

95 AR #11

RFA May 24, 1995

EXECUTIVE SUMMARY

The New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau, Technical Compliance and Permitting Sections conducted a Visual Site Inspection (VSI) of the proposed Triassic Park Hazardous Waste Disposal Facility on May 19, 1995. The VSI is part of the Resource Conservation and Recovery Act (RCRA) Facility Assessment and is a RCRA Permit requirement. The proposed facility, located approximately 4 miles south of U.S. Highway 380 and 42 miles east of Roswell in eastern Chaves County, is 480 acres in size and is currently rangeland. Construction for the disposal facility has not begun yet. The owner/operator is Gandy Marley, Inc. of Tatum, New Mexico.

When the facility is constructed, the Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), identified by NMED during a Preliminary Review done in April 1995 and a VSI conducted in May 1995, will be:

- SWMU 1 - Drum handling facility
- SWMU 2 - Roll off temporary storage area
- SWMU 3 - Liquid waste receiving and storage area
- SWMU 4 - Stabilization facility
- SWMU 5 - Surface impoundment
- SWMU 6 - Landfill
- SWMU 7 - Truck wash facility
- SWMU 8 - Maintenance shop
- SWMU 9 - Chemical laboratory
- SWMU 10 - Stormwater retention basin
- SWMU 11 - Future debris encapsulation facility
- SWMU 12 - Future waste processing area
- SWMU 13 - Untarpping, sampling, and weigh scales area
- SWMU 14 - Truck staging area

- AOC 1 - Roads
- AOC 2 - Clay processing area
- AOC 3 - Dust control/clay processing water basin

Based on NMED's evaluation of the above future SWMUs and AOCs, no additional action is recommended until the facility is constructed and in operation. At that time the potential SWMUs and AOCs should be reevaluated. The recommendations and conclusions drawn from the RFA are described in the following pages.

CHAPTER 1

INTRODUCTION

1.1 Purpose of The RCRA Facility Assessment

The purpose of the RCRA Facility Assessment (RFA) is to identify potential or known releases from SWMUs or AOCs and to determine if further investigation is needed. Determinations regarding the likelihood of potential releases is made through a Preliminary Review (PR) and a Visual Site Inspection (VSI). A PR was conducted prior to and concurrent with the VSI. During the PR, efforts were focused on collecting facility waste management/generation process information, identifying SWMUs and other potential releases of concern, and gathering unit characteristics including operational history.

The VSI was conducted by the following Hazardous and Radioactive Materials Bureau (HRMB) personnel:

- o Cornelius Amindyas, HRMB RCRA Permitting Section
- o Teri Davis, HRMB RCRA Technical Compliance Section
- o Bob Sweeney, HRMB RCRA Technical Compliance Section

The following personnel also participated in the VSI:

- o Mr. Dale Gandy, Gandy Marley, Inc. (GMI)
- o Mr. Bill Marley, GMI
- o Mr. Larry Gandy, GMI

1.2 Procedures

The RFA was conducted by HRMB in accordance with the procedures outlined in EPA's RFA guidance document (EPA 1986). The PR portion of the RFA, done in HRMB's offices in Santa Fe in late April 1995, included a review of:

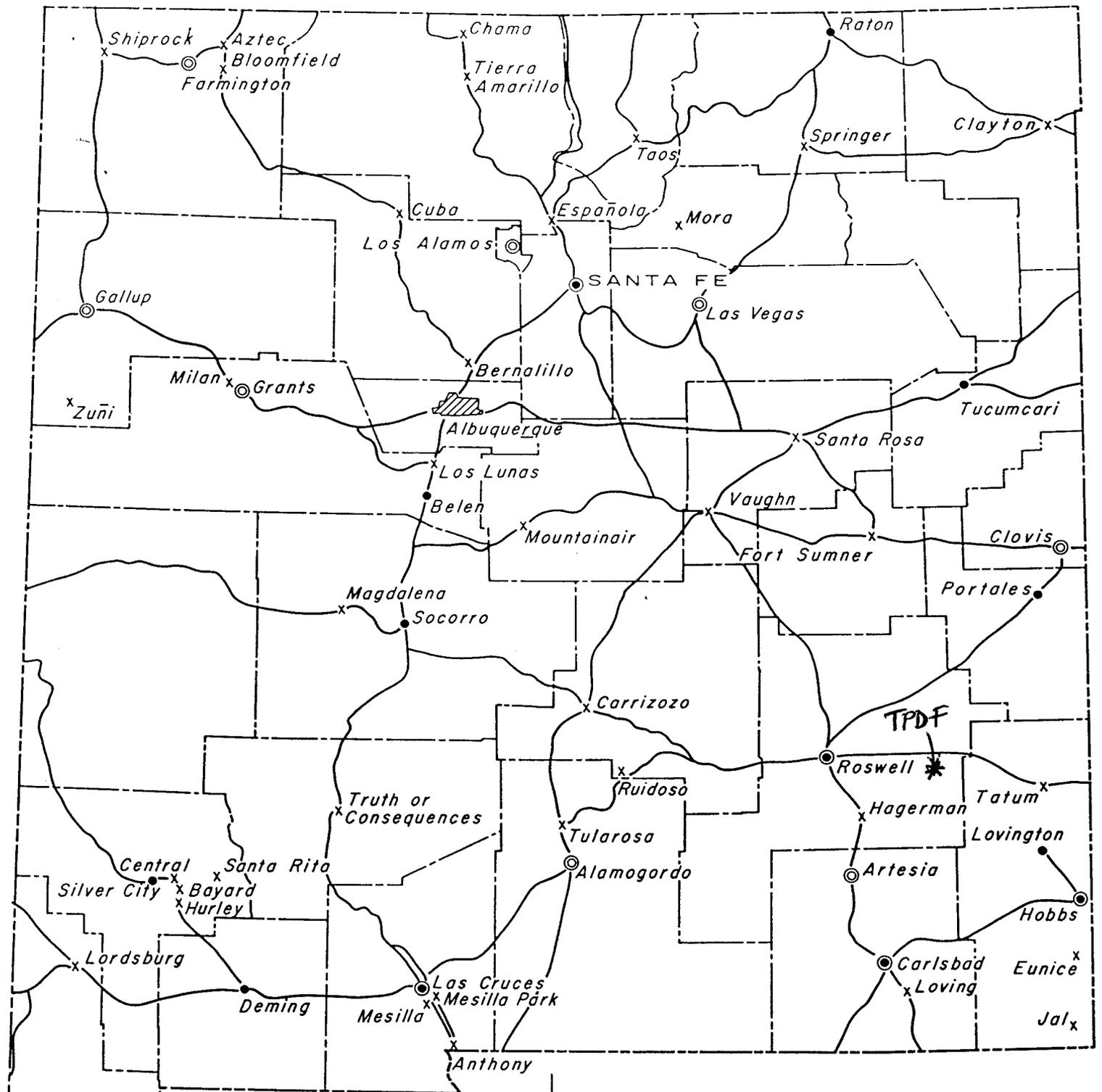
- 1) the documents submitted by GMI for the Triassic Park Hazardous Waste Disposal Facility (TPDF) and
- 2) information on the geology and hydrology of the TPDF area available in the NMED & HRMB Libraries.

NMED used the information collected during the PR to prepare a list of potential SWMUs at the facility.

The VSI part of the RFA was conducted on May 18 & 19, 1995 on August 4, 1994, at and near the TPDF facility. When NMED personnel arrived at the facility they met with GMI personnel to

explain the purpose of the visit, review the RFA process briefly, discuss the PR, and resolve questions concerning GMI's proposed hazardous waste management practices. The VSI participants are listed above in Section 1.1.

To understand GMI's proposed waste management practices, HRMB personnel inspected the entire facility, including the 14 SWMU and 3 AOC locations identified during the PR. The VSI and subsequent follow-up meetings and telephone conversations provided the information needed to complete the RFA Report. Photographs of the proposed facility's location, and the surrounding area, were taken during the VSI and are included in Appendix A.



POPULATION
 x 1-5,000
 • 5-10,000
 ⊙ 10-25,000
 ⊛ 25-50,000
 ▨ 201,189

TPDF: PROPOSED SITE OF
 * TRIASSIC PARK WASTE DISPOSAL FACILITY

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
 FACILITIES OF INTEREST - OCTOBER 1995



CHAPTER 8

REFERENCES

New Mexico Hazardous Waste Management Regulations, 20 NMAC 4.1, September 1994.

RCRA Permit Application for the Triassic Park Waste Disposal Facility, and Appendices, November 1994, prepared by The S.M. Stoller Corporation for Gandy Marley, Inc.

U.S. Environmental Protection Agency, Office of Solid Waste. RCRA Facility Assessment Guidance, EPA/530-SW-86-053, October 1986.

U.S. Environmental Protection Agency, Office of Solid Waste. "Liners and Leak Detection Systems for Hazardous Waste Land Disposal Units", 57FR3462 (January 29, 1992), (codified at 40 CFR Parts 260, 264, 265, 270, and 271).

U.S. Environmental Protection Agency, Office of Solid Waste. RCRA Ground-Water Monitoring: Draft Technical Guidance, EPA/530-R-93-001, November 1992.