



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

VIA EMAIL ONLY

June 24, 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 for Granite State Landfill, initially 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 (GSL) 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**.

In addition to the documents listed in the NHDES letter dated February 28, 2024, the subject application also consists of the following:

- Granite State Landfill, LLC. (19 April 2024). Response to NHDES Incomplete Application (Part 1: Exhibits 1-8; Part 2: Exhibits 9-16). Received April 22 and 25, 2024. Assigned WMD Log No. 2023-66600-13.
- Cleveland, Waters and Bass (17 June 2024). Submittal of Additional Information Responding to NHDES Incomplete Application Correspondence. Received June 17, 2024 as confidential business information under Env-C 208. Assigned WMD Log No. 2023-66600-14.

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. Based upon a review of the application submitted, GSL has not provided all relevant legal agreements pursuant to Env-Sw 314.09. Provide all relevant legal agreements to demonstrate the applicant meets the landowner requirement under Env-Sw 804.06 and all easements and right of ways meet the requirements of Env-Sw 1003.02 and 1003.03. Clearly identify all easements and right of ways in the plans.
2. Appendix 2 of the Geotechnical Report submitted on February 8, 2024, (WMD Log No. 2023-66600-11), did not include the shear strength calculations for GCL/drainage sand and GCL/drainage geocomposite. Provide the referenced shear strength data as required by Env-Sw 314.11(a), Env-Sw 805.06(i)(3) and Env-Sw 1103.05(h).
3. Appendix 3 of the Geotechnical Report submitted on February 8, 2024, (WMD Log No. 2023-66600-11) did not include static and seismic stability calculations for the proposed cap. Provide cap stability calculations as required by Env-Sw 314.11 and Env-Sw 805.10(i).

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4. Appendix K-5 of the Hydrogeological Report submitted on February 8, 2024, (WMD Log No. 2023-66600-11) was missing at least the first ten pages of analytical results. Provide the missing analytical data in support of Env-Sw 314.10(b)(5).
5. Filing notifications to the DOJ, Town of Dalton, NH Fish & Game, NH Department of Resources & Economics, NH Rivers Coordinator, and the Ammonoosuc River Advisory must be sent by certified mail, return receipt requested; or delivered in hand, with a signed acknowledgment from the recipient in accordance with Env-Sw 303.06(b). Provide return receipts or signatures denoting hand delivery of these notifications as required by Env-Sw 314.08.
6. On pdf page 9 of the GSL Response to NHDES Incomplete Letter (WMD Log No. 2023-66600-13), GSL identified a lined leachate pond in the infrastructure area as shown as Pond 1 in Figure G&D-5. GSL stated that any overflow of the underground storage tank will drain to the lined leachate pond. Provide siting and design information on the underground storage tank and the lined leachate pond to demonstrate compliance with Env-Sw 804.03 and Env-Sw 805.06.
7. Section 6.9 of the facility Operating Plan as updated in application supplement (WMD Log No. 2023-66600-13) identified extenuating circumstances in which GSL will be required to operate outside the operating hours of 6 am and 6 pm to pump and remove leachate; however, the demonstration required by Env-Sw 1105.08(b) was not submitted. Submit a demonstration that the facility will not successfully operate within the 6:00 am to 6:00 pm window; and the alternative hours will not result in problems relating to safety, access control or nuisances. Include with the demonstration a flow chart or flow diagram depicting the sequence of leachate management, with flow rates, the number of trucks that can be loaded per hour, and other information as applicable, to show that during the extenuating circumstances identified in the operating plan that GSL cannot successfully operate within the 6 am to 6 pm window.
8. Application supplement (WMD Log No. 2023-66600-13) included a draft financial assurance plan. Update Appendix A of the draft Standby Trust Agreement to ensure the principle (i.e., Granite State Landfill LLC) and the principle's address remain the same throughout the document. Provide a list of individuals from GSL in Appendix B of the draft Standby Agreement that are authorized or designated to provide orders, requests, and instructions to the bank as required by Env-Sw 314.03(a).
9. Update Figure 1 of the Traffic Study (Attachment V(5) of Section V, Volume 2, Part 2) to include the date and plan scale, (e.g. scale bar) as required by Env-Sw 314.11 and Env-Sw 1103.05.
10. Ensure that a copy of all information submitted to complete the application has been provided to each person and entity identified in Env-Sw 303 to whom the applicant was required to provide a copy of the initial application. Pursuant to Env-Sw 304.05(b), provide to NHDES a written and signed statement attesting to the same.

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.

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 issued (dated 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.

John Gay, Region Engineer, GSL
Granite State Landfill, Dalton, NH
Application No. 2023-66600
Incomplete Application – Request for Additional Information
June 24, 2024
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If you have any questions regarding this correspondence, please contact me.

Sincerely,



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