



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

June 7, 2024

VIA EMAIL

John Gay, Engineer
Granite State Landfill, LLC
1855 Vermont Route 100
Hyde Park, Vermont 05655
E-mail: John.gay@casella.com

Subject: Application for Water Quality Certification – Incompleteness Letter
Granite State Landfill, Dalton, NH (NHDES #2021-404I-002)

Dear Mr. Gay:

The purpose of this letter is to notify Granite State Landfill, LLC (GSL) that the New Hampshire Department of Environmental Services (NHDES), Watershed Management Bureau, has determined that the Application for Water Quality Certification, submitted to NHDES on April 19, 2024 (Application), for the Granite State Landfill Project (Project), is incomplete.

GSL submitted the Application to NHDES to obtain a certification in accordance with 33 U.S. Code § 1341 (Section 401 of the federal Clean Water Act), and RSA 485-A:12, III. The purpose of a certification is to ensure, with reasonable assurance, that construction and operation of the Project will comply with New Hampshire's surface water quality standards, which are specified in RSA 485-A:8 and New Hampshire Code of Administrative Rules Env-Wq 1700. NHDES's certification is required before the US Army Corps of Engineers (USACE) can issue an individual dredge and fill permit for the Project. The Project involves the proposed construction and operation of a secure solid waste disposal facility, i.e. a landfill, within the Alder Brook/Hatch Brook and Ammonoosuc River watersheds, in Dalton, Coos County and Bethlehem, Grafton County, New Hampshire.

NHDES determined that GSL did not submit enough information to assess the Application. NHDES requests that GSL submit the following information **within 60 days of the date of this letter** (August 6, 2024) to provide NHDES with adequate time to review the requested information. In accordance with RSA 485-A:12, III-a(a), GSL must submit the requested information **within 120 days** of the date of this letter (October 5, 2024), or NHDES is required to deny the WQC Application. The process to request an extension to the 120-day deadline is outlined in RSA 485-A:12, III-a(a).

Requested Information:

GSL is herein requested to provide the following information, for NHDES to assess the Application for completeness:

1. As stated in the Section 4 of the 2022-2023 Granite State Landfill Baseline Environmental Studies Sampling and Analysis Plan, dated October 2023 and prepared by Normandeau Associates, Inc. (SAP) and submitted with the Application, “A Baseline Study Report will be prepared and submitted to NHDES to present results from each of the baseline environmental studies, to include graphics and tables which present the data collected and provide a narrative of our findings using the QC methods outlined in Section 3.0. Any anomalous or indicative results will be highlighted...”

Please submit the Baseline Study Report.

2. In accordance with Env-Wq 1703.13, temperature in class B surface waters shall be as specified in RSA 485-A:8, II.

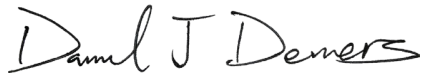
Please provide information relative to assessment of potential thermal impacts for all phases of the Project, including interim landfill cell construction, within the Alder Brook wetlands complex immediately downgradient of the Project, and at each of the monitoring station locations defined in the SAP, compared to pre-development conditions. This information should include, but is not limited to:

- a. a comprehensive, calibrated and validated thermal model using pre-development baseline conditions compared to project impacts; or
 - b. an alternative thermal assessment methodology.
3. Provide an antidegradation analysis for the impacts of all phases of the Project, including interim landfill cell construction, within the Alder Brook wetlands complex immediately downgradient of the Project and at each of the monitoring station locations defined in the SAP, that addresses the requirements of Env-Wq 1708 to include, but not limited to, the following:
 - a. Project proposed impacts on surface water quality, relative to the surface water quality standards including point source and nonpoint source discharges of pollutants, that would lower water quality and quantity, or adversely affect existing or designated uses.
 - b. A comprehensive and detailed hydrologic budget and calculations that assess changes in flow that would occur seasonally and during all phases of the Project, including interim landfill cell construction, for the pre- and post-development Project footprint, within the Alder Brook wetlands complex immediately downgradient of the Project, and at each of the station locations defined in the SAP. The hydrologic budget must consider all surface water and groundwater/infiltration inputs and outputs (e.g. dust control, leachate collection system).

Please submit requested additional information to the following mailing or email address (email is preferred): 401 Certification Program, NHDES Watershed Management Bureau, P.O. Box 95, Concord, NH 03301-0095; wqc@des.nh.gov.

Please contact me with any question or comments, regarding this letter at daniel.i.demers@des.nh.gov or call me at [\(603\) 271-0699](tel:6032710699).

Sincerely,



Daniel J. Demers
Water Quality Certification Supervisor
Watershed Management Bureau

Ec. Bethlehem Municipal Clerk/Conservation Commission
Dalton Municipal Clerk/Conservation Commission
Courtney Bowler, Chair, Ammonoosuc River Local Advisory Committee
Lindsey Lefebvre, US Army Corps of Engineers New England District
Kevin Roy, Casella, Granite State Landfill, LLC
Erin L. Holmes, P.E., Administrator, NHDES Watershed Management Bureau
Philip Trowbridge, P.E., Manager, NHDES Land Resources Management Program