

Ms. Sherry Giarusso-Mulhearn, Executive Director
Rhode Island Resource Recovery Corporation (RIRRC)
65 Shun Pike
Johnston, R.I. 02919

December 2, 1999

Re: Automobile Shredder Residual (ASR) Analytical Results

Dear Ms Giarusso-Mulhearn:

The Office of Waste Management recently reviewed the ASR analytical results taken by GZA Geoenvironmental, Inc. on behalf of the RIRRC. Said sampling was required as part of the Department's June 7, 1999 approval for use of ASR "fines" at the Central Landfill, in order to provide independent validation of the characterization of the ASR being received by the RIRRC from Metals Recycling, Inc. The analysis of the samples was completed by the Mitkem laboratory, and the results were sent to GZA in correspondence dated September 30, 1999.

Based upon our review, the average of the TCLP lead results was 5.9 ppm. This exceedance of the 5.0 ppm threshold required RIRRC **to immediately cease acceptance of ASR**. Specifically, condition #11 of the June 7, 1999 approval states:

"11. Evaluation of analytical results: RIRRC shall immediately cease accepting ASR "fines" for daily cover, or (ASR or ASR "fines") for disposal as solid waste, and notify the Department immediately, if either:

- A. The arithmetic average of the analytical results for the first four samples (for each contaminant) exceed 50 ppm for PCB, or 5.0 ppm for lead, or 1.0 ppm for cadmium, or 30,000 ppm for TPH; or
- B. The arithmetic average of the analytical results for the entire 20 samples (for each contaminant) exceed 50 ppm for PCB, or 5.0 ppm for lead, or 1.0 ppm for cadmium, or 30,000 ppm for TPH."

Therefore please advise this office immediately that RIRRC has ceased accepting this material in compliance with the above cited condition.

In addition, several other issues were raised as part of the Department's review of the analysis report which must also be addressed. These include:

- Reasons for not immediately notifying the Department upon receipt of the results from the Mitkem laboratory report,

- Proper submittal of the written report to the Department in accordance with the time frame required by condition #12 of the approval. It is also worth noting that the report did not contain any evaluation of the results specifically pointing out the lead exceedance.
- The reliability of the PCB and TPH results in the report due to required dilution of the samples during analysis,
- The issue of when EPA procedures were utilized for collection, handling, and analysis of the samples versus the protocols of W.Z. Baumgarten, & Associates,
- Proper and full completion of all data required on the “chain-of-custody” form, including entry of all sample transfer times, proper preservation methods (ie: cooler temperature), and legible signatures.

If you have any questions on the above subject matter, please contact me at 222-2797. Also, the Department is available to meet with RIRRC to discuss the results, and off-site disposal options for any stockpiled material that may be at the landfill.

Sincerely,

Leo Hellested, P.E.
Chief – Office of Waste Management

Cc: Jan Reitsma, Director DEM
Edward Szymanski, Associate Director DEM
Terrence Gray, Assistant Director DEM
Dean Albro, Chief DEM-OC&I
Alan Shoer, Chief DEM Legal

Bruce Waterson, Metals Recycling Inc.