

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

OFFICE OF WASTE MANAGEMENT

**NOTICE OF PUBLIC COMMENT PERIOD ON
A SOLID WASTE MANAGEMENT FACILITY MONITORING PLANS**

In accordance with 42-35-1 et seq. of the Rhode Island General Laws, the Department of Environmental Management Office of Waste Management ("DEM") announces its intent to accept the air and groundwater monitoring plans submitted by Newton B. Washburn, LLC for its proposed transfer station site at 145 Shun Pike, in Johnston, Rhode Island.

These monitoring plans are available for public viewing at the Johnston Town Hall and the Mohr Public Library in Johnston, on the DEM website,

<http://www.dem.ri.gov/programs/wastemanagement/facilities/NBWmonitoringplans.pdf>, and by appointment, at the following address: **Department of Environmental Management, Office of Waste Management, 235 Promenade Street, Providence, RI 02908. (401) 222-2797. Attention: Chris Shafer.**

Public comments on these plans may be submitted no later than July 10, 2017. Submit comments by e-mail to christopher.shafer@dem.ri.gov or in writing to **Department of Environmental Management, Office of Waste Management, Attn: Chris Shafer, 235 Promenade Street, Providence, RI 02908.**

Date: _____

Leo Hellested, Chief,
Office of Waste Management

Brief Summary of Newton-Washburn Transfer Operation

The enclosed monitoring plan relates to the transfer operation at Newton B Washburn LLC 145 Shun Pike, Johnston. This transfer station will temporarily store liquid/solid mixes in an open 30 yard roll off container box , prior to shipping them out of state. The liquid solid mix will include fuels from tank closures/cleaning and spill responses/cleanup such as virgin fuel oils and gasoline, off-spec fuel products (fuel/water mixes) and off-spec fuel tank bottoms. All are non-hazardous liquid wastes and they will be solidified in the container box , using wood chips, sawdust, or similar materials that will be mixed with the liquid wastes.

Newton B Washburn LLC

145 Shun Pike

Johnston, RI

Self Monitoring Compliance Form, Air Monitoring

Date of sampling event:

Drum Lot Number:

Formal Analytical results review:

PID analysis

Drum lot cross section:

Workup of process, PID:

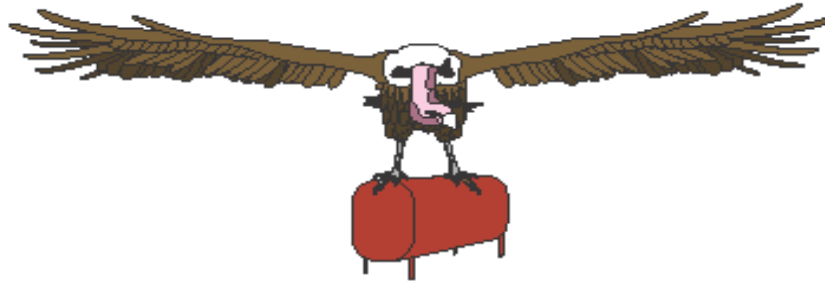
Comments/Notes

By _____

Date:

24 HR. EMERGENCY SERVICES

401-300-6791



NEWTON B. WASHBURN, LLC

ENVIRONMENTAL SERVICES

Air Monitoring Map Legend

NBW

145 Shun Pike

Johnston, RI

The attached map identifies the perimeter of the permitted operational work area, with the red outlines. The default air monitoring sampling sites, downgradient and upgradient, so marked with an X on the perimeter red outline is completely contingent upon the weather conditions and parameters outlined below:

Actual weather conditions ie rain, snow, sunshine

Ambient temperature

Wind direction and speed

These parameters to be assessed with each sampling event will identify the placement of the VOC sampling device to allow the best possible assessment for the accurate measurement of any potential and or real VOC constituent release off site.

As indicated in the written document, all analytical and assessment results and notes will be kept on file at the facility located at the above noted address.

Last Document Review: May 26, 2017



Air Monitoring Plan

Newton B Washburn Environmental Services LLC

145 Shun Pike

Johnston, RI

NBW as part of the solid waste facility self monitoring program must determine and assess on an initially continual basis any release in the form of vapor, constituency and material volatiles both potential and real time. This continual assessment will be logged onto the monitoring report with all reports and subsequent documentation being kept on file at the 145 Shun Pike address. The following program allows real time assessment to be compared to theoretical for accurate determination to meet the applicable Air Quality Regulations or exempt from a formal permit requirement, with the applicable specific focused analyte being VOC's.

As per the permit/license, NBW will be processing fuel related materials and by products of use. All materials will be classified as "virgin product". It is essential that initially, full VOC analysis be run by a State certified lab, allowing accurate documentation of incoming materials and moreso serving as a potential to emit standard reference. This will be supported with an on site flash point assessment also where deemed necessary fully dependent upon the incoming materials. At no time will NBW receive or process Hazardous Waste of any sort or the complexities thereof.

It is important that this program initially be used as an evaluation and comparison for determining required compliance. The incoming materials will be processed in lots of drum quantity/number to be determined as this is an ongoing process. A composite sample of the

incoming materials will be taken by equal aliquots of a minimal 30% count of the said lot. This sample will be taken and run for formal VOC reporting allowing the initial assessment. The same aliquot will have the head space VOC content assessed and so logged by PID. As the material is processed, real time assessment of the immediate head/air space of the roll off can will be monitored by PID and so logged to be compared to the potential to emit analytical incoming data. For the first six months, actual samples of the “end product” will be sampled and evaluated for VOC so as to assess the dilution factor if one occurs.

Upon the completion of the six month assessment, a report will be submitted to Ruth Gold and Chris Shafer for assessment and response to the analytical data generated, and to determine the required frequency of sampling, with all parameters and assessment going forward.

The incoming and outgoing sampling criteria and relative analysis are as follows, based on the constituency of the materials being processed at the facility and the license parameter outline:

Method 8260, full analyte parameter evaluation, VOC

Method 8270D, full analyte parameter evaluation, SVOC to be evaluated over time to determine applicability and continuation. (This parameter is for initial assessment only to determine feasibility and necessity. The formal continuation of this parameter, once real time data is acquired, will be determined. If it is found to be inapplicable, NBW will formally request that this analytic parameter be removed as a required analysis.

These analyses represent the best offer of continued compliance monitoring, initially on an every occurrence and report. Based on controls and management strategies, NBW would address the results

history with the Department to entertain at a later date any possible adjustment to the frequency and specific required analyses to satisfy the permit parameters.

Specific Air Analysis

The formal Suma Canister analysis for voc's will be completed on a biannual basis. It is essential that NBW identify and monitor all potential release possibilities, up gradient and down gradient of the process area at the fence/property line. This will determine and document off property release, if it occurs, in real time. This parameter is fully dependent upon the following weather parameters:

Wind Speed and Direction, for canister placement for accuracy

Ambient Temperature, which will directly effect any evaporation rate potential

The canister sampling time frame is 24 hours to completion. The devices will be placed in such areas that represent the best possible assessment based on all applicable parameters stated above.

The standard sampling area, identified as the default area is located on the northeast and south west fence line within close proximity of the process area allowing the best possible assessment for the potential to off property emit evaluation.

It is essential that NBW evaluate full circle with the inclusion initially of full VOC analysis of incoming materials, the process itself in real time, allowing the potential to release to be assessed. This process coupled with ongoing formal, Cannister, and informal, PID, assessment measurements will allow full control of the process and its emissions documentation and assessment, if any exist. All materials are virgin

fuel and fuel related, thereby making the VOC analysis the best analytic option for assessment, as all potential constituents are represented within the analysis parameters.

Collectively, NBW will correlate all assessment analytical with actual real time data from monitoring/sampling with comparison to all applicable RIDEM methodology standards.

Each report will be kept on file at the 145 Shun Pike facility, and submitted to the Department as required by the license parameter outline for compliance documentation purposes.

Attachments

Sample location and process identification pictures

Sample assessment report



Ground Water Monitoring Plan

Newton B Washburn Environmental Services LLC

145 Shun Pike

Johnston, RI

The ground water monitoring plan outlined below is in compliance reference to the RIDEM solid waste facility license for the above referenced operation. Its design and parameters meet the criteria of self monitoring and compliance with RIDEM department regulations while allowing full operation of the facility within all of the applicable outlines of the license.

This plan has been developed so as to monitor and maintain the facilities operation with full controls on the potential of a release of any kind. This plan allows for the assessment and maintenance of ground water monitoring from both above and below gradients of the operation. Furthermore, the operation itself is contained and managed within the containment confines of 12 inch thick seamed, sealed concrete, making a release potential extremely minimal, with subgrade/ground water impact.

This operation is on the border of the RIRRC landfill, private land that abuts the RIRRC property. Therefore NBW does not accept the responsibility of any analyte or spike thereof that is resultant of the landfill work scope and operation. The NBW potential surrounds fuel and fuel related solids only without the risk of waste or waste byproducts chemical constituency or any other potential influx of contaminants form the landfill. Thus, the up gradient and the down gradient well assessments should concur with RIRRC standards and

serve as a baseline monitoring tool for any potential NBW release impact, which in reality is nil in possibility.

The potential for release within the realm of the NBW operational process is fuel, fuel residuals and its relative constituents. It must be noted also, that the RIRRC landfill accepts contaminated soils and car wash grit as well as other waste streams, with the same contaminant structure. Any observed excursion of analyte parameters will immediately be evaluated with assessment focused on the NBW process, and on the RIRRC runoff. With the wells being upgradient and downgradient of the work process area which will allow an accurate snapshot of the process impact to the environment.

Any potential ground water impact and or observed influx of constituents must be assessed to determine ownership. NBW's operation and process including twelve inch concrete that is sealed, greatly minimizes the potential impact to ground water. If a release was to occur, and is typically cleaned up immediately, that is outside the containment work area soils would be immediately evaluated for total petroleum hydrocarbon assessment to determine actual area of impact in real time, not theoretical.

The monitoring criteria and relative analysis are as follows, based on the constituency of the materials being processed at the facility and the license parameter outline:

Method 8260, full analyte parameter evaluation, VOC

Method 8270D, full analyte parameter evaluation, SVOC to be evaluated over time to determine applicability and continuation.

These analyses represent the best offer of continued compliance monitoring, initially on a quarterly re-occurrence and report. Based on controls and management strategies, NBW would address the results

history with the Department to entertain at a later date any possible adjustment to the frequency and specific required analyses to satisfy the permit parameters.

Collectively, NBW will correlate all assessment analytical with actual results of the well monitoring/sampling to all applicable RIDEM methodology standards.

Each report will be kept on file at the 145 Shun Pike facility, and submitted to the Department as required by the license parameter outline for compliance documentation purposes.

Attachments

Well location and identification pictures

Site sketch showing location of wells in comparison to the facility process and workup areas

Newton B Washburn LLC

145 Shun Pike

Johnston, RI

Self Monitoring Compliance Form, Ground Water

Date of sampling event:

Well Site:

1

2

3

Analytical results review:

Comments/Notes

By _____

Date: