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# INFORMATION NEWSLETTER

SEPTEMBER 1994

Increasingly there is a need in New Mexico and elsewhere to safely recycle, treat, and dispose of hazardous waste. Gandy, Marley Inc. is committed to serving that need in a safe, environmentally responsible manner. We believe that by developing a treatment, storage, and disposal (TSD) site today, we will ensure a cleaner, safer environment for future generations.

For the past three years, Dale Gandy and Bob Marley, lifelong residents of Lea and Chavez Counties, have been conducting site selection and characterization activities for a TSD facility. Our major concern in site selection was to identify any potential impact the facility may have on the ecology of the area including, but not limited to, surface and groundwater resources. Extensive testing has proven the selected site an excellent location for the facility due to the following documented facts:

- There is no permanent surface water drainage within 25 miles. The proposed site is located outside of any groundwater basin, and drilling to depths of over 800 feet has shown the proposed location not to be above any water table.
- The nearest surface water is the Pecos River, approximately 30 miles to the west.
- The proposed site is situated within thick, Triassic age clays away from any aquifers.

As a result of our extensive site characterization study, we are confident that the physical and geographic characteristics of the proposed site will assure long-term isolation of any hazardous wastes from the environment. In addition to these favorable geologic site

characteristics, the proposed facility location is in a remote, unpopulated portion of southeastern New Mexico, on private land, where it will not disturb the public. (See attached map.)

The New Mexico Environment Department (NMED) will be involved in overseeing and approving the site selection, and the design, construction, operation, closure, and long-term maintenance of our TSD facility. Gandy, Marley Inc. will work with the governing federal and state agencies to protect the public and the environment.

The facility, because of the types of wastes it will accept, is governed by the federal Resource Conservation and Recovery Act (RCRA) passed by congress in 1976. RCRA created a regulatory program designed to manage various solid wastes. Congress significantly strengthened the RCRA statute with the enactment of the Hazardous and Solid Waste Amendments of 1984 (HSWA). These amendments altered the solid waste program by creating a ban on the land disposal of hazardous waste that had not been treated in certain prescribed ways and by placing stringent permit requirements on all land disposal facilities. For this reason and due to Gandy, Marley Inc.'s commitment to protect the environment, all untreated hazardous waste that is subject to land disposal restrictions will be strictly prohibited from disposal at our facility. In addition, this facility will not accept transuranic or radioactive waste. The facility will be constructed and operated in accordance with, and in many cases above and beyond the scope of applicable rules and regulations. Protection of human health and the environment is, and will continue to be, our first priority.

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Under RCRA, the Environmental Protection Agency (EPA) is responsible for the regulation of solid and hazardous waste. In New Mexico, RCRA is administered by the NMED. The EPA established the guidelines we will use to complete the permit application necessary to proceed with the operation of the facility. Our anticipated date for submitting the permit application to the NMED is October 20, 1994.

The RCRA permit application will include requests for the following:

- **Treatment.** To best service the needs of New Mexico we believe some waste treatment capabilities will be necessary. We are committed to identifying and employing the best available technologies to support the treatment options. Three treatment processes are being evaluated at this time: recycling, solidification, and volume reduction. Recycling will maximize the re-use of recoverable resources. Solidification will be used to ensure that no free liquids are placed in the landfill. Volume reduction will be used to ensure compliance with NMED requirements for placing containers in landfills.

We believe that providing the best available treatment technologies will be of significant benefit to hazardous waste generators in New Mexico and the surrounding area.

- **A container storage area.** The container storage area will include secondary containment to help ensure no hazardous waste is accidentally released to the environment. This area will only be used in situations where off-normal operational conditions prevent timely treatment or disposal of waste; it will not be used for long-term storage. The area will be monitored in accordance with the regulations.
- **Tank storage.** Storage tanks will be used to accumulate bulk liquids prior to treatment. The tank system will include impermeable floors, release detection, and secondary containment. All other applicable regulatory requirements will be met to prevent the migration of liquid from the tank system.

- **Land disposal.** We are preparing a design that is in accordance with the RCRA regulations and is scientifically engineered to protect human health and the environment.

In addition to these permit requests we are continuing the investigation of other major applicable topics including, but not limited to, floodplains, threatened and endangered species, air quality, and worker safety.

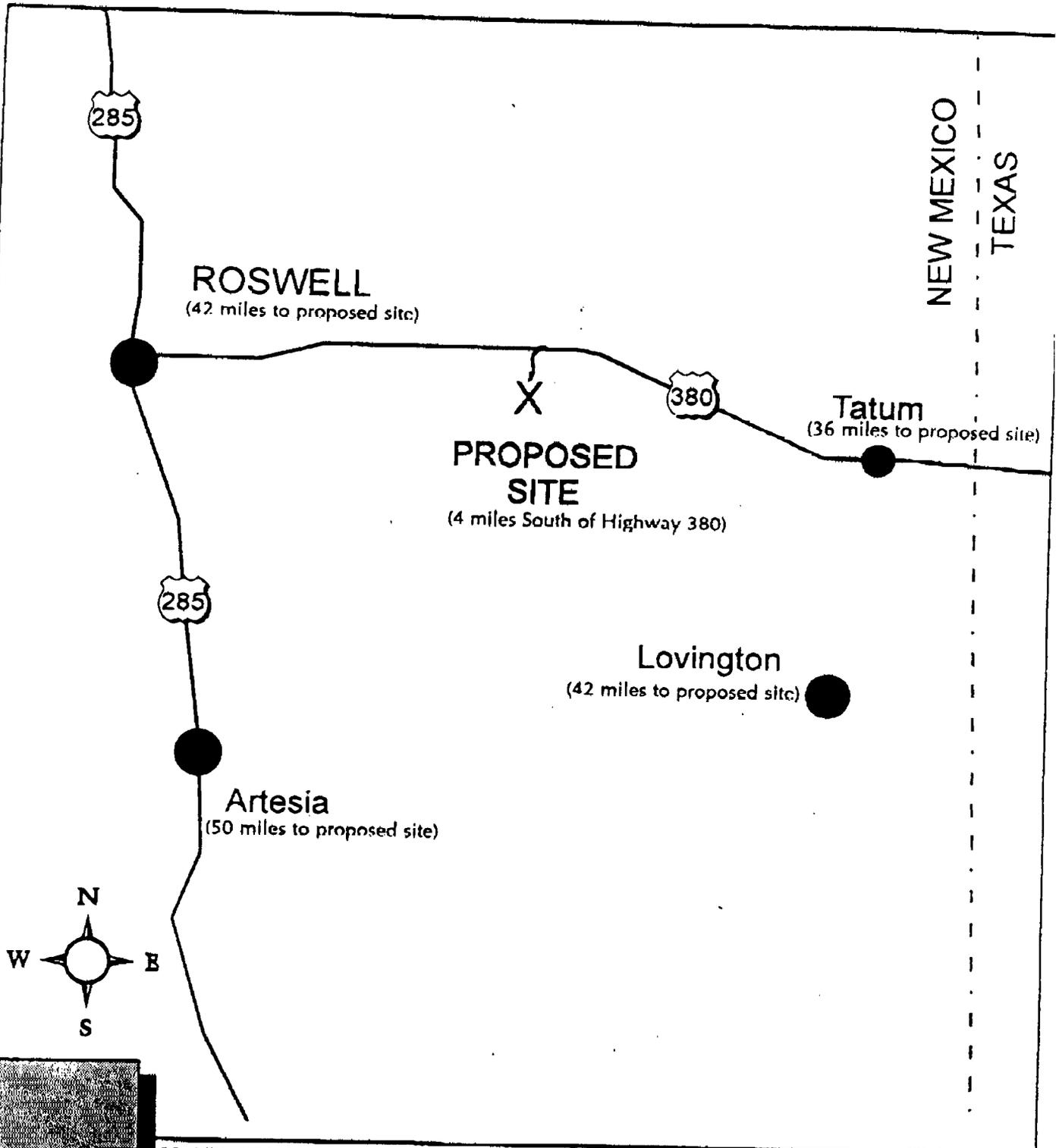
Transportation safety is very important to us and because of that we are prepared to comply, above and beyond with the established requirements. The U.S. Department of Transportation has established strict regulatory requirements relating to the types of containers, labeling, and transport vehicles used for all hazardous waste transportation. In addition, all drivers involved with this facility will be certified in the required specialized training in hazardous materials transportation and emergency response procedures.

Gandy Marley Inc. is prepared and looking forward to presenting and discussing the project, and what this facility hopes to accomplish with local officials and other interested parties. In addition, the Gandy Marley team will start making technical and economical presentations in early November.

We believe in the integrity of this facility. The facility will be an asset to the State of New Mexico, as it has the potential to provide economic advantages to our existing industrial base, attract new industries, and be of benefit to the local economy. As good neighbors and citizens, living in the very community in which the facility is to be built, we are committed to developing a scientifically engineered and environmentally safe facility. To this end we will work with the regulators and the public as closely as possible. If you have any questions or comments regarding the facility or our work, please do not hesitate to call me at (505) 396-4948, Ken Schultz at (505) 275-5750, or call Trey Greenwood of the S.M. Stoller Corporation at (505) 885-0172.

-Dale Gandy

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**INDEX MAP - PROPOSED SITE**  
**SOUTH EAST NEW MEXICO**  
GANDY MARLEY INC. PROJECT