

**DES Waste Management Division
29 Hazen Drive; PO Box 95
Concord, NH 03302-0095**

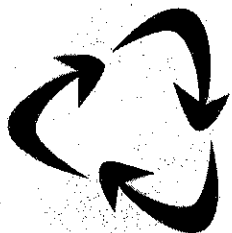
**Type I-A Permit Modification Application
Phase IIIA Expansion - Updated Solid Waste Goals
Mt. Carberry Secure Landfill
Bean Brook Road
Success, NH**

**NHDES Site #: 123456789
App No. 2020-48625
Project Type: LAND/LN
Project Number: 0000297**

Prepared For:
Androscoggin Valley Regional Refuse Disposal District
Berlin, NH 03570
Phone Number (603) 752-3342
RP Contact Name: Sharon Gauthier
RP Contact Email: sgauthier@avrrdd.org

Prepared By:
CMA Engineers, Inc.
35 Bow Street
Portsmouth, NH 03801
Phone Number: (603) 431-6196
Contact Name: Paul Schmidt, P.E.
Contact Email: pschmidt@cmaengineers.com

Date of Report: March 19, 2021



Androscoggin Valley

Regional Refuse Disposal District

March 19, 2021

Groundwater Permit Coordinator
NH Department of Environmental Services
Waste Management Division, Solid Waste Bureau
P.O. Box 95 – 29 Hazen Drive
Concord, NH 03301-0095

RE: AVRRDD – Mt. Carberry Secure Landfill
Type I-A Permit Modification Application No. 2020-48625
Phase IIIA Expansion - Updated Solid Waste Goals
NHDES Site # 123456789

Dear Permits Coordinator:

Please find attached letter, prepared by CMA Engineers, in response to the NHDES letter dated January 26, 2021 stating incompleteness of the Phase IIIA Type IA Permit Application.

Should you have any questions, please do not hesitate to call at (603) 752-3342.

Very truly yours,

Sharon Gauthier
Executive Director

Enclosures:

- CMA NHDES Response Letter
- Solid Waste Management Goals and Update to the Solid Waste Management Plan

cc: Paul Schmidt, CMA Engineers
NHDES OneStop (Electronic Upload)
Jennifer Fish, Coos County



PRINTED ON RECYCLED PAPER

PO Box 336, 3 Twelfth Street
Berlin, NH 03570
Tel. (603) 752-3342



March 19, 2021

Ms. Jaime Colby, P.E.
NHDES - Waste Management Division
29 Hazen Drive, P.O. Box 95
Concord, New Hampshire 03302

**RE: Androscoggin Valley Regional Refuse Disposal District
Mt. Carberry Secure Landfill – Phase IIIA Expansion Type I-A Permit Modification Response to
the NHDES January 26, 2021 Letter
NHDES Permit No. DES-SW-88-029
CMA File # 777**

Dear Ms. Colby:

On behalf of the Androscoggin Valley Regional Refuse Solid Waste District (“AVRRDD” or “the District”), CMA Engineers, Inc. has prepared this letter to provide additional information requested by the New Hampshire Department of Environmental Services (NHDES) in support of AVRRDD’s application for the Phase IIIA Expansion Type I-A Permit Modification. The additional information provided herein is based on NHDES’ letter dated January 26, 2021.

As detailed below, NHDES requested additional information regarding the District’s solid waste goals. The District had not previously formally defined specific goals beyond the original purpose adopted with the formation of the District. In response to the NHDES comments, the District established specific goals in support of the District’s original purpose. These goals were approved on February 25th, 2021 during the District meeting, as a supplement to the Districts Solid Waste Management Plan. See attached “Solid Waste Management Goals and Update to the Solid Waste Management Plan”.

Responses to the specific NHDES comment are provided below:

- 1. The supplement to the application dated October 2020, provides the purpose of AVRRDD and describes how the proposed expansion meets the District’s purpose. However, the supplement does not state the District’s goals and how the proposed expansion will assist the District in meeting those goals. Please identify the District’s goals*

The District’s original Solid Waste Management Plan was last updated in February 1994. In response to the NHDES comments, the District created and adopted the attached supplemental Solid Waste Management Goals and Update to the Solid Waste Management Plan.

The attached document includes a current status that provides context to each of the goals that have been adopted by the District. Below is a specific discussion with respect to the Phase IIIA Type IA Application.

1. Provide facilities and/or contract for services to provide for management of waste which can be recycled, reused or otherwise managed in a beneficial manner and to minimize the amount of waste being disposed of (landfilled) consistent with the State of New Hampshire hierarchy of management of waste.

As is stated in the Public Benefit section of the Phase IIIA application, the landfill is part of an integrated solid waste management program that includes both the District's Materials Recycling Facility (MRF) and the Mt. Carberry Secure Landfill. The MRF is operated to provide for recycling and beneficial reuse, and thereby minimize the amount of waste landfilled. The Landfill operation includes beneficial reuse of several materials as daily cover, including ground glass, ground wood wastes, auto shredder residue and mill sludge.

2. Provide facilities and/or contract for services to provide for proper management of special wastes which require separate handling to ensure these wastes are properly managed and disposed of in a safe manner.

As detailed in the Phase IIIA application and the attached document, the MRF provides for management of multiple special wastes. The Mt. Carberry Secure Landfill provides for proper disposal of asbestos and is an important disposal site for asbestos waste in northern NH. The landfill also provides for disposal of contaminated soils which cannot be managed through other methods.

3. Provide facilities and/or contract for services to provide for proper management of solid wastes which cannot be managed by the preferred methods identified above, in accordance with state and federal requirements.

The Mt Carberry Secure Landfill is a core part of providing proper disposal of solid wastes which cannot be managed by other preferred methods. The Phase IIIA expansion is necessary to provide this service for member communities and northern NH.

The landfill also provides dedicated disposal capacity to the White Mountain Paper mill in Gorham (previously Gorham Paper and Tissue). The landfill also provides fuel to the mill in the form of landfill gas used in the mill's main boilers. The mill is a vital component of the local economy and these disposal and energy arrangements are key elements in its economic viability.

Also, please see the response to goal #4 for additional information relative to providing disposal capacity for District communities and the region.

4. Manage District operations in a manner to provide for long term and cost-effective management of solid wastes in an environmentally sound way. Consistent with this goal

and where practical, extend such services on a more regional basis to provide economies of scale.

The Phase IIIA expansion as proposed is designed to meet each component of this goal. The expansion is designed for long term disposal, providing a total of 20 years capacity with planning for future phases. The size of the landfill, including the proposed waste acceptance rate, is consistent with historical operation of the landfill, which provides for a cost-effective operation and includes a regional component to provide economies of scale. The waste acceptance rate was proposed with no inflator to ensure the available capacity is not utilized too quickly. The expansion is proposed as a state of the practice facility meeting or exceeding environmental requirements, as detailed in the application.

As is stated in the Public Benefit section of the Type IA application, which is duplicated in part below to provide additional context, the Phase IIIA expansion meets a state-wide need in both the short and long term. The Mt. Carberry Landfill also provides a more regional need for the northern portion of the state. Without the Mt. Carberry Landfill, wastes would have to be sent to one of the three other facilities (the Concord Waste to Energy Plant, NCES or the Turnkey landfill) or out-of-state, which would result in significant hauling requirements, and would require several of the local communities to construct solid waste transfer stations. The next closest facility, NCES, has been operating near its annual limits, serving primarily northwestern and central New Hampshire. NCES only has current permitted capacity through 2021 at current waste acceptance rates. NCES has applied for an expansion that, if approved, would decrease the annual waste acceptance rate and provide capacity through 2026. Even with NCES operational, most wastes, including all asbestos waste, would need to be diverted to the Turnkey Landfill in Rochester, which is 100 miles away, at significant effort and cost, plus the associated environmental impacts of such hauling. [Subsequent to the original application, the application for additional capacity through 2026 at NCES was approved by NHDES].

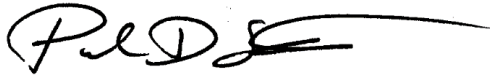
When the facility was operated as a private paper industry landfill, waste quantities were significant, and the capital and operational infrastructure needed to operate and maintain the facility were significant. Operation as a commercial facility with additional waste beyond that generated by the District's member municipalities is necessary in order to allow the facility to be financially viable in order to meet the District's short and long term public purposes. This is a publicly owned facility, dedicated to local disposal needs in the region, that must take some waste beyond the local region in New Hampshire in order to "make ends meet." The facility is, by its nature, of benefit to the public.

The District also takes a long term view of providing this needed public benefit. While the Public Benefit statute has a 20-year planning period, the District's planning period for its public purpose is justifiably and properly far longer. The District is currently applying for permits to construct Phase IIIA which was previously permitted by NHDES as part of the overall Phase III. The subsequent Phase III-B is also within the originally permitted Phase III footprint and will require final design and permits to construct in the future when Phase IIIA capacity is depleted. Permitting of additional capacity in a Phase III North expansion was

recently denied by NHDES because it provided capacity beyond a 20-year public benefit planning period. This, plus additional acreage on the property, provide future options to provide for the long term solid waste management needs of the District's member municipalities and local industries in the region. Such long term planning on behalf of the public is unarguably prudent and of benefit to the public.

Thank you for your attention to these matters. Please do not hesitate to call if you have any questions.

Very truly yours,
CMA ENGINEERS, INC.



Paul D. Schmidt, P.E.
Project Manager

NJM/ams

Enclosures:

- Solid Waste Management Goals and Update to the Solid Waste Management Plan

cc: Sharon Gauthier, AVRRDD
NHDES OneStop (Electronic Upload)
Jennifer Fish, Coos County

Androscoggin Valley Regional Refuse Disposal District
Mt. Carberry Secure Landfill
Solid Waste Management Goals and
Update to the Solid Waste Management Plan
Adopted February 25, 2021

Purpose

AVRRDD was formed with the following purpose:

The District shall be established and shall exist for the purpose of developing and operating a facility or contracting with other disposal facilities for the disposal, handling and/or recycling of solid waste of the member municipalities. Any such facility may be located within one or more member municipalities. The District shall be entitled to establish a recycling facility and any facilities as may be permitted to be established by this agreement or by law.

Goals

The following goals are established to further develop this purpose. A status as of 2021 is provided to document current efforts relative to each goal:

1. *Provide facilities and/or contract for services to provide for management of waste which can be recycled, reused or otherwise managed in a beneficial manner and to minimize the amount of waste being disposed of (landfilled) consistent with the State of New Hampshire hierarchy of management of waste.*

2021 Status:

- The District owns and operates the AVRRDD Materials Recycling Facility (MRF) which operates as a recycling facility and transfer station. The MRF provides for recycling of source separated recyclables and other materials.
- The MRF is available for both direct drop-off by residents and delivery of recyclable materials collected by individual municipalities.
- The MRF provides for management of materials which do not require disposal including leaf and yard waste, brush, wood, and inert debris.
- Individual municipalities in the District also each provide for recycling services within their communities, through a variety of methods including curbside collection and recycling and waste disposal transfer stations with much of the material delivered and further processed at the AVRRDD MRF with waste delivered to Mt. Carberry Secure Landfill.
- The Mt. Carberry Secure Landfill is permitted for and manages several wastes for beneficial reuse as daily cover, including ground glass, ground wood wastes, auto shredder residue and mill sludge.

2. *Provide facilities and/or contract for services to provide for proper management of special wastes which require separate handling to ensure these wastes are properly managed and disposed of in a safe manner.*

2021 Status:

- The AVRDD MRF provides for collection and management of multiple special wastes in accordance with state and federal requirements. Examples include waste oil, tires, electronics, cathode ray tube (CRT) devices, white goods, and batteries.
- AVRDD hosts an annual household hazardous waste day each year at the MRF facility.
- The Mt. Carberry Secure Landfill provides for disposal of wastes which are otherwise difficult to manage including asbestos and contaminated soils.

3. *Provide facilities and/or contract for services to provide for proper management of solid wastes which cannot be managed by the preferred methods identified above, in accordance with state and federal requirements.*

2021 Status:

- AVRDD owns and operates (in part through contract operations with Cianbro) the Mt. Carberry Secure Landfill to provide for disposal of solid wastes which cannot be managed by the MRF or other methods.
- The AVRDD MRF provides for residential and small commercial drop-off of construction and demolition debris (C&D) waste and bulky waste for transfer to Mt. Carberry Secure Landfill. Prior to delivery to Mt. Carberry, employees remove items such as scrap metal, wood and inert debris which are managed separately.
- Individual municipalities in the District also each provide for collection and transfer services for MSW and C&D wastes within their communities, through a variety of methods including curbside collection and transfer stations for delivery to Mt. Carberry Secure Landfill.
- The Mt. Carberry Secure Landfill provides disposal capacity for the paper mill in Gorham for mill wastes, including sludge, in accordance with agreements that were initially established as part of the sale of the landfill, from the previous mill owners, to AVRDD.

4. *Manage District operations in a manner to provide for long term and cost-effective management of solid wastes in an environmentally sound way. Consistent with this goal and where practical, extend such services on a more regional basis to provide economies of scale.*

2021 Status:

- The AVRDD MRF is designed to provide for consolidation and processing of recyclables and other materials for District communities which provides for efficient handling of materials and minimizes transportation costs.
- The AVRDD MRF is permitted to accept materials from entities outside the District under agreements with the District.
- The Mt. Carberry Secure Landfill was purchased by the District, when the Pulp and Paper Mill placed it for sale, to allow for long term, cost effective and local management of solid waste. Without this local option, the District members would have increased capital requirements and operational costs for transfer to remote facilities.
- The Mt. Carberry Secure Landfill continues to provide a cost-effective, long term disposal option for the paper mill in Gorham, for which the landfill was originally constructed.
- Due to economies of scale for a modern secure solid waste landfill, the Mt. Carberry Secure Landfill is permitted for and accepts materials from entities outside the District under agreements with the District. This provides a local option for other municipalities and commercial and industrial facilities in the region.
- The acceptance of waste from other regions beyond the District is necessary in order to maintain economic viability, due to the size of the Mt. Carberry Secure Landfill. These economies of scale allow for the facility to serve as a cost effective resource for the District members for the foreseeable future.
- The Mt. Carberry Secure Landfill is operated in a manner to balance both maintaining long term capacity and cost-effective operations. The Stage 12 expansion was permitted to maximize vertical capacity over the existing footprint. Phase III of the landfill, which was part of the original footprint, is being designed, permitted and developed to provide long term capacity, through an initial Phase IIIA being permitted and a future Phase IIIB. The District has applied for capacity in Phase IIIA to be limited to a maximum of 305,500 cubic yards per year (3 year running average) over the life of the phase.
- The District maintains financial assurance mechanisms in accordance with NHDES requirements to provide for eventual closure and post-closure monitoring and maintenance of the Mt. Carberry Secure Landfill.
- The District's facilities are operated in accordance with local, state and federal requirements and within standards of practice in the solid waste industry to ensure environmentally sound operations.