

December 14, 1999

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

RE: Recent Landfill Compliance Issues

Dear Ms. Giarusso-Mulhearn

Based on inspection reports received during the past week from Fuss & O'Neill, Inc. as well as RIDEM staff, it appears that the corrective measures necessary to address the issues documented in my December 7, 1999 letter to you have not yet been implemented. Of particular concern is the fact that sections of the horizontal gas collection trench being installed on top of the landfill were left exposed again over this past weekend. Significant numbers of complaints continue to be received from the neighborhoods surrounding the landfill, and we continue to document objectionable odors off-site.

The issues documented by field staff this past week are as follows:

- Sections of the horizontal gas collection trench being installed on top of the landfill were left exposed again at the end of the working day this past Friday.
- No odor control products were being utilized during trench excavation activities (as required by the Department's 22 November 1999 approval), at a time when significant odors were observed by RIDEM inspectors to be emanating from both the trench and stockpiled waste.
- Leachate breakouts were again observed at the toe of the southeastern slope (near pond 3) which was recently winter stabilized but not capped
- 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.

In addition, several concerns pertaining to potential future erosion in the ENSR work area were also brought to our attention as a result of a site visit on December 7, 1999, by representatives of RIDEM, Fuss & O'Neill, Louis Berger, Pare, and Metcalf & Eddy. These concerns are as follows.

- Rills have developed on a number of slopes above the diversion benches. If not repaired, these rills will continue to erode. Considering the short design length of these slopes, we have some

concern that these rills may be a result of the unconventional placement of the erosion control blanket (horizontal instead of vertical).

- The two highest diversion benches above the Area 4 downchute (Benches 7 and 8) do not drain to a stabilized downchute as originally designed. Instead, runoff collected in these benches is allowed to drain directly down the slope to the next bench. Similar conditions, where downchutes were allowed to drain directly down a slope, resulted in significant erosion problems this past fall.
- Several of the diversion bench flow lines in Area 4 drain below the Area 4 downchute. This condition will result in runoff ponding in the benches and potentially saturating or overtopping the bench berms. During the site visit, one of these berms had overtopped as a result of this condition, which eroded a new gully into the slope. The benches must therefore be graded into the downchutes to drain properly.

As stated in my 7 December 1999 correspondence, these inspection summaries are being sent so that RIRRC management is fully aware of the results of our recent inspections, and can ensure corrective measures are implemented as promptly as possible. The Department reserves its rights to issue future enforcement action(s) based upon the results of these and future inspections.

If you have any questions with the above-cited issues, please do not hesitate to contact me at (401) 222-2797, ext. 7502. Also, the Department is still awaiting the submission of the expected schedule to complete installation and connection of the new gas collection wells, as well as the new horizontal collection trench, as requested in the 7 December 1999 letter.

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