



TO: Barbara
Hoditschek

FROM: Denise
GELSTON

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Including
this one 3

DATE:
6/6/94

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■ COMMENTS:

Barbara - as per our meeting on 6/2/94,
here are our questions regarding
the RCRA permit application for
the proposed Gandy Landfill. Any
guidance you or your staff can provide
will be greatly appreciated.

At your convenience, perhaps a
conference call can be established
to go over our questions (people
other than me need to hear the
answers). Please call when you're
ready.

Thanks! Let me know if you
have any questions

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Denise
Gelston

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Stoller Questions on the Gandy Landfill Project

1. We are considering proposing an exemption from the requirements to install a double liner and leachate collection and removal systems because of the depth to groundwater and other characteristics at the proposed site. Although we believe the regulations allow for this (reference 40 CFR 264.301(b)), we would like to get a sense of whether NMED would even consider this. What kind of alternative design and operating practices would be acceptable?
2. If the facility were to pursue an exemption from the double liner and leachate collection and removal systems, would we still need to address:
 - (a) the action leakage rate in the permit application (40 CFR 264.302)?
 - (b) the response action plan in the permit application (40 CFR 264.304)?
 - (c) a construction quality assurance plan (40 CFR 264.19)?
3. We are also considering proposing a groundwater monitoring waiver (40 CFR 264.90(b)). Would some other kind of monitoring be required? If so, what kinds?
4. We are considering including treatment such as volume reduction or some kind of solidification. This is just for your information.
5. We have attempted to obtain a floodplain map for the area in which the facility is located. We have received a letter from the flood plain administrator for Chaves County indicating that no map has been printed because the area is one of minimal flood hazard. Will this meet the requirement in 40 CFR 270.14(b)(11)(iii)?
6. What modeling is required? Assuming we will be modeling contaminant transport, what is the objective of the modeling exercise (i.e. travel time of contaminant released from the landfill to the water table [or in our case a given depth such as 1,000 feet])?
7. How do we model a contaminant release if that is the scenario of interest? For example, what is the size of the release and the time period over which the release occurs? Examples would be a small leak occurring at one point in time.
8. What is the period of interest for the simulation (100 years, 1,000 years)?
9. How should we model contaminant transport? A worst case approach would assume conservative contaminant transport with water (such as would occur with an ion like chloride). Do we want to adopt this approach? Also, since we have a mixture of waste (each with its own transport properties) to model each contaminant individually would become time consuming. So even if we don't take the most conservative approach we need to make assumptions about the waste form. Does NMED have any preference?
10. Will NMED review (and accept) our geologic model prior to modeling? This is very important since the modeling results will be entirely dependent on the geologic model.
11. Does NMED have any examples of acceptable modeling studies?

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12. Does NMED have any preference concerning models (we are considering SUTRA and VS2DT)?
13. Does NMED have any guidance regarding exposure information required in 40 CFR 270.10(j)?
14. The site characterization program at the Gandy site will involve a final drilling/coring campaign in early summer. Does NMED want to review and approve the drilling pattern (drill hole density) for this program?
15. Will NMED require electric/gamma logs of each drill hole as a record - or will a field lithology sheet suffice?
16. Does the state have any preference as to the type of analyses (in situ vs. laboratory) used to determine geotechnical parameters (i.e. saturated hydraulic conductivity, dry bulk density, porosity, etc.)?
17. Will NMED require splits of drill cuttings and cores collected during this program?