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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 20, 1996

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

**RE: Incomplete Closure Cost Estimates on the Triassic Park
Hazardous Waste Disposal Facility**

EPA ID Number: NM0001002484

Dear Mr. Gandy:

In preparation for the forthcoming public hearing on the Triassic Park Waste Disposal Facility draft permit, the New Mexico Environment Department (NMED) conducted further analysis of the Closure and Post-Closure cost estimate Tables formerly submitted to NMED by Gandy Marley Inc. After analysis of the Closure Cost Estimates and Closure-generated Waste Volumes presented in Tables 9-1 and 9-2 of Part B permit Application pages 9-12 through 9-14, NMED found that the following portions of the Triassic Park Waste Disposal Facility were not included in the cost estimates:

(1) General Structure Demolition and Removal of:

- Scales,
- Truck Staging Area,
- Chemical laboratory,
- Maintenance shop
- Truck wash facility
- Guard Shack/Administration Trailer

(2) Final Contours Total Area:

- Storm Water Retention Basin
- Dust Control/Clay Processing Water Basin
- Total facility, No Ponding cost estimates
- Depth of ponding

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- (3) **Future Debris Encapsulation Facility.** No estimate was made on this portion.
- (4) The Following Areas or Items Were not Included in the Cost Estimates of Table 9-1:
 - (a) **Container storage Area, Line 2:** Disposal of remaining drums, was the estimate made per drum or a flat fee was used?
 - (b) **Container storage Area: Line 3,** Was the decontamination cost of equipment obtained considering the use of a bulldozer?
 - (c) **Container Storage Area: Line 4,** What was the area in square feet of the concrete and secondary containment?
 - (d) **Container Storage Area, Line # 5,** How many samples of the concrete floor will be taken after its demolition?
- (5) **Storage Tank area:**
 - (a) **Storage Tank area, Line # 3,** What is the area of the concrete containment area?
 - (b) **Storage Area, Line # 5,** How many samples will be taken after the demolition of concrete containment?
- (6) **Table 9-1, Page 9-13, Landfill**
 - (a) **Landfill, Line # 4;** Provide the number of groundwater monitoring wells, number of samples, and frequency of sampling.
 - (b) **Landfill, Line # 5,** Provide the number of soil samples around the landfill, and frequency of sampling.
 - (c) **Landfill, Line # 8:** provide the area of the cover clay layer, and the capacity in cubic yards of the landfill cover, and the cost per square yard of the final cover.
- (7) **Table 9-2; Page 14, Annual Post-Closure Costs:**
 - (a) **Line 3 1:** Provide information on the number of times facility inspection will be conducted during the post-closure care period
 - (b) **Table 2, Line # 6:** How many ground water monitoring wells will be installed? How many ground water samples will be taken, and at what frequency?

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- (8) **If any dirt or clay needs to be hauled in** what will be the cost to haul? Are there royalty hauling costs?

Please submit to NMED Hazardous and Radioactive Materials Bureau, the revised Tables 9-1 and 9-2 by the close of business day August 26, 1996 for incorporation into the draft permit. If you have any questions on this matter you may call Cornelius Amindyas at (505) 827-1561.

Sincerely,



Barbara Hoditschek, Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB
Mitchel Hanrahan, SWB
Files: Red and Reading 96