

*Summary Notes and Action Items
Triassic Park Waste Disposal Facility
NMED Review Meeting
July 14-17, 1998*

DRAFT

Attending:

*Jerry Bober - NMED
Cornelius Amindyas - NMED
Patrick Corser - MW*

Review of Volume I

1. Suggest using Group I and II documents to refer to the Part A portion of the application and the Part B portion of the application - MW.
2. All internal references in the documents should reference the specific volume where the information is located - MW
3. The references to the site location (Range and Township) should be corrected on Figure 1-1. Confirmed that site is located in R31E and T11S - MW
4. Add access road from Highway 380 to site on all figures - MW.
5. Check reference in Waste Analysis Plan regarding unscheduled shipments to the site and what basis is used to accept or reject - MW.
6. Check 40 CFR 264.35 for requirements for emergency vehicle access for Drum Storage Unit - MW.
7. Include reference to *New Mexico* registered professional engineer when ever referencing a professional engineer - MW.
8. Describe treatment methodology for ignitable and/or reactive wastes after they are placed in stabilization bins - MW.
9. When referencing a specific drawing indicate the Sheet number if more than one sheet for the drawing.
10. Check State/Federal requirements for head restrictions - Landfills required that head in the LCRS be maintained at 12 inches or less. There is no specific requirement for impoundments. However, the ALR for impoundments requires that the head be maintained at less than 12 inches in the LDRS - MW.
11. Incorporate text that will limit the amount of free water that is allowed to be placed in the landfill - "*Apply sufficient moisture to prevent wind erosion of the daily cover*"
12. Add description of the frequency and method of monitoring for gas generation in the landfill.
13. When referring to drawings in text - suggest only referencing the drawing/figure number and not the title. This will reduce the possibility of errors in the drawing/figure titles.
14. In ALR text - check requirement for 24-hour NMED notification if ALR exceedance may endanger human health and the environment - if not required in regulations then eliminate - MW.
15. Check justification for 25-year/24-hour storm design for landfill run-on and run-off and 100-year/24-hour design for freeboard design in impoundment MW.
16. Check soil temperatures in Alama Series soils - MW.
17. Check composition (by percentage) in Roswell-Faskin-Jalmar Association soils - MW.
18. Revise calculations for bedding dips on page 3-8 to make easier to understand - MW.
19. Check location of Sangre de Cristo uplifts - northeastern or southeastern New Mexico - MW
20. Reference dates for all NMED letters mentioned in Text. Fax copies to J. Bober to confirm copies are in NMED files - MW

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21. Check New Mexico definition of "Aquifer" - does it include "significant" amounts of groundwater - MW (see Page 3-18) - MW
22. Add frequency of vadose zone monitoring on or around page 3-31R - MW
23. Add facility location to figure 3-5 - MW
24. When referring to solid waste it should be referred to as Municipal Solid Waste (MSW) and Construction and Demolition (C&D).
25. Look at requirements for re-submittal of waste profile for "process change" or "waste change" - MW.
26. Check RCRA 40 CFR 268.32 for list of "California List Wastes"
27. Incorporate laboratory QA/QC objectives for analytical data to Section 4-7
28. Confirm with Dale Gandy whether he wants to permit both portions of roll-off storage area. Future permitting would require a Class 3 permit modification - MW.
29. NMED will write letter summarizing the review meeting held in Montgomery Watson's office and describe the scope of the comments and how the revisions will be incorporated into the administrative record - NMED.
30. NMED indicated that a groundwater monitoring waiver request maybe required to implement the vadose zone monitoring. NMED will confirm the procedures and the appropriate RCRA citation that should be referenced - NMED
31. NMED suggested that 3-dimensional drawing of the subsurface hydrogeology might be helpful to illustrate the lack of groundwater below the site - MW.
32. Agreed to define the Triassic Park Waste Disposal Facility (Facility) at the start of each document and then be consistent with the use of "Facility" throughout all of the volumes - MW.
33. Sections 6-12 not reviewed.

See *
below

Review of Volume III

1. Eliminate reference to specific 40 CFR 264 regulations - MW
2. Remove discussion of response to A T Kearney comments (Section 1.3) - MW
3. List out manufactures of HDPE that would be considered for Facility. This is related to compatibility testing - MW
4. Add comment in text about structural details as shown on Drawing 45 - MW
5. Check alternative liner design submittal and HELP modeling - this will need to be incorporated into administrative record - MW and NMED.
6. Check all drawings for consistency of feet and inches in dimensions - MW.
7. NMED suggested collection of information on the performance of dual-wall tanks to address questions during public hearing - MW
8. Add various notes, dimensions, and call-outs on drawings to facilitate public review - MW.

Volumes II, IV, V and VI not reviewed. NMED to review and arrange meeting to discuss comments on the remaining volumes.

264.56(f) -> Emergency Procedures
64.90(c) -> Monitoring Period
64.90(d)

264.90(b)(2) exempt from reqs. if given listed conditions apply

and §265.90(c)

Based on the VZM they'll include LCR & LDRS

Justification

3rd liner w/ leachate collect & removal system which (3rd liner)

improved technology

makes their proposed VZM exceed regulatory requirements

GANDY MARLEY - TRIASSIC PARK CHRONOLOGICAL EVENTS

1. 12/15/97: GM submits 2 sets of the application.
2. 12/29/97: GM submits 1 additional set of the application.
3. 02/06/98: GM submits missing Vol IV and VI of one of the original sets.
4. 02/12/98: CA sends FAX to GM on the RSI Draft.
5. 03/05/98: GM is sent the RSI.
6. 03/27/98: CA sends FAX to GM requesting list of companies likely to waste to TP.
7. 03/30/98: CA sends FAX to GM requesting final inspection checklist.
8. 04/01/98: GM sends FAX responding to FAXes 03/27 and 03/30.
9. 04/06/98: GM sends preliminary response to RSI.
10. 04/17/98: GM and CA have telecom discussing response to RSI.
11. 04/27/98: GM sends letter in response to telecom on 04/17.
12. 04/28/98: GM sends replacement pages from RSI.

Call Corporation Commission

GMI

Nick x1031