



ESTABLISHED 1975

March 1, 2024

Ms. Barb Schwendtner  
State of Vermont Agency of Natural Resources  
Waste Management and Protection Division  
Certification and Compliance Section  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704

**RE: New England Waste Services of Vermont, Inc.  
Landfill Facility – Coventry, Vermont  
Solid Waste Facility Identification Number OL510  
February 24, 2024, SAFF Leachate Treatment System Malfunction**

Dear Ms. Schwendtner:

New England Waste Services of Vermont, Inc. (NEWSVT) provides the following summary of our response and investigation regarding a malfunction of the SAFF leachate treatment system on February 24, 2024 at the NEWSVT Landfill. The following steps were taken, as required by the corresponding permit conditions, and Vermont Solid Waste Management Rules (October 31, 2020):

1. 2nd Major Amendment (2023.02.13) – Leachate Management Building and Pad;
  - (a) Condition 7 -The Permittee shall notify the Program of any activation of the leak detection systems within 24 hours. The notification shall include a summary of the event; including information on the containment and estimated of volume contained, and a proposed solution to ensure the collection and containment system remain effective.

**Initial notification was made to the Vermont Department of Environmental Conservation (DEC) Spill Response Team, immediately upon discovering the system malfunction and subsequent leachate spill.**

**Approximately 8,699 gallons of leachate leaked from within the treatment unit, of which 5,854 gallons, was contained within the two secondary containment systems. The remaining 2,845 gallons drained from the containment, across the road and into adjacent on-site stormwater collection infrastructure. No leachate was discharged off-site. Timeline for clean up activities is addressed in section 2(a) below.**

**A full investigation into the cause of the malfunction is currently underway and once complete a follow up report will be submitted to DEC detailing the cause and corrective actions required to ensure proper functioning of the system and containment of leachate moving forward.**

2. Certification Phases I-IV & VI (2018.10.12);

- (a) Condition #90 In accordance with §6-703 of the Rules, the operator shall submit a report to the Agency within five working days of the receipt of any information indicating non-compliance or interruption of normal operations (e.g. fires, infrastructure damage or failure, equipment shutdown or weather-related incidents) with any term or condition of this Certification. Any discharge, emission, or release which poses a threat to public health and safety, a threat to the environment or the creation of a nuisance must be reported within 24-hours to the Agency, and the local health officer. A written report shall be submitted to the same parties within seven days of the discharge, emission, or release. The report shall identify the discharge, emission, or release that occurred, the type, quantity, and quality of waste, and the actions taken to correct the problem.

**Initial notification was made to the DEC Spill Response Team, immediately upon discovering the system malfunction and subsequent leachate spill. Notification was also made to the local health officer as required by §6-703 of the Rules.**

**At 7:05am on Saturday February 24, NEWSVT staff were made aware of a spill in the area of the SAFF leachate treatment system. At 7:25am personnel arrived on site and shut power off to the unit, stopping the flow of leachate to the system. Personnel immediately began cleanup by pumping down secondary containment. By 8:30am cleanup began for the leachate that escaped the containment area which included the following:**

- **A ditch was dug as an intercept point to prevent leachate from traveling further and a pump truck was utilized remove liquids from the intercept point. Approximately 1,400 gallons of impacted stormwater was removed from this point;**
- **A vacuum tanker was mobilized to the sediment pond forebay where approximately 18,600 gallons of impacted stormwater was removed as a precaution to prevent possible leachate from getting to the stormwater pond. This volume was largely stormwater and no evidence of leachate has since been found in the stormwater pond;**
- **Rock and soil were removed from the stormwater ditch and placed within the landfill. Once the forebay was pumped down, sediment was cleaned, removed from the forebay, and placed within the landfill. This resulted in a total of approximately 800 yards of material (rip-rap, soil and silt from forebay) being removed and placed within the landfill as a precaution;**
- **Impacted gravel from the roadway was removed and placed within the landfill;**

**The comprehensive initial stage of cleanup ended at 4:30pm on Saturday, February 24.**

**On Monday, February 26 personnel continued to shovel material surrounding the SAFF leachate treatment system area to ensure all possible impacted soil was removed. Additionally, a third-party contractor began replacing stone that had been removed from the stormwater infrastructure.**

**Cleanup was completed on Tuesday, February 27 when the remaining culverts were flushed with clean stormwater and collected via vacuum truck to ensure there was no leachate remaining in the area. Approximately 2,845 gallons escaped containment measures.**

- (b) Condition #89 The Permittee shall take all reasonable steps to ensure that the activities taking place at the Facility do not result in a discharge, emission, or release of a waste material into the environment.

**The SAFF leachate treatment system is designed with multiple levels of fail-safe features in place within the unit including a high-pressure alarm and two flood switches which should have activated to disable the system. In this circumstance, all the measures failed to alarm and engage despite weekly observation and maintenance to ensure proper functioning. In addition, the unit has direct remote oversight by the unit manufacturer, with staff available 24/7 for alarm conditions and troubleshooting.**

**During routine maintenance and observation, the fail-safe features were functioning properly. At no point prior to this malfunction were any issues identified. There is an ongoing investigation with the system manufacturer to identify why these fail-safe features did not alarm or engage, and to correct the issue to ensure proper functioning, prior to resuming use of the system. Once this investigation is complete, a follow up report will be submitted to DEC.**

- (c) Condition #91 In the event of noncompliance with the certification, the Permittee shall take all necessary steps to abate releases to the environment and shall carry out such measures as are necessary to protect the public health or the environment.

**Spill response was mobilized immediately upon identifying the malfunction and release. Cleanup was completed as described in section 2(a) of this report.**

**In addition to the physical cleanup measures that have been completed, soil sampling will be done in the area outside of the SAFF system containment area, and the impacted area of the stormwater collection infrastructure. Stormwater samples from the pond will also be obtained to ensure stormwater was not impacted. Once the results of these samples are received, an additional report will be submitted to DEC.**

3. Solid Waste Management Rules (SWMR) § 6-1005 Additional Disposal Facility Operating Standards;

- (c)(18) All components of the designed landfill system, including the leachate collection and removal system, and the landfill gas collection and control system, shall be maintained to achieve the performance standards of § 6-1004 [including §6-1004(h)(5) effective leak detection for components constructed outside of the lined portion]. If any component is individually incapable of achieving, or which prevents the entire system from achieving, the required performance standards, the Agency shall be notified, and it shall be replaced to comply with and achieve the performance standard. A certification amendment may be necessary if design changes are proposed in order to achieve the needed performance standard.

**NEWSVT will not resume use of the system in the existing temporary location. Use of the system will resume in the permanent building when complete, and a full investigation and any necessary repairs or updates to the SAFF system are complete.**

Should you have any questions please do not hesitate to contact me at (802) 772-6205.

Sincerely,

**NEW ENGLAND WASTE SERVICES OF VERMONT, INC.**

A handwritten signature in black ink, appearing to read "Kelly Gleason". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kelly Gleason, Environmental Analyst  
Permits, Compliance, & Engineering

c. Jeremy Labbe, NEWSVT  
Kim Crosby, NEWSVT  
DUMP