



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

December 9, 2011

Mr. Michael O'Connell, Executive Director  
RI Resource Recovery Corporation  
65 Shun Pike  
Johnston, RI 02919

Dear Mr. O'Connell:

As you know, the Department of Environmental Management has been closely monitoring your response to the odors coming from the landfill. In response to the Letter of Non-Compliance issued by DEM on October 17, 2011, RIRRC outlined a corrective action plan in a letter dated October 27, 2011. That corrective action plan focused on four main strategies: the installation of additional gas collection wells in Phases IV and V, the dewatering of existing wells to restore their effectiveness and efficiency in collecting landfill gas, engagement of an independent third-party to evaluate the gas collection systems and conditions at the landfill, and the placement of additional intermediate cover material in areas where further disposal is not expected in the near future. The Department concurred with this approach to the problem and has been overseeing the implementation of the actions over the past six weeks.

Since the submittal of the corrective action plan, you have also provided the Department with information showing that the amount of gas collected from the overall facility began dropping in April 2010 and continued, with a significant decrease in collection evident starting in May 2011, through to current conditions. The cause of this drop is not known at this time.

During the past six weeks, the Department has conducted many inspections both on the landfill and in the surrounding community. On those inspections, air monitoring was done to measure the concentration of hydrogen sulfide. As we are nearing the target date for the completion of your corrective action plan, odors are still being detected both on and off-site.

Next week will be a critical juncture in this response. We hope to see noticeable improvements in air quality as the new wells come on-line and the flow from those wells is optimized. It is our understanding that you are relocating a flare to the area adjacent to Phase V and piping the wells from this source area of the landfill gas directly to this flare for destruction. We hope, and expect, to see that system on-line by Monday December 12<sup>th</sup>.

The Department expects to receive the report from the independent third-party documenting their evaluation of the gas collection systems and conditions at the landfill by the close of business on Tuesday, December 13<sup>th</sup>.

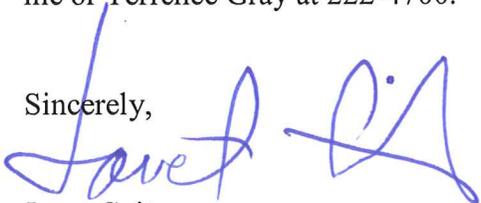
Finally, the Department will continue to conduct monitoring and inspections on and off-site. If conditions are not improved, as documented through these inspections, we will order RIRRC to take additional measures potentially including, but not necessarily limited to:

- Application of additional, and enhanced, cover material- including the application of Posi-Shell, which our direct experience has shown to be effective for providing an effective barrier to the migration of gases and clear visual indicators of areas of high hydrogen sulfide concentrations;
- Suspension of approvals for the use of construction and demolition debris, including fines and Recovermat materials, as alternative daily cover;
- Installation of additional gas collection wells; and/or
- Acquisition and installation of additional flares.

The Department also reserves the right to take enforcement action, including the potential assessment of penalties, for all instances of regulatory non-compliance.

We appreciate your regular communication and cooperation as you have instituted these corrective actions. If you have any questions or would like to discuss this further, please contact me or Terrence Gray at 222-4700.

Sincerely,



Janet Coit  
Director

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