

**From:** [Daun, Mary](#)  
**To:** [Thornton Town Administrator](#); [Colby, Jaime](#)  
**Cc:** [Peter Laufenberg](#); [Peter Laufenberg \(gmail\)](#); [Colby, Jaime](#); [McKenna, Leah](#); [Wimsatt, Mike](#)  
**Subject:** RE: URGENT RE: Test Boring Work Plan, NHDES Site No. 199101060, Campton-Thornton Municipal Landfill  
**Date:** Friday, March 28, 2025 4:07:00 PM  
**Attachments:** [image001.png](#)

---

Hi Desiree,

In response to your below email, and in follow-up to our discussion earlier this week, the department is providing the following guidance.

It is our understanding, based upon the [November 13, 2024 meeting](#) with the Town of Thornton, Eversource, and NHDES, that the Town will pursue a Type I-B permit modification to address the replacement of utility pole structures. During the meeting, Eversource discussed the need to drill two test boring holes to determine if any waste is present in the proposed structure locations and to pre-characterize the soils for disposal. NHDES agreed that such test boring work can be performed prior to applying for the Type I-B permit modification, and requested Eversource submit a test boring work plan to NHDES.

The [work plan](#) for test borings was submitted by GZA to NHDES on February 11, 2025. NHDES responded to Eversource, and copied the Town, stating that it had received the work plan and would reach out if it had any questions. NHDES reviewed the work plan. Consistent with our discussion at the November meeting, for each test boring, Eversource proposes to cut the cap open, drill the test boring, containerize the material removed (expected to be mostly soil), backfill the test boring with cement-bentonite grout, and repair the cap geomembrane using a qualified contractor. The work plan also included a health and safety plan which identified air monitoring during the drilling of test borings. NHDES had no questions or further comments regarding the plan. The test boring work plan does not need approval by NHDES. However, this does not limit the Town's ability to discuss or otherwise work with Eversource regarding the proposed test borings or work plan.

During the November 13, 2024 meeting, NHDES suggested the test borings be grouted to ensure they did not provide a contaminant pathway through the landfill, and that the material recovered from the test borings be sampled and analyzed to ensure proper waste characterization and disposal at an authorized facility. Regarding the transfer station, NHDES views the entire parcel on which the landfill and transfer station are located as the site of generation. As such, the excavated material may be stored on the parcel at a location to which Eversource and the Town both agree.

If the Town anticipates that hazardous waste may be encountered, it should coordinate with Eversource. For a hazardous waste determination, generator knowledge can be used to make an initial determination. If visual or analytical test results indicate that hazardous waste was encountered at any time, then the material must be managed as hazardous waste. If you have questions regarding the management of hazardous waste, please contact NHDES' [Hazardous Waste Management Bureau](#) at 1-800-HAZWAST.

If you have further questions, I can be contacted at the number below.

Regards,  
Mary

**Mary F. Daun, P.E.**  
**Solid Waste Management Bureau**  
**NH Department of Environmental Services**  
Phone: (603) 271-8573  
[mary.f.daun@des.nh.gov](mailto:mary.f.daun@des.nh.gov)

*NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question) [NHDES Customer Service Satisfaction Survey](#).*

---

**From:** Thornton Town Administrator <townadmin@thorntonnh.gov>  
**Sent:** Friday, March 28, 2025 10:14 AM  
**To:** Colby, Jaime <jaime.colby@des.nh.gov>; Daun, Mary <Mary.F.Daun@des.nh.gov>  
**Cc:** Peter Laufenberg <p.laufenberg@thorntonnh.gov>; Peter Laufenberg (gmail) <palaufenberg@gmail.com>  
**Subject:** URGENT RE: Test Boring Work Plan, NHDES Site No. 199101060, Campton-Thornton Municipal Landfill  
**Importance:** High

**EXTERNAL EMAIL WARNING!** This email originated outside of the New Hampshire Executive Branch network. Do not open attachments or click on links unless you recognize the sender and are expecting the email. Do not enter your username and password on sites that you have reached through an email link. Forward suspicious and unexpected messages by clicking the Phish Alert button in your Outlook and if you did click or enter credentials by mistake, report it immediately to [helpdesk@doit.nh.gov](mailto:helpdesk@doit.nh.gov)!

---

Hello Jaime & Mary,

I have left each of you phone messages this morning as a follow up of a phone conversation with Mary on Tuesday, March 25. I understand that you may have other items in front of you but this matter does need some immediate attention please?

My Board of Selectmen and Transfer Station Manager have some serious concerns regarding this project. They plan to do test borings in the next couple of weeks & we think more attention needs to be put into a review by NHDES.

1. Based on the email below it seems to have implied a “green light” to

Eversource without our involvement or opportunity to address our concerns for the process. You had previously told us this was an unprecedented process in NH & that we had to be involved with all of this as we are the permit holder.

1. During a walk through meeting last week with Eversource our representative attendees were told that 12 +/- barrels of material will be extracted from our capped landfill during the boring & stored on our premises until tested.
  - i. The Town does not have the authority to receive, store, handle, transport or dispose of the waste generated by Eversource activities.
  - ii. Our permit does not allow for any hazardous waste/material to be stored there; potential or otherwise.
  - iii. There are laws and administrative rules that state unknown waste/material shall be treated as hazardous until proven otherwise. (RSA 147, RCRA/EPA, CERCLA and NHDES Administrative Rules)
  - iv. Nobody knows what will be extracted deep within our landfill cap. Based on history of the property it could be many potentially hazardous materials including gases from composition of materials.
  - v. The Board is not willing to risk public safety, impact our permit status or cause financial situations to the Town.

The Thornton Board of Selectmen are requesting something in writing from NHDES regarding this process that Eversource submitted to you at your very earliest convenience as Eversource plans to keep moving forward very quickly.

Thank you for your prompt attention to our concerns, we look forward to hearing from you very soon.

*Desiree L. Mahurin*

Town Administrator  
Town of Thornton, NH  
16 Merrill Access Road  
Thornton, NH 03285

Email: [townadmin@thorntonnh.gov](mailto:townadmin@thorntonnh.gov)

Phone: (603)726-8168

Business Hours: Tuesday – Thursday 8:00 am – 4:00 pm & Friday 8:00 am – 3:30 pm

---

**From:** Colby, Jaime <[jaime.colby@des.nh.gov](mailto:jaime.colby@des.nh.gov)>

**Sent:** Tuesday, February 11, 2025 2:26 PM

**To:** Jen Baron <[jennifer.baron@gza.com](mailto:jennifer.baron@gza.com)>

**Cc:** Codispoti, Jennifer A <[jennifer.codispoti@eversource.com](mailto:jennifer.codispoti@eversource.com)>; Memic, Almir <[almir.memic@eversource.com](mailto:almir.memic@eversource.com)>; STRACHAN, ANGUS P <[angus.strachan@eversource.com](mailto:angus.strachan@eversource.com)>; Belanger, Gregory <[gregory.belanger@eversource.com](mailto:gregory.belanger@eversource.com)>; David Lamothe <[david.lamothe@gza.com](mailto:david.lamothe@gza.com)>; Daun, Mary <[Mary.F.Daun@des.nh.gov](mailto:Mary.F.Daun@des.nh.gov)>; Thornton Town Administrator <[townadmin@thorntonnh.gov](mailto:townadmin@thorntonnh.gov)>

**Subject:** RE: Test Boring Work Plan, NHDES Site No. 199101060, Campton-Thornton Municipal Landfill

**CAUTION:** This email originated from an external email address . Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jen,

NHDES has received the work plan and will add it to the facility record. If we have any questions, we will reach out.

Regards,  
Jaime

---

**Jaime M. Colby, P.E.**

*Supervisor, Engineering & Permitting*

**Solid Waste Management Bureau | NH Department of Environmental Services**

29 Hazen Drive, Concord, NH 03302-0095 | Phone: [\(603\) 271-5185](tel:6032715185)

Email: [jaime.m.colby@des.nh.gov](mailto:jaime.m.colby@des.nh.gov)

*NHDES would greatly appreciate your feedback and wants to hear from you. Please take a moment to fill out our short (5-question) [NHDES Customer Service Satisfaction Survey](#).*

---

**From:** Jen Baron <[jennifer.baron@gza.com](mailto:jennifer.baron@gza.com)>

**Sent:** Tuesday, February 11, 2025 11:14 AM

**To:** Colby, Jaime <[jaime.colby@des.nh.gov](mailto:jaime.colby@des.nh.gov)>

**Cc:** Codispoti, Jennifer A <[jennifer.codispoti@eversource.com](mailto:jennifer.codispoti@eversource.com)>; Memic, Almir <[almir.memic@eversource.com](mailto:almir.memic@eversource.com)>; STRACHAN, ANGUS P <[angus.strachan@eversource.com](mailto:angus.strachan@eversource.com)>; Belanger, Gregory <[gregory.belanger@eversource.com](mailto:gregory.belanger@eversource.com)>; David Lamothe <[david.lamothe@gza.com](mailto:david.lamothe@gza.com)>

**Subject:** Test Boring Work Plan, NHDES Site No. 199101060, Campton-Thornton Municipal Landfill

**EXTERNAL EMAIL WARNING!** This email originated outside of the New Hampshire Executive Branch network. Do not open attachments or click on links unless you recognize the sender and are expecting the email. Do not enter your username and password on sites that you have reached through an email link. Forward suspicious and unexpected messages by clicking the Phish Alert button in your Outlook and if you did click or enter credentials by mistake, report it immediately to [helpdesk@doit.nh.gov](mailto:helpdesk@doit.nh.gov)!

---

Hi Jamie,

On behalf of Eversource Energy, attached is the Test Boring Work Plan that has been developed for the upcoming geotechnical test boring work at the Campton-Thornton Municipal Landfill. The work plan was developed for the two test borings to be drilled inside the limits of the landfill to support replacement structure design as part of Eversource's X178-1 Line Rebuild Project. Based on our November 13, 2024 pre-application/coordination meeting, it is our understanding the proposed test boring work is not a permit required activity and not subject to the permit modification required for proposed construction; however, it was requested we file the work plan as a courtesy to be included in NHDES's document files for the property.

Let us know if this email is sufficient notification/filing or if you would like to us to upload the plan directly to OneStop as well. A copy of the plan has also been sent by Eversource to the Town's attorney, Chris Boldt at Donahue, Tucker & Ciandella, PLLC.

Thanks,  
~Jen

**Jennifer R. Baron, P.E.**  
**Senior Project Manager**

GZA | 5 Commerce Park North, Suite 201 | Bedford, NH 03110

o: 603.232.8758 | c: 207.232.5832 | [jennifer.baron@gza.com](mailto:jennifer.baron@gza.com) | [www.gza.com](http://www.gza.com) | [LinkedIn](#)

GEOTECHNICAL | ENVIRONMENTAL | ECOLOGICAL | WATER | CONSTRUCTION MANAGEMENT  
Known for excellence. Built on trust.

---

*This electronic message is intended to be viewed only by the individual or entity to which it is addressed and may contain privileged and/or confidential information intended for the exclusive use of the addressee(s). If you are not the intended recipient, please be aware that any disclosure, printing, copying, distribution or use of this information is prohibited. If you have received this message in error, please notify the sender immediately and destroy this message and its attachments from your system.*

---

For information about GZA GeoEnvironmental, Inc. and its services, please visit our website at [www.gza.com](http://www.gza.com).