

F A X



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NMED
7/20/99

To:	Dale Gandy	Date:	July 20, 1999
From:	Patrick Corser - MW	Reference:	602
Fax No:	505/396-6887	Charged Amt:	
Subject:	Meeting Notes with NMED	No. of Pages:	18 (including cover)

Dale,

Attached are my notes from meeting with NMED on July 14, 1999. If you would like I can forward a copy to NMED (S. Kruse) for their files. I am planning to call James Bearzi on Thursday to discuss the schedule. I will include Ken Schultz in the call. Do you want to participate? If so, let me know.

We are finalizing the RSI Response document today or tomorrow. I will send two copies to you and one to Ken, Jim and Trey. NMED has asked that I send three to them and one to TechLaw.

Jim has forwarded his sections of the work plan and Dave is working on his. I am hoping to put the pieces together this week and forward to NMED as draft. I will keep you informed on progress.

Regards,

Patrick Corser

cc: Jim Bonner (505) 255-1400 ✓
Trey Greenwood (505) 885-1556
Ken Schultz (505) 275-5750
332-7283

If you do not receive all pages, or if there are any problems with this transmission, please call 970-879-6260

Meeting Notes

Status Report Meeting - July 14, 1999, 10:00 am at NMED's Offices

Gandy Marley Triassic Park Waste Disposal Facility

Attending:

See attached sign up list

1. **Reviewed Objectives for Meeting**

- See below. No comments or additional items.
 - Resolve outstanding RSI responses.
 - Identify major components of permit application to be revised.
 - Identify format for permit revisions.
 - Confirm schedule for preparation and submittal of revised permit and development of draft permit.

2. **Identify Major Permit Revision Components**

- Engineering drawings, specifications and calculations
 - Minor edits and updates based on comments from NMED and TechLaw, no major new engineering. OK – No comments.
 - Operations and Maintenance Plan to be included in revisions to permit (see attached outline). OK – No comments on outline.
- Groundwater characterization and groundwater monitoring program
 - Present and discuss outline for work plan for additional groundwater characterization program.
 - Location and number of wells as shown in attachments to agenda are OK – provided nothing new or different is encountered.
 - Air rotary drilling OK
 - Same logging technique as original investigation is OK
 - Coring is not required for monitoring well to the east
 - Slug testing would be OK for well to the east to determine hydraulic parameters for saturated zone.
 - Outline for field investigation work plan will be reviewed by Jim Bonner and Steve Pullen after main meeting.
 - Jim invited NMED to visit drilling and logging operations - NMED indicated that they would visit the site.
 - Holes would be located based on the existing borehole grid that was referenced to the section corner.
 - Drilling hole to the east will start with approximate location "B" however, the location would be controlled by drilling rig access.
 - Discuss components of work plan for VZMW.
 - Outline and information will be similar to additional groundwater characterization work plan.
 - Discuss need/format/permit location for groundwater monitoring waiver.
 - NMED is currently offering waiver on monitoring of Santa Rosa Aquifer based on being able to monitor Upper Dockum water if it is present.
 - If water is not found in Upper Dockum unit east of site – they may have to think through how they word a waiver.

- Discuss point of compliance, detection monitoring, assessment monitoring, etc.
 - NMED wants to see proposal from GMI for frequency and parameter list for each of the following
 - Sump vadose zone monitoring
 - VZMW's
 - Possible upper Dockum monitoring well east of site
 - Waste Analysis Plan
 - Discuss status based on July 6 meeting notes (see attached)
 - S. Kruse will review and comment on notes attached to agenda.
 - Closure and Post-Closure Plan
 - Discuss status based on July 6 meeting notes (see attached)
 - S. Kruse will review and comment on notes attached to agenda.
- 3. Review Format for Proposed Revisions to Permit**
- Proposed plan
 - Replacement pages for Volume I – Permit Application Document.
 - Replacement pages, sections, or volumes as required for attachments to permit (Volumes II – VI).
 - Proposed plan is OK. GMI has a fair bit of flexibility in producing revised volumes if necessary. However if this is done, then an index of changes may be required so NMED can only review changes not the entire document.
- 4. Review Schedule for Overall Project (GMI submittals and HRMB review)**
- See attached schedule prepared by GMI and schedule prepared by NMED. Major differences include
 - NMED has much more time for their review
 - They are planning on public review processes starting by end of the year but may not be completed
 - NMED is unsure of EPA and legal review impacts
 - Jim Bearzi will check on scheduling and will be prepared to discuss next Thursday afternoon via conference call
 - After conference a mutually agreeable schedule will be prepared that will reflect input by GMI and NMED.
- 5. Review HRMB's Response to Gandy Marley Draft Response to RSI**
- Review issues that NMED identified to discuss further or indicated responses were not acceptable (see attached list).
 - A draft final Response to RSI Comments will be presented that will incorporate recent discussions between HRMB and Gandy Marley design team. If the draft final responses are acceptable the document will be finalized.

Comments to Review with HRMB Staff

<i>Comment Number</i>	<i>Status Before Meeting</i>	<i>Status After Meeting</i>
3	Revised	Jim
12b-d	Revised	OK
13	Discuss	OK
14	Discuss	OK with additional text
18a	Discuss	OK
19a	Discuss	OK
20	Discuss	OK
21	Discuss	OK
27	Revised	Jim
31b	Revised	Jim
31e	Revised	OK Check with Steve
35	Discuss	OK Discuss with Carl
44	Revised	OK
46a	Revised	OK
48	Discuss	OK
51b-c	Discuss	OK
51d-e	Revised	OK
53c	Discuss	OK
54	Discuss	OK
56	Discuss	OK
57	Discuss	OK
59b	Discuss	OK
60	Discuss	OK
61	Discuss	OK
66	Revised	Jim
71	Revised	OK
75	Revised	Jim
76	Revised	Jim
80-84	Discuss	OK
81	Discuss	OK
82	Discuss	OK with revised text
83	Discuss	OK
84	Discuss	OK
D-1a(3)©	Revised	OK
D-1a(3)(e)	Revised	OK
D-1b(4)	Revised	OK
D-6c(3)	Revised	OK
D-6c(5)	Discuss	OK
D-6g(2)(d)	Revised	OK
I-1a	Revised	OK
I-1e(2)	Revised	OK

Proposed Outline

OPERATIONS AND MAINTENANCE PLAN

1.0 General

2.0 Units to be Addressed

- 2.1 Landfill
- 2.2 Evaporations Plan
- 2.3 Liquid Waste Storage
- 2.4 Stabilization
- 2.5 Drum Handling
- 2.6 Truck Roll-Off
- 2.7 Truck Wash
- 2.8 Drainage Systems

3.0 Operations

- 3.1 Waste Acceptance
- 3.2 Procedures for Placement and Handling of Waste
- 3.3 Inspections
- 3.4 Monitoring Systems

4.0 Maintenance

- 4.1 Identification of Required Maintenance
- 4.2 Procedures for Maintenance
- 4.3 *Documentation for Maintenance Activities*

WORK PLAN
STRATIGRAPHIC AND GROUNDWATER CHARACTERIZATION PROGRAM

1.0 Introduction

2.0 Stratigraphic Characterization Program

- 2.1 Purpose
- 2.2 Approach (rationale)
- 2.3 Drilling equipment
- 2.4 Logging
 - 2.4.1 Geophysical
 - 2.4.2 Lithologic
- 2.5 Hole abandonment

3.0 Groundwater Characterization Program

- 3.1 Purpose
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- 3.5 Aquifer Testing
- 3.6 Sampling
 - 3.6.1 Procedure
 - 3.6.2 Analyses
- 3.7 Well completion/Hole abandonment

4.0 Approvals

Liasse Park

7/14/99

Stephanie Kruse	NMED/HRMB	505/827-1558 x 10
Ken Schultz	GMI	(505) 275-5750
James Bearzi	NMED/HRMB	505-827-1567
Greg Lewis	NMED/HRMB	505-827-1758
Pat Lopez	HRMB	greg-lewis@nmed.state.nm.us
Jim Barber	GMI	970/879-6260 FAX. CORP@EHW.COM
Steve Tollen	NMED/HRMB	(505) 255-6200
Kyle Gandy	GMI	(505) 827-1561 (10)
		505-396-4948

LOPE,

CONF Call THURSDAY @
2:00 PM

- Pat Gandy
- Ken Schultz
- James Bearzi
- Pat Lopez

1 HR
Job #
154262.

Tx Pat

July 12, 1999

TENTATIVE SCHEDULE

COMPLETION: TRIASSIC PARK RCRA PERMIT

Carl will be out:

August 4-6

September 6-24 (can be rescheduled)

Steve P. will be out:

August 4-13

- 7 /14/99 Ground water characterization work plan submitted.
- 7/19 Ground water characterization work plan approved.
- 7/19-23 Draft revised Chapter 4.0 (WAP) submitted for review.
Draft revised Chapter 8.0 (Closure/Post-Closure) submitted for review.
- 8/09-13 Ground water characterization work completed.
- 8/23-27 Ground water characterization report submitted.
- 9/06-10 Ground water characterization report approved.

If everything checks out, there will be monitoring of the uppermost aquifer (shallow aquifer at the contact between the Upper and Lower Dockum + vadose zone monitoring). Must be part of the permit application. TP will have to redo Chapter 3.0 (Ground Water/Vadose Zone Monitoring) in permit application accordingly.

- 9/13 Revised permit application submitted in response to RSI and subsequent discussions.
- 9/30 Revised permit application approved.
- 12/31 Draft permit to EPA (or OCE?) for review.
OCE

F. Corser

33Agenda
Status Report Meeting - July 14, 1999, 10:00 am at NMED's Offices

Gandy Marley Triassic Park Waste Disposal Facility

Attending:

Dale Gandy
Ken Schultz
Jim Bonner
Patrick Corser
NMED

1. **Objective for Meeting**
 - Resolve outstanding RSI responses.
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 - Discuss need/format/permit location for groundwater monitoring waiver.
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 - Waste Analysis Plan
 - Discuss status based on July 6 meeting notes (see attached)
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- ✕ 4. **Review Format for Proposed Revisions to Permit**
 - Replacement pages for Volume I – Permit Application Document.
 - Replacement pages, sections, or volumes as required for attachments to permit (Volumes II – VI).

5. Review Schedule for Overall Project (GMI submittals and HRMB review)

- Submittal of Final Response to Comments
- Approval of Response to Comments
- Submittal of Work Plan for Additional Site Characterization
- Approval of Site Characterization Work Plan
- Implementation of Additional Site Characterization
- Revise Permit Documents
- NMED Review of Revised Permit Documents
- Draft Permit

Comments to Review with HRMB Staff

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3	Revised - Jim
12b-d	Revised - OK
13	Discuss - OK
14	Discuss → EXPAND RESPONSE #14
18a	Discuss - OK
19a	Discuss - OK
20	Discuss - OK
21	Discuss - OK
27	Revised - Jim
31b	Revised - Jim
31e	Revised - OK w/ STOPS
35	Discuss - OK → CALL TO EVALUATE IF SAMPLING REQUIRED.
42	Discuss - OK
44	Revised - OK - NEED TO PROVIDE DATA FOR REPORT MOD.
46a	Revised - OK
48	Discuss - OK
51b-c	Discuss - OK
51d-e	Revised - OK
53c	Discuss - OK
54	Discuss - OK
56	Discuss
57	Discuss
59b	Discuss
60	Discuss
61	Discuss
66	Revised - Jim
71	Revised - OK
75	Revised - Jim
76	Revised - Jim
80-84	Discuss
D-1a(3)©	Revised - OK
D-1a(3)(e)	Revised - OK
D-1b(4)	Revised - OK
D-6c(3)	Revised - OK
D-6c(5)	Discuss - OK
D-6g(2)(d)	Revised - OK
I-1a	Revised - OK
I-1e(2)	Revised - OK

80 - See Revision Text
 81 - OK
 82 - See Revision Text
 83 - OK
 84 - OK

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WORK PLAN

STRATIGRAPHIC AND GROUNDWATER CHARACTERIZATION PROGRAM

1.0 Introduction

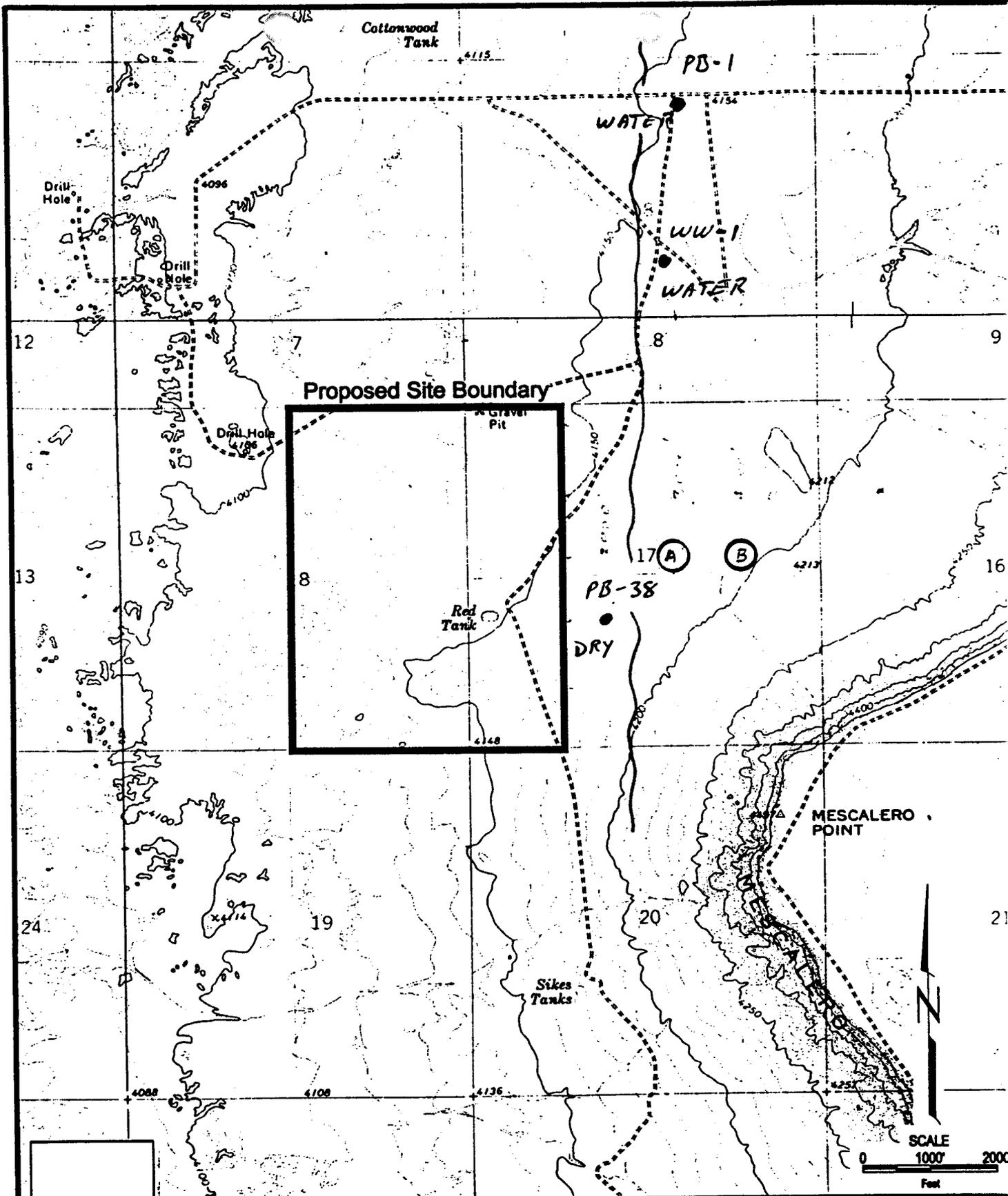
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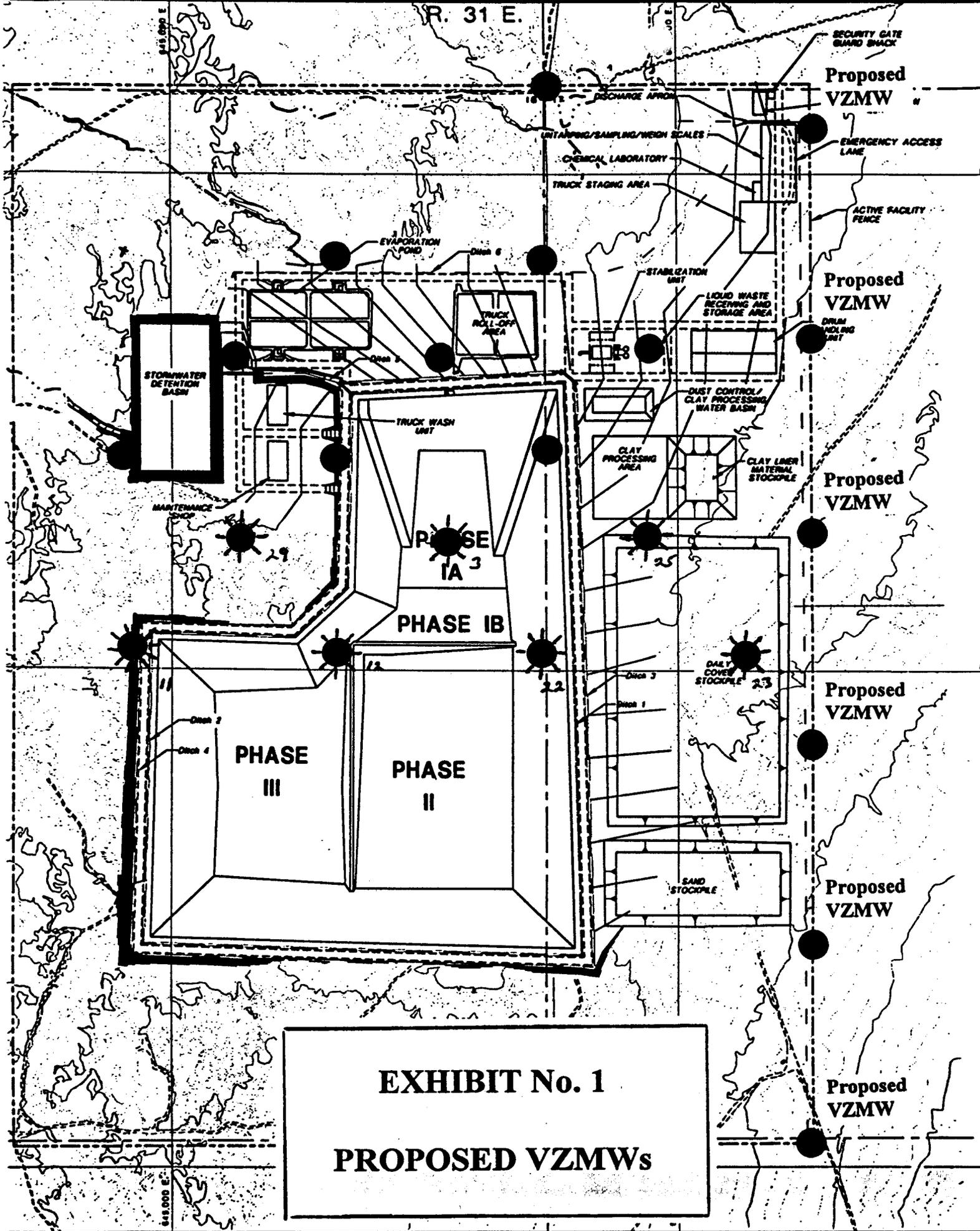
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- 3.6 Sampling
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 - 3.6.2 Analyses
- 3.7 Well completion/Hole abandonment

4.0 Approvals



TOPOGRAPHY OF SITE VICINITY
TRIASSIC PARK WASTE DISPOSAL FACILITY

Figure 3-2



MEETING LOG

DATE: July 6, 1999	TIME: 8:30 am
SUBJECT: Comments on Chapter 4	INITIATED BY:
ATTENDEES: Trey Greenwood, DelHart Stephanie Kruz, NMED Stu Dinwiddie, NMED Carl Will, NMED	Prepared by: Trey Greenwood

Meeting Notes as Prepared by Trey Greenwood:

The primary focus of the meeting was the resolution of comments on Chapter 4 of the application. Stephanie Kruz had reviewed the draft she had received and gave me her comments. She does want some commitments that the facility will implement the necessary programs and generate SOPs as the facility is constructed. These areas include;

- Chain-of-Custody (we will include a form),
- Decontamination of equipment for sampling (brief paragraph stating that recognized practices will be employed), and
- Sampling protocols, sample preparation, and sample preservation (brief paragraph stating that SW-846 protocols will be followed).

In addition, she wants a statement in the WAP that says Triassic Park will employ the most current revision of SW-846 for the sampling and analysis programs. Other Chapter 4 commitments include;

1. Provide NMED with a definition of explosives,
2. Provide NMED with a definition of radioactive/nuclear,
3. Add a separate discussion of compatibility, ignitability, and reactivity,
4. Clarify between basic screening and fingerprinting,
5. Add a discussion on special analysis for applicability of BB, CC, and sorbents,
6. Discussion of waste compatibility with tanks and ancillary equipment,
7. Management of lab packs,
8. Resolve conflict of reactive waste with respect to compatibility with landfill liner or redering the waste non-reactive, and
9. Add a small section referring to personnel training and safety.

In addition to discussions on Chapter 4 there was also some discussion on Chapter 8, the Closure Plan. Stu was present for these discussion. A number of the comments by NMED on the Closure Plan centered on the development of a sampling and monitoring plan for post closure care. This plan would include the protocols for sampling and monitoring as-well-as the design and location of monitoring wells. Including this type of information in

a closure plan is standard, however, GMI had requested some time ago to be allowed to submit a sampling and analysis plan for the post closure period prior to facility closure. NMED (TechLaw) felt that this was not in agreement with the requirements for what should be included in the Closure Plan. After some discussion with Stephanie and Stu it could not be established where the requirement existed that the sampling and analysis plan be included in the application. NMED agreed that Chapter 8 should be revised to outline some of the components that will be included in the sampling and analysis plan and that the application should state that this plan will be submitted 180 days prior to closure for state and public input and state approval. The components of this plan can (and will) be excerpted from some existing plans and the details of implementation will be developed prior to facility closure.

The final item discussed in the meeting was schedule for finalization of the two chapters (4 and 8) and the other comments. It was agreed that the revision to Chapter 4 and Chapter 8 would be given to NMED during the week of July 19, 1999. Stephanie and Carl have agreed to review both of these and provide any final comments/additions/corrections by the second week of August. From that point any changes that result from the preparation of the permit will simply be page changes and will be handled over the telephone. In addition, Stu made it very clear that any submittals should be in the form of page changes to the application that they are currently reviewing that a resubmittal of any of the volumes would require a full review as it would be considered a re-submittal. In addition, Stu also agreed that they could checklist approval of the sections of the document as they finish the review and issue a final letter once the checklist is complete.

Approved by:



TASK	JULY	AUG	SEPT	OCT	NOV	DEC	2000 JAN
1. SUBM. FINAL RESPONSE TO PSI							
2. APPROVAL OF RESPONSE TO PSI COMMENTS							
3. SUBM. OF WORK PLAN FOR ADDITIONAL CONTRACT.							
4. APPROVAL OF WORK PLAN							
5. IMPLEMENT ADDITIONAL SITE CHARACTERIZATION							
6. REVISE PERMIT DEC.							
7. NAMED REVIEW OF REVISED PERMIT DEC.							
8. DEPART PERMIT					*		
9. REVISE COMMENTS							