

October 30, 2000

Mr. James Allam
Rhode Island Resource Recovery Corporation
65 Shun Pike
Johnston, Rhode Island 02919

Re: Proposed Revisions to the Alternate Cover Material policy
Central Landfill

Dear Mr. Allam:

The Office of Waste Management (OWM) has reviewed RIRRC's submittal dated June 28, 2000 related to the proposed revisions to the alternate cover material policy at Central Landfill dated October 6, 1999.

As part of the June 28, 2000 submittal, GZA conducted a study to develop new-revised criteria for Arsenic, Lead and Polycyclic Aromatic Hydrocarbons (PAHs). The new revised limits for these constituents are higher than the previous ones that were set forth in the Final Interim Alternate Cover Material Policy dated October 6, 2000 and were developed based on a site specific risk assessment. In addition, GZA established the new chemical screening criteria based on the following factors; an evaluation of the worker exposure scenario, OSHA standards, an evaluation of contaminant target organs and risk modeling method, and a review of criteria used by other states.

The Final Interim Policy dated October 6, 1999 included information regarding testing, evaluation, handling and storage of Alternate Daily Cover (ADC) Material. These procedures must remain in effect pertaining to the new proposed policy. In addition, the new policy calls for RIRRC to conduct increased monitoring of landfill workers as an added precaution.

Based on the above information, the OWM approves your request with the following conditions and restrictions:

1. Alternate cover material that has a lead concentration of less than 2000 ppm versus 3000 ppm as proposed in RIRRC's submittal, may be utilized at Central Landfill.
2. Use of alternate daily cover material pertaining to this approval may only be used in Phase IV of the Central Landfill.
3. Alternate cover material utilized at the Central Landfill, under this approval, must be generated from sources within the State of Rhode Island.
4. The ADC material must be non-hazardous.

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5. As proposed in the June 28, 2000 submittal, airborne dust levels must be kept below the ACIGH's recommended 3 mg/m^3 airborne concentration for respirable dust so the total lead levels in the air do not exceed 9 ug/m^3 .
6. Biological sampling for lead, arsenic and any other potential parameters must be implemented as proposed in the submittal and the frequency shall be prescribed by an independent occupational health physician. Semi-annual reports prepared by the physician, which include the results and recommendations, must be submitted to OWM.
7. The personnel hygiene program implemented by RIRRC must be reviewed and evaluated by the physician as part of the biological sampling program.
8. Personnel air-monitoring program, as described in the RIRRC's submittal, must be conducted annually during the dry months. This air-monitoring program's results must be reviewed and evaluated annually by a certified industrial hygienist.
9. The methodology used to test, evaluate, handle and store ADC must remain in effect.
10. RIRRC must submit an annual comprehensive report that includes but is not limited to; the physician's reports, certified industrial hygienist's report, a description of ADC accepted at the landfill (physical and chemical composition) and RIRRC's consultant's evaluation and recommendations for this new policy based on the new information. Said report shall be submitted annually from the issuance date of this approval.
11. ADC material must be kept in a wet condition and/or covered properly during stockpiling to minimize dust problem.
12. Adequate sedimentation and erosion controls must be implemented during the storage of said materials.
13. RIRRC shall implement controls to ensure said material is not tracked outside the footprint of the lined landfill. (e.g. traffic controls and designated tire wash areas for vehicles travelling over said material).
14. ADC must not be used on the exterior slopes of the lined landfill.
15. The Department reserves the right to amend or rescind this approval at any time based upon the compliance status of the facility and its review of the required reports.

This policy must be incorporated into the existing operating plan as an amendment.

If you have any questions, please feel free to contact me at (401) 222-2797 extension 7143.

Sincerely,

Laurie Grandchamp, Supervising Engineer
Office of Waste Management

Cc: Terry Gray, Assistant Director
Leo Hellested, RIDEM OWM
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