

MEMORANDUM

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TO: Cornelius Amindyas, RCRA Permitting Program
FROM: Bob Sweeney, Technical Compliance Program
DATE: October 16, 1995
SUBJECT: Adequacy of the Gandy Marley Inc. "Response to Notice of Deficiency for Triassic Park Part B Permit Application" dated September 29, 1995.

My review of the Gandy Marley Inc. (GMI) reply to the Hazardous and Radioactive Materials Bureau's (HRMB) August 8, 1995 Notice of Deficiency (NOD), for technical comments on the Permit Application's Table of Contents, Section 1, and Section 2-only, indicates the following:

- a) Their response to Comments #24 & 63 is that GMI intends to accept liquid wastes containing 50 parts per million, or less, of PCBs. Does NMED regulate PCBs? What other agencies should be involved in this?
- b) GMI's replies to Comments #25-28, 31-34, 39, 43, 45, 46, 53, and 68-71 (all concerning the landfill) will require evaluation of the "Waiver Justification Document" (included with their September 29 Response), examination of "final" plans for the landfill (not yet submitted), and discussions with NMED's Solid Waste Bureau prior to determining adequacy.
- c) GMI's response to Comment #36, concerning removal of any gas generated in the landfill, is inadequate.
- d) The adequacy of GMI's reply to Comments #62 & 72 will depend on the "final" design of the evaporation pond (not yet submitted).
- e) All other responses to NOD Comments on the Permit Application's Table of Contents, Section 1, and Section 2 are adequate.

I will send you additional memoranda as my review of the NOD Response proceeds.