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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 30, 1996

Mr. Larry Gandy
Vice President
Gandy Marley, Inc.
1109 East Broadway
Tatum, New Mexico 88267

**RE: Follow up to Notice of Deficiency Response, Triassic Park
Hazardous Waste Disposal Facility**

Dear Mr. Gandy:

The New Mexico Environment Department (NMED) has reviewed for technical adequacy the Gandy Marley, Inc. (GMI) "Response to Notice of Deficiency", dated September 29, 1995, for the Triassic Park Hazardous Waste Disposal Facility. The Notice of Deficiency (NOD) was for the November 1994 "RCRA Permit Application for the Triassic Park Waste Disposal Facility".

After reviewing the Response, the Hazardous and Radioactive Materials Bureau (HRMB) has additional questions and comments. The comments related to the landfill liner and HELP model were sent in NMED's letter dated January 24, 1996. Comments and questions regarding other matters are found in Attachment 1 to this letter. Information requested in the attachment should be submitted to HRMB within ten (10) working days of receipt of this letter. The HRMB may consider a petition for a deadline extension, provided that a written justification and the expected submittal time are given. After all NOD items are responded to adequately, GMI should submit pages (containing the revisions to the original application and the date of revision) which may be incorporated into the original Part B Application.

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If you have questions regarding this matter, please contact Bob Sweeney of the Technical Compliance staff at (505) 827-1558.

Sincerely,



Ronald A. Kern, Manager
RCRA Technical Compliance Program
Hazardous and Radioactive Materials Bureau

cc: Barbara Hoditschek, HRMB
David Neleigh, EPA Region 6
Bob Sweeney, HRMB
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Attachment I

The following technical comments and questions from the Hazardous and Radioactive Materials Bureau (HRMB), New Mexico Environment Department (NMED), relate to the Gandy Marley, Inc. "Response to Notice of Deficiency" dated September 29, 1995. The "ITEM" numbers below match the item numbers used in the August 1995 Notice of Deficiency.

ITEM

36. The response is inadequate. Although the potential for gas generation in the landfill may be limited, NMED is still interested in how any gas generated will be detected and removed.

82. The response is inconsistent with the data provided in the permit application. On July 17, 1994 borehole 14o was drilled to a depth of 100 feet. No groundwater was recorded on the lithology log. The geophysical log, run on July 17, indicated water in the bottom 9 feet of the borehole. Whether this water is groundwater (i.e. it was present but undetected during the drilling of the borehole or it entered the borehole via the subsurface following the rainstorm on July 17) or water that entered the borehole as surface runoff during the rainstorm is unresolved.

Borehole 14, located approximately 400 feet west of borehole 14o, was also drilled to a depth of 100 feet (on July 14, 1994) and, according to the lithology log, encountered no groundwater. The geophysical log (run on July 15) recorded 38 feet of water in the borehole. Evidently there is groundwater in this area and it is possible that the water found in borehole 14o is groundwater.

86. The response is inadequate because it does not address the disappearance of the 9 feet of water in borehole 14o.

89. The response, while it answers NOD Comment 89, raises another question. Plate 3-8 is cited in the response as an example of facies change from siltstone/sandstone, near the site of the proposed landfill, to mudstone 1,000 feet downgradient to the east. On the contrary, Plate 3-8 shows the siltstone/sandstone beds at the proposed landfill boundary to extend beyond the easternmost borehole. How is this geologic setting capable of retarding migration of contaminants from the landfill to groundwater east of the site?

91. Subsurface evaluation done during July 1995 has shown the lack of groundwater in the Upper Dockum in the eastern part of the proposed facility; however, the

existence and location of groundwater in the west half of the proposed facility is unresolved (cf. Item 82 above).

94. Part of the reply reads "One well will be constructed with a 5-foot screen extending from the base of the Lower Dockum." Should this read "Upper Dockum"?
99. The July 1995 drilling program found the Upper/Lower Dockum contact 84 feet below ground level in PB-36 (the borehole located at the proposed landfill's east slope). The base of the landfill will be in Lower Dockum sediments if the landfill is excavated to 100 feet as planned. The slope of the landfill will rest on Upper Dockum siltstones and sandstones and, since these will permit contaminant migration from the landfill to groundwater east of the facility, a double liner system will be required on the slopes, as well as on the floor, of the landfill.
100. The response states that locations of the initial shallow drill holes are shown on Plate 3-7. They are not. Please correct the Plate. Also, Plate 3-7 includes several boreholes labeled "Drill Hole" and one labeled "Oil Well". Are the drill holes abandoned oil tests? Are any of them producing or abandoned water wells? If any are/were water wells, please provide the depth and quality of water and the formation name of the aquifer.
103. The geophysical and lithology logs for PB-27 indicate siltstone/sandstone is present from a depth of 70 feet to total depth at 200 feet. Groundwater has been found both upgradient and downgradient from this borehole. Can GMI suggest an explanation for the lack of groundwater in PB-27?

The last part of the response for this comment reads "The location of WW-2 is SWSE Section 19, T11S, R31E. The geophysical log and lithology log will be changed to reflect this." The geophysical log needs to be corrected; the lithology log does not. Also, Figure 3-13 and Plate 3-7 need to be corrected because WW-2 is shown in the SESW of Section 19 on both maps.

Additional Comment #1 - The corrected Plate 3-1, included in the NOD Response, shows vertical groundwater flow from the Ogallala Formation into and through the Upper Dockum. Please provide an explanation for how vertical flow may occur through the Upper Dockum mudstones and claystones (which are found interbedded with the siltstones and sandstones).

Additional Comment #2 - Figure 3-13 and Plate 3-7, which were included with the NOD Response, show the location of a drill hole between PB-14 and PB-32 immediately west of the facility boundary. Does this drill hole exist?