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PETER MAGGIORE  
SECRETARY

August 18, 1999

Mr. Larry Gandy  
Vice President  
Triassic Park Waste Disposal Facility  
1109 E. Broadway  
Tatum, New Mexico 88627

RE: Partial approval: Final responses to Request for Supplemental Information

Dear Mr. Gandy:

Enclosed please find comments prepared by Hazardous and Radioactive Materials Bureau (HRMB) staff on the Gandy Marley, Inc. (GM) final responses to our Request for Supplemental Information (Comments Nos. 1-93). GM's responses are dated July 1999.

These responses are approved in part. Primary reason for partial approval remains that HRMB staff need to review the actual wording contained in the revised closure plan. HRMB staff will continue to work with GM contractors to resolve remaining issues.

HRMB's contractor has reviewed the engineering design portions of GM's July 1999 final responses for changes since the May 1999 draft response document. In accordance with our contractor's review, HRMB approves these seven responses in part, subject to revision of the permit application in accordance with the commitments made in the responses.



## Comments

### Triassic Park Hazardous Waste Disposal Facility Response to Request for Supplemental Information

#### General Comments

- 1.-2. The response is acceptable.
3. The response is acceptable, subject to review of the groundwater protection monitoring system submitted.

#### Specific Comments

##### Volume I - Part A

- 4.a.-c. The response is acceptable, subject to review of the revised permit application.

##### Volume I - Part B

#### Section 1.0, General Standards

5. No response necessary.
6. The response is acceptable. Please be aware that County approval of the appropriate zoning change will be included in the Permit as a Permit Condition before construction.

#### Section 2.0, Treatment, Storage and Disposal

7. The response is acceptable.
- 8.a. The response is acceptable, subject to review of the revised permit application.
- 8.b.-9.a. The response is acceptable.
- 9.b. The response is acceptable, subject to review of the revised permit application.
- 9.c.-12.a. The response is acceptable.
- 12.b.-13.b. The response is acceptable, subject to review of the revised permit application.

14. The response is acceptable.
15. The response is acceptable, subject to review of the revised permit application.
- 16.a.-16.d. The response is acceptable.
17. The response is acceptable. HRMB notes that a 6 inch daily cover is required by the New Mexico Environment Department (NMED) Solid Waste Bureau for Subpart D landfills, and seems to be standard at other hazardous waste landfills. The focus of Comment No. 17 is that all waste must be covered daily, regardless of the minimum depth of cover required.
- 18.a. The response is acceptable.
- 18.b. The response is acceptable, subject to review of the revised permit application.
- 19.a.-20. The response is acceptable.
21. The response is minimally acceptable. Please add additional detail as requested (e.g., how wet the sludge will be when removed, how the sludge will be removed, how, how often, and where the sludge-removing equipment will be cleaned) to the revised permit application.

### **Section 3.0, Groundwater Protection**

**N.b., Section 3.0 should be rewritten in light of the August 1999 stratigraphy characterization and groundwater investigations and discussions between NMED and Triassic Park contractors.**

22. The response is acceptable.
- 23.a.-23.b. The response is acceptable.
- 23.c. The response is generally acceptable; however, please change Item 3) on page 13 to state that the neutron log can be used as an indicator of the presence of water in the formation immediately surrounding the formation.
24. The response is generally acceptable; however, please note that Section 3.6.2.2, *Upper Dockum - "Uppermost Aquifer"*, p. 3-15, needs to be updated to include the results of the August 1999 investigation.

25. On page 16, please change "A cement plug...." to read, "A Cement grout containing 5% bentonite will be placed in WW-1...."
26. The response is generally acceptable; however, in paragraph four of the response, "perorations" should read "perforations".
- Also, in paragraph five of the response, please explain how the "cave in" has been identified, or change to indicate that this is conjecture.
- 27.a.-c. The response is generally acceptable; however, please update the revised permit application and describe the use of the meteoric water mobility procedure (MWMP).
- 28.-29. The response is acceptable.
30. Please update to include the August 1999 data.
- 31.a. The response is acceptable
- 31.b. The response is acceptable. Please change "...help located..." on page 19 to "...help locate vadose zone monitoring wells."
- 31.c.-g. The response is acceptable. (It is assumed, here and elsewhere, that "...the revised permit..." refers to "...the revised permit application...."
- 32.-33. The response is acceptable. Please assure that any available information is included in the revised permit application and that the needed corrections are made.

#### **Section 4.0, Waste Analysis Plan**

**N.b., the issues below and other issues relating to the Waste Analysis Plan (WAP) were discussed with Mr. Trey Greenwood at a meeting held in Santa Fe in July 1999. The revised WAP will be reviewed separately.**

- 34.a.-b. The response is acceptable, subject to review of the revised Waste Analysis Plan.

34.c. The response is not acceptable. HRMB disagrees that special tests that will be required for waste characterization (e.g., determination of ignitable, reactive, and incompatible waste; determination of compliance with 40 CFR 4.1.500 incorporating 40 CFR 264, Subparts BB and CC; or procedures to determine whether a biodegradable sorbent has been added to a waste stream by an off-site generator) cannot be determined until receipt of waste. These procedures must be included in the Waste Analysis Plan (WAP) before NMED can approve this Plan.

HRMB agrees with the statement that it is inappropriate to include procedures for the annual leak tests and ancillary equipment required by 20 NMAC 4.1.500 incorporating 40 CFR 264.195(i) in the WAP. Please include a discussion identifying the procedures used for these tank tests in the section on Inspections.

34.d. The response is acceptable, subject to review of the revised permit application.

34.e. No response to Comment No. 34.e. is necessary, subject to review of the revised permit application, as noted in our response to Comment No. 34.d. above.

34.f. The response is acceptable, subject to review of the revised permit application.

35. The response is acceptable, if the response includes the water and sludges which will collect in the stormwater retention basin. NMED disagrees that this basin will necessarily be clean water (see Comment No. 5).

36.a.-b. The response is acceptable. Please add appropriate language to the revised permit application.

37. The response is inconclusive. The changed language will be reviewed in the revised WAP.

38.-39. The response is acceptable, subject to review of the revised WAP.

40.-41. The response is inconclusive. The changed language will be reviewed in the revised permit application.

#### **Section 5.0, Procedures to Prevent Hazards**

42.-43. The response is acceptable.

44. The response is acceptable, subject to review of the revised permit application.

45. No response necessary.

46. The response is acceptable. Please be aware that submittal before construction of copies of the water rights permits will be included as a Permit Condition. Please add a paragraph to the revised permit application discussing the amounts of water estimated to be necessary for construction/Facility operations/fire control.
47. No response necessary.
- 48.a.-b. The response is acceptable. Please note that, because stored drums, including drum bottoms, must be inspectable, the drums must not be stored against the walkways.
- 49.a.-d. The response is acceptable.

### **Section 8.0, Closure and Post-Closure of Permitted Units**

- 50.-51.a. The response is acceptable.
- 51.b.-c. The response is acceptable. As discussed with Mr. Pat Corser on July 14, 1999, the revised permit application will contain a commitment to submit a Sampling and Analysis Plan for closure 180 days prior to initiation of closure.
52. The response is acceptable.
- 53.a. The response (for clarification) is acceptable.
- 53.b.- 54. The response is acceptable, subject to review of the revised permit application.
- 55.a. The response (for clarification) is acceptable.
- 55.b.-57. The response is acceptable, subject to review of the revised permit application.
58. The response (for clarification) is acceptable.
- 59.a.-60. The response is acceptable, subject to review of the revised permit application.
- 61.a. The response is acceptable, subject to review of the revised permit application. Please delete all reference to management of leachate under an NPDES permit from the revised permit application. Please include a paragraph on contouring and revegetation of the stormwater retention basin.
- 61.b. The response is acceptable.

- 61.c. No response necessary.
62. The response is acceptable, subject to review of the revised permit application.
- 63.a. No response necessary.
64. The response is inconclusive. Discussion of post-closure care maintenance should be comprehensive. In addition to items noted, inspections for subsidence/burrowing animals, etc., and plans for action as necessary should be included in the Contingency Plan.
65. The response is acceptable, subject to review of the revised permit application.
66. The response is acceptable. As agreed, vadose zone monitoring wells will be placed after the structure map for the site, based on the August 1999 data, is completed.
- 67.a. The response is acceptable. Please note this in the revised application.
- 67.b. The response is acceptable.
- 67.c.-d. The response is acceptable, subject to review of the revised permit application. A plan for determining background concentrations in soil should be discussed with the Hazardous and Radioactive Materials Staff prior to submittal of the revised permit application.
- 68.a.-69. The response is acceptable, subject to review of the revised permit application.

#### **Section 10.0, Corrective Action**

- 70.a.-b. No response necessary.

#### **Section 11.0, 40 CFR Subpart AA and BB Regulations**

**N.b.: Permit Conditions pertaining to Subparts BB and CC will be written by the US Environmental Protection Agency.**

71. The response is acceptable.
72. The response is acceptable, subject to review of the revised permit application.
- 73.a.-b. The response is acceptable.

- 74.a. Please revise the permit application to eliminate any mention of regulation of the Stabilization Unit as a continuous transfer facility.
- 74.b. The response is acceptable.

## **Volume II**

75. The response is acceptable, subject to review of the revised permit application.
76. The response is acceptable, subject to receipt and review of the log.
77. The response is acceptable.

## **Volume III**

### **Section 3.0, Landfill**

- 78.a. The response is acceptable. The discussion of the landfill should be revised as indicated in the response to Comment No. 78.c.
- 78.b. The response is not responsive and therefore is not acceptable.
- 78.c. The response is acceptable.
79. The response is acceptable.

### **Section 4.0, Evaporation Pond**

80. The response is acceptable.
81. Please identify the Operations and Maintenance Plan.

### **Section 6.0, Stabilization Unit**

82. The response is acceptable.
- 83.a.-b. The response is acceptable.
84. The response is acceptable.

**Section 7.0, Drum Handling Unit**

85.-86.        The response is acceptable.

**Editorial Comments**

87-93.        The response is acceptable.