



TECHLAW INC.



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August 2, 1999

Mr. James P. Bearzi
State of New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
P.O. Box 26110
2044 Galisteo
Santa Fe, NM 87502

Reference: Work Assignment Y513; State of New Mexico Environment Department, Santa Fe, NM; General Permit Support Contract; Triassic Park Engineering Design Review; Review of Facility's July 1999 Responses (Section D); Draft Deliverable

Dear Mr. Bearzi:

We have reviewed the engineering design portions of the July 1999 Response to Request for Supplemental Information Triassic Park Permit Application, assigned to TechLaw by the HRMB. The Response was checked for changes since the May 1999 Draft Response document, which was reviewed in the TechLaw deliverable dated June 23, 1999.

The attached deliverable addresses seven responses, which were the only items identified as not adequate (or "no response" in the cases of the two closure comments) in the June 23, 1999 TechLaw deliverable. The new or additional responses to these comments were the only changes identified in the July 1999 responses to the RSI: Engineering Design Issues.

If the application is revised in accordance with the commitments made in these responses, these sections of the application should be complete and technically adequate, except the Closure Plan, as noted in comment I-1a.



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Enclosed is a hard copy and a file of the deliverable on a 3.5-inch diskette in WordPerfect 6.1. In addition, the file was e-mailed to Ms. Stephanie Kruse in your office.

Please call me or Mr. Greg Starkebaum at (303) 763-7188, you have any further questions.

Sincerely,

June K. Dreith
June K. Dreith
Project Manager

enclosure

cc. S. Kruse
C. Amindye
R. Dinwiddie
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G. Starkebaum
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**TRIASSIC PARK HAZARDOUS WASTE LANDFILL
ENGINEERED DESIGN REVIEW SUBMITTAL**

Submitted by:

**TechLaw, Inc.
300 Union Boulevard, Suite 600
Lakewood, CO 80228**

Submitted to:

**Mr. James P. Bearzi
State of New Mexico
Environment Department
Hazardous and Radioactive Material Bureau
P.O. Box 26110
2044 Galistes
Santa Fe, NM 87502**

In response to:

Work Assignment No. Y513

August 2, 1999

**REVIEW OF JULY 1999 RESPONSES TO
REQUEST FOR SUPPLEMENTARY INFORMATION
TRIASSIC PARK WASTE DISPOSAL FACILITY
TATUM, NEW MEXICO**

The July 1999 Montgomery Watson Final Responses were reviewed to evaluate several revised responses which were determined to be not adequate in the May 1999 Draft Responses.

**D-1a(3)(c) Containment System Capacity and Control of Run-on: 270.15(a)(3) and (4),
264.175(b)(3) and (4)**

The response is adequate. A commitment is provided to remove all liquids from any rolloff container, if any are found during inspection at the entrance gate, before the rolloff is placed in the "incoming" section of the rolloff container storage area.

D-1a(3)(e) Removal of Liquids from Containment System: 270.15(a)(5), 264.175(b)(5)

The response is adequate. A commitment is provided to revise application to demonstrate compliance with 264.175(b)(5).

D-1b(4) Container Storage Area Drainage: 270.15(b)(2), 264.175(c)

The response is adequate. A commitment is provided to modify the design drawing to indicate the restricted area for placement of rolloff containers.

D-6c(3) Loads on Liner System: 270.21(b)(1), 264.301(a)(1)(I)

The response is adequate. A commitment is provided to modify the "permit text" to indicate that protective soil cover ("operations layer") will be placed over the entire liner system during construction (not incrementally during operation).

**D-6g(2)(d) Leachate Collection and Leak Detection Systems: 270.21(b)(1), 264.301(a)
and (c)**

The response is adequate. Although some differences of opinion exist regarding the level of detail in the design necessary to demonstrate compliance with the regulations, the responses to comments D and D-6g(3) suggest that additional design and construction information will be provided in the revised application.

I-1a Closure Performance Standard: 270.14(b)(13), 264.111

No response.

**I-1e(2) Disposal or Decontamination of Equipment, Structures and Soils: 264.112(b)(4),
264.114**

The response is adequate. A commitment is provided to revise the closure plan to include the type of commitment specified in 264.112(b)(4).