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March 10, 2000

Hart M. "Trey" Greenwood, President
DelHart, LLC
520 East Harkness
Carlsbad, New Mexico 88220

**RE: COMMENTS: SECTION 8.0, CLOSURE AND POST-CLOSURE OF
PERMITTED UNITS, TRASSIC PARK WASTE DISPOSAL FACILITY
PERMIT APPLICATION**

Dear Mr. Greenwood:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed its review of draft Section 8.0, "Closure and Post-Closure of Permitted Units," (revised December 8, 1999) of the Gandy Marley, Inc. Permit Application for the Triassic Park Waste Disposal Facility. HRMB's comments are attached.

After you have had a chance to review these comments, please call me at 827-1558 ext. 1016 to discuss a time-frame for submittal of revisions to Section 8.0.

Sincerely,

Stephanie Kruse

Stephanie Kruse, Supervisor
Triassic Park Project

Cc: James Bearzi, NMED/HRMB
Carl Will, NMED/HRMB
David Cobrain, NMED/HRMB
Dale Gandy, Triassic Park
David Neleigh, EPA

HRMB COMMENTS
March 2000

SECTION 8.0 (revised December 8, 1999)
TRIASSIC PARK HAZARDOUS WASTE DISPOSAL FACILITY

1. Page 8-1, Section 8.1, paragraph 1. "Liquids generated during closure (decontamination solutions and evaporation pond liquid) will be treated onsite...."

Should leachate from the Surface Impoundment and the Landfill be included?

2. Page 8-1, Section 8.1, paragraph 1, line 2. Insert at the end of the first sentence, "in compliance with 40 CFR 264, Subpart G."

3. Page 8-1, Section 8.1, paragraph 2. Add the following sentence at the end of the paragraph, "All laboratory samples will be analyzed for the hazardous constituents specified in 40 CFR Part 261, Appendix VIII and all other constituents considered by NMED to be a threat to human health and the environment."

4. Page 8-1, Section 8.1, paragraph 3, line 1. Capitalize "secretary."

5. Page 8-1, Section 8.1, paragraph 3, line 2. Replace "Facilities" with "Facility or a unit or units."

6. Page 8-1, Section 8.1.1, bullet 3. Replace "facilities" with an appropriate term, e.g., "equipment."

7. Page 8-2, Section 8.1.1.2, paragraph 3, second sentence. "The use of wash water will be limited to minimize the amount of waste generated." Limited how? The determining factor is the necessity to clean until sampling and analysis indicates the contaminants have been removed.

8. Page 8-2, Section 8.1.1.2, paragraph 4, subsection 1.0 (Sampling Program. Add item 1.6, Field Screening Methods.

9. Page 8-3, Section 8.1.1.2, fourth and fifth sentences. "The liner and collection sump system will be removed at closure but will not be decontaminated. Since this material will be considered a hazardous waste, it will be disposed of in the landfill." This material should be sampled and analyzed.

10. Page 8-3, Section 8.1.1.3, line 1. Change "membrane" to "geomembrane".
11. Page 8-3, Section 8.1.1.4, paragraph 1. Delete the last two sentences beginning with "Ten such individual samples...."
12. Page 8-4, Section 8.1.1.4, Table 8.1. Provide itemized estimates including unit volumes and unit costs and estimated totals for each item including labor, laboratory, project management, subcontractor, reporting and offsite waste disposal costs.
13. Page 8-5, Section 8.1.1.4, paragraph 1, line 1. Change "... locations that correspond to the floor drain sumps...." to "...locations that correspond to all of the floor drain sumps...."
14. Page 8-5 Section 8.1.1.4, paragraph 1, lines 2-3. Change "... an additional sample will be collected in the dock area" to "Eight additional samples will be collected in the dock area and samples will be collected at 20-foot intervals beneath the drainage trenches."
15. Page 8-5, Section 8.1.1.4, paragraph 2, line 4. Replace "contaminate" with "contaminant."
16. Page 8-5, Section 8.1.2.2, line 4. "The stabilized waste will be placed in roll-off containers and cured in accordance with the provisions of the WAP prior to disposal in the landfill."

This is not discussed in the Waste Analysis Plan. Please add here or in the WAP. How long does it take to cure? How is the completion of curing determined?

17. Page 8-5, Section 8.1.2.3, line 4. Replace "268.7(d)" with "§268.45." Insert "debris treatment" between "LDR" and "requirements".
18. Page 8-6, Section 8.1.2.4, paragraph 1, line 2. Change "...samples will be collected and analyzed for constituents that may have...." to "...samples will be collected and analyzed for constituents defined in section 8.1 paragraph 2 of this permit application."
19. Page 8-6, Section 8.1.2.4, paragraph 1, line 4. Change "contaminate" to "contaminant".

Change "...at a frequency equivalent to one per 400 square feet." to "...at a frequency of one per 400 square feet over the entire surface impoundment unit area."

20. Page 8-6, Section 8.1.2.4, paragraph 1, lines 4-6. Delete the sentences beginning with "Ten such individual samples will be combined...." and "This will result in a testing frequency of one composite sample per...."
21. Page 8-6, Section 8.1.2.4, paragraph 1, lines 6-7. Change the sentence "In addition, a sample will be obtained from the leachate collection sump and the tanker pad fill line." to "In addition, a sample will be obtained from each leachate collection sump and beneath the tanker pad fill lines at the influent location and at 10 foot intervals beneath the transfer piping. Samples also will be collected adjacent to each side of the concrete containment pad."
22. Page 8-6, second Section 8.1.2.4, Filling and Revegetating. Change the section number from 8.1.2.4 to 8.1.2.5.
23. Page 8-6, Section 8.1.2.5, line 1. Change "...Evaporation Pond will be filling the depression with soil to the...." to "...Surface Impoundment will be filling the depression with clean soil to the...."
24. Page 8-6 Section 8.1.2.5, line 2. Add the following sentence between the two existing sentences: "The surface impoundment location will be graded to ensure that the direction of surface water runoff is not toward the landfill units."
25. Page 8-6, Section 8.1.3.1, first sentence. Add a reference notation for the standard operating procedures which will be developed for the management of waste in the liquid waste tanks.
26. Page 8-7, Section 8.1.3.2, line 2. Replace "LDR requirements as" with "LDR debris treatment requirements under 40 CFR §268.45."
27. Page 8-7, Section 8.1.3.2, line 3. Change "40 CFR 267(d)" to "40 CFR §268.7(d)."
28. Page 8-7, Section 8.1.3.2, line 5. Insert "debris treatment" between "LDR" and "requirements".
29. Page 8-7, Section 8.1.3.3, lines 1-2. Change "samples will be collected and analyzed for constituents that may have...." to "...samples will be collected and analyzed for constituents defined in section 8.1 paragraph 2 of this permit application."

30. Page 8-7, Section 8.1.3.3, line 5. Change "...obtained beneath the sumps in the concrete base for the liquid waste storage units." to "...obtained beneath each sump in the concrete base for the liquid waste storage units, beneath each tank after demolition, and adjacent to each side of each tank pad. In addition, samples will be obtained at a frequency of one per every 400 square feet at the unit and at locations where visual or field screening evidence of contamination is present."
31. Page 8-7, Section 8.1.4.1, sentence 1. Please amend the first sentence to indicate that the standard operating procedures will be in accordance with EPA regulations and guidelines.
32. Page 8-7, Section 8.1.4.1, line 4. Curing of stabilized waste is not discussed in the WAP.
33. Page 8-7, Section 8.1.4.2, line 4. Change "...however, this will be cleaned and rinsed prior to ..." to "... however, the building will be decontaminated prior to...."
34. Page 8-7, Section 8.1.4.2. Please indicate that there will be a sampling and analysis plan for the equipment and building structure. All decontaminated units/structures/equipment should receive verification sampling (e.g., Section 8.1.3.2.)
35. Page 8-8, Section 8.1.4.4, line 2. Change "...soil samples will be collected and analyzed for hazardous constituents that...." to "...soil samples will be collected and analyzed for RCRA characteristic properties and the constituents defined in section 8.1 paragraph 2 of this permit application."
36. Page 8-8, Section 8.1.4.4, line 4. Change "Individual samples will be collected at a frequency equivalent to one per 400 square feet." to "Individual samples will be collected at locations specified by NMED at closure and at a frequency of one sample per 400 square feet in the entire stabilization unit area."
37. Page 8-8, Section 8.1.4.4, paragraph 1, lines 5-6. Delete the sentences beginning with "Ten such individual samples will be combined..." and "This will result in a testing frequency of one composite sample...."
38. Page 8-8 Section 8.1.5, paragraph 1, line 4. Change "Section 8.1" to "for the drum handling unit in Section 8.1.1".
39. Page 8-8 Section 8.1.5, paragraph 1, line 6. Change "(Section 8.1.1.2)" to "(Sections 8.1.1.2, 8.1.1.3 and 8.1.1.4).

40. Page 8-8, Section 8.1.5, paragraph 1. "The major steps of inventory removal,..will be identical to those described in Section 8.1.1. Details of the sampling and analysis program will be specified in a sampling and analysis plan providing information similar to that to be developed for the drum handling unit (see Section 8.1.2)...."

This statement should also be included in the liquid waste storage tanks and roll-off container storage discussions.

41. Page 8-8, Section 8.1.6, lines 1 and 2. Unless the Application is revised to explain what Phase IA is, replace "Phase IA" with "Phase I." (If there is no Phase IB, it is confusing to refer to IA.)

42. Page 8-8 Section 8.1.6, paragraph 2, line 1. Change "...final cover will be constructed that is less than...." to "...final cover will be constructed with a permeability that is less than...."

43. Page 8-8, Section 8.1.6, paragraph 2, line 4. Replace "3.0" with "3.1.5."

44. Page 8-9, Section 8.1.6, first bullet, line 2. Resolve discrepancies with other parts of the Application. The Application Volume III, Section 3.1.5., does not specify the slope of the cover. Volume III, Drawings 21 through 23, show a slope of 6 per cent.

45. Page 8-9, Section 8.1.6, second bullet, line 1. Insert between "will" and "consist" "have a transmissivity of greater than or equal to 2.2×10^{-4} meters squared per second and." Insert "and" between "geocomposite" and "consist".

46. Page 8-9, Section 8.1.6, third bullet, line 1. Insert before "HDPE", "60 mil." Insert after "GCL", "with a permeability of less than or equal to 5×10^{-9} centimeters per second."

47. Page 8-9, Section 8.1.6, paragraph 2 below the bulleted items, line 6. Change "...latest technology...." to "...best available technology...."

48. Page 8-9, Section 8.1.6, paragraph 2 below the bulleted items, line 8. Change NMRD to NMED.

49. Page 8-9, Section 8.1.6, paragraph 3 below the bulleted items, line 8. Specify when the sampling and analysis plan will be submitted.

50. Page 8-9, Section 8.1.6, paragraph 5 below the bulleted items, sentence 1. Change "It is proposed that 16 individual samples be obtained along the haul roads and that they be combined into 4 composite samples for testing." to "It is proposed that samples be obtained along the haul roads at 100 foot intervals and at locations where visible staining is observed."
51. Page 8-9, after Section 8.1.6. Please add a section addressing closure of the potential Solid Waste Management Units identified in Section 7.0. A Sampling and Analysis Plan for the storm water retention basin, the truck wash, and other appropriate Swims should be prepared at closure for approval by NMED. The Response dated July 1999 to the Request for Supplemental Information states (Comment 61), "At closure, the storm water retention basin will be removed from service. The area will be contoured and revegetated as necessary." Please include a discussion of disposal of the liner, sampling, remediation as appropriate, filling in of the pond, and revegetation.
52. Page 8-10, Section 8.1.6, second paragraph, line 1. Insert after "landfill", "in compliance with 40 CFR §264.115."
53. Page 8-10, Section 8.1.6, second paragraph, line 3. Insert after "benchmarks", "in compliance with 40 CFR §264.116."
54. Page 8-10, Section 8.1.6, second paragraph, line 7. Insert after "property", "in compliance with 40 CFR §264.119(b)(1)."
55. Page 8-10, Section 8.1.6, third paragraph, line 3. Insert after "landfill", "in compliance with 40 CFR §264.119(a)."
56. Page 8-10, Section 8.2, first paragraph, line 2. Move "only" in the second sentence so that the sentence reads, " Post-closure care is anticipated to be needed only for the landfill...."
57. Page 8-11, Table 8.2. Change the inspection times for Facility "Fence," "Locks and gates," and "Warning signs" to monthly as stated in the text on page 8-10, Section 8.2.1.
58. Page 8-12, carry-over sentence. Add "are met" after "precipitation and run-off from the landfill area."
59. Page 8-12, Section 8.2.4.1, paragraph 1, sentence 1. Change "The leachate collection and removal system will be operated until leachate is no longer detected." to "The leachate collection system will be operated when necessary until the completion of post-closure care."

60. Page 8-12, Section 8.2.4.1, paragraph 1, sentence 2. Add the sentence, "The site log will be kept on-site or at a location approved by the Secretary.", after sentence 2.
61. Page 8-12, Section 8.2.4.1, paragraph 3, lines 7-8. Change "...registered professional engineer's assessment." to "...registered professional engineer's assessment and upon approval by NMED."
62. Page 8-12, Section 8.2.4.3, paragraph 2, line 1. Change "...maintenance will be similar to those...." to "...maintenance will be equivalent to those...."
63. Page 8-13, Section 8.2.5.1, line 1. Delete the word "systems."
64. Page 8-13, Section 8.2.7, line 3. Insert after "post-closure plan", "in compliance with 40 CFR §264.120."
65. Page 8-13, Section 8.2.8, paragraph 2, line 3. Change "...or roll-off storage area, then a post-closure care permit application for those portions of the...." to "...or roll-off storage area, then the post-closure care permit will be amended to include those portions of the...."
66. Page 8-13, Section 8.2.8, paragraph 2, line 4. Change "...meet the closure performance standard will be submitted to NMED no later than 90 days" to "...meet the closure performance standard. The post-closure care plan amendments will be submitted to NMED no later than 90 days...."
67. Page 8-14, Section 8.3, paragraph 2, line 4. In the last sentence, please note that the landfill will close under the requirements of 40 CFR 264.310.
68. Page 8-14, Section 8.3, paragraph 3, lines 4-5. Change "...selected constituents are within three standard deviations of the mean constituent concentration in clean background soil will...." to "...concentrations of contaminants of concern are within a statistically significant range relative to clean background soil as determined by NMED will..."

69. Page 8-14, Section 8.3, paragraph 3 last sentence. Please delete the last sentence, "Clean background soil samples will be collected from the surrounding area outside the Facility fence line." Add, "Clean background samples will be obtained from the alluvium unit and from the Upper and Lower Dockum units from each of the vadose zone monitoring well borings for a total of six background samples per stratigraphic unit. If the alluvium is not present at a specific vadose zone monitoring well boring location, a surface sample from the southern portion of the site shall be substituted for the sample. Each sample will be submitted to analytical laboratory for chemical analysis of priority pollutant metals using EPA SW-846 analytical methods or equivalent methods approved by NMED."
70. Page 8-14, Section 8.4, paragraph 2, line 6. Change "...shipped off site." to "...shipped off site for proper disposal at a permitted facility."
71. Page 8-15, Section 8.4, paragraph 2, line 2. Insert between "closure" and "of the entire Facility", "of a hazardous waste management unit or."
72. Page 8-15, Section 8.4, paragraph 3, line 3. Insert at the end of the sentence ", with approval from NMED and if the owner or operator complies with 40 CFR §264.113(d)."
73. Page 8-15, Section 8.5, line 2. Change "...certification that the hazardous waste management unit..." to "...certification that each hazardous waste management unit..."
74. Page 8-15, Section 8.5, line 3. Insert at the end of the first sentence, ", in compliance with 40 CFR §264.115."
75. Page 8-15, Section 8.5, lines 3-4. Change "The certification will be signed...." to "The closure certification for each unit will be signed...."
76. Page 8-15, Section 8.5, line 6. Insert at the end of the last sentence, ", in compliance with 40 CFR §264.120."
77. Page 8-15 Section 8.7.1, paragraph 2, lines 4-5. Delete the sentence, "In reality it is expected that Facility personnel will perform many closure tasks."
78. Page 8-16, Section 8.8, line 3. Change "...40 CFR 264.145 the standards for...." to "40 CFR 264.145 defines the standards for"

79. Page 8-16, Table 8-3. Provide itemized estimates including unit costs and estimated totals for each item including labor, laboratory, project management, subcontractor, reporting and offsite waste disposal costs.
80. Page 18, Figure 8-1. Provide a key to symbols. Label the units on the x-axis.