The sections below are intended to provide additional information for inclusion in the Type 1-A Permit Modification Application for the above facility.

SECTION III: DESCRIPTION OF PROPOSED MODIFICATION

The current permit held by BDS is for 153 tons per day (TPD), which includes 138 TPD of C&D and 15 TPD of recyclables, and 655 cy of storage. The modification includes allowing an additional daily average of 350 TPD of capacity (up to a total of 503 tons), with a not to exceed peak of 600 tons on any single day, that will be used to manage existing MSW requiring new management starting in January 2015.

The modification warrants updating of the Operations Plan and Closure Plan, revised versions of which are attached.

SECTION IV: SCHEDULE

A number of towns that are currently members of the Concord Regional Solid Waste / Resource Recovery Cooperative (the Coop) will be ending their contract with the Wheelabrator facility at the end of 2014. It is the intent of BDS to provide MSW collection and management for those members of the Coop starting in the beginning of January 2015 or the date of approval of this Permit Modification Application, so that there is not an interruption in services to these clients. The modification will also allow BDS to accommodate summertime peaks in Lakes Region refuse generation that are currently not specifically assigned by contract.

SECTION V: STATEMENT OF NEED

Based upon the currently waste generation of the towns opting out of the Coop contract, approximately 30,000 tons of MSW (annually) will require management that is currently being managed at the Wheelabrator facility. The BDS facility has the physical infrastructure, capacity, and staff to accommodate management of the material currently being received by Wheelabrator. BDS is in the process of finalizing a contract with the Town of Belmont to provide this additional service (BDS already manages C&D and recyclables for these members of the Coop). Modifying the existing permit is required to allow the acceptance of 350 TPD of MSW. This capacity is needed by the facility to accept the expected existing waste stream from the towns opting out of the Coop.
SECTION VI: IMPACT EVALUATION

1. The effect the modification will have on facility function, capacity, life expectancy, service type and service area.

The effects of the permit modification (receiving a daily average of 503 tons of C&D, MSW and/or recyclable material and not to exceed 600 tons on any single day) are expected to include:

- no negative impact to facility function since it was designed as a solid waste transfer station and the existing building has a sufficient tipping floor to manage MSW and other materials simultaneously;

- no negative impact on facility capacity because it currently has excess capacity for solid waste management and can comfortably accommodate the proposed increase in capacity;

- no significant increase in traffic on local roads as most of the refuse hauling trucks currently drive past the BDS facility on their way to the Wheelabrator facility (most of the additional MSW tons received at the BDS facility will be delivered by transfer trucks already stationed at BDS and these new tons, therefore, do not represent additional traffic because the trucks are currently returning to the BDS facility empty or with recycling [on the split body fleet] after dumping MSW elsewhere, and under the proposed permit modification these trucks will be returning full, resulting in no net new traffic on Industrial drive or at the facility);

- increased truck traffic at the BDS facility, but no new traffic patterns or new methods of managing truck loads in or out;

- no modifications being needed to the facility structures because the size and layout of the facility is currently sufficient to handle the increased traffic and materials;

- no change or decrease in the life expectancy of the facility because the building was designed to handled solid wastes;

- no increase in the service type since the facility is current permitted for an unlimited service type (BDS is already providing C&D and recyclables handling for the service area); and

- no increase in the current service area.

2. The effect the modification will have on environment, public health and safety.

Receipt of MSW at the facility will have positive effects on the environment by reducing emissions by waste collection vehicles because truck travel miles will be reduced overall. Public
health and safety will unaffected because the BDS facility is designed to managed solid waste and has excess capacity to safely accommodate the additional MSW material.

3. The effect the modification will have on the state’s ability to achieve goals and objectives specified in RSA 149-M:2, namely achieving a 40% minimum weight reduction in the solid waste stream on a per capita basis by the year 2000 and avoiding the disposal of recyclable materials in a lined landfill with a leachate collection system.

BDS already manages solid wastes and recyclables at the facility in accordance with the state’s goals. MSW received at the facility is expected to primarily originate from accounts that already have their recyclables managed by BDS. The increased capacity will allow more materials to be handled overall, and thereby increase the amount of material recycled. New accounts will be required to follow mandatory recycling activities and be encouraged to participate in non-mandatory recycling. BDS standard operating procedures include separating certain recyclables out of the waste stream on the tipping floor. Accepting MSW at the Belmont facility will create a significantly more efficient hauling model than the current use of separate facilities for MSW and Recycling. These efficiencies will be passed on to allow more affordable recycling services to our customers resulting in higher recycling diversion rates supporting the State’s 40% recycling diversion goal.

4. Identify the effect the modification will have on establishing and maintaining integrated waste management systems consistent with the hierarchy of waste management methods such as source reduction, recycling and reusing, composting, waste to energy technologies, incineration without resource recovery and landfilling.

Receipt of MSW as an outcome of the modification will not change the established hierarchy of waste management methods with the exception that the MSW received will ultimately be landfilled instead of incinerated, as it is currently. However, BDS currently provides the ability to perform significant diversion of materials through its network of service providers.

5. Consistency with the state solid waste management plan and the applicable district plan, pursuant to RSA 149-M:12,1(b).

The proposed modification is supportive of the state’s solid waste management plan by keeping not increasing waste from out-of-state sources and providing responsible waste management services to in-state communities. The BDS facility already serves towns in the Coop district and this modification will expand these services.

SECTION 7: PUBLIC BENEFIT DEMONSTRATION

A demonstration of public benefit in accordance with RSA 149-M:11 and in conformance with the provisions of Env-Sw 1005.05
In accordance with Env-Sw 405.04 Public Benefit Requirements, the facility meets the requirements for providing a substantial public benefit as specified in RSA 149-M:11 and Env-Sw 1005 based upon satisfy the following operating conditions:

(a) the total quantity of waste transferred by the BDS facility on an annual basis to New Hampshire landfills will not exceed the total quantity of waste received by the facility from New Hampshire generators, measured in tons: **MSW to be received by the facility is already being generated in the state and will simply be redirected to a different final location;**

(b) the facility currently operates and will continue to operate in a manner which:
   (1) separates and diverts recyclable materials to authorized facilities for reuse; and
   (2) avoids disposal of recyclable materials in a lined landfill with a leachate collection system; and

(c) during each calendar year that the facility receives waste, the permittee does now and will continue to communicate with the host solid waste management district as specified in Env-Sw 1105.12.

The modification will have of tangible benefit to the new clients using the facility and to the public at large. It will decrease the trucking costs of waste collection vehicles allowing them to discharge materials at the BDS facility instead of traveling farther. This in turn will both reduce air pollution from vehicles and decrease municipal solid waste collection costs, saving money for the host towns. The location of the facility will result in more conveniences for the participating clientele resulting in improved waste handling schedules. There will not be negative environmental or public health impacts as the Belmont transfer facility is an enclosed area, remote from sensitive receptors and residential areas.

**FINANCIAL ASSURANCE**

Section 9 of the Closure Plan addresses the current closure cost estimate and financial assurance for the facility. It should be noted that, upon approval of the permit modification, the bond amount will be updated.