

Davidson, Tyler

From: Davidson, Tyler
Sent: Tuesday, August 6, 2024 10:38 AM
To: Kevin Roy; Bruce Grover; john.gay@casella.com; Kimberly Crosby
Cc: Colby, Jaime; Daun, Mary
Subject: NCES Incident Reports - Secondary Flows - June 12, 2024 through August 5, 2024
Attachments: NCES Incident Report - June 12, 2024 (Secondary).pdf; NCES Incident Report - June 18, 2024 (Secondary).pdf; NCES Incident Report - June 24, 2024 (Secondary).pdf; NCES Incident Report - July 2, 2024 (Secondary).pdf; NCES Incident Report - July 26, 2024 (Secondary).pdf; NCES Incident Report - July 29, 2024 (Secondary).pdf; NCES Incident Report - August, 5, 2024 (Secondary).pdf

Dear Permittee:

From June 12, 2024 through August 5, 2024 the New Hampshire Department of Environmental Services (NHDES) received seven written incident reports for the NCES Landfill in response to elevated flow rates within the secondary leachate collection system. These reports are attached.

Based on a completeness and technical review conducted by NHDES, the reports do not include all of the information specified in Env-Sw 1005.09 and cannot be accepted because the following sections were missing or incomplete, as detailed below:

- **Item 10, The quantity and types of wastes and material(s) involved in the incident or situation and in the clean-up activities** - Section incomplete. For all attached incident reports, it is unclear if this is the rolling 30-day average of secondary leachate flows required by Env-Sw 806.08(d)(4).
- **Item 12, Assessment of actual or potential hazards to the environment, safety and human health related to the incident** – Section incomplete. Env-Sw 1005.09(c)(4)(d) requires an assessment of actual or **potential** hazards to the environment, safety, and human health related to the incident. For all attached incident reports, an assessment of the potential hazards that could result from, or that are indicated by, elevated leachate flows in the secondary leachate collection system is warranted in this section.
- **Item 13, Measures the permittee has or intends to apply to reduce, eliminate, and prevent a recurrence of the incident or situation** – Section Incomplete.
 - For the incident reports submitted on June 12, June 18, June 24, and July 2, 2024, the information provided in this section appears to identify potential causes of the elevated flows, but does not discuss measures to reduce, eliminate, and prevent a recurrence of the situation.
 - For the incident reports submitted on July 26, July 29, and August 5, 2024, the Permittee only submitted a statement that investigation into the matter is ongoing. In addition to this statement, information regarding timing (i.e., when is the investigation expected to be completed?), as well as an acknowledgement that additional or future measures will be implemented based on the results of the investigation, would be warranted in this section. Additionally, any measures to reduce, eliminate, or prevent a recurrence of the situation that have been conducted prior to report submittal (e.g., check pumps and transducers, etc.) should be listed in this section.

Please revise the report(s) to include the missing information and **re-submit the reports** by Monday, August 12, 2024. The reporting form is available [online](#). If you have any questions, please contact me by email at tyler.j.davidson@des.nh.gov or by phone at (603) 271-0674.

Sincerely,

Tyler J. Davidson
Compliance Assurance Section
NHDES, Solid Waste Management Bureau