#3

Triassic Park HELP Modelling Procedure

To: Rich Stafford

From: Bob Sweeney

Date: January 23, 1996

Rich - In reply to your DG message of 22JAN96 regarding the HELP Modelling Procedure for the Triassic Park Hazardous Waste Disposal Facility -

a) I've reviewed the procedure modified for this application and it looks fine to me.

b) The term "RCRA specified liner" is used by the Hazardous and Radioactive Materials Bureau when referring to a liner at any unit or facility regulated under Subtitle C of RCRA. 20 NMAC 4.1 Subpart VIII, 40 CFR 268.5(h)(2)(ii) allows disposal of haz. waste in a permitted landfill if the landfill is in compliance with the requirements of Subpart F of Part 264 and §264.301(c),(d) and (e). For landfills, the above regs constitute the Minimum Technical Requirements.

20 NMAC 4.1 Subpart V, 40 CFR 264 Subpart F has to do with releases from landfills (and other units) and deals mostly with action levels, monitoring wells and corrective action. §264.301 is specifically for landfills and gives the requirements for liner systems, leachate collection and removal systems (lcrs), and leak detection systems (lds). This section also allows alternative designs if they're as effective as the specified systems in preventing migration of any haz. constituents to surface or groundwaters. The specified systems are, briefly, as follows:

The uppermost component, immediately below the operations layer, must be an lcrs designed and operated to ensure that leachate depth over the liner does not exceed one foot. Below the lcrs will be a liner designed and constructed to prevent the migration of haz. constituents into the liner. Below this top liner will be another lcrs (which is also the lds) which must be constructed with sumps and liquid removal methods capable of preventing liquids from backing uip into the

drainage layer. Finally, below the lower lcrs (and lds) there will be a composite bottom liner consisting of an upper component, designed and constructed to prevent migration of haz. constituents into itself, and a lower component constructed of at least 3 feet of compacted soil with a hydraulic conductivity less than, or equal to, 1×10^{-7} cm/sec.

Well Rich, I've picked , chosen, and spliced together parts of the regs to cover liners, etc. I hope it makes sense. Let me know if you have questions.