

## AGENDA

### Triassic Park Waste Disposal Facility Part B Permit Review

April 14, 1999

*Attending:*

*NMED  
TechLaw  
Gandy-Marly Design Team*

1. **Review objectives for meeting**
  - Discuss and resolve level of detail on designs for Part B Permit application and response to comments
  - Agree on format for response to comments and modifications to permit documents
  - Discuss and resolve major design issues (see below) prior to detailed response to comments
  - Schedule for permit milestones
  - Maintain working relationship through permitting process
  
2. **Permit Submission - Recent History**
  - March 1996 original permit submission
  - March 1997 – NMED request for supplemental information
  - June 1997 – Submitted response to NMED and TechLaw comments on March 1996 application submittal. Never received comments or approval on responses.
  - December 1997 – Complete revised permit submitted
  - March 5, 1998 – NMED submit comments (23)
  - April 6, 1998 – MW responds to comments
  - April 17, 1998 – Telephone conversation with NMED responses were approved
  - April 28, 1998 – Replacement pages submitted
  - May 15, 1998 meeting to discuss comments on submittal – technical review not completed
  - July 14-17, 1998 participated in NMED technical review of permit in Colorado (MW offices).
  - November 1998, At request of NMED provided revised copies of Volumes I and III
  - November 1998 Submitted DRAFT letter regarding Groundwater Monitoring
  - March 11, 1999 – received NMED and TechLaw comments on entire permit application.
  
3. **Scope of Current Comments**
  - Technical and administrative comments
  - Include Part A, Part B, Engineering report, drawings, calculations
  - Specific comments on specifications and CQA plan were limited – is review complete ?
  
4. **Design Issues:**
  - Explain use of “Not for Construction” on drawings
  - Review Gandy-Marley approach to “detailed designs” (see attached supporting information)
  - Groundwater monitoring in vadose zone requirements – public comment on GW monitoring
  - Landfill
    - Detailed designs for future phases
    - Final designs for construction
    - Detailed designs for pumping systems and monitoring system – shop drawings
    - Gas generation
    - Compatibility issues (soil and geosynthetics)
    - Test fill

- **Stabilization Unit Design**
  - Construction designs for unit, process and controls and instrumentation
  - Compatibility
- **Liquid Storage Units**
  - Construction designs for tanks
  - Construction designs for piping systems
- **Ponds**
  - Same as above
  - Number of Ponds to be permitted
- **Drum Storage Units**
- **Roll-Off Units**
  - Stabilized Unit will be regulated
- **Truck Wash –**
  - May be regulated unit

**5. Permitting and Other Issues**

- Waste acceptance procedures and characterization
- Closure plan and closure plan cost estimates
- Sampling and analysis plan
- Laboratory QA/QC plan

**6. Summary**

- Plan of action
- Summary of agreements
- Written meeting notes

# ***Proposed Design Process for Permitting and Construction Documents***

## ***Triassic Park Waste Disposal Facility***

1. **Conceptual/Preliminary Designs (Internal Project Team Review)**
  - Identify major facilities to be included in development plan
  - General layout on site plan
  - Identify process flow diagrams
  - General capacities of facilities
  
2. **Permit Level Designs**
  - Detailed design drawings
  - Demonstrate compliance with all regulatory requirements
  - Sufficient detail to demonstrate constructability
  - Submit for regulatory agency review and permit approval
  
3. **Bidding and Construction Drawings**
  - Same as above with the following:
    - Details or specifications for any regulatory permit conditions
    - Survey control points and layout grid
    - Shop drawings
      - Plumbing
      - Electrical
      - Building structures
      - Operational features
  - Agency approval prior to start of construction
  
4. **As-built Drawings**
  - Documentation of all regulatory criteria
  - Liner system CQA documentation and details
  - LCRS system CQA documentation and details
  - Design Changes and Clarifications
  - Agency approval prior to start of operation

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**Supporting Reference Documents:**

1. EPA Guidance Document "Permit Applicants' Guide Manual for Hazardous Waste Land Treatment, Storage and Disposal Facilities" EPA PB89-115695
  - The following supports the concept of "Permit Conditions" that are prepared by the permitting agency
    - Section 4 – General Guidance for Preparing a RCRA Land Treatment, Storage or Disposal Permit Application
      - Page 4-6 "Thus the permit may contain the attachments prepared by the applicant, either as originally written or as modified by EPA. The attachments essentially describe how a requirement will be fulfilled. The applicant proposes and justifies why his approach fulfills the requirements in either the attachment or in the general application as appropriate. The EPA assesses the material and permits construction and operations as described in the permit. The use of attachments facilitates the review and the revision of permit applications and permits themselves. If several attachments are acceptable as proposed by the applicant, they may be incorporated into the permit unchanged. If some require additional information [it can be supplied by] EPA or returned to the applicant instead of returning the entire permit application."
2. EPA Technical Resource Document "Lining of Waste Containment and Other Impoundment Facilities" EPA/600/2-88/052
  - These statements support the concept of "Permit Level Designs" and "Bidding and Construction Drawings and Specifications". Each would be approved by regulatory agencies.
    - Chapter 8 – Specifications for the Materials and Construction of Waste Storage and Disposal Units
      - Section 8.1 Introduction "After developing the design of a waste containment unit, the designer/engineer must prepare the necessary plans, technical specifications and drawings for the bid package and for use in constructing the containment unit."
      - Section 8.2 "This Chapter deals principally with the technical specification documents that the designer prepares for the bid package. These specifications include the drawings and specifications for the materials and workmanship. The specification document incorporates the output of the design process which probably includes the basic approval of the design by the appropriate regulatory agency."
  - These statements support the concept of performance or base bid specifications for construction of ancillary facilities.
    - Section 8.3 "Performance specifications define the work to be done by specific results; they give the contractor complete freedom to employ his knowledge and experience to carry out a particular project." "..... the specific components of a hazardous waste containment unit may be specified on the basis of performance; e.g. the capacity of pumps that might be used in the leachate collection and removal systems"

- These statements support the concept of agency approval of construction drawings and specifications.
  - Chapter 9 – Construction of Lined Waste Storage and Disposal Units
    - Section 9.1 “In the construction phase of a project, design plans and specifications are converted into the actual waste storage or disposal unit. The construction contractor is responsible for constructing the unit in strict accordance with the design criteria, plans, and specifications that have been approved by the owner and the permitting agency.”
  
- 3. These documents provide typical design and construction details that are required to meet regulatory criteria
  - EPA Seminar Publication “Requirements for Hazardous Waste Landfill Design, Construction, and Closure; EPA/625/4-89/022.
  - EPA Technical Guidance Document– “Guide to Technical Resources for the Design of Land Disposal Facilities” EPA/625/6-88/018
  - EPA Technical Guidance Document – “Quality Assurance and Quality Control for Waste Containment Facilities” EPA/600/R-93/182
  - EPA Publication - “Resistance of Flexible Membrane Liners to Chemicals and Wastes” EPA/600/2-85/127
  - EPA Publication “Geosynthetic Design Guidance for Hazardous Waste Landfill Cells and Surface Impoundments”
    - Recommended design guidance for clay liners: FMLs, liquid management, covers CQA plans, compatibility issues, leakage rates and response action plans.

# 4/14/99 Mtg. Triassic Park Permit

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