



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

# Fax Cover Sheet

Date 2-12/98

To: Larry Gandy  
Company: Gandy Marley Inc.  
Phone: (505) 398-4966  
Fax: -- -- 6887

From: Cornelius Amindyas  
Company: Hazardous & Radioactive Materials  
Phone: (505)-827-1557  
Fax: (505)-827-1544



Pages including this cover page: 3

Comments: Larry: The next 2 sheets

contain some of the supplementary information that the Hazardous & Radioactive Materials Bureau will be requesting you (Gandy Marley) to provide. I am faxing the draft before the Manager, Supervisor & Bureau Chief review it to let you know what is forthcoming (sort of "heads up"). Thanks.

Sincerely: Cornelius.

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ATTACHMENT A

REQUEST FOR SUPPLEMENTARY INFORMATION:  
TRIASSIC PARK HAZARDOUS WASTE DISPOSAL FACILITY

February 2, 1998

**DRAFT**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed review of Gandy Marley Inc.'s (GMI's) Permit application for the Triassic Park Hazardous Waste Disposal Facility (TPDF). After reviewing the subject Application using the appropriate checklists, HRMB has determined that GMI must address the following issues satisfactorily before the application can be declared administratively complete:

**NOTE:** The quotes in **bold** print below, are taken directly from the October 1997 Part B Permit Application text submitted by GMI.

**Global Comments:**

1. Volume I, Part B, page 1-1, second paragraph, and the last line of page 1-1: **"This application has been divided into two sections with a total of six volumes. Section I includes the following volumes: Volume I - Part A and Part B, Volume II - Appendix A-M. Section II is divided into four volumes ...and incompatible wastes are described in Section 4.3.2.1 of this application.**

- Comments:**
- a) HRMB advises that the whole application be identified as Volumes I through VI in order to make it easier for the reviewer to distinguish between Section 2 and Volume II, and also to avoid confusing Volume II with Section II.
  - b) Volume III, Engineering Report is referred to in Volume I text as Section II. Consistency with document title, as explained in comment a) above will avoid confusion during third party review.

**Specific Comments:**

2. **General Facility Description:** HRMB suggests that paragraph 1.1.8 in Volume I, page 1-3 titled "Facility Location", precede paragraph 1.1 ("General Description"). This suggested change should introduce the facility to reviewers before they read further about the purpose of the TPDF.
3. Provide a copy of the insurance policy or other documentation which comprises compliance with the requirements of 20 NMAC 4.1.500 and .900 incorporating 40 CFR §264.147, and §270.14(b)(17).
4. **Drawing Number 1:** Although Drawing # 1 of Part A in Volume I has topographic maps of the TPDF on the required scale of 1:200, the units comprising the facility are not shown. Submittal of Drawing 4 (**Facility Layout**) from Volume III, enlarged to the scale of 1 inch equal to 200 feet should satisfy the requirement specified by 20 NMAC 4.1.900 incorporating 40 CFR §270.14(b)(19).
5. Provide information on the endangered and threatened species at the TPDF. Describe how GMI plans to conduct hazardous waste treatment, storage, and disposal activities in a manner that will not jeopardize the continued existence of such species, as the sand dune sagebrush lizard, the bobcat, the owls, and the antelopes that were seen by HRMB personnel at the Mescalero cliffs, during the 1995 RCRA Facility Assessment of the site. [Note: A member

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of the public from the Roswell area expressed concern about the above named lizard in a written comment sent to HRMB at the beginning of the public comment period in 1996].

6. Section 2.3, page 2-9, Paragraph 4, the last sentence: **"Waste will be transferred from the tanks to the stabilization unit either by pumping into transfer tankers or by direct piping."**
  - a) Explain what measures will be taken during waste transfer from tanks to the stabilization units and to the surface impoundment, to protect the health of the workers, and spillage of the waste to the environment.
  - b) Volume II, Appendix L: Provide a map showing evacuation routes for personnel at the TPDF, in case of emergency.
7. Describe procedures for the maintenance of all waste sampling equipment during final closure of the facility. Stipulate the precision and accuracy of the sampling equipment.
8. Provide a laboratory quality assurance/quality control (QA/QC) program for hazardous waste and soil samples at closure, and identify the QA/QC procedures for each analytical method.
9. Volume I, Section 8.1, page 8-1: **"Closure Activities"**: Prior to the commencement of closure activities, GMI must notify the Secretary of NMED at least 60 days prior to the date GMI expects to begin closure of the TPDF. GMI is also required to notify the Secretary 45 days before the closure of the surface impoundment, container storage units, and storage tanks. Incorporate this requirement in Section 8, in order to comply with 20 NMAC 4.1.500 incorporating 40 CFR §264.112(d). [Note: It is probably more acceptable to state that "all facilities and structures will be dismantled", than to say "it is envisioned", as stated in the first sentence ..."].
10. Volume I, page 8-1, last paragraph, second to the last sentence: **"For the purposes of this plan it is assumed that all wastes remaining in inventory can either be disposed of directly in the landfill, treated at the onsite treatment facility prior to disposal in the land fill, or returned to the generator if either of the previous two options are not available."**

Provide a detailed description of the methods for transporting any remaining waste to the generator during final closure of the TPDF.

11. Provide a detailed description of the following:
  - a) methods for sampling soil at closure, and the approximate number of samples to be taken from each unit of the TPDF;
  - b) methods for testing the soil samples taken in item a); and
  - c) what measures GMI will take to remove contaminated soil when laboratory sample results indicate contamination. Explain how the contaminated soil will be disposed of, and the final destination of the soil.
12. Volume I, Section 8.1.2.4, page 8-5, last paragraph, last sentence: **"Sample results will be compared against the closure performance standard presented in Section 3.8."**

Explain what measures GMI will take when the concentration of hazardous constituents in soils taken from the evaporation pond, tank storage area, container storage unit, and stabilization area exceed the standards of Section 8.3 [i.e., three standard deviations or  $3\sigma$ ].

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