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Triassic Park*

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M E M O R A N D U M

TO: Cornelius Amindyas, RCRA Permitting Program

THROUGH: Teri Davis, RCRA Technical Compliance Program Supervisor
and Ron Kern, RCRA Technical Compliance Program Manager

FROM: Bob Sweeney, RCRA Technical Compliance Program

DATE: November 13, 1995

SUBJECT: **Potential Solid Waste Management Units and Areas of Concern, Triassic Park Hazardous Waste Disposal Facility**

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The following list of potential Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) is for the proposed HSWA Permit, Module IX of the Gandy Marley, Inc. RCRA Permit. To determine which units should be SWMUs and which should be AOCs, I used the Permit Application, the May 1995 RCRA Facility Assessment (RFA), and the following definitions (from the EPA Region VI Corrective Action Training Workshop):

Solid Waste Management Unit - any discernible waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste.

Area of Concern - any discernible unit or area which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time.

Potential SWMUs (14):

- 1) the drum handling facility
- 2) the roll off temporary storage area
- 3) the liquid waste receiving and storage area
- 4) the stabilization facility
- 5) the surface impoundment
- 6) the landfill
- 7) the truck wash facility **

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- 8) the maintenance shop **
- 9) the chemical laboratory **
- 10) the stormwater retention basin **
- 11) the untarping, sampling, and weigh scales area **
- 12) the truck staging area **
- 13) the future debris encapsulation facility **
- 14) the future waste processing area **

Potential AOCs (3):

- 1) roads, including those leading to the facility
- 2) the clay processing area
- 3) the dust control/clay processing water basin

The SWMUs marked with ** were not included in Gandy Marley's Permit Application. This was noted in my August 2, 1995 NOD Comments and included in Gandy Marley's September 29, 1995 Reply. They reasoned that "Because the facility has not yet been constructed or operated, there are no SWMUs at this time." I agree, and for this reason have referred to all SWMUs and AOCs as potential. When Gandy Marley, Inc. is ready to begin operations at the facility, an RFA update should be done and the potential SWMUs and AOCs reevaluated.

cc: Barbara Hoditschek, RCRA Permitting Program Manager
Ron Kern, RCRA Technical Compliance Program Manager
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