



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

TP00



PETER MAGGIORE
SECRETARY
PAUL R. RITZMA
DEPUTY SECRETARY

Reading
file
Mailed
4.10.00

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 7, 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 5, 6, 7, and 9 (as revised January 7, 2000) of the Triassic Park Hazardous Waste Disposal Facility. HRMB's comments are attached.

HRMB's review of Section 10 will be sent under separate cover.

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

Sincerely,

Stephanie Kruse

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

April 2000

**HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
COMMENTS**

**Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9**

Section 5.0, Procedures to Prevent Hazards

1. Page 5-2, Section 5.2.1, carry-over paragraph, 1st sentence. "Sections 5.2.2 through 5.2.9" should be changed to "Section 5.2.2 through 5.2.10."
2. Page 5-2, Section 5.2.1.1, 3rd paragraph, 2nd sentence. With regard to the inspection checklists, it was agreed at the review of the August 18, 1999 revision of the Permit Application in Santa Fe that additional checklists would be included. Mr. Pat Corser was provided with examples of these checklists.
3. Page 5-4, Section 5.2.5, 1st paragraph, last sentence. "(4) the Cathodic Protection Systems" should read "the Cathodic Protection Systems".
4. Page 5-5, Section 5.2.7, 1st sentence. Table 5-1 says that a Facility guard will make the rounds of the Facility daily to check for any abnormalities. Please revise this sentence to agree with Table 5-1.
5. Page 5-6, Section 5.2.10. Please include a discussion of appropriate sampling and analysis of the wash water collected at the truck wash area.
6. Page 5-7, Section 5.3.5, last sentence. "Staked" should be "stacked".
7. Page 5-7, Section 5.3.4. NMED remains concerned about the possible insufficiency of water in case of fire outside of buildings or in the Landfill. Discussion with NMED's Solid Waste Bureau regarding water supply at similarly situated solid waste landfills determined the following:

A regional landfill near Wagon Mound, New Mexico has a 5 000 gal tank; and

The Lea County (New Mexico) Landfill has a 10 000 gal tank.

At a minimum, the Landfill must meet the requirements of the New Mexico State Fire Marshal's Office.

**HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
COMMENTS**

**Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9**

8. Page 5-7, Section 5.4, 1st full paragraph, 2nd sentence. These employees should also receive the annual 8-hour refresher course.
9. Page 5-8, Section 5.4.1, 1st full paragraph, last sentence. See Comment 6.
10. Page 5-8, Section 5.4.2.1, 2nd paragraph. Please add the run-off/run-on inspection to Table 5-1.
11. Page 5-8, Section 5.4.2.2. Please add a sentence addressing maintenance as needed.
12. Page 5-12, Section 5.5, carry-over paragraph. References to Section 4.0 should be checked, following approval of the latest revision.
13. Page 5-12, Section 5.5.2, 1st sentence. Please change "40 CFR 261.2" to "40 CFR 261.21".
14. Page 5-14, Table 5-1. Please add the inspection schedule for the stormwater retention basin and associated ditches to Table 5-1.

Section 6.0, Contingency Plan

15. Section 6.0. This section should include a discussion of inspections for emergency equipment, including a table similar to Table 5-1.
16. Page 6-1, Section 6.0, 2nd paragraph, 2nd sentence. Please delete this sentence. A final contingency plan is required as part of the permit application. Please indicate the specific information (referring to the list in the next paragraph) that will be submitted to NMED 60 days prior to initiation of operations (e.g., the list of Emergency Coordinators, signed agreements with local authorities).
17. Page 6-5, Section 6.3.4, 2nd bullet, last line. Should not this line include hazards to human health and/or the environment inside the Facility as well as outside?
18. Page 6-7, Section 6.3.5.1, 3rd paragraph. Please change "effected" to "affected".
19. Page 6-8, Section 6.3.5.2, 5th bullet. Please change "the regional administrator" to "the NMED Secretary".

**HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
COMMENTS**

**Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9**

Section 7.0, Personnel Training

20. Page 7-5, Section 7.1.5, 7th bullet. Please replace "fingerprint testing confirms" with "the initial and annual full chemical analysis and fingerprint analysis confirm".
21. Page 7-5, Section 7.1.6, 1st sentence. Please include ditches in the list.
22. Page 7-6, Section 7.2.1.1, 1st paragraph. Please review this section. The outline of the RCRA training class course contents contained in paragraph 2 seems very ambitious for an 8-hour session.