

December 7, 1999

Ms. Sherry Giarusso-Mulhearn, Executive Director
Rhode Island Resource Recovery Corporation (RIRRC)
65 Shun Pike
Johnston, RI 02909

RE: Recent Landfill Compliance Issues

Dear Ms. Giarusso-Mulhearn

As you know, Fuss & O'Neill, Inc. has been conducting daily inspections of the Central Landfill on behalf of RIDEM to augment the periodic inspections conducted by our own staff. Based on these inspections, several issues have been brought to our attention that are of particular concern to the Department. It is our understanding that most of these issues have been previously communicated directly to your field staff by Fuss & O'Neill or RIDEM at the time of inspection. This correspondence, therefore, is being sent to summarize the issues so that RIRRC management can ensure corrective measures are implemented as promptly as possible. Additional, subsequent updates may follow.

The issues recently documented by field staff are as follows:

- A significant amount of exposed trash has been observed on the working face at the end of the day indicating that inadequate daily cover is being placed on the working face. This was observed most recently by Fuss & O'Neill on December 1 and 3, 1999. RIDEM inspectors also documented exposed waste away from the working face area on November 26th and 30th. It is suggested that your staff check the placement of daily cover at the working face before all equipment operators are allowed to depart the landfill.
- During the night inspection on November 22, 1999 (after closing hours), RIDEM inspectors observed stockpiles of exposed, excavated waste generated from drilling activities to install the new gas collection wells. All excavated waste must be disposed of at the working face, or properly containerized (roll-offs with covers), or covered with intermediate cover on location (ie: minimum 1' foot). At the time of the inspection no cover material was observed in the vicinity of the stockpiled waste.
- A 30 to 40 foot section of the horizontal gas collection trench being installed on top of the landfill was left exposed at the end of the working day this past Friday. This is especially troubling since this trench was going to be exposed over the entire weekend. If the pipe is not ready for backfilling near the end of the trench, the Department's 22 November 1999 approval requires the excavation to be properly covered at the close of the day. Use of posi-shell cover or foam may be an acceptable alternative to allow for the expeditious continuation of the installation the following day, however, proper odor control measures cannot be sacrificed in the interest of expediting this, or any other project

Ms. Sherry Giarusso-Mulhearn

December 7, 1999

Page 2 of 2

- Significant on site odors continue to be detected emanating from the top and the western slope of the landfill, indicating areas of gas releases.
- The schedule submitted by ENSR in accordance with Paragraph c of our September 30, 1999 letter stated that construction would be completed by November 24, 1999. However, several items of work still need to be completed based upon an inspection on December 3, 1999, including the construction of stormwater management features and placement of additional erosion control matting.
- Leachate breakouts were observed at the toe of the southeastern slope (near pond 3) which was recently winter stabilized but not capped. These breakouts were also observed on the northwestern slope (along the landfill access road). These breakouts have been observed since November 16, 1999. These leachate breakouts must be remediated promptly.
- Litter continues to be a problem at the site and is being blown into the sedimentation basins thereby increasing risk of litter entering off-site watercourses.

If you have any questions with the above cited issues, please do not hesitate to contact me at (401) 222-2797, ext. 7502. In addition, please advise the Department of the expected schedule to complete installation of the new gas collection wells, as well as the new horizontal collection trench commenced this past week.

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
James Brown, EPA
Dean Audet, Fuss & O'Neill

Dennis aRusso, RIRRC
Dana Zewinski, RIRRC