, 2024 meeting, GSL stated that this area will be redesigned to redirect any spills in the loadout area to the leachate storage tank(s). Provide updated design plan(s) to reflect this proposed change.
6. As discussed during the January 24, 2024 meeting, GSL stated that there is a proposed change to on-site septic system management. Pursuant to Env-Sw 314.11 and in support of Env-Sw 805.02(a)(8), submit updated plans regarding the facility's septic disposal system.
 7. Geotechnical Report. Pursuant to Env-Sw 314.11(a), address the following comments.
 - a. Provide stability calculations for the leachate collection and removal system to demonstrate the system can maintain integrity under both dynamic and static loading events for all phases of landfill development pursuant to Env-Sw 805.06(i)(3).
 - b. Provide all input data for the stability calculations performed using the GeoStudio 2021.3 software to demonstrate compliance with Env-Sw 805.03(e), Env-Sw 805.05(h), Env-Sw 805.10(i), and Env-Sw 1103.05(h).
 - c. Submit bearing capacity analyses calculations for landfill infrastructure pursuant to Env-Sw 805.03(e) and Env-Sw 1103.05(h).
 - d. Provide crush calculations on both the leachate force main and the landfill gas (LFG) main proposed to be located beneath the access road from the landfill to the infrastructure area pursuant to Env-Sw 1103.05(h). Be sure to consider loading due to co-existing sand and gravel operations.
 - e. Provide preliminary calculations and analyses for puncture resistance and anchor trench pullout pursuant to Env-Sw 805.05(f) and (h).
 8. Hydrogeological Report. Test pit logs were not provided in the Hydrogeological Report (Section V, Attachment V(4), Volume 2, Part 1). It does not appear the test pits were considered in the evaluation provided. Additionally, test pits included in the Stormwater Management Report (Section VI, Attachment VI(4), Volume 3) are not referenced in the hydrogeological report, and test pit locations are not identified on a figure. Pursuant to Env-Sw 314.10(b)(5) provide test pit logs and an exploration location plan, and update the evaluation as needed in consideration of test pit information.

9. Leachate Management. HELP model data was partially provided in Section 10 of Attachment VI(5), Volume 3. Pursuant to Env-Sw 314.11(a) provide missing information including, at a minimum, column identification for the output data.
10. Pursuant to Env-Sw 314.11(a) and Env-Sw 805.11(h) submit a plan showing the proposed location of all permanent fencing that will be maintained to catch litter. Be sure to consider the prevailing wind direction.
11. Operating Plan. The Operating Plan (Section VII, Volume 4) did not provide sufficient detail to allow the certified operator and other trained facility personnel to operate the facility in compliance with RSA 149-M and the Rules without further explanation or guidance as required by Env-Sw 314.03(a) and Env-Sw 1105.11(a). Address the following to ensure the Operating Plan is complete.
 - a. An updated leachate management plan must be included as part of the Operating Plan pursuant to Env-Sw 806.05(b). Such plan must address:
 - i. The leachate pump out and removal schedule, including the schedule for loading and shipments of leachate, in accordance with Env-Sw 806.05(b). If the applicant is proposing to load leachate outside routine operating hours of 6 am to 6 pm, then a demonstration pursuant to Env-Sw 1105.08(b) is required to be submitted as part of the application.
 - ii. Regularly scheduled inspections and routine maintenance of the leachate collection and removal system in accordance with Env-Sw 806.05(e).
 - b. Section 5 does not provide information on the maintenance, inspection and monitoring requirements for multiple systems including the following:
 - i. Vector control systems;
 - ii. Landfill gas management and migration monitoring systems, including LFG probes;
 - iii. Leachate management and leak detection systems; and
 - iv. Stormwater management systems
12. The waste identification sections in the facility Operating Plan and the Closure Plan do not match. Provide reconciled plans to ensure the waste proposed to be accepted at the facility are the same in each plan and in Section II, Facility Description.
13. Provide preliminary drawings for a decomposition gas management system and supporting information for the decomposition gas migration monitoring system, as required pursuant to Env-Sw 314.11, Env-Sw 805.02(a)(6), and Env-Sw 806.07.
14. Closure Plan. The Closure Plan (Section VIII, Volume 5) did not provide sufficient detail to allow a third party to implement and complete all required facility closure tasks in compliance with RSA 149-M and the Rules without further explanation or guidance in accordance with Env-Sw 314.03(a) and Env-Sw 1106.04(a). Address the following to ensure the Closure Plan is complete.
 - a. Section 5 Closure Requirements does not identify on-the-ground markers to locate the limits of the capping system. Provide information on such markers pursuant to Env-Sw 805.10(o).
 - b. Section 6 Post-Closure Requirements does not provide sufficient details as required under Env-Sw 1106.04(e)(6). Provide information on the inspection and maintenance schedules for the leachate, stormwater, and LFG management systems.

15. Provide a financial assurance plan, including a draft of the financial assurance mechanism (e.g., bond, standby trust), prepared in accordance with Env-Sw 1403 as required by Env-Sw 314.12(f).
16. Design Plans and Specifications. Several design drawings do not include dimensions, labels, and other details required pursuant to Env-Sw 314.11 and Env-Sw 1103.05. Specifically,
 - a. Identify all elevations and sump locations in Figures 4 and 5 in Attachment V(1) of the Site Report (Section V, Volume 2, Part 1). Add groundwater and bedrock separation numbers in the northernmost corner and for the sump area.
 - b. Label the flood hazard areas in Figure 11 in Attachment V(1) of the Site Report (Section V, Volume 2 Part 1).
 - c. Provide elevations in Figures 1 through 7, Fill Sequence plans in the Operating Plan (Section VIII, Volume 4).
 - d. Include elevations in Figure C-2 of the Design Drawings (Volume 7).
 - e. Update Figure 1 of the Traffic Study (Attachment V(5) of Section V, Volume 2, Part 2), to the most recent proposed design and include date and scale information.
 - f. Revise figures within Appendix H of the Hydrogeological Report, (Section V, Attachment V(4), Volume 2, Part 1) to correct legends with formatting issues. Specifically, revise Figures H.1.B, H.3, H.6A, H.6B, H.9A, H.9B, H.12, and H.15.

Please address the above comments and submit your response by concurrently submitting one hardcopy and one electronic copy to NHDES. Submit the electronic version through the NHDES OneStop Data Provider portal using the site code "123456789." Please also designate "Application No. 2023-66600" on both the e-submittal and the paper copy.

Please note that on February 8, 2024 the department received a supplemental submittal to the application (WMD Log Nos. 2023-66600-11), which provided the missing appendices from the original geotechnical report. A review of this supplement has not yet been completed by the Department. NHDES intends to review this supplement for completeness within 60 days of receipt of the supplement.

Pursuant to Env-Sw 304.04, Incomplete Applications, review of your application is suspended until the additional requested information is received. Note that, pursuant to Env-Sw 304.05(d), all of the information needed to complete the application must be submitted within one year of the date of the first incomplete application letter (this letter, issued February 28, 2024) to avoid having the application become dormant and be deemed denied. As such, please provide the requested information as soon as practicable.

If you have any questions regarding this correspondence, please contact me.

Sincerely,



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