

M E M O R A N D U M

To: Pete Maggiore, Secretary, NMED

Through: Ed Kelley, Ph.D, Director, WWM Division

Through: Benito Garcia, Chief, HRMB

Through: Stephanie Kruse, Supervisor, HRMB

From: Cornelius Amindyas, Environmental Specialist, HRMB

Subject: Chronology of the Triassic Park Permit Application

Date: September 30, 1998

The following is the Chronology of the Triassic Park Waste Disposal Facility Permit Application:

<u>DATE</u>	<u>ACTION TAKEN</u>
9/29/98	The Draft Permit is currently undergoing Peer review.
9/11/98	HRMB hand delivered the Draft Permit to Attorney Master Nick Persampieri, Office of General Council (OGC) for legal review and advice.
8/31/98	HRMB Staff completed the Triassic Park Permit text, compiled the Table of Contents, and began editing the regulatory citations.
7/13/98 Through 7/16/98	HRMB staff and Gandy Marley Inc. (GMI) Contractors (Montgomery Watson) conducted an in-depth review of the revised Permit Application at Steamboat Springs in Colorado. The review was for Administrative Completeness and Technical Adequacy.
5/12/98	HRMB Staff met with GMI on the Status of the draft Permit, and Technical review of the Engineering Drawings.

- 4/6/98 HRMB began re-drafting the Draft Permit because OGC had objected to issuance of a Subtitle C Permit, containing engineering drawings which were called "Conceptual Drawings".
- 3/6/98 HRMB mailed a letter to GMI requesting supplementary information.
- 2/27/98 HRMB completed review of the revised Permit application for administrative completeness.
- 2/4/98 HRMB evaluated the proposals that were submitted by the firms in response to the Legal Notice promulgated on May 29, 1997.
- 12/15/97 HRMB received six volumes of the revised Triassic Park Permit Application with FINAL Engineering designs certified by a Professional New Mexico registered Engineer as required by the New Mexico Hazardous Waste Management Regulations.
- 11/21/97 HRMB received responses and proposals for technical review of the engineering drawings from TechLaw Inc, SECOR International, Inc., SC&A, and AK GeoConsultant, Inc.
- 9/29/97 HRMB promulgated a Legal Notice in the Albuquerque Journal, and the Santa Fe New Mexican soliciting proposals from qualified firms to review the engineering drawings of the Permit Application, provide technical evaluation of the drawings, and be ready to provide expert testimony at public hearings.
- 7/15/97 Informal meeting - HRMB recommended that GMI submit a revised version of their Permit Application, including FINAL Engineering designs of the Facility and the units comprising it, certified by a professional Engineer registered in New Mexico.
- 7/7/97 HRMB wrote a letter to GMI requesting a meeting to do a Document Comparison.

6/5/97 HRMB received a cover letter from TerraMatrix with an enclosure for detailed comments to the ATK review.

4/30/97 HRMB responded to GMI's proposal of 4/9/97.

4/9/97 GMI proposed to re-submit the Revised Application with final certified Engineering Drawings of the Triassic Park Waste Disposal Facility, considering comments from the ATK review, and the advice of NMED's OGC, to rescind the draft Permit, because a facility cannot be permitted without Final Engineering Drawings.

3/21/97 HRMB wrote GMI a letter (with an enclosure) requesting for Supplementary Information based on the ATK comments on the Permit Application.

2/26/97 HRMB hand delivered to Ken Schultz of Gandy Marley Inc., a copy of the Final A.T.Kearney (ATK) Report.

2/21/97 HRMB received ATK Report on the review of the GMI Permit Application.

2/19/97 HRMB received and incorporated the missing Tables and Figures from GMI into the Permit Application.

2/10/97 HRMB Staff held Telecom with GMI advising them to send the missing Tables and Figures to ATK.

1/17/97 HRMB received a Post Card from Sherry Bixler requesting to be notified about Triassic Park Public Meetings.

12/30/96 HRMB received the NM Department of Public Safety's Comments on Gandy Marley Inc.'s Disclosure Statements.

10/29/96 HRMB received Elizabeth Shores' Request for a Public Hearing on the Triassic Park Draft Permit.

10/27/96 HRMB received Sherry Bixler's Comments on the Triassic Park Draft Permit.

10/2/96 NMED sent a letter requesting the Department of Public Safety to review GMI's Disclosure Statements.

10/1/96 NMED wrote a letter to GMI to Submit Final Engineering Drawings certified by a New Mexico registered professional Engineer.

9/17/96 Ms. Betty Richards Requested for a Copy of the Triassic Park Permit Application.

9/6/96 NMED wrote a letter to Karen Jo through Honorable Congressman Bill Richardson.

9/5/96 NMED wrote a letter to Congressman Bill Richardson enclosing the Location Map of the proposed Triassic Park Waste Disposal Facility.

8/20/96 NMED wrote a letter to GMI about Incomplete Cost Estimates.

8/12/96 NMED received a letter from Congressman Bill Richardson on Ms. Karen Jo's Concerns about the proposed Triassic Park Waste Facility.

8/7/96 HRMB received John Weaver's comments on GMI's Permit Application on behalf of Ms. Richards.

8/1/96 NMED sent a response to Ms. Richards' Additional concerns about the Triassic Park Permit Application.

7/30/96 HRMB received Ms. Karen Jo's Letter to Congressman Richardson expressing her concern about the proposed Triassic Park Waste Disposal Facility.

7/12/96 HRMB wrote and sent comments to GMI on Additional Drill Holes they might consider installing.

6/27/96 HRMB received Ms. Betty Richards' Letter to Mr. Mark Weidler Requesting a Public Hearing.

6/11/96 NMED wrote and sent a response to Ms. Richards' second request for a Public Hearing.

5/22/96 Betty S. Richards' Comments on Draft Permit and request for a Public Hearing was received by HRMB.

5/19/96 Thomas L. Pearson's Comments on Draft Permit received at HRMB.

5/19/96 HRMB received Ms. Dorothy J. Russel's comments on Draft Permit.

5/15/96 Gandy Marley Inc.'s Comments on the Draft Permit received at HRMB.

4/18/96 NMED received EPA's Comments on Draft Permit.

4/4/96 HRMB promulgated a 45 day Public Comment period (in Legal Notice # 86) through the Media.

3/7/96 HRMB received Terra Matrix Inc.'s letter with Revised Figures 2-8, 2-9, and 2-10.

3/1/96 Terra Matrix Inc.'s Landfill Liner Alternatives Hydrologic Evaluation of Landfill Performance (HELP) Analysis was submitted to HRMB.

2/15/96 HRMB received GMI's Response to Additional Technical Comments.

2/12/96 HRMB received HELP Analysis Results and Alternative Landfill and Cover Designs from Terra Matrix, Inc.

1/30/96 HRMB sent Technical Follow-up Comments and a letter on GMI's Response to NOD on Technical Adequacy.

11/1/95 HRMB sent a letter to GMI declaring the Permit Application to be Technically Adequate.

10/13/95 HRMB requested GMI to provide a list of hazardous waste generators from whom they plan to accept hazardous waste for disposal.

9/29/95 GMI's response to Technical NOD was received.

8/31/95 GMI wrote HRMB requesting for extension of the deadline for response to the NOD.

8/8/95 HRMB sent a Notice of Deficiency (NOD), Technical Adequacy to GMI.

7/12/95 HRMB replied GMI's letter on the location of additional drill holes at the Triassic Park.

5/24/95 HRMB completed compiling the RFA Report on the Triassic Park.

5/9/95 HRMB Staff conducted RCRA Facility Assessment (RFA) study of the proposed Triassic Park Facility.

3/1/95 HRMB wrote and sent a letter of Administrative Completeness of their Permit Application to GMI.

2/23/95 HRMB received a letter from GMI with a Revised Part A Permit Application.

2/1/95 GMI's Response to NOD received.

1/25/95 HRMB sent copies of the Triassic Park Permit Application to the U.S. EPA Region VI.

1/10/95 HRMB sent a Notice of Deficiency (NOD) of Administrative completeness to GMI.

12/29/94 HRMB completed Review of Permit Application for Administrative completeness using the EPA checklist.

12/1/94 HRMB advised to obtain an EPA ID Number.

11/10/94 HRMB began review of the Triassic Park Permit Application.

11/17/94 GMI submitted EPA Hazardous Waste (Parts A and B) Permit Application for a proposed Triassic Park Waste Disposal Facility in two volumes.