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PETER MAGGIORE
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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 5, 2000

Mr. Patrick Corser, P.E.
Principal
Triassic Park Permit Application
Montgomery Watson Mining Group
P.O. Box 774018
Steamboat Springs, Colorado 80477

Dear Mr. Corser:

The Hazardous and Radioactive Material Bureau (HRMB) of the New Mexico Environment Department has completed its review of Sections 1, 2, and 11 (as revised December 7, 1999) of the Triassic Park Hazardous Waste Disposal Facility. HRMB's comments are attached.

As you know, HRMB's review of Section 8 was sent to Mr. Trey Greenwood under separate cover.

Please call me at 505/827-1558 ext. 1016 if you have any comments or questions.

Sincerely,

Stephanie Kruse
Project Leader
Triassic Park Project

cc: James Bearzi, NMED/HRMB
John Kieling, NMED/HRMB
Carl Will, NMED/HRMB
John Pellicer, Montgomery Watson
Dale Gandy, Triassic Park
David Neleigh, EPA

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April 2000

NEW MEXICO ENVIRONMENT DEPARTMENT

**HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
COMMENTS**

**Triassic Park Hazardous Waste Disposal Facility
Permit Application
December 7, 1999 Revisions
Sections 1, 2, and 11**

Section 1.0, General Description

1. Page 1-1, Section 1.1, 2nd paragraph. Please review this paragraph in the context of the section title. If this section contains a general description of the Facility, why discuss only the evaporation pond in the General Description section? Waste is also stored and treated and also goes directly to the landfill. Perhaps only the last sentence of the paragraph is needed.
2. Page 1-3, Section 1.1.11. Please clarify that sanitary liquid wastes will be disposed off-site.
3. Page 1-9, Section 1.3.1, 3rd paragraph. Are the calculations for derivation of storm run-off flows in the Engineering Report in Vol. III or in another supporting volume of the Permit application? If so, please cite. If not, please provide. (Staff notes on the review of the August 18, 1999 revision in Santa Fe with Pat Corser read, "Pat C. will provide calculations. Or will get into III, App. F.")

Section 2.0, Treatment, Storage, and Disposal

4. Page 2-4, Section 2.2.1.3. Please change "The Facility will contain seven separate containment areas" to "The drum handling unit will contain seven separate containment areas".
5. Page 2-5, Section 2.2.2, 3rd paragraph. Trucks should not pick up an accumulation of waste at the Roll-Off Storage Area. Should this paragraph be transferred to the landfill or truck wash, etc., section?
6. Page 2-5, Section 2.2.2, 4th paragraph. The first sentence states that the roll-off storage area is restricted to wastes that do not contain free liquids. However, the second sentence of Section 2.2.2.1 (page 2-6) states, "The roll-off storage area is designed to store any non-stabilized waste that may contain free liquids." Please explain this discrepancy.

HRMB COMMENTS

Triassic Park Hazardous Waste Disposal Facility Permit Application December 7, 1999 Revisions Sections 1, 2, and 11

7. Page 2-5, Section 2.2.2, 1st paragraph. Please discuss measures that will provide for the segregation of containers which may hold PCB-contaminated soils or other solids.
8. Page 2-6, Section 2.2.2.1, 1st paragraph, 2nd sentence. "The roll-off storage area is designed to store any non-stabilized waste that may contain free liquids." This sentence contradicts the previous sentence (page 2-5, Section 2.2.2, 4th paragraph, 1st sentence), "This area is restricted to wastes that do not contain free liquids." Please correct the discrepancy.
9. Page 2-8, Section 2.2.8. Please correct Part A, Section XII, which identifies the design capacity of the roll-off storage unit in gallons.
10. Page 2-11, Section 2.3.8, 1st sentence. The written assessment attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste should be included in the Permit application, in compliance with 20 NMAC 4.1.500 (incorporating 40 CFR 264.192(a)).
11. Page 2-12, Section 2.3.9, 2nd paragraph, 2nd sentence. Please add this sentence to Section 8.0, *Closure Plan*.
12. Page 2-13, Section 2.4, 4th paragraph. This paragraph is not clear to the reviewer. How will the determination be made that specific stabilized wastes can go directly to the Landfill for disposal without testing?
13. Page 2-13, Section 2.4, 6th paragraph. 150,000 cubic yards (amount treated per day) divided by 2,500 cubic yards (maximum amount per batch) = 60 batches per day. 60 batches per day divided by 4 bins = 15 batches per bin per day. Please assure HRMB that this is feasible.
14. Page 2-15, Section 2.4.7, 1st paragraph, 4th sentence. All designs for the stabilization bins must be final.
15. Page 2-15, Section 2.4.8, 1st sentence. Please see Comment No. 13.
16. Page 2-15, Section 2.4.8, 2nd sentence. Please change the 2nd sentence from "the preliminary tank design" to "the final tank design".

HRMB COMMENTS

Triassic Park Hazardous Waste Disposal Facility Permit Application December 7, 1999 Revisions Sections 1, 2, and 11

17. Page 2-16, Section 2.5. Please change "The overall landfill will be constructed in Phases. As shown on drawing 4." to read, "The overall landfill will be constructed in Phases, as shown on drawing 4."
18. Page 2-16, Section 2.5.1.1. Please add the identification of permitted wastes from Section 4.0 to this section.
19. Page 2-16, Section 2.5.1.1. Please add waste containing organic concentrations of at least 10 percent by weight to the list of unacceptable wastes.
20. Page 2-17, Section 2.5.1.1, 2nd sentence. The area of Phase 1A given in this sentence (553,200 cubic yards) does not agree with Part A, Section XII (533,000 cubic yards). Please correct this typographical error.

Please remove the last two words of the sentence.
21. Page 2-20, Section 2.5.1.8, 3rd paragraph, 3rd sentence. Changes at closure in response to gas build-ups beneath the barrier layer of the Landfill cover may require a modification to the Permit.
22. Page 2-23, Section 2.5.3.6, 1st sentence. The 1st sentence refers to Section 4.3.1.2. Please be aware that Section 4.0, the Waste Analysis Plan, has been revised and all references to particular subsections of 4.0 should be rechecked.
23. Page 2-25, Section 2.5.3.9, 3rd bullet. The third bullet reads, "Utilizing if during a heavy rain event, water ponds on the surface of the daily cover." Please clarify this bullet.
24. Page 2-28, Section 2.6.1.1, 1st paragraph. Please provide references for the documents cited at the end of the section.
25. Page 2-30, Section 2.6.1.2, 1st sentence. Add "in" between "presented" and "Drawing".
26. Page 2-32, Section 2.6.3. Please remove "and Quantity" from the heading.
27. Page 2-32, Section 2.6.3. Please indicate that the evaporation pond will not accept wastes covered by 20 NMAC 4.1.500 (incorporating 40 CFR 264, Subparts BB and CC).

HRMB COMMENTS

Triassic Park Waste Disposal Facility Permit Application December 7, 1999 Sections 1, 2, and 11

28. Page 2-35, Figure 2-1. Figure 2-1 is the same as Figure 1-2. Is this figure discussed in the Section 2.0 text?

Section 11.0, 40 CFR 264 Subpart AA, BB & CC Regulations

29. Page 11-1, Section 11.2. Please discuss whether wastes with organic concentrations of 10 percent or greater by weight will be accepted for storage in containers and/or placement in the Landfill.
30. Page 11-1, Section 11.3, 2nd paragraph. "Potential air pollution from these containers will be controlled in accordance with the container level 2 standards specified in CFR 264.1086(d)." This sentence is repeated in Section 11.3.2.

Please note that a container with a design capacity less than or equal to 0.1 m³ is exempt from the requirements of Subpart CC (20 NMAC 4.1.500 (incorporating 40 CFR 264.1080(b)(2))). A container with a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ must meet Container Level I standards (20 NMAC 4.1.500 (incorporating 40 CFR 264.1087(b)(1)(i))).

31. Page 11-1, Section 11.3.1. The second sentence reads, "The waste determination shall be made at the point where the Facility first takes possession of the waste." Please change this sentence to indicate that the waste determination will be made at the point of waste origination (20 NMAC 4.1.500 (incorporating 40 CFR 264.1082(c)(1))).
32. Page 11-2, Section 11.3.5, 1st sentence. Add "be" between "will" and "limited".
33. Page 11-2, Section 11.3.6. The correct cite is 40 CFR 264.1088(b).