

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

In the matter of the application for
Remedial Action Approval at:
Former Coventry Landfill
Arnold Road
Coventry, RI
Plat 15 Lots 96, 97.1, 97.2 and 99

Office of Customer & Technical Assistance

ORDER OF APPROVAL ADDENDUM

In the above entitled matter wherein the Town of Coventry and the Coventry Landfill Group in its capacity as potentially responsible parties at the Coventry Landfill, Arnold Road (the Site), Coventry, filed with the Rhode Island Department of Environmental Management (RIDEM) the following documents which collectively fulfill the requirements of Section 9.00, "Remedial Action Work Plan (RAWP)" of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), as amended November 2011, the Rules and Regulations for Composting Facilities and Solid Waste Management Facilities (Solid Waste Regulations) as well as the Guidelines on Beneficial Use Determinations ("BUDs") for Source Segregated Solid Waste:

1. Remedial Action Work Plan and Landfill Closure Design, Former Coventry Landfill, Arnold Road, Coventry, Rhode Island, submitted by GZA GeoEnvironmental, Inc. (On behalf of The Town of Coventry and the Coventry Landfill Group), dated May 17, 2013.
2. Former Town Landfill, Arnold Road, Coventry, RI, Request for Variance and BUD Application, submitted by the Town of Coventry, dated February 5, 2013.
3. Response to Comments Regarding BUD Application received February 14, 2013, Former Coventry Landfill, Coventry, Rhode Island, submitted by GZA GeoEnvironmental, Inc. (On behalf of The Town of Coventry and the Coventry Landfill Group), dated June 11, 2013.
4. Response to Comments Regarding BUD Application, Remedial Action Work Plan and Landfill Closure Design, Former Coventry Landfill, Coventry, Rhode Island, submitted by GZA GeoEnvironmental, Inc. (On behalf of The Town of Coventry and the Coventry Landfill Group), dated August 28, 2013.

Subsequent to the Department issuing the original Order of Approval dated November 8, 2013, the following documents were also filed by or on behalf of the Town of Coventry and the Coventry Landfill Group:

5. Revised Application for Beneficial Use Determination (BUD) Program at Former Coventry Landfill – Arnold Road, Coventry, RI, submitted by the Town of Coventry, received March 25, 2016.

6. Revised Materials Management Plan, Former Town Landfill, Coventry, Rhode Island, submitted by the Town of Coventry, received March 25, 2016.
7. Revised Storm Water Management Plan, Former Coventry Municipal Landfill (prepared by GZA GeoEnvironmental, Inc.), submitted by the Town of Coventry, received March 25, 2016.
8. BUD Material Reuse Levels Risk Evaluation, Former Coventry Landfill, Coventry, Rhode Island, submitted by GZA GeoEnvironmental, Inc. on behalf of the Town of Coventry and Coventry Landfill Group, received April 5, 2016.
9. Response to RIDEM's June 2, 2016 Comments, Request for Variance and BUD Application, Former Coventry Landfill, Arnold Road, Coventry Rhode Island, CERCLA ID (RID980734164), submitted by GZA GeoEnvironmental, Inc. on behalf of the Town of Coventry and Coventry Landfill Group, received July 15, 2016.

These documents describe a Remedial Action Work Plan to remediate existing contamination and close the landfill pursuant to R.I.G.L. Sec. 23-19.14-1 et seq. and the Department's Remediation Regulations, as amended November 2011, and the Rules and Regulations for Composting Facilities and Solid Waste Management Facilities (Solid Waste Regulations) dated January 1997 in accordance therewith.

Furthermore, a BUD Application hearing was conducted on May 11, 2016, in accordance with R.I.G.L. Sec. 23-18.9-16 and the Guidelines on Beneficial Use Determinations. The notice for the hearing and public comment period was published on April 21, 2016 in the Providence Journal.

It is the Department's intent that all conditions set forth in the Order of Approval (Order) dated November 8, 2013, shall remain in full force and effect unless specifically altered by this Order of Approval Addendum (OA Addendum). This OA Addendum continues to place primary responsibility for the construction, operation, maintenance and monitoring of the approved Remedial Action Work Plan (RAWP), BUD Approval and Landfill Closure Design on the Town of Coventry and Coventry Landfill Group. As the responsible party and performing party, the Town of Coventry and Coventry Landfill Group are expected to implement the RAWP, BUD activities and Landfill Closure Design in an expeditious and professional manner that prevents non-compliance with the Order, OA Addendum and RAWP, and protects human health and the environment.

Upon consideration thereof, the Department of Environmental Management's Office of Customer & Technical Assistance (OCTA) approves the requested revision to the Order, provided in the above listed documents, through this Order of Approval Addendum provided that:

1. The modifications and revisions to the Order, approved by this OA Addendum, shall supersede the original terms and conditions of the Order.
2. The Department shall receive written notification 72 hours prior to the receipt of any material pursuant to the authority of this OA Addendum.

3. All work must be performed in accordance with all applicable regulations and the Department approved Remedial Action Work Plan inclusive of schedules, and must be consistent with Section 11.00 (Remedial Action) of the Remediation Regulations.
4. The Town of Coventry and the Coventry Landfill Group will construct a synthetic membrane cap incorporating the Closure Turf System, which has a hydraulic conductivity of less than 1×10^{-7} cm/sec, as proposed in the above listed documents.
5. The construction, monitoring and reporting requirements for the SVE System as proposed in the Remedial Action Work Plan must be adhered to. Any proposed deviation from the approved plan must be reviewed and receive the prior written approval of the Department. The Department must be notified of a system shutdown due to a power failure within 24 hours of the event. The Department must also be notified at least 24 hours prior to a planned system shut down for maintenance activities. The Town of Coventry and Coventry Landfill Group must request and receive the Department's written approval prior to the final termination of SVE System operations.
6. Results of all environmental sampling that are required by the Department during the closure or post-closure period of the landfill shall be sent to Chris Walusiak, Office of Customer & Technical Assistance (OCTA), 235 Promenade Street, Providence, RI 02908.
7. The Office of Customer & Technical Assistance (OCTA) shall be immediately notified of any Site or operation condition that results in non-compliance with this OA Addendum.
8. Any interruptions of the remedial action shall be reported to Chris Walusiak at the Office of Customer & Technical Assistance (OCTA) by telephone within one (1) working day and in writing within seven (7) days of occurrence.
9. Any hazardous waste derived from the implementation of the Remedial Action Work Plan shall be disposed of in accordance with the Department's Rules and Regulations for Hazardous Waste Management. In the event hazardous waste is disposed of off-site, documentation of proper disposal shall be provided to the Office of Customer & Technical Assistance (OCTA).
10. The Order and this OA Addendum does not remove the Town of Coventry and the Coventry Landfill Group's obligation to obtain any other necessary permits from other state, local, or federal agencies or compliance with any applicable statutes or regulations by any state, local or federal agency.
11. This OA Addendum shall be recorded in the Town of Coventry Land Evidence Records and a recorded copy forwarded back to RIDEM within ten (10) days.
12. No hazardous waste shall be accepted from any off-site sources for treatment, storage or disposal at the Site.

13. An Institutional Control in the form of an Environmental Land Usage Restriction (ELUR) for the Site will be recorded in the Town of Coventry Land Evidence Records at the time of this project's completion and will specify all of the site conditions, restrictions and emergency provisions in order to meet the appropriate Remedial Objectives as defined in the Remediation Regulations and Solid Waste Regulations. Be advised that, because the ELUR is part of the remedy, the Department will require (as will be stated in the ELUR) that the property owner submit an annual inspection report by a qualified environmental professional. This report will be subject to review by the Department. A recorded copy of the Department approved ELUR must be forwarded back to the Office of Customer & Technical Assistance (OCTA) prior to the issuance of the Interim Letter of Compliance.
14. Within sixty (60) days of the Department approved conclusion of remedial actions at the Site, the Town of Coventry and the Coventry Landfill Group shall submit a Closure Report detailing all of the Remedial Actions, the current Site status, confirmation sampling results and any disposal documentation to the OCTA.

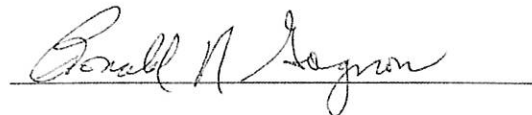
Within sixty (60) days of the Department approved conclusion of remedial actions at the Site, the Town of Coventry and the Coventry Landfill Group shall commence the post-closure groundwater-monitoring program incorporating monitoring wells listed in the Post-Closure Environmental Monitoring Plan (EMP)

The Order and the Department approved revisions listed in the OA Addendum shall remain in full force and effect provided said Remedial Action Work Plan, Beneficial Use Determination activities and Landfill Closure activities are implemented in a manner satisfactory to the Department of Environmental Management. Failure to comply with all points stipulated in this OA Addendum shall result in the issuance of a Notice of Violation and Order against the responsible parties.

The Order and this OA Addendum shall be subject to modification or revocation in accordance with the law.

Entered as the Order of the Department of Environmental Management this 27th day of July 2016.

By:



Ronald N. Gagnon, P.E.
Chief, Office of Customer & Technical Assistance
Department of Environmental Management

TOWN OF COVENTRY, R.I.
Aug 01, 2016 03:03P
Cheryl A George, TOWN CLERK