From: Wimsatt, Mike

To: <u>Daun, Mary; Colby, Jaime; McKenna, Leah</u>

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

**Date:** Friday, March 28, 2025 5:05:58 PM

Attachments: RE URGENT RE Test Boring Work Plan NHDES Site No. 199101060 Campton-Thornton Municipal Landfill.msq

FYI

Mike Wimsatt, Director NHDES – Waste Management Division 603-271-1997 michael.j.wimsatt@des.nh.gov

**From:** Wimsatt, Mike <michael.j.wimsatt@des.nh.gov>

**Sent:** Friday, March 28, 2025 5:04 PM

**To:** Scott, Robert < Robert.R.Scott@des.nh.gov>; Peter Laufenberg < p.laufenberg@thorntonnh.gov>; Kenney, Joseph < joseph.d.kenney@nh.gov>; Liot Hill, Karen < Karen.LiotHill@nh.gov>

**Cc:** EC: GCWEB <GCWEB@nh.gov>; Rose, Meagan <Meagan.M.Rose@nh.gov>; Thornton Town Administrator <townadmin@thorntonnh.gov>; YuhasKirn, Sarah

<SARAH.L.YUHASKIRN@des.nh.gov>; Crepeau, Adam <Adam.J.Crepeau@des.nh.gov>

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

### Dear Chair Laufenberg,

It was a pleasure speaking with you this afternoon. We appreciate you bringing your concerns to our attention regarding Eversource's planned work at the Campton-Thornton Landfill. As discussed, Mary Daun, Permit Engineer in our Solid Waste Management Bureau, in follow up to her communications with Town Administrator Mahurin earlier this week, sent the attached email to Ms. Mahurin and to you shortly after 4 pm today. The email confirms that NHDES has received and reviewed the GZA workplan for the planned test borings. While the workplan does not require formal approval from NHDES, we have reviewed it and have determined that it is consistent with discussions held between the parties at a meeting held last November, and we have no questions or further comments on the plan. The email also discusses and provides some guidance on the collection and management of drill cuttings from the explorations.

I trust that this email and our telephone conversation have been responsive to your inquiry. As we discussed, some of the issues of concern to the Town are largely matters between the Town and Eversource. However, NHDES will be happy to provide continued assistance appropriate to its role. If you have further questions or concerns, please don't hesitate to reach out to me.

Best regards,

#### Mike

Michael J. Wimsatt, P.G., Director
Waste Management Division
NH Department of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, New Hampshire 03302-0095
Tel 603-271-1997 Fax 603-271-2456
michael.j.wimsatt@des.nh.gov
www.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) <u>NHDES Customer Service Satisfaction Survey.</u>

**From:** Scott, Robert < <u>robert.scott@des.nh.gov</u>>

**Sent:** Friday, March 28, 2025 2:47 PM

**To:** Peter Laufenberg <<u>p.laufenberg@thorntonnh.gov</u>>; Kenney, Joseph <<u>joseph.d.kenney@nh.gov</u>>; Liot Hill, Karen <<u>Karen.LiotHill@nh.gov</u>>

**Cc:** EC: GCWEB < GCWEB@nh.gov >; Rose, Meagan < Meagan.M.Rose@nh.gov >; Thornton Town Administrator < townadmin@thorntonnh.gov >; Wimsatt, Mike < michael.j.wimsatt@des.nh.gov >; YuhasKirn, Sarah < SARAH.L.YUHASKIRN@des.nh.gov >; Crepeau, Adam < Adam.J.Crepeau@des.nh.gov >

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

Mr. Laufenberg,

Thank you for bringing this to my attention. Someone will be getting back to you shortly.

### Bob

### Robert R Scott

Commissioner

New Hampshire Department of Environmental Services 29 Hazen Drive, PO Box 95 Concord, NH 03302-0095 W: 603.271.2958

C: 603.892.1706 robert.r.scott@des.nh.gov

**From:** Peter Laufenberg < <u>p.laufenberg@thorntonnh.gov</u>>

**Sent:** Friday, March 28, 2025 2:04 PM

**To:** Kenney, Joseph <Joseph.D.Kenney@nh.gov>; Liot Hill, Karen <karen.liothill@nh.gov>; Scott, Robert <<u>robert.scott@des.nh.gov</u>>

**Cc:** EC: GCWEB <<u>gcweb@nh.gov</u>>; Rose, Meagan <<u>Meagan.Rose@nh.gov</u>>; Thornton Town Administrator <<u>townadmin@thorntonnh.gov</u>>

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

Municipal Landfill **Importance:** High

Good Afternoon Commissioner Scott, Councilor Liot Hill and Councilor Kenney,

I am writing as the Chair of the Board of Selectmen for Thornton, NH, to express my concerns regarding the Department of Environmental Services' (DES) response—or lack thereof—to our inquiries about Eversource's activities in relation to our capped landfill.

## **Background:**

One of Eversource's main distribution lines runs directly through the Campton-Thornton capped landfill, with some poles extending 30 feet into the landfill itself. When the landfill was capped in the early 1990s, PSNH and the Thornton Board of Selectmen signed an agreement allowing Eversource access to the property for various purposes.

As you may be aware, Eversource has recently embarked on a project to upgrade its distribution line running north to south from Littleton to Franklin, including the section that passes through our landfill.

### **Our Concerns:**

Thornton is the sole permit holder for the capped landfill, meaning we bear full legal, environmental, and financial responsibility for anything that happens to it. Our immediate concern is Eversource's plan to conduct test borings in preparation for the construction of new towers for their upgraded electrical line. Despite the significance of this work, we have received no communication from DES regarding these test borings.

Below, you'll find an email from our Town Administrator to DES requesting detailed guidance, as we have not been kept informed about work occurring on a landfill that we are ultimately responsible for.

We intend to cooperate with Eversource and uphold our agreement granting them access to their right-of-way for maintenance. However, we are deeply concerned about the risks associated with disturbing a 30-year-old capped landfill containing 50 years' worth of municipal solid waste. It does not appear that DES has prioritized these concerns. Thornton has diligently monitored and maintained this landfill for over 30 years, ensuring compliance and avoiding fines. We are trying to prevent any future environmental & financial burden on the taxpayers of Thornton, Campton, and Ellsworth, yet our concerns do not seem to be heard.

Any assistance you can provide would be greatly appreciated. Please feel free to reach out to me via email or at my cell number, 603-254-9791.

Thank you, and I look forward to your response.

Best regards,

Peter Laufenberg Chair, Board of Selectmen Town of Thornton, NH

**From:** Thornton Town Administrator **Sent:** Friday, March 28, 2025 10:14 AM

**To:** Colby, Jaime; Daun, Mary

**Cc:** Peter Laufenberg; Peter Laufenberg (gmail)

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

Municipal Landfill

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.

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 <u>very quickly</u>.

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

Phone: (603)726-8168

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

From: <u>Daun, Mary</u>

To: <u>Thornton Town Administrator</u>; <u>Colby, Jaime</u>

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: <u>image001.png</u>

### 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 <u>November 13, 2024 meeting</u> 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' <u>Hazardous Waste Management Bureau</u> 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 marv.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) <u>NHDES Customer Service Satisfaction Survey.</u>

**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

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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

Phone: (603)726-8168

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

From: Colby, Jaime < iaime.colby@des.nh.gov>

**Sent:** Tuesday, February 11, 2025 2:26 PM **To:** Jen Baron < iennifer.baron@gza.com>

**Cc:** Codispoti, Jennifer A < <u>iennifer.codispoti@eversource.com</u>>; Memic, Almir

<almir.memic@eversource.com>; STRACHAN, ANGUS P <angus.strachan@eversource.com>;

Belanger, Gregory < <a href="mailto:gregory.belanger@eversource.com">gregory.belanger@eversource.com</a>; David Lamothe

<<u>david.lamothe@gza.com</u>>; Daun, Mary <<u>Mary.F.Daun@des.nh.gov</u>>; Thornton Town Administrator <<u>townadmin@thorntonnh.gov</u>>

**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

Email: jaime.m.colby@des.nh.gov

From: Jen Baron < jennifer.baron@gza.com > Sent: Tuesday, February 11, 2025 11:14 AM To: Colby, Jaime < jaime.colby@des.nh.gov >

**Cc:** Codispoti, Jennifer A < <u>iennifer.codispoti@eversource.com</u>>; Memic, Almir

<a href="mailto:</a> <a href="mailto:strachan@eversource.com">strachan@eversource.com</a>; STRACHAN, ANGUS P <a href="mailto:angus.strachan@eversource.com">strachan@eversource.com</a>; STRACHAN, ANGUS P <a href="mailto:angus.strachan@eversource.com">angus.strachan@eversource.com</a>; STRACHAN, ANGUS P <a href="mailto:angus.strachan@eversource.com">angus.strachan@eversource.com</a>; STRACHAN, ANGUS P <a href="mailto:angus.strachan@eversource.com">angus.strachan@eversource.com</a>;

Belanger, Gregory <a href="mailto:square-action-align: right;">gregory.belanger@eversource.com</a>; David Lamothe <a href="mailto:david.lamothe@gza.com">david.lamothe@gza.com</a>

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

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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
0: 603.232.8758 | c: 207.232.5832 | jennifer.baron@gza.com | www.gza.com | LinkedIn

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