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North Country Environmental Services, Inc.



3 Pitkin Court
Montpelier, Vermont 05602

(802) 223-7221
(802) 223-7128 Fax

May 25, 2001

Mr. Michael McCluskey
Waste Management Division
New Hampshire Department of Environmental Services
6 Hazen Drive
Concord, NH 03301-0509

**RE: North Country Environmental Services, Inc. Landfill
Landfill Facility - Bethlehem, N.H
Incident Report and Resolution
{Via facsimile; (603) 271-2456, 2 pages – originals to follow conventional mail}**

Dear Mr. McCluskey:

North Country Environmental Services, Inc. is writing to provide a complete Incident Report and Resolution to a leachate spill that occurred at the above referenced facility. More specifically, on April 30, 2001 leachate overflowed from the existing 1000-gallon leachate storage tank located to the north of the facility and adjacent to the leachate evaporator. This spill was a result of an unintentional manual override of the leachate consolidation system controls.

Incident History: In the afternoon of April 30, 2001, a leachate tanker arrived at NCES to collect and transport leachate to a wastewater treatment plant. The tanker was situated adjacent to the leachate consolidation building to proceed with normal loading of leachate from the consolidation tank. As you are aware, the leachate from the consolidation tank can be directed to one of two destinations either the evaporation system or direct to a leachate tanker. The limit switch valve arrangement in the consolidation building is configured such that if leachate is to be loaded into a tanker than the corresponding valve is manually opened and the evaporator valve is manually closed thus automatically enabling the overflow protection on the load out arm via the limit switch. Conversely, if the leachate evaporator is to receive the leachate than that corresponding valve is manually opened and the load out valve is manually closed thus automatically enabling the high tank level sensor in the evaporator tank.

As facility staff prepared to manually open and close the appropriate valves to direct leachate to the load-out arm, they noticed that leachate was being pumped to the leachate evaporation tank. Rather than interrupting the flow to the evaporator tank, facility staff allowed the pump to continue directing flow to the evaporator tank until the cycle was complete. Unbeknownst to facility staff, the pump continued to pump leachate to the evaporator tank despite the controller receiving a high alarm and a high-high alarm signal from the evaporation tank. Other facility staff noticed leachate overflowing from the evaporator tank shortly after the tanker arrived at the consolidation building. At that time the pump was manually shut-off and leachate flow discontinued.

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The exact cause of the controller override is not entirely clear, but after evaluating the incident and speaking with Ron Gehl of EOS Research, Inc. (The manufacturer of the controls system), we believe that the keyed switch and/or the load-out arm switch may have been turned "ON" while leachate was being pumped to the evaporation tank. It is believed that the act of turning on either or both switches an override of the high level tank sensor was initiated.

Incident Resolution: An unknown volume of leachate overflowed from the evaporation tank. Facility staff excavated to a depth of 18" over the obvious soil stained area adjacent to the evaporation tank immediately following the incident. Approximately three-bucket loads were excavated from a Cat 966F Loader and disposed in the landfill. Soil samples will be collected in the vicinity of the leachate evaporator tank to confirm that all of the contaminated soil was removed. The results of the soil analysis will be forwarded to you as soon as they are available.

EOS personnel are in the process of evaluating and re-configuring the control logic to ensure that the controller cannot be overridden. In the interim, EOS and facility staff has prepared a procedure to manually ensure that a similar condition will not occur before the controls are further automated. Should you have any questions please do not hesitate to contact me at (802) 223-7221.

Sincerely,
NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.



Joe Gay, E.I.
Permits, Compliance and Engineering

- C: Larry Lackey, North Country Environmental Services, Inc. (via e-mail)
- Ted Reeves, North Country Environmental Services, Inc. (via e-mail)
- Lenny Wing, North Country Environmental Services, Inc. (via e-mail)
- Don Monahan, North Country Environmental Services, Inc. (via e-mail)
- Al Sabino, North Country Environmental Services, Inc. (via e-mail)
- Robert Banfield North Country Environmental Services, Inc. (via e-mail)