

MEMORANDUM

To: J. Dreith, Triassic Park file

From: G. Starkebaum

Subject: Meetings with TP Consultant

Date: April 27, 1999

I met with Pat Corser again on Monday and Tuesday, April 19 and 20, to attempt to resolve the remaining technical issues in the NOD comments on the 1998 application. We met at the TechLaw office on Monday and at the Montgomery Watson office at 165 S. Union in Lakewood on Tuesday.

I will only summarize the discussions, since Mr. Corser is planning to provide detailed proposed resolutions for each comment. (The detailed draft comment resolution matrix was intended to be completed by Friday the 23rd, but has not been provided to me yet.)

We were able to come to agreements on most of the comments. Either Mr. Corser agreed that additional information or design details (and an Operations Plan) should or will be provided, or I agreed (in a few cases) that the requested information (or part of it) was actually present in the 11/98 application. For example (comment D-4e), the permeability tests performed on "additional" Upper Dockum soil samples apparently "should have" been included in the application, and Mr. Corser agreed to provide these (and the permeability data from original application).

We did not come to agreement on how to resolve the main CQA comments (D-4g(3) and D-6g(3); regarding overall CQA organization and definitions), or the run-on and run-off system comments (D-6j):

We agreed to address the CQA questions in a later telephone conference. (I have since obtained the CQA plan and other data from the current permit for the Highway 36 (Safety-Kleen) disposal facility in Colorado, since Mr. Corser said that he used that as the model for the proposed Triassic Park application. It appears to support the original TechLaw criticism of the unusual CQA organization proposed for TP.)

After a brief discussion Mr. Corser referred the runoff control comments to another member of his staff for response. I explained that the large number of drainage comments [3 pages] resulted because we could not determine (from the existing plans and calculations) exactly what upstream areas contribute runoff to the ditches which transport flow around, through or past the hazardous waste units (impoundment, landfill and container storage areas), and whether the ditches are in fact designed to handle at least the 25-year storm runoff. If the existing plans and calculations can be adequately clarified,

there may be little or no need for changes in the design.

The question of how the Truck Wash should be handled was discussed in some detail. (The unit was mentioned at the 4/14 meeting at the NMED office, and Mr. Gandy agreed that it would be addressed as a permitted unit, but the specific unit(s) to be permitted was (were) not defined.) Mr. Corser and I agreed that the final decision on how the unit should be defined and described in the application will be left to NMED. We considered the possibility of defining a surface impoundment or sump unit, or one or two storage tanks with extensive appurtenances (all of which would be required to have secondary containment). We seemed to be in agreement that the most straightforward way to define the truck wash for permitting is to consider the wash water tank as the only actual permitted unit, with the concrete sump, clarifier, pumps and piping as ancillary equipment. This would include the entire building, which is proposed to be underlain by a geomembrane for secondary containment. The clarifier has not been designed yet, but Mr. Corser indicated that it is not expected to be a double-shell tank like the wash water and other hazardous waste storage tanks. It may be a simple two- or three-cell reinforced concrete box, sitting directly on the floor.

One item of concern not addressed in previous comments or meetings is the need for secondary containment under the wash water, leachate and (other) liquid hazardous waste tank transfer pipe connections. This concern arose initially because the truck wash water pipe connection (to the hose from a tank truck) is not shown within the secondary containment that extends under the rest of the truck wash. During this discussion, Mr. Corser noted that the TP design team has apparently decided that none of the storage tanks and stabilization bins will be interconnected by hard-piping, i.e., all intra-site transfers of liquid wastes will be done by tank truck. We therefore spent some time discussing the need for secondary containment at all transfer points. I am not sure if Mr. Corser decided to go ahead and include such containment, but I strongly recommended to him that it should be, to demonstrate compliance with 40 CFR 264.193(b).

The closure design for Phase IA was discussed in some detail. Since only Phase IA will be included in the permit, I asked how the (new) liner system and cover are proposed to be designed. Mr. Corser explained that he intends to propose no new liner sections, only placement of a final cover on the exposed (interim soil-covered) waste fill surface. This would result in a strangely shaped final fill, with a long, steep slope (about 250 feet, at 25%) down to the bottom of the 80- to 90-foot deep pit. I objected to this approach, pointing out the probable erosion problems and occasional ponding of large volumes of water which will result if the hole is not filled in. Mr. Corser pointed out the high cost of backfilling the pit, and says that he can not justify that cost, since the potential problems can be dealt with in other ways (e.g., two or three benches on the steep slope(s) to limit erosion). He is confident that the high evaporation rate in the area will ensure that any water that collects at the bottom of the pit will be rapidly removed without the need for any pumping. I think this is questionable, since the pond at the bottom of the pit is only about 1.5 acres in size- perhaps expandable after closure to 2 or 3 acres; but the runoff area- the entire area to be excavated for Phase IA- is more than 30 acres. This will clearly be an issue of concern in future negotiations.