

Administrative Review

Part B Application

Facility: TRIASSIC PARK WASTE DISPOSAL FACILITY

Unit: 3

Date of Review: November 1994

Name of Reviewer: C.A.

New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
RCRA Permti Program
Standard Operating Procedure
Chapter 5, Checklist B
Page 1 of 18

GENERAL PERMIT REQUIREMENTS

FOR PART B APPLICATIONS

ADMINISTRATIVE REVIEW CHECKLIST

FACILITY: TRIASSIC PARK WASTE DISPOSAL FACILITY

UNIT: _____

REVIEWER: CORNELIUS AMINDYAS

DATE: NOVEMBER 1994 - JAN. 95

Administrative Review
 Part B Application
 Facility: TRASSIC PARK
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 2 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(1)	General description of the facility or unit.	<u>Y</u>	<u>Part B Application Section 2</u>	
§ 270.14(b)(2)	Chemical and/or physical analysis which must be known to treat/store/dispose of waste.	<u>Y</u>	<u>"</u>	<u>Under Waste Management Section 5 pp. 5-1 to 5-9</u>
§ 270.14(b)(3)	Waste analysis plan required to comply with:	<u>Y</u>	<u>-1-</u>	<u>Section 5 pp. 5-1 to 5-9</u>
§ 264.13(b)	Develop and follow a written waste analysis plan.	<u>Y</u>	<u>-1-</u>	<u>will use EPA SW-345 procedure</u>
§ 264.13(c)	Off-site waste analysis requirements.	<u>Y</u>	<u>"</u>	<u>req prior to disposal</u>
§ 270.14(b)(4)	Security requirements under § 264.14	<u>Y</u>		<u>Section 6.1</u>
§ 270.14(b)(5)	General inspection schedule in compliance with §264.15(b).	<u>Y</u>		<u>Section 6.2</u>
Specific requirements of inspection schedule: (continued)				
§ 264.174	Container inspections	<u>"</u>	<u>Section 2.1</u>	<u>-1-</u>
§ 264.193(i)	Tank inspections			

[Handwritten mark]

Administrative Review
 Part B Application
 Facility: TR Park
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 3 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 264.195	Overfill control inspections	<u>Y</u>	<u>Section 2</u>	_____
§ 264.226	Surface impoundments monitoring and inspection	<u>Y</u>	<u>Section 2.6 a</u>	<u>Section 6.2.3</u>
§ 264.254	Waste Pile monitoring and inspection	<u>N/A</u>	<u>N/A</u>	<u>Will not be managing waste piles</u>
§ 264.273	Land treatment design and operating requirements	<u>Y</u>	<u>Section 2.2.3</u>	_____
§ 264.303	Landfill monitoring and inspection	<u>Y</u>	<u>Section 2.5 b</u>	<u>Section 6.2.2</u>
§ 264.602	Miscellaneous units	<u>N/A</u>	_____	_____
§ 264.1033	Process vent standards	<u>N/A</u>	_____	_____
§ 264.1052	Equipment leak air emission standards	<u>Y</u>	_____	_____
§ 264.1053	Compressor standards	<u>Y</u>	_____	_____
§ 264.1058	Standards for pumps, valves, pressure relief devices flanges and connections.	<u>Y</u>	_____	_____
§ 270.14(b)(6)	Justification of any waiver requests for § 264 Subpart C.	<u>Y</u>	_____	<u>for GW monitoring Denied.</u>

Administrative Review

Part B Application

Facility: _____

Unit: _____

Date of Review: _____

Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 4 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(7)	Requirements for a contingency plan under § 264 Subpart D with specific requirements under:	<u>Y</u>	<u>Sections 7.1 to 7.4.7.</u>	
§ 264.227	Surface impoundment emergency repairs.	<u>Y</u>		
§ 270.14(b)(8)	Description of procedures and equipment used to:			
	§ 270.14(b)(8)(i) prevent hazards in unloading operations (ramps, and special forklifts)	<u>Y</u>		
§ 270.14(b)(8)(ii)	runoff prevention with berms, trenches, and dikes.	<u>Y</u>	<u>Sections 4.2 & 6.4.2</u>	
§ 270.14(b)(8)(iii)	Prevent contamination of water supplies	<u>Y</u>		
§ 270.14(b)(8)(vi)	mitigate effects of equipment failure and power outages	<u>Y</u>	<u>Section 7</u>	<u>Under Contingency Plan</u>
§ 270.14(b)(8)(v)	prevent undue exposure of personnel by use of personal protective equipment (PPE)	<u>Y</u>		

Administrative Review

Part B Application

Facility: _____

Unit: _____

Date of Review: _____

Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 5 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(8)(vi)	prevent release to the atmosphere	<u>Y</u>	_____	_____
§ 270.14(b)(9)	description of controls of ignitable/reactive waste with specific requirements of: § 264.17 separated and protected from ignition and reaction	<u>Y</u>	<u>Section 6.5</u>	_____
§ 264.17(c)	documentation of compliance with § 264.17	<u>Y</u>	_____	_____
§ 270.14(b)(10)	traffic pattern studies that estimate volume and number of types of vehicles	<u>Y</u>	_____	_____
	identify turn lanes	<u>N/A</u>	_____	_____
	identify traffic/stacking lanes	<u>Y</u>	_____	_____
	describe road surface	<u>Y</u>	_____	_____
	describe road load bearing capacity	<u>Y</u>	_____	_____
	identify type and number of traffic controls	<u>N/A</u>	_____	_____

Administrative Review
Part B Application

Facility: _____
Unit: _____
Date of Review: _____
Name of Reviewer: _____

New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
RCRA Permti Program
Standard Operating Procedure
Chapter 5, Checklist B
Page 6 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(11)	Facility/unit location information:			
	(i) sisemic standard (264.18(a))	N/A		Chaves County is outside 40 CFR counties required to perform this
	(ii) Sisemic standard must show:			
	(A) no fault within 3,000' with displacement in Holocene (10,000 yrs)	N/A		
	Published geologic studies	Y	Section 3.5	
Aerial reconnaissance of a five (5) mile radius from the facility/unit	Y	Appendix B index		
Analysis of aerial photographs covering 3,000' radius from the facility/unit	Y			
Walking studies of the radius if needed	N/A			

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 7 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
	(B) Faults including lineations with Holocene displacement within 3,000' exist then no faults within 200'	<u>N/A</u>	_____	<u>no faults present</u>
	(iii) 100 year flood plain information	<u>N/A</u>	_____	<u>not in 100 yr ft.</u>
	(iv) If in the 100 year flood plane:			
	(A) Engineering analysis of hydrostatic forces expected in a 100 year flood.	<u>N/A</u>	_____	_____
	(B) Structural engineering studies for flood protection to prevent washout.	<u>N/A</u>	_____	_____

Administrative Review

Part B Application

Facility: _____

Unit: _____

Date of Review: _____

Name of Reviewer: _____

New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
RCRA Permti Program
Standard Operating Procedure
Chapter 5, Checklist B
Page 8 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
	(C) Detailed description of procedures to remove hazardous waste to safety before flood reaches the waste:	<u>N/A</u>	_____	_____
Specific requirements to include:				
	(1) timing of removal	_____	_____	_____
	(2) Location to be moved to	_____	_____	_____
	(3) dedicated equipment and personnel to ensure removal	_____	_____	_____
	(4) Potential for accidental discharge during movement.	_____	_____	_____
	(v) Plan to show how the facility will be brought into compliance with § 264.18(b). (Flood control)	<u>✓</u>	_____	_____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(12)	Outline of training program introductory/continuing in accordance with § 264.16.	<u>Y</u>	<u>Section 8 of 8-1 to 8.3.3</u>	
	Must be designed to meet § 264.16(a)(3) job task descriptions.	<u>Y</u>	<u>Section 8</u>	
§ 270.14(b)(13)	Closure plan designed to meet:	<u>Y</u>	<u>Section 9</u>	
§ 264.112	Amendment to closure plan	<u>Y</u>	<u>Section 9</u>	
§ 264.118	Post closure plan amendment	<u>Y</u>	<u>p. 9-10 Section 9.6</u>	
§ 264.178	containers	<u>Y</u>	<u>§ 9.2.4.3 2 Section 2.2</u>	
§ 264.197	tanks	<u>Y</u>	<u>§ 9.2.4.3 1 Section 2.3</u>	
§ 264.228	surface impoundments	<u>Y</u>	<u>§ 9.2.2 1 Section</u>	
§ 264.258	waste piles	<u>N/A</u>		
§ 264.280	land treatment	<u>N/A</u>		
§ 264.310	landfills	<u>Y</u>	<u>§ 9.2.6</u>	
§ 264.351	incinerators	<u>N/A</u>		
§ 264.601	miscellaneous units	<u>N/A</u>		

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 10 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 264.603	<i>post closure</i> requirements by the Secretary	<u>Y</u>	<u>Section p. 9-3</u>	_____
§ 270.14(b)(14) § 264.119	Disposal units must comply with	<u>Y</u>	_____	_____
§ 270.14(b)(15) § 264.142	Closure cost estimates	<u>Y</u>	<u>69.6</u>	_____
§ 264.143	Financial Assurance	<u>Y</u>	<u>69.9</u>	_____
§ 270.14(b)(16) § 264.144	Post Closure Care Cost Estimate	<u>Y</u>	_____	_____
§ 264.145	Post closure care financial assurance	<u>Y</u>	<u>Tables 9-1 to 9-3.</u>	_____
§ 270.14(b)(17) § 264.147, 264.147(a), 264.147(b), 264.147(c)	Copy of insurance policy	<u>N</u>	_____	_____
§ 270.14(b)(18) § 264.149 § 264.150	State financial mechanism	<u>N</u>	_____	_____

Administrative Review

Part B Application

Facility: _____

Unit: _____

Date of Review: _____

Name of Reviewer: _____

New Mexico Environment Department
Hazardous and Radioactive Materials Bureau

RCRA Permti Program
Standard Operating Procedure

Chapter 5, Checklist B

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(19)	Topographic Map Requirements: 1,000' around the facility/unit with at least a 1" (2.5 cm) = 200' (61 meters) scale and a contour interval of at least 5' (1.5 meters) if the relief is greater than 20' (6.1 meters) or 2' (.6 meters) if less than 20' (6.1 meters).	<u>N</u> <u>NO</u>	_____	_____
	(i) map scale and date	<u>1:24000</u> <u>N/A</u>	_____	_____
	(ii) 100 year flood plain	<u>N</u>	_____	_____
	(iii) surface water locations	<u>N/A</u>	_____	_____
	(iv) surrounding land use	<u>Y</u> <u>none</u>	_____	<u>map provided</u>
	(v) wind rose	<u>Y</u>	_____	<u>Figures 2-1 thru Figure 2-12.</u>
	(vi) map orientation (N)	<u>Y</u>	_____	_____
	(vii) legal boundaries	<u>Y</u>	_____	_____
	(viii) access controls	<u>Y</u>	_____	_____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 12 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
	(ix) injection/withdrawal well location on and off-site	<u>Y</u>	_____	_____
	(x) Buildings: TSD Operations	<u>Y</u>	_____	_____
	Run-on/run-off control	<u>Y</u>	_____	_____
	Sewer lines: storm	<u>Y N/A</u>	_____	_____
	sanitary	<u>N/A</u>	_____	_____
	Process	<u>N/A</u>	_____	_____
	Loading/unloading areas	<u>Y</u>	<u>Section 6.4.1 p 6-9. & § 6.2 p 5-7</u>	_____
	Fire control information	<u>Y</u>	<u>Section 6.3.4. p 6-8</u>	_____
	(xi) Barriers for drainage or flood control	<u>Y</u>	<u>P 6-10</u>	_____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 13 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
	(xii) Location of operational units within the HWM Facility site showing where hazardous waste will be treated /stored/disposed of including equipment cleanup.	<u>Y</u>	<u>Fig 2-1</u>	_____
§ 270.14(b)(20)	Compliance with other federal laws and regulations as required under 270.3:			
	(a) Wild and Scenic Rivers Act	<u>Y</u>	_____	_____
	(b) National Historic Preservation Act	<u>Y</u>	_____	<i>Information provided in response to NOJ of 12/11</i>
	(c) Endangered Species Act	<u>Y</u>	_____	
	(d) Costal Zone Management	<u>N/A</u>	_____	_____
	(e) Fish and Wildlife Coordination Act	<u>Y</u>	_____	<u>in NOJ response.</u>
	(f) Executive Orders	<u>?</u>	_____	_____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 14 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(b)(21)	Compliance with Land Disposal Restrictions under § 268.5 and 268.6	<u>Y</u>	_____	_____
§ 270.14(c)	Additional information as required under 264.90(b) ground water:			
§ 270.14(c)(1)	Ground water monitoring under § 265.90 through 265.94	<u>Y</u>	<u>Section 3</u>	_____
§ 270.14(c)(2)	Identification of uppermost aquifer, ground water flow rate and direction	<u>Y</u>	<u>3</u>	_____
§ 270.14(c)(3)	A topographic map required under 270.14(b)(19) that identifies proposed point of compliance as required by 264.95.	<u>N</u>	<u>Section 3-1</u>	_____
	Proposed location of ground water monitoring wells under 264.97	<u>Y</u>	<u>Section 3-8</u>	_____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 15 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(c)(4)	description of plume of contamination that has entered the ground water from a regulated unit at the time the application was submitted.	<u>N/A</u>	_____	_____
	(i) extent of plume indicated on topographic map required by 270.14(b)(19)	<u>N/A</u>	_____	_____
	(ii) identification of constituents and concentration for appendix IX of § 264	<u>Y</u>	<u>Section 318.2</u>	<u>provided and not monitoring now</u>
§ 270.14(c)(5)	Detailed plan and an engineering report describing proposed ground water monitoring program under § 264.97.	<u>Y/A</u>	_____	<u>and Section 414.5 Contaminant Transport</u>
§ 270.14(c)(6)	If no releases are detected at date of submittal then follow § 264.98	<u>N/A</u>	_____	<u>under corrective action</u>

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 16 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
	(i) List of proposed: indicator parameters, _____ waste constituents, _____ reaction products _____ that can provide reliable indication of presence of hazardous constituents in the ground water.	Y Y Y	Section 5 W.M.P. _____ _____	_____ _____
	(ii) Proposed ground water monitoring system	Y _____	_____ _____	_____ _____
	(iii) Background values for each proposed monitoring parameter	Y _____	_____ _____	_____ _____
	(iv) Description of proposed sampling and analysis to be used Statistical comparisons to be used	Y Y _____	Section 5 W.M.P. _____ _____	_____ _____

Administrative Review
 Part B Application
 Facility: _____
 Unit: _____
 Date of Review: _____
 Name of Reviewer: _____

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 18 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.16(f)	New tank installation as required by § 264.192(b) and (c)	<u>Yes</u>	_____	_____
§ 270.16(g)	Detailed description of the secondary containment as required by § 264.193 (a) through (f)	<u>Yes</u>	_____	_____
§ 270.16(h)	Request for variance under § 264.193	<u>Yes</u>	_____	_____
§ 270.16(i)	Description of procedures and controls to prevent spills and overflows 264.194(b)	<u>Yes</u>	_____	_____
§ 270.16(j)	Detailed description of compliance with 264.198 and 264.199 for tanks containing reactive/ignitable waste.	<u>Yes</u>	_____	_____

Administrative Review

Part B Application

Facility: TRIASSIC PARK

Unit: _____

Date of Review: Fall 1994

Name of Reviewer: CAA

New Mexico Environment Department
 Hazardous and Radioactive Materials Bureau
 RCRA Permti Program
 Standard Operating Procedure
 Chapter 5, Checklist B
 Page 17 of 18

REGULATORY CITATION(S):	REQUIREMENT:	PROVIDED: Yes/No/N.A.	LOCATION:	COMMENTS:
§ 270.14(c)(7)	If a release is detected at the point of compliance then § 264.99 requires corrective action to be made under 264.100	<u>Yes</u>	_____	_____
§ 270.15	Container Storage Information	<u>Y</u>	_____	_____
§ 270.16	Tank Storage Information			
§ 270.16(a)	Written assessment of tank, structural integrity and suitability submitted by an independent, certified, registered professional engineer	<u>N</u>	_____	_____
§ 270.16(b)	Dimensions and capacity of each tank	<u>Yes</u>	_____	_____
§ 270.16(c)	Feed system description	<u>Yes</u>	_____	_____
§ 270.16(d)	Piping diagram	<u>NO</u>	_____	_____
§ 270.16(e)	External corrosion protection description as required by § 264.192(a)(3)(ii)	<u>Yes</u>	_____	_____