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Subject: \_\_\_\_\_

Number of pages including this page: 11 ~~18~~

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NO.	COMMENT	TL	RESPONSE
1			
2			
3			Incorporate groundwater monitoring waiver letter in the permit.
4a			
4b			Pond 2 will not be permitted as part of this application Recommended Changes: The second Pond will be total removed from drawings
4c			Add potential storage volume to Part A for Roll-Off Container Unit
Section I			
5			
6			
7			Delete the word "recovery"
8a			Individual storage cells are defined as groupings of drums as shown on Drawing 37. The specific areas sections to be used for storage will depend on the volume and type of waste being processed at the site. Labels will be added to each section of the drum storage unit to identify the type of waste to be stored. The labels may change depending on the volume and type of waste being received. Concrete curbs will separate different storage areas (see Drawing 37 and Detail 4/37/38). See Section 2.2.12 which describes separation. Recommended changes - Add note to Drawing 37 describing labels for different storage areas. Add new text to Section 2.2.1.1 about labeling of storage areas.
8b			Clarify that building is only covered with a roof. Recommended changes - Add text to Section 2.2.1.1 that changes "enclosed" to "covered"
9a			Only PCB wastes will be stored in designated cells Recommended Changes:
9b			Free to respond - PCB wastes could be included in contaminated soil
9c			Two TSCA cells as shown on Drawing 37 Recommended changes - Add additional leader line to second TSCA cell as shown on Drawing 37
10a			See comment 1 above Check on "Derived Waste Storage Area" Recommended Changes - Revise text to state that Roll-Off Storage Area (Stabilized) will not be a 90-day storage area but will comply with 40 CFR 264.170
10b			Free liquids associated with roll-off bins are expected to be very small quantities and therefore would be handled in the stabilization process and would not be sent to the liquid storage tanks or the evaporation ponds. It is difficult to provide additional details on the kinds of wastes that will be sent to the liquid storage tanks and surface impoundment until a permit is issued and the facility can begin marketing its capabilities.

NO.	COMMENT	TL	RESPONSE
			Recommended Changes:
10c			See above - Trey can you add anything more here?
11			40 CFR 264.192 - Allows reference to API Publication 1615 (November 1979) or ANSI Standard B31.2 and ANSI Standard B31.4 - may be used, where applicable, as guidelines for proper installation of piping systems. Recommended Changes - Add note to drawings with this reference and to text in Section 2.3.9.
12a			OK - Did we ever say it would not be permitted? Recommended Changes - None
12b			Discuss will consists of indicating that piping system will comply with API Publication 1615 (November 1979) or ANSI Standard B31.2 and ANSI Standard B31.4. Drawings currently show piping system from tanks and where tanker trucks would connect to transfer liquids to Stabilization area. If piping was installed it would be placed in as direct a line as possible to the stabilization area. Recommended Changes - Add new text to sections 2.3.12 and to Volume III. Add note to existing drawings indicating that piping would meet with API Publication 1615 (November 1979) or ANSI Standard B31.2 and ANSI Standard B31.4 standards and that piping location would be determined in the field but would generally be in as direct route depending on other utility locations.
12c			Add new inspection item for annual leak tests to Table 5-1 Recommended Changes - See above
12d			They will be flushed with water and samples could be taken on the rinse water - Trey can you add some more to this?? Recommended Changes - None
13a			It is difficult to provide all that detail that is requested due to the unknown condition of the waste to be treated. When the stabilization process is completed, the waste will pass the paint filter test. The duration of mixing will depend on the input waste and the stabilization products that are added. Complete mixing is determined by visual observation and confirmed by paint filter test. The ratio of waste to reagent is variable depending on the type of waste being treated. The number of loads per day will depend on the market conditions. <i>Check on the gallon per load.</i> Mixing may be dependent on air temperature. Recommended Changes - None
13b			A typical treatment recipe can be provided but it should only be considered as typical. This was removed from drawings based on comments by NMED. Recommended Changes - Add table with typical recipe to drawings
14			Volume III presents the structural design analysis of the mixing bins which indicates the steel vault must be constructed of 7/8-inch to 1-inch steel. Therefore the bin structural analysis will dictate the materials used for the mixing bins. Volume III, Section 6 indicates that corrosion protection for the bins will be provided by

NO.	COMMENT	TL	RESPONSE
			installing grounded cathodes to the inner and outer bins. We recognize the some of the wastes that will be stabilized in the bins may be reactive with the steel bins; however, the wastes will only be in the bins for a limited amount of time and therefore the corrosion would be limited. Recommended Changes - None
15			Based on a comment from NMED we have tried to not repeat very similar information in the Part B application Volume I and in the Engineering Report (Volume III). The text in Section 2.5.1 clearly references the text in the engineering report (Volume III) that presents the phasing information in detail. Recommended Changes - None
16a			<i>Trey to address</i>
16b			<i>Trey to address</i>
16c			The initial estimates of waste inflow to size the first phase was based on approximately 15,000 yd <sup>3</sup> per month. This turns out to be 180,000 cy per year. Phase IA of the landfill has a waste capacity of 553,232 (Table 3, Page 3-20, Volume II). Therefore, the first phase would have capacity for approximately 3-yrs of waste placement. Recommended Changes - None
16d			See 4a
17			There is no regulatory requirement for minimum daily cover thickness. However, GM will modify the minimum cover thickness to 0.5 feet Recommended Changes - minimum cover thickness will be 0.5 feet
18a			This level of detail for the monitoring was developed based on input from NMED. Recommended Changes - Table 5-1 will be modified to include this inspection.
18b			The requested language can be added to Section 8.0. Air quality standards - <i>Trey can you respond ?</i> Recommended Changes - Add language to Section 8.0
19a			The landfill placement operation will be based on an set of grids along the north end of the landfill and along both the east and west sides of the landfill. Incompatible waste will be placed with a minimum of one grid in between the loads. Grid are normally spaced at approximately 50 to 100 foot intervals. Therefore, the minimum spacing would be 50 feet. Recommended Changes - Add above language to Section 2.5.3.7
19b			Recommended Changes - The sentence will be deleted.
20			There are only 2 ponds - Pond 1 and future Pond 2. Each pond has two sides A and B to facilitate the operation of the Ponds. The separation berm between the two sections is described in Section 2.6.1.3, Page 2-27
21			The overall pond operation is described in Volume III, Section 4. The sludge will be removed by vacuum truck

NO.	COMMENT	TL	RESPONSE
			and transported to the stabilization bins. The general procedure for pond operation is described in Volume III, Section 4. The volume of liquids in the ponds will be dependent on the waste market. Net evaporation (total evaporation minus rainfall) for the site is in the range of ___ inches per year.
22			Jim Bonner to check on wording
23a			Jim Bonner to check
23b			Jim Bonner
23c			Jim Bonner
24			Jim Bonner
25			Jim Bonner
26			Jim Bonner
27			Jim Bonner
28			Jim Bonner
29			Jim Bonner
30			Jim Bonner
31a-d			Jim Bonner
31e			The leak detection systems in both the landfill and pond liner systems will limit the head on the secondary liner. This will eliminate any influence from rainfall or leakage.
31f			Jim Bonner
31g			Jim Bonner
32			Jim Bonner
33			Jim Bonner
34a			
34b			
34c			
35d			
34e			
34f			Trey
35			Runoff in the retention basin will be clean water and is therefore, not expected to be contaminated. Recommended Changes - items will be added to the list.
36a			Trey
36b			Trey
37			Trey

NO.	COMMENT	TL	RESPONSE
38			Trey
39			Trey
40			Trey
41			Trey
42			There is not regulatory requirement for the type of fence to be used at the site.
43			Trey
44			Trey
45			Agreed
46a-c			The measures required to obtain water rights for the site are beyond the requirements of the Part B permit application. GM fully realizes that all permits to obtain water for the site will be required prior to the start of operations. These permit can be supplied to NMED after they are obtained. However, in our opinion they will not be required prior to receiving the Part B permit.
47			Agreed
48a and b			The barriers are shown on the drawings in Volume III, Drawing __ and __. Additional text can be added to describe these features. In our opinion, these berm in combination with the sloping floors (to the sumps) will be sufficient to separate the incompatible wastes.
49			Table 5-1 will be updated.
50			Paragraph suggested by NMED will be added to text
51			Trey
52			Trey
53			Trey
53			Trey
54			Trey

NO.	COMMENT	TL	RESPONSE
55			Trey
56			Trey
57			Trey
58			Trey
59			Trey
60			Trey
61			Trey
62			Trey
63			Trey
64			Trey
65			Trey

NO.	COMMENT	TL	RESPONSE
66			Trey
67			Trey
68			Trey
69			Trey
70			Trey
71			Trey
72			Trey
72			Trey
73			Trey
74			Trey
75			Jim

NO.	COMMENT	TL	RESPONSE
76			Jim
77			Trey
78			<p>Paragraph A. Only Phase IA of the landfill will be permitted at this time.</p> <p>Paragraph B. See above</p> <p>Paragraph C. Although only Phase IA will be permitted at this time, we will be showing the entire landfill footprint to indicate how future cells (approved on a permit modification) may be developed.</p> <p>Proposed Changes: Revise permit application to only indicate that Phase IA will be permitted at this time.</p>
79			<p>First Paragraph: These sections are included in Volume IV of the permit application</p> <p>Proposed Changes: None</p>
80			<p>First Paragraph: The definitions of treatment and storage units will be reviewed to determine the appropriate description and regulatory requirements.</p> <p>Proposed Changes: Make all reference consistent with above determination on description of facilities.</p>
81			<p>Paragraph A: Depending on the service life of the Ponds, the liners may have to be replaced. However, it is not considered an "Emergency Repair". The timing for the development of the Ponds is not known.</p> <p>Proposed Changes: Describe requirements for maintenance repairs in Operations and Maintenance plan.</p>
82			<p>First Paragraph: See response to comment D. The operational features of the facility design will be provided in the drawings provided for construction.</p> <p>Proposed Changes: None</p>
83			<p>Paragraphs A and B: The actual reagent use will be very dependent on the waste type and characteristic. Therefore, providing any type of receipt could be miss leading. A listing of the types of reagents that will be used is presented in the application.</p> <p>Proposed Changes: None.</p>
84			<p>First Paragraph: See response to comment D and 82.</p> <p>Proposed Changes: None</p>
85			<p>First Paragraph: There are typical walkway berm details shown on Drawings 37 and 38 that are intended to provide separation between the cells.</p> <p>Proposed Changes: None</p>
86			<p>Paragraph A and B: Drawings 37 indicates the location of the sumps and the concrete walkway between cells. Depending on operations the various cells will be labeled as to the type of waste being stored.</p>

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NO.	COMMENT	TL	RESPONSE
			Proposed Changes: A note will be added to the drawings that will indicate that each cell shall be labeled as to the type of waste being stored.
17			First Paragraph: the Table of Contents will be updated Proposed Changes: See above
18-93			The typographical errors that were noted will be corrected in the revised application.
5			<p>A clarification of the meaning of "Not for Construction" is referenced on the cover sheet of the drawings and is presented in the notes on sheet 2. This note indicates that the drawings are being used for the Part B permit application and are not to be used for construction. Additional work to be completed to issue the drawings for construction include the following:</p> <ul style="list-style-type: none"> <li>• Receipt of Part B permit</li> <li>• Survey grid points for construction staking</li> <li>• Review and approval of contractor submittals etc.</li> </ul> <p>The process for preparing and submitting design drawings for the Part B permit and bidding and construction drawings was outlined to NMED on a meeting on April 14, 1999 which is summarized below:</p> <p><b>Conceptual/Preliminary Designs (Internal Project Team Review)</b></p> <ul style="list-style-type: none"> <li>• Identify major facilities to be included in development plan</li> <li>• General layout on site plan</li> <li>• Identify process flow diagrams</li> <li>• General capacities of facilities</li> </ul> <p><b>Permit Level Designs</b></p> <ul style="list-style-type: none"> <li>• Detailed design drawings</li> <li>• Demonstrate compliance with all regulatory requirements</li> <li>• Sufficient detail to demonstrate constructability</li> <li>• Submit for regulatory agency review and permit approval</li> </ul> <p><b>Bidding and Construction Drawings</b></p> <ul style="list-style-type: none"> <li>• Same as above with the following: <ul style="list-style-type: none"> <li>• Details or specifications for any regulatory permit conditions</li> <li>• Survey control points and layout grid</li> <li>• Shop drawings <ul style="list-style-type: none"> <li>• Plumbing</li> <li>• Electrical</li> <li>• Building structures</li> </ul> </li> </ul> </li> </ul>

NO.	COMMENT	TL	RESPONSE
			<ul style="list-style-type: none"> <li>• Operational features</li> <li>• Agency approval prior to start of construction</li> </ul> <p>As-built Drawing</p> <ul style="list-style-type: none"> <li>• Documentation of all regulatory criteria</li> <li>• Liner system CQA documentation and details</li> <li>• LCRS system CQA documentation and details</li> <li>• Design Changes and Clarifications</li> <li>• Agency approval prior to start of operation</li> </ul> <p>This general press was agreed to by NMED. It was agreed that text would be added to the permit application that further defined the drawings:</p> <p><i>"These drawings present final designs for the RCRA permitted facilities. Details on the non-RCRA components of the facilities may be supplemented during the bidding and construction phase. Gandy-Marley will supply the additional details on the non-RCRA components of the design to NMED for review and approval prior to the start of construction."</i></p> <p>TL has requested that a general operation plan be included in the permit application. In addition, a "cross-walk" will be prepared that will cross-reference all information on each unit in the permit application.</p>
D-1			<p>The Permit application will be modified to include the roll-off storage area as a permitted unit. The roll-off containers will be lined with a HDPE bel liner inside the bed of the roll off containers. This system (HDPE and steel container) considered to be a primary liner for the waste. To provide secondary containment a liner will be placed below the operation layer over the entire non-stabilized and stabilized portion of the Roll-Off Area.</p>
D-1A(3)			<p>First Paragraph: The permit text (Volume III, Engineering Report, Section 2.2) indicates that the native soils have an allowable bearing pressure of approximately 2,000 psf. The expected loading from the concrete floor of the drum storage area is expected to be less than 500 psf (concrete slab and stacked drums). Therefore, the foundation soil should be adequate to support the drum storage unit. The trench in the sump area will be limited to 2 to .5 feet deep and will be spanned by a metal grate. The grate will be supported on either side of the trench by thickened sections of the concrete floor slab.</p> <p>Second Paragraph - As stated above, the permit text (Volume III, Engineering Report, Section 2.2) indicates that the native soils have an allowable bearing pressure of approximately 2,000 psf. The expected loading from the concrete floor of the drum storage area and stacked drums is expected to be less than 500 psf. Therefore, the foundation soil should be adequate to support the drum storage unit. A HDPE geomembrane underlies the entire footprint of the DSU which will prevent liquid migration into the subsurface soils. The perimeter of the</p>

N.	COMMENT	TL	RESPONSE:
			<p>drum storage unit will be graded to drain away from the facility foundation. Therefore, swelling of the foundation soil should not be a concern. The technical specifications for the foundation soils, the surface preparation for deployment of the liner, and the material gradations and placement and compaction specifications for the DSU select sub-base are presented in the Volume IV, Specifications.</p> <p>Third Paragraph - The specifications for the select sub-base are presented in Volume IV, Section 02229. These specifications indicate that the material shall have 0 to 2 percent passing the Number 200 sieve. Based on this requirement the material is expected to be very free draining and will transport any leaking liquids to the sump.</p> <p>Fourth Paragraph - Waste will be characterized and screened as part of the waste acceptance procedures. This is expected to prevent incompatible waste from being stored in the same roll-off containers that are delivered to the site. After the materials have been stabilized, material from a single stabilization batch will not be mixed with material from a different batch, therefore, eliminating the potential for incompatible waste to be stored in the same roll-off bin. Individual bins will be physically separated from each other in the storage area by a minimum of 3 feet and will be stored inside the covered steel roll-off bins and the HDPE bed liners.</p> <p>Fifth Paragraph - The cross-section shown on page 1 of 4 of the calculations is intended to represent the conditions in the sump as shown on Drawing 45, Sheet 2 of 2, Detail 3. This specifies that sump gravel thickness is 3-feet. The length of the perforated pipe in the calculation and the sump detail will be clarified to be consistent.</p> <p>Sixth Paragraph - The drawing on page 4 of 4 of the calculation in Appendix E-32 shown a graphic scale. In addition, the drawing indicates nothing and cutting for the location of the pond which provides an additional scale.</p>
D-1A(3)A			<p>First Bullet - The liner system for the Roll-Off storage unit consists of a HDPE geomembrane placed on prepared subgrade and covered with a double-sided geocomposite. It is further covered with a sub-base and road base materials that total 2-feet. These materials are compacted to 95% of Maximum Modified Proctor (MMP) <math>\pm</math> 3% of Optimum Moisture Content (OMC). The design should accommodate the limited truck traffic that will be required to load and unload the roll-off boxes and not result in any damage to the geosynthetic components.</p> <p>Second Bullet - The geomembrane (HDPE) is considered to be a low permeability liner (permeabilities are reported to be less than 1E-10 cm/sec). In addition, these materials are recommended for use in hazardous waste containment applications. Therefore, the HDPE liner is considered compatible with rainwater and any spills of</p>

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COMMENT	ID	RESPONSE
		<p>waste materials that occur within the roll-off storage area.</p> <p>Third Bullet: The wastes are not expected to be in contact with surface soils in the roll-off storage area. The waste materials will be stored in bedliners and the steel roll-off containers. In the unlikely event that leakage does occur it is expected to be of very limited volume and it is expected to react with the rock base aggregate.</p> <p>Fourth Bullet: The road base and sub-base materials will be compacted to a minimum of 95 percent of MPP. Based on extensive experience with placement and compaction of these types of materials to these densities they are expected to perform adequately under the very limited traffic that the roll-off area will experience. In addition, the road base and sub-base materials are underlain by the double-sided geocomposite layer. This will prevent any saturation of the overlying materials except for very short periods of time during peak rainfall events. If perhaps there is any disturbance of the road base surface as a result of loading and unloading the roll-off trailers, it will be observed during the weekly inspections. The amount required by placement of new material or re-grading of the existing material. In the case of severe rutting (greater than 1-inch) the area will be excavated and the geosynthetic materials will be inspected for damage. Repairs will be made if required.</p> <p>Second Paragraph - See above response</p> <p>Third Paragraph - The roll-off unit will be placed and removed on the roll-off pad by highway truck or site trucks. Landfill operational staff will visually observe truck leaving the landfill for excessive accumulation of waste on the tires and/or truck body. If excessive accumulation is noted, the truck will be noted to the truck wash for cleaning. Therefore, tracking of waste should not be a problem. We do not believe that the surface of the roll-off storage area is required to be equivalent to a concrete surface that is being used in the DJ building. This is primarily being used to facilitate use of a forklift to move the drums.</p> <p>Fourth Paragraph - See response to above comments</p>
<p>(C)</p>		<p>First Paragraph - The roll-off containment area is surrounded by a berm with a minimum height of 2.0 feet (see Drawing 4, sheet 1 of 1). This berm will divert run-off water around the perimeter of the truck roll-off area. Culverts are proposed under each of the access ramps to allow surface water flow to the west toward the run-off detention basin. The interior depth of the berms around the roll-off area is also a minimum of 2 feet. The 25-year, 24-hour storm for this site is 4.3 inches. This is expected to result in ponding inside the roll-off area to a depth of approximately 2 feet in the sump area and in the range of 1-foot or less in the central area of the roll-off unit. The containment area for the roll-off area does not need to account for the 10 percent of the volume of the containers, since incoming waste roll-off containers are not expected to contain free liquids. The criteria for free liquids is contained in the waste acceptance criteria.</p>

NO.	COMMENT	TL	RESPONSE
			<p>pumps, flow meters, and other controls. As indicated in response to comment D construction designs and specifications will not be provided in the application but will be provided prior to the start of construction. Also see D-2A(3)</p> <p>Proposed Changes: See above. An outline for the Operations and Maintenance plan is attached as Appendix A to the response to comments.</p>
D-2A(3)			<p>First Paragraph: The application will be revised to indicate that all liquids in the tanks will be transferred by tanker trucks. Therefore, the process flow diagrams on drawing 40 are considered to be sufficient to meeting the requirements of 270.16(d). Notes will be added to the drawings to indicate where liquids will enter the tanks and where they will leave the tanks. Also see response to comment E/A(2)</p> <p>Proposed Changes: Text and drawing modifications in Volumes I and I to reflect above and addition of Operations and Maintenance Plan.</p>
D-2A(4)			<p>First Paragraph - The stabilized waste will be either transferred to the roll-off area or directly to the landfill. The text references indicated in the comment will be clarified to indicate that either of these two scenarios could occur. The conditions that would require the stabilized waste to be temporarily stored at the roll-off unit prior to being disposed of in the landfill, would be associated with completion of testing to determine how and if the material can be disposed of the landfill. Reference will be added to the VAP. Also see response to comment D-2A(2).</p> <p>Proposed Changes: Clarify text that either of the two scenarios described above could be used to describe the handling of waste after stabilization.</p> <p>Second Paragraph - The application (Volume III, Engineering Report) will be modified to indicate what types of waste that will be excluded from the stabilization bins to avoid excessive corrosion.</p> <p>Proposed Changes: See above.</p>
D-2C(1)			<p>First, Second, Third, Fourth Paragraphs - Based on discussions with TL this comment can be responded to by including the manufacture information on the double wall tanks compatibility and installation details (tie-downs). These will be included in an appendix to the Engineering Rept in Volume III and will be referenced on the drawings.</p> <p>Proposed Changes: See above.</p> <p>Fifth Paragraph - the Engineering Report (Volume III, Section 2.2 General Facility Design Analyses) indicates that the site soils have an allowable bearing capacity of 2,000 psf. The concrete specifications (03300, Volume IV) require a minimum 28 day compressive strength of 4,000 psi. A calculation will be provided indicating that the tank bearing pressure will be suitable for the concrete pad.</p>

NO.	COMMENT	TL	RESPONSE
			<p>Proposed: Add calculation allowable bearing pressures and concrete pads.</p> <p>Sixty and Eight Paragraph of the stabilization is refined science. They are basically mixing bowls. The bins are able to withstand the impacts from the backhoe bucket. The bins are made of a material that will be placed. Given these two options, steel appears to be the most suitable material. It can react with some of the waste proposed to be stabilized, it is relatively slow, it is probably the best material to withstand impacts from mixing equipment. The design concepts for double steel containers with impact energy absorbers, a leak detection system between the two steel bins and also inside the concrete vault and remove any potential leaks. The bins can be removed and replaced if damaged or if observed. The design has been based on a rational assessment of the design loads that are experienced during mixing. The design thickness is based on a reasonable level of risk. It is fully realized that if an overloading condition arose and there was a crack or otherwise at the point of not providing support then the bin would be taken out of service and repaired or replaced.</p> <p>We believe this type of the design is the best type of container for hazardous waste given the extreme loading conditions that are experienced during storage.</p> <p>Proposed: The text of the EIR Report (Volume III) will need to discuss the approach to selecting tank material and strength. In addition, the O&amp;M Maintenance plan will be developed to address general procedures for handling of materials.</p>
D-2D(1)			<p>First step - The specifications for the tanks will be constructed from the same materials and specifications for the tanks will be used in the application.</p> <p>Proposed: The specifications for the poly-tanks will be provided in the application that will provide the necessary information on quality and structural details.</p> <p>Second step - A minimum 0.5 feet for the concrete pad will be added to the drawing. The dimension of the sum will also be added. The concrete for the secondary container the liquid in the tank and secondary container is the tanks.</p>

NO.	COMMENT	TL	RESPONSE
			<p>themselves. The concrete could be considered as the secondary containment for the ancillary facilities such as the piping and transfer connections.</p> <p>Proposed Changes: The text of the application (Volumes I and III) will be modified to indicate that the concrete pad will be secondary containment for the ancillary facilities. The drawings will be modified to show the slope of the concrete pad and the sump dimensions. In addition, a concrete pad will be added to the landfill tanks, liquid waste storage tanks and any other loading/unloading points for tanker trucks.</p> <p>Third Paragraph: The ancillary equipment will include the piping, monitoring and transfer systems associated with the liquid waste storage tanks. The drawings and text currently identify these components. These will all be located over concrete pads with sumps for collection of leaks and spills during loading/unloading operations.</p> <p>Fourth Paragraph: The primary and secondary containment for the waste in the stabilization bins will be the steel bins. The concrete vault that is used to house the steel mixing bins is not part of the containment systems. However, it will provide a monitoring and collection point if leakage were to occur from both the primary and secondary systems.</p> <p>Proposed Changes: The text in Volumes I and III will be expanded to clarify the primary and secondary containment systems and the function of the concrete vault system.</p> <p>Fifth Paragraph: See comment to fourth paragraph. Also see response to comment D. The details for tie-down of the steel tanks to the concrete vault will be provided in the construction drawings.</p> <p>Proposed Changes: None</p> <p>Sixth Paragraph: The details shown on the drawings, with the modifications indicated above, are considered sufficient for permitting. The Operations and Maintenance plan will present and discuss the details for pumping liquids from the leak detection sump and the concrete vault.</p> <p>Proposed Changes: See changes proposed for previous comments. Operation and Maintenance plan.</p>
D-4			<p>First and Second Paragraph: See response to comment D-2</p> <p>Third and Fourth Paragraph: Diversion ditches are planned around the surface impoundments that would drain into the site wide surface water diversion channels as shown on Drawing 25. The location of the ditches around the surface water ponds will be shown on the drawings and will be presented and discussed in the engineering report and surface water analysis section of the calculations.</p> <p>Proposed Changes: Surface water diversion channels will be shown on the drawings and the text will be updated to discuss the diversion channel design.</p>

NO.	COMMENT	TL	RESPONSE
			<p><b>Fifth Paragraph:</b> Drawing 5 indicates the general site grading that would be required to promote surface water flow to the surface water retention pond. Diversion ditches will be required around each facility that will drain in to the site wide diversion ditches shown on Drawing 25  <b>Proposed Changes:</b> see response to comments on the third and fourth paragraphs.</p> <p><b>Sixth Paragraph:</b> Drawing 4 shows the surface diversion ditch locations. Drawing 5 shows the surface grades around the site. Drawings 28-32 show the detailed surface grading around the Evaporation Ponds.  <b>Proposed Changes:</b> The surface water diversion channels will be shown around each unit and the contributing drainage area.</p> <p><b>Seventh Paragraph:</b> The specific reference is Volume IV, Specifications, Section 02110 Site Preparation and Earthworks.  <b>Proposed Changes:</b> This reference will be incorporated into Section 2.6.2.3</p> <p><b>Eighth Paragraph:</b> Only one ponds will be constructed (Pond 1); however, it will have two sides (side 1A and side 1B).  <b>Proposed Changes:</b> The text and drawings will be modified to clarify that only one pond will be constructed. The storage volumes will also be updated to reflect that only one pond will be constructed.</p> <p><b>Ninth Paragraph:</b> The interior slopes of the pond around the perimeter are 3H:1V (see Drawing 28). The slopes of the interior berm are 2H:1V.  <b>Proposed Changes:</b> The volumetric calculations to determine the storage volume will be detailed in the revised application.</p> <p><b>Tenth Paragraph:</b> The anchor trench calculations were based on a conservative slope length of 60 feet. Actual scaled length is approximately 45 to 50 feet.  <b>Proposed Changes:</b> The calculations will be modified to reflect that the slope length is conservative.</p> <p><b>Eleventh Paragraph:</b> See above responses.</p>
D-4E(2)			<p><b>First Paragraph:</b> See response to comment D. Drawings 8 and 9 present contour for the subgrade elevations and top of protective soil cover layer for the Phase 1A portion of the landfill. Drawing 12 presents the net cross-section on both the slopes and floor of the landfill. These drawings define the thickness and extent of the landfill liner system for Phase 1A.  <b>Proposed Changes:</b> None</p>

NO.	COMMENT	TL	RESPONSE
		X	<p>Second Paragraph: The permeability laboratory data was inadvertently not included in the submittal. The recompacted permeability testing data will be presented in the revised application. These data will show that the material can be recompacted to meet a permeability specification of less than 1E-07 cm/sec. The laboratory testing data have provided the basis for the establishing the low permeability soil liner placement window presented in the specifications.</p> <p>Proposed Changes: The laboratory data will be included in the revised permit application.</p> <p>Third Paragraph: The specifications require that the test fill be constructed prior to construction of the landfill liner system. The CQA plan presents a detailed plan for constructing and monitoring a test fill.</p> <p>Proposed Changes: The test fill plan will be modified to indicate that 12-inch diameter samples will be used for permeability testing on the test fill. The borrow sources that will be used include the soil obtained from the excavation. If additional material is required to construct the liner, then additional borrow sources may be required.</p>
D-4E(2)(A)			<p>First Paragraph - The requested data on depth of soil samples and standard testing procedures used will be provided. Regarding the potential for dispersion and piping of the soil due to flow of wastes through the soil liner, the selected soils will be subjected to a leachate compatibility test. This test permeates a minimum of two pore volumes of leachate through the sample and monitors the changes in permeability with time and pore volume. This test is expected to provide an indication of the potential for dispersion or piping of the soil as a result of contact with the leachate.</p> <p>Proposed Changes: Soil sample depth information to be provided and test procedures for soil classification tests.</p>
D-4E(2)(B)			<p>First Paragraph: Soil liner compatibility tests will be performed once the waste stream has been identified and a synthetic leachate can be generated. The test will consist of the standard permeability test on a recompacted sample of the proposed soil liner material (ASTM D5084) and the synthetic leachate. The test will be started with normal tap water until the permeability can be determined. Then the permeating fluid will be switched to the synthetic leachate and continued until a minimum of two pore volumes of leachate have passed through the sample. The measured permeability will be monitored continuously through out the test.</p> <p>Additional reference literature will be provided with the application that indicates that soil liner and leachate compatibility testing is normally not a problem unless the leachate contains high concentrations of organics. The WAP does not allow the site to accept high concentrations of organic, therefore, the soil and leachate compatibility is not expected to be a problem</p>

NO.	COMMENT	TL	RESPONSE
			Proposed Changes: Reference literature will be provided with the application.
D-4F(1)			<p>First Paragraph: It is expected that the sump LCRS and LDRS systems will be equipped with cumulating flow meters to monitor all liquids removed from the sump from the start of operations and direct reading pressure transducers that can be converted to elevation of liquid. These will be described further in the Operations and Maintenance plan for the site.</p> <p>Proposed Changes: Include description of the types of pumping systems and instrumentation that will be installed in the sumps of all facilities in the Operations and Maintenance plan.</p>
D-4G			
D-4G(1)(C)			<p>First Paragraph: The requested information is presented in Volume IV, Specifications, Section 02718</p> <p>Second Paragraph: The requested information is presented in Volume III, Section 9.1 and is shown on Drawing 44. A HDPE geomembrane liner extends under the entire truck wash facility and includes a geocomposite drainage layer which flows to a sump for liquid removal. The dimensions of the sump are shown on the drawings and are presented and discussed in the text of Volume III, page 9-3.</p> <p>Third Paragraph: It is recommended that a liquid level probe be used to measure the presence and/or depth of any liquids in the truck wash sump.</p> <p>Proposed Changes: A note will be added to Drawing 44 which will clarify the location of the surface and subsurface sumps for the truck wash. In addition, the Operations and Maintenance plan will be prepared that will detail equipment used to monitor liquid levels in the sump</p>
D-4G(3)			<p>First Paragraph: The results of the specific laboratory testing on the mudstone samples from the lower Dockum will be provided in the revised application. These data provided the basis for stating that the material can be used for the low permeability soil liner.</p> <p>Proposed Changes: The results will be included with revised permit application.</p> <p>Second and Third Paragraphs: The test fill plan presented in the CQA Plan (Volume IV) will be modified to propose using large diameter (12-inch) samples cut from the test fill for permeability testing. This will be done rather than conducting a Sealed Double Ring Infiltrometer. (SDRI). Recent research has indicated that the large diameter permeability tests will represent actual field permeability values as determined from SDRI tests (Benson, et al).</p> <p>Proposed Changes: The test fill plan will be modified to indicate use of large diameter samples for permeability</p>

NO.	COMMENT	TL	RESPONSE
			<p>testing</p> <p>Fourth Paragraph: The current CQA plan (Volume IV) presents a definition of CQA and CQC that is consistent with the referenced EPA Guidance document. The CQA plan will further clarify the "Independent" status of the CQA organization.                      Proposed Changes: Modify CQA plan as indicated above</p> <p>Fifth Paragraph: The testing frequencies outlined in the referenced guidance document will be incorporated into the CQA plan. However, we understand that NMED would consider alternative testing frequencies after construction of the first cell and some field experience with the proposed soil liner materials has been obtained.                      Proposed Changes: Modify CQA testing frequencies as requested. In addition, statement will be added to CQA plan that will require that the final CQA report present the results of any CQC tests conducted by the installation contractors.</p> <p>Sixth Paragraph: Volume I, Page 2-20 indicates that the facility will not accept waste until NMED has approved the CQA Certification Report.                      Proposed Change: A similar statement will be added to the CQA Plan.</p>
D-4I			<p>First Paragraph: The reference to surface impoundment on Page 7-1 will be removed. In addition, on page 7-1, under the section on the evaporation pond the response action will include "closure of the pond" per 264.223(b)4                      Proposed Change: See above</p>
D-4I(3)			<p>First Paragraph: The pond levels will be inspected weekly as part of the facility operations and maintenance plan and will also be observed during any filling operations. These visual observations will be made against a staff-gauge to confirm that the design capacity is not being exceeded.                      Proposed Change: Operations and Maintenance plan will provided details on visual observations to be made and that a staff-gauge will be installed to determine design operating level.</p> <p>Second Paragraph: The pond has been designed with 2-feet of free board. This is presented in Volume III, Page 4-2. There is no run-on to the pond from the surrounding area. The direct precipitation to the pond from the 100 year rainfall is 5.3 inches. Therefore, the 2-feet of free board should be sufficient to accommodate the direct rainfall from the 100 year- 24 hour event.                      Proposed Changes: None.</p>
D-6			NA

NO.	COMMENT	TL	RESPONSE
D-6C(3)			<p>First Paragraph: The operations layer will be placed over the entire side slopes and floor during the construction phase of the project. This is intended to provide protection for the liner materials over the long term. The D6 dozer is specified for placement of the operations layer in the specifications Section 02232. The allowable equipment loadings are for various thickness of operations layer material that are used for haulroad etc. The specifications Section 02232, 3.02, Paragraph F indicate that unless otherwise specified these allowable equipment ground pressures should be used. However, in Paragraph E the D6H-LGP or other equipment approved by the Owner shall be used for placement. Proposed Change: None</p> <p>Second Paragraph: See above comment. The condition of complete saturation of the operations layer is possible during peak rain events. However, the specifications prohibit placement of operations layer material during rain or adverse weather conditions (Paragraph M). Furthermore, the geocomposite drainage layer is directly below the protective soil layer and should provide drainage for the protective soil layer material in the long run. The stability calculation presented in Appendix E-2 specifically indicate that the D6 dozer will not place protective soil during rainfall events. Since this construction will be completed during the construction phase of the project CQA staff will be onsite to confirm that proper placement equipment is used and that the material is not placed during rainfall events. Proposed Change: None</p> <p>Third Paragraph: The stability calculations for the anchor trench and the protective soil layer stability, indicate that the critical interface strength for the liner system can be characterized by a residual friction angle (31 degrees) and adhesion (15 psf). This is greater than the slope angle of 18 degrees. Therefore, there will not be any residual stress developed in the liner system or the anchor trench as a result of static loading conditions. Proposed Changes: None</p>
D-6C(4)			<p>First Paragraph (Part 1): The permit application will be revised to only request a permit for Phase IA. The extent of liner coverage on Phase IA is shown on the Drawing 9. Proposed Changes: None</p> <p>First Paragraph (Part 2): The Operations and Maintenance plan will require that waste trucks are inspected for waste clods and other loose waste material hanging from wheels and/or truck frames that could fall off after existing the landfill. If debris is noted, the loose material will be removed prior to existing the landfill. Other</p>

NO.	COMMENT	TL	RESPONSE
			<p>non-loose material may have to be removed at the truck wash. Proposed Changes: None</p>
D-6C(5)			<p>First Paragraph: The protective soil layer will be placed over the entire floor and side slopes as part of the construction. This is shown on the Drawing 12. Proposed Changes: None</p>
D-6D			<p>First Paragraph: The stability calculations for the landfill will be updated to specifically address the berm on the west and south sides of the landfill. Laboratory testing of the near surface soils indicates that they have an allowable bearing capacity of 4,000 psf. Therefore, the settlement and bearing capacity of the surrounding soils should not be an issue. Proposed Changes: Slope stability calculation to support the 3H:1V fill slopes around the perimeter of the landfill will be presented and included in the appendices to the Engineering report</p> <p>Second Paragraph: The slope along the south side of the Phase IA excavation is consider a temporary slope that will be cut by the excavation contractor. It is shown as 2H:1V in the plans, however, the haulroad running across the slope will result in an over all slope angle of approximately 2.75H:1V. However, to address this question, cut slope stability calculation will be updated to reflect this slope. Proposed Changes: Slope stability calculations for cut slopes will be updated to include the south slope of the Phase IA excavation.</p> <p>Third Paragraph: The ramp slope stability calculations were considered to be the most critical in terms of equipment loading. Therefore, they were analyzed with a scraper on the ramp. The overall slope stability (3H:1V slope) with equipment loading was not considered to be critical as the weight of the scraper, dozer or loaded truck is very small compared to the weight of the slope materials. However, in order to verify this assumption, calculations will be provided to show that the overall slope stability is not impacted by the presence of the ramp or any landfill related equipment. Proposed Changes: Add calculation for side slope stability with ramp and equipment loading (static and dynamic).</p>
D-6D(4)(B)			<p>First Paragraph: The results of the geotechnical investigation indicated that the site soils have an allowable bearing capacity of 4,000 pounds per square foot. This will provide adequate bearing for the structural fills around the perimeter of the landfill. Proposed Changes: Calculation package will be included in revised permit application that will demonstrate</p>

NO.	COMMENT	TL	RESPONSE
D-6E(1)(A)			<p>adequate foundation bearing capacity for the perimeter structural fills based on the native soils.</p> <p>First Paragraph: The application currently references EPA guidance documents that indicate that HDPE is generally resistant to most leachates for facilities that do not accept organics. However, specific HDPE manufactures ratings for compatibility with various chemical will be presented in an Appendix to the Engineering Report. In addition, Gandy-Marley has committed to perform site specific compatibility tests prior to the start of construction, once the waste stream to be accepted at the site is known.</p> <p>Proposed Changes: Add manufactures published information on compatibility with various chemicals to the application.</p>
D-6E(1)(C)			<p>First Paragraph: The specification for the prepared subgrade will be modified to require that only CL and CH (USCS) materials be used. This is the same specification as the clay liner material. In addition, testing for the prepared subgrade will increased to include tests for grain size and Atterberg limits at a frequency of one per 125,000 square feet.</p> <p>Proposed Changes: See above</p>
D-6E(2)(B)			<p>First Paragraph: Gandy-Marley has committed to perform site specific compatibility tests prior to the start of construction, once the waste stream to be accepted at the site is known.</p> <p>Proposed Changes: Manufactures published information on the compatibility of the GCL with typical leachate materials will be provided in an Appendix to the Engineering Report.</p>
D-6F(1)			<p>First Paragraph: The Permit application will be revised to only include permitting Phase IA of the landfill. Therefore, descriptions of future phases will not be required.</p> <p>Proposed Changes: See above</p> <p>Second Paragraph: The operations and maintenance plan that will be included with the revised permit application will address procedures to maintain the head on the liner to less than 1-foot. This will be accomplished through pumping from the side slope riser and vertical riser pipes. The leachate collection tank at the crest of the landfill will be pumped as required to maintain the operating capacity for the sump pumps.</p> <p>Proposed Changes: Include operations and maintenance plan.</p>
D-6F(2)			<p>First and Second Paragraphs: The specifications for the transmissivity testing on the geocomposite will be modified to require that the tests be conducted at a worst case normal pressure of 15,000 psf and that textured rather than smooth HDPE be used. The particular configuration for the test will simulate the worst case condition for the geocomposite in terms of backing materials that could allow penetration into the webs of the geonet and restrict flow.</p> <p>Proposed Changes: Modify test conditions to included 60 mil textured HDPE and a maximum normal load of 15,000 psf.</p>
D-6F(3)			<p>First Paragraph: The text of the application will be modified to correct the discrepancies in the pump</p>

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NO.	COMMENT	TL	RESPONSE
			<p>requirements.                      Proposed Changes: Modify the text of the engineering report and the specifications to clarify the requirements for the pumps in the primary system (side slope and vertical riser) the secondary side slope riser and the vadose zone side slope riser.</p> <p>Second Paragraph: The design drawings indicate that the sumps are all depressed below the level of the floor of the landfill. EPA guidance documents specify that the leachate must be maintained below 1-foot of head over the floor liner. This does not include the sump. Therefore, the pump will be submerged for more than 1-foot to allow safe operations.                      Proposed Changes: Operations and Maintenance plan to be included in the revised application, will address the minimum depth in the sumps to allow safe and efficient operation of the side slope riser pipe pumps.</p> <p>Third Paragraph: The text of the Operations and Maintenance plan will describe how the piezometers will measure the head above the tip of the piezometer and this will be calibrated to the elevation of water. This will then be compared to the elevation of the floor of the landfill to determine if pumping is required. The flow meters will be accumulating flow meters that will record the total volume of liquids removed. The volume of liquids pumped will be recorded manually whenever the sump is pumped. This information will be used to determine if Action Leakage Rates are being exceeded. The specific wiring and readout details of the instrumentation will not be included in the permit application but will be provided prior to the start of construction.                      Proposed Changes: The Operations and Maintenance plan will present information on the operation of the piezometers and flow meters that will be installed in all of the sumps.</p>
D-6F(4)			<p>First Paragraph: As stated in previous comments only Phase IA will be permitted in revised permit application. The Operations and Maintenance plan to be submitted with the revised permit application will present a description of the type of instrumentation and equipment that will be used to maintain the liquid levels below 1-foot above the top liner.                      Proposed Changes: The revised permit application will only request permitting Phase IA of the landfill and will included a Operations and Maintenance plan.</p> <p>Second and Third Paragraphs: The Operations and Maintenance plan will describe the general procedures and documentation associated with monitoring and pumping the sumps. The design for the Phase IA landfill envisioned that contaminated surface water runoff of the landfill face would drain to the south toe and then into the LCRS system, where it would be removed by either the side slope riser or vertical riser pump systems. EPA</p>

NO.	COMMENT	TL	RESPONSE
			<p>guidance documents discussing the procedures for pumping of the LCRS and maintaining the required 1-foot of head above the top liner, recognize that this may not be achievable immediately after rainstorms, particularly during the start of filling for each individual cell.</p> <p>Proposed Changes: Operations and Maintenance plan will be included in revised permit application.</p> <p>Fourth Paragraph: The revised permit application will only include Phase IA. However, the HELP analyses that were conducted for the entire landfill footprint for conditions both during operations and after closer indicated that the fluid levels would not exceed 1-foot of head on the liner.</p> <p>Proposed Changes: Revised permit application will only include Phase IA.</p>
D-6F(5)			<p>First Paragraph: As previously indicated, compatibility testing of the proposed materials for the liner and leachate collection system will be tested prior to construction of the facility.</p> <p>Proposed Changes: None.</p>
D-6F(7)			<p>First Paragraph: The geotextile design presented in Engineering Report evaluates the filter characteristics of the geotextile against the onsite soils that will be placed as the operations layer on the side slopes and floor of the landfill. The filter design evaluates the Apparent Opening Size (AOS) against the gradation of the soils to be protected. We understand that a geotextile filter will allow a certain amount of fine particles through the geotextile with the objective of establishing a filter gradation in the adjacent soil. If there is not a defined soil layer directly adjacent to the geotextile, then there is the potential for large volumes of fines (silt and clay size particles) to migrated through the geotextile. Therefore, the design has specified a protective soil layer on top of the geotextile on both the side slopes and the floor of the landfill.</p> <p>Proposed Changes: None.</p>
D-6G			<p>First Paragraph: The revised permit application will only request approval for Phase IA.</p> <p>Proposed Changes: See above.</p>
D-6G(1)(B)			<p>First Paragraph: As previously indicated soil liner and leachate compatibility tests (EPA 9090) will be conducted prior to construction. In addition, the test fill will be constructed, as per the procedures outlined in the CQA plan, prior to the start of construction (Volume IV, Specifications 02221).</p> <p>Proposed Changes: The text of the application (Volume I) and the Engineering Report (Volume III) will be modified to more clearly represent that the EPA 9090 test and a test fill on the soil liner materials will be conducted prior to construction.</p> <p>Second Paragraph: The revised permit application is only for Phase IA. Additional, phases will require a permit modification.</p> <p>Proposed Changes: Revised permit modification will only request Phase IA.</p>

NO.	COMMENT	TL	RESPONSE
D-6G(2)			<p>First Paragraph: The revised permit application will be signed and stamped by Mr. Corser. Proposed Changes: See above</p>
D-6G(2)(B)			<p>First Paragraph: The revise permit application will only request permitting Phase IA. Proposed Changes: See above.</p>
D-6G(2)(D)			<p>First Paragraph: Since only Phase IA will be permitted with this application. Connections to future phases will not be shown. Proposed Changes: None.</p>
D-6G(3)			<p>First Paragraph: The CQA plan will be signed and stamped by Mr. Corser Proposed Changes: None.</p> <p>Second Paragraph: The CQA plan currently indicates that these will be tested in accordance with manufacture requirements. Proposed Changes: The CQA plan will be modified to include a brief description of the operational features that will be included in the facilities and the general manufactures procedures for checking and/or calibration during installation.</p> <p>Third Paragraph: The CQA plan will be updated to reflect frequencies recommended in the EPA technical guidance document. However, it is understood that based on favorable construction and operating experience during the initial phases of the facility testing frequencies could be modified. Proposed Changes: Modify testing frequencies to match referenced EPA guidance document.</p> <p>Forth Paragraph: The permit application (Volume 1, Section 2.5.2.3) currently indicates that NMED must review and approve the certification report prior to waste acceptance. However, the organization chart and text of the CQA plan will be modified to more clearly indicate the role of NMED on the implementation process for construction of the landfill. Proposed Changes: See above.</p> <p>Fifth Paragraph: The CQA plan will be modified to clearly indicate that design changes and modification will have to submitted, reviewed and approved by NMED in accordance with permit modification requirements of 40 CFR 270.41 and 42. Proposed Changes: See above</p> <p>Sixth Paragraph: The revised permit application will only include Phase IA construction. However, the CQA</p>

NO.	COMMENT	TL	RESPONSE
			<p>plan will be modified to clearly reflect that a certification report will be required for each phase of landfill construction.                      Proposed Changes: See above.</p> <p>Seventh Paragraph: The operational features of the facilities will be installed in accordance with manufactures procedures. Therefore, they may have CQA plans that should be implemented as part of construction and should be consistent with but separate from the overall CQA plan that is being presented as part of this application.                      Proposed Changes: None.</p>
D-6G(4)			<p>First Paragraph: A Operations and Maintenance plan will be prepared and submitted as part of the revised permit application.                      Proposed Changes: See above</p>
D-6G(5)			<p>First Paragraph: The specification indicate repair procedures for the soil and geosynthetic materials that will be used for containment and leachate collection and removal. However, the operations and maintenance plan will specifically reference the specification sections when referring to repair of facilities.                      Proposed Changes: See above.</p>
D-6H			<p>First Paragraph: The revised permit application will only request a permit for Phase IA. The Operations and Maintenance plan will address specific pumping rates and methods for measuring volumes over a particular time period to compare to ALR values.                      Proposed Changes: the Operations and Maintenance plan will address specific procedures for tracking volumes of liquids pumped from the sump and comparison to ALR values.</p> <p>Second Paragraph: The calculation presented in the Appendix to the engineering report are consistent with those recommended by EPA. The calculation for the ALR are dependent on both the transmissivity of the geonet or geocomposite and the thickness. With both of these factors taken into account the ALR values can be justified.                      Proposed Changes: None.</p>
D-6H(2)			<p>First Paragraph: The Operations and Maintenance plan will address specific pumping rates and methods for measuring volumes over a particular time period to compare to ALR values. The plan will indicated the area over which the ALR will be calculated based on the proposed filling area.                      Proposed Changes: Submit Operations and Maintenance plan with revised permit application.</p>
D-6I(1)			<p>First Paragraph: In Volume I, Section 5 indicates that the landfill will be inspected weekly and after storms. Due to the limited rainfall that is expected at the site, this criteria will require inspection after any rainfall. In addition, Section 5 indicates that the LCRS and LDRS will be inspected daily for the presence of liquids.</p>

NO.	COMMENT	TL	RESPONSE
			Required Changes: None.
D-6J			<p>1 The revised permit will only request permitting Phase IA.</p> <p>2 Phase IA haulroads are shown on drawing 8.</p> <p>3 A freeboard depth of 0.3 feet is a common value used by other governing agencies (i.e. Office of Surface Mining). However, a re-evaluation will be made using Soil Conservation Service methods and may be better suited for this type of operation. This method uses 20 percent of the depth for subcritical flow and 25 percent for supercritical flow but not less than a 1.0 foot.</p> <p>4 Any localize spills will be cleaned up as required by the Contingency Plan presented in Volume I of the permit application. The truck staging area will drain to the surface water runoff basin, which is designed to contain the 25-year, 24-hour storm and control the 100-year, 24-hour storm event.</p> <p>5 The storm water control system consists of not only ditches but also the detention pond and associated spillway. Section 3.0 provides further explanation of the control system.</p> <p>6 The medium hydrograph response was used because of the B type (sandy) soils on site. Fast hydrograph responses refer to hard packed soils or urban areas. The on-site sandy soils would not produce the fast run-off as associated with a fast response.</p> <p>7 This section will be revised as requested.</p> <p>8 Surface water will not be allowed to pond along side the road due to the positive grade of the road. The water surface mark is shown to indicate the roadside ditch capacity.</p> <p>9 Table A-1 will be revised as requested.</p> <p>10 The Channel Design Table and Drawing No. 25 will be revised.</p> <p>11 The Channel Design Table and Drawing No. 25 will be revised.</p>

NO.	COMMENT	TL	RESPONSE
			12 The table does include a footnote indicating the 100-year, 24-hour flow value.
			13 Corrections to the Design Table will be made.
			14 The channel design discussion will be revised as requested.
			15 The reference will be provided as requested.
			16 The drawing will be revised as requested.
			17 The hatching is subgrade. We will modify hatching to be consistent with symbols on Drawing 2.
			18 The direction arrow will be changed.
			19 The clay liner material is used to backfill the anchor trench to prevent infiltration of surface waters. The material should be placed and compacted in accordance with the Clay Liner specifications in Volume IV.
			20 The slope is approximately 4H:1V. This will be noted on the drawings.
			21 This comment has been eliminated as agreed upon.
			22 This comment has been eliminated as agreed upon.
			23 The clean water basin will be pumped after rainfall events that result in the accumulation of water in the basin. This will provide capacity for the 25-year, 24-hour storm event.
			24 Drawing 13 is generally a enlarged (detailed) area of the collection basin and Drawing 10 represents the filling plan for Phase 1A. Thus the berm and associated culvert are not shown on both. The permit application will be revised to discuss the purpose of the berm and culvert.
D-6J(3)			Discussions are ongoing with NMED regarding the requirements for permitting the truck wash and associated tanks.

NO.	COMMENT	TL	RESPONSE
D-6J(5)			<p>First Paragraph: The operations and maintenance plan will address maintenance of the drainage ditches. This is expected to include regular monitoring after all rainfall events for the build up of sediment and erosion.                      Required Changes: Operations and Maintenance plan.</p>
D-6K			<p>First Paragraph: The operations and maintenance plan will indicate that landfill operators will inspect vehicles prior to leaving the landfill for signs of accumulated waste on the tires or truck body. If accumulated waste is observed the vehicle will be directed to the truck wash. The maximum wind speed for placement will be specified at 35 miles per hour (MPH) in the operations and maintenance plan.</p>
I			
I-1A			
I-1E(2)			
I-1E(3)(B)			<p>First Paragraph: The vegetative cover thickness should be 2.5 feet.                      Proposed Changes: The closure plan will be revised to be consistent with the Engineering Report and drawings.</p>
I-1E(3)(E)			<p>First Paragraph: Drawing 23 indicates a toe drain around the perimeter of the landfill cover to collect and discharge water that infiltrates through the vegetative cover.</p>