

December 22, 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 many of the issues documented in my earlier correspondences have not been fully addressed. Of particular concern is the fact that inspectors have documented again that sections of the horizontal gas collection trench being installed on top of the landfill were left exposed, despite the notice in my prior letters. Be advised that the Department continues to receive significant numbers of odor complaints from the neighborhoods surrounding the landfill, and every effort must be made on the part of the landfill staff to address all of the issues cited.

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.
- No odor control products were observed being utilized during trench excavation activities (as required by the Department's 22 November 1999 approval).
- 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 significant problem at the site and is being blown into the sedimentation basins thereby increasing risk of litter entering off-site watercourses.
- Two of the three culverts connecting Pond 3A and Pond 3 are blocked with sediments.
- Several culverts under the access road on the northern slope are also blocked with sediments as well as the twin culverts under the ramp to the new 2000 cfm flare on the southwestern corner of the landfill.

- The depth of intermediate cover was measured in nine test holes on top of the landfill. The depth of cover measured ranged from four to nine inches, and was therefore inadequate.
- Waste has also been observed not adequately covered at the end of the day on the working face. While the depth of daily cover appears to be adequate in most areas, it is inadequate in some areas.
- Some trucks hauling waste have been cleaning their truck beds away from the working face, thereby leaving small piles of waste around the crown of the landfill. All waste must be disposed, and covered at the working face.

As stated in my earlier correspondences, these inspection summaries are being sent so that RIRRC management is fully aware of the results of our recent on-site 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.

Also, the Department has received the first two weekly Landfill Gas (LFG) Progress Reports compiled by GZA. Upon preliminary review of these reports several inconsistencies were noted relative to certain activities and the projected schedules for completion. We have forwarded the reports onto Fuss & O'Neill, so additional comments may be forthcoming.

If you have any questions with the above-cited issues, please do not hesitate to contact me at (401) 222-2797, ext. 7502.

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
James Brown, EPA
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