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## TECHLAW INC.

October 23, 2000

Mr. William P. Moats  
State of New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
P.O. Box 26110  
2044 Galisteo  
Santa Fe, NM 87502

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Reference: Work Assignment Y513.0806.200; State of New Mexico Environment Department, Santa Fe, NM; General Permit Support Contract; Sandia National Laboratories; Response to Supplemental Information, Alternative Cover Design, Draft Deliverable

Dear Mr. Moats:

We have reviewed the US DOE's and Sandia National Laboratories' response to NMED's June 5, 2000 Request for Supplemental Information regarding the September 23, 1999 "Deployment of an Alternative Cover and Final Closure of the Mixed Waste Landfill" (Deployment Document). Not all comments have been adequately responded to, as indicated in the body of our Review (attached).

Additional follow up is needed in two areas:

- Several comments that raised either minor or editorial issues were responded to by stating that the requested changes would be made to the affected text of the Deployment Document. No timetable was included in the Response for making the requested changes. TechLaw, Inc recommends that NMED review the Deployment Document when it is revised to ensure that the requested changes have in fact been made.
- More substantive comments regarding the Alternative Landfill Cover Demonstration (ALCD) are to be addressed (according to the Response) in a separate report to NMED by October 15, 2000. TechLaw, Inc recommends that NMED review the report to insure the issues raised in the comments have been thoroughly addressed.



Mr. William P. Moats  
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Enclosed are a hard copy and a file of the deliverable on a 3.5 inch diskette in Word 97 format.

Please call me if you have any questions.

Sincerely,

*June K Dreith*

June K. Dreith  
Project Manager

Enclosures

cc: J. Bearzi, NMED  
W. Jordan/Central Files  
G. Koenig, TechLaw



**RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION**

**DATED JUNE 30, 2000**

**DRAFT DELIVERABLE**

**Response to Enclosure 1 (Comments Generated by NMED)**

**Sandia National Laboratories  
Alternative Cover Design**

**Submitted by:**

**TechLaw, Inc.  
300 Union Boulevard, Suite 600  
Lakewood, CO 80228**

**Submitted to:**

**Mr. William P. Moats  
State of New Mexico Environment Department  
Hazardous and Radioactive Material Bureau  
P. O. Box 26110  
2044 Galisteo  
Santa Fe, New Mexico 87502**

**In response to:**

**Work Assignment No. Y513.0806.200**

**October, 2000**

## **Response to Request for Supplemental Information**

**Dated June 30, 2000**

### **Response to Enclosure 1 (Comments generated by NMED)**

**Comment 1:** The Response adequately addresses the comment.

**Comment 2:** The Response adequately addresses the comment.

**Comment 3:** The Response is not adequate. The Comment requested additional information on the Alternative Landfill Cover Demonstration Test Plot. The Response offered to submit the requested information to NMED by October 15, 2000. Until the supplemental information has been submitted and undergone a review for completeness and technical adequacy, the Comment remains open. Submit the requested information to allow review for completeness and technical adequacy.

**Comment 4:** The Response does not adequately address the comment. The Comment suggested a technical change to a Construction Specification. The Response acknowledged the Comment but did not state whether the suggested change would be made. Modify the Response to indicate whether the suggested change has been accepted and if so provide the modified Construction Specification.

**Comment 5:** The Response does not adequately address the comment. The Comment suggested a technical change to a Construction Specification. The Response acknowledged the Comment but did not state whether the suggested change would be made. Modify the Response to indicate whether the suggested change has been accepted and if so provide the modified Construction Specification.

**Comment 6:** The Response is adequate but requires additional follow-up. The Comment suggested a technical change in a Construction Specification. The Response acknowledged the Comment and stated that the suggested change would be made. Submit the modified Construction Specification.

**Comment 7:** The Response adequately addresses the comment.

**Comment 8:** The Response does not adequately address the comment. The Comment requested a clarification as to whether the upper and lower fiber optics cables would be installed after the cover was partially or completely constructed. The Response did not supply the requested information. Provide a general construction schedule for the cover which clearly shows the sequence of installation of the various lifts and the fiber optic cables.

**Comment 9:** The Response adequately addresses the comment.

**Comment 10:** The Response adequately addresses the comment.

**Comment 11:** The Response does not adequately address the comment. The Response provides the requested proposed allowable QC test failure rates but provides no documentation as to whether the rates are representative of generally accepted practices. Provide documentation that the proposed QC test failure rates are representative of generally accepted practices and will not compromise the integrity of the cover.

**Comment 12:** The Response adequately addresses the comment.

**Comment 13:** The Response adequately addresses the comment.

**Comment 14:** The Response adequately addresses the comment.

**Comment 15:** The Response adequately addresses the comment.

**Comment 16:** The Response adequately addresses the comment.

**Comment 17:** The Response adequately addresses the comment.

## **Response to Enclosure 2 (Comments generated by TechLaw, Inc.)**

### **GENERAL COMMENTS**

**Comment 1:** The Response is not adequate. The Comment requested that the CQAP be modified to include construction of a test pad as described in EPA guidance. The Response stated that construction of a test pad is not necessary, due to the fact that "...The materials, equipment, procedures, and results from test pads, covers, and weighing lysimeters ... have been evaluated. Applicable materials, equipment, procedures, and design specifications were incorporated into the design of the MWL vegetated soil cover." The Response however contains no specific information or references that support the claim. Provide additional details on how information obtained from the test pads, covers, and weighing lysimeters in the cited states was evaluated and incorporated into the design of the MWL soil cover. Please include any instances where test pad data did not provide any meaningful information to the actual design or construction of a final cover similar to the proposed MWL cover.

**Comment 2:** The Response adequately addresses the comment.

**Comment 3:** The Response adequately addresses the comment.

**Comment 4:** The Response adequately addresses the comment.

**Comment 5:** The Response adequately addresses the comment.

**Comment 6:** The Response adequately addresses the comment.

### **SPECIFIC COMMENTS**

**Comment 1:** The Response adequately addresses the comment.

**Comment 2:** The Response adequately addresses the comment.

**Comment 3:** The Response adequately addresses the comment.

**Comment 4:** The Response is not adequate. The Response states that Biointrusion barriers will not be effective over long periods of time. The Response offers no data or references that support the claim, nor does the Response explain why a failure of Biointrusion barriers could not be detected and repaired during normal post closure care cover inspection and maintenance activities. Modify the Response to provide detailed justification for excluding Biointrusion barriers from the cover design.

**Comment 5:** The Response is partially adequate and requires additional follow-up. The Comment suggested a technical change to the text. The Response acknowledged the Comment and stated that the suggested change would be made. Submit the modified text.

**Comment 6:** The Response adequately addresses the comment.

**Comment 7:** The Response does not adequately address the comment. The Comment suggested two technical changes to a Construction Specification. The Response acknowledged the Comment but did not state whether the suggested changes would be made. Modify the Response to indicate whether the suggested change has been accepted and if so please provide the modified Construction Specification.

**Comment 8:** The Response adequately addresses the comment.

### **MISCELLANEOUS COMMENTS**

**Comment 1:** The Response adequately addresses the comment.

**Comment 2:** The Response adequately addresses the comment.

**Comment 3:** The Response adequately addresses the comment.