



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

December 15, 2020

Michael P. Donegan, Esq.
Environmental Law
Orson and Brusini Ltd.
144 Wayland Avenue
Providence, RI 02906

Re: Site Investigation Report
Former Truk-Away Landfill
Industrial Drive
Warwick, Rhode Island

Dear Mr. Donegan,

The Rhode Island Department of Environmental Management (the "Department") Office of Customer and Technical Assistance (OCTA) has received the following document regarding the above listed Site:

- Site Investigation Report Former Truk-Away Landfill, Warwick Industrial Drive, Warwick, RI, Prepared by GZA GeoEnvironmental, Inc., received July 1, 2020.

Upon review of the above listed document, the OCTA has generated the attached comments.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-4700 x7135 or by e-mail at chris.walusiak@dem.ri.gov.

Sincerely,

Chris Walusiak, P.E.
Principal Civil Engineer
Office of Customer and Technical Assistance
Department of Environmental Management

cc: Ronald Gagnon, P.E., Administrator, RIDEM/OCTA
Mary Kay, Esq., Executive Counsel, RIDEM/OLS
Susan Forcier, Esq., Deputy Chief Legal Counsel, RIDEM/OLS
Ed Summerly, P.G., GZA
Richard Carlone, P.E., GZA

**Comments Regarding the
Site Investigation Report
Former Truk-Away Landfill
Warwick Industrial Drive, Warwick, RI
Submitted by: GZA GeoEnvironmental, Inc.**

1. Remedial Alternative #3 Site Capping and Institutional Controls, Page 19

Per Section 1.9.7 (B) (1) (Upper Concentration Limits) of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases 250-RICR-140-30-1:

The free-phase petroleum (light non-aqueous phase liquids - LNAPL) that has been encountered in groundwater monitoring wells MW-3 and MW-EA-01 should be addressed in the proposed remedial objectives. Historic sampling results indicate that the LNAPL product contains PCBs that have exceeded the analytical thresholds established by the Toxic Substances Control Act (TSCA). As a result, the proposed remedial objective will need to account for PCBs accordingly.

2. Remedial Alternative #3 Site Capping and Institutional Controls, Page 19

The results of previous and current site investigation activities indicate the presence of LNAPL containing PCBs, a GB groundwater exceedance and surface water sampling results exceeding both chronic and acute surface water criteria at multiple sampling locations. Due to these exceedances, the Department will require a final cap that meets the permeability requirements and is consistent with Section 2.2.12 (Final Cover System) of Part 2 – Solid Waste Landfills, of the Solid Waste Regulations (250-RICR-140-05-2). The final cover system design should also incorporate appropriate gas controls in accordance with Sections 2.1.9 (B.) (10.) and 2.3.8 of these Regulations (250-RICR-140-05-2).

3. Remedial Alternative #3 Site Capping and Institutional Controls, Page 19

As part of a future Remedial Action Work Plan/Closure Plan submittal, the Department will require that waste encountered in the surrounding wetland areas is removed to the best extent practicable. Solid waste removed from these areas shall either be consolidated under the approved final cover system or removed and disposed of at a licensed Solid Waste Management Facility.