

# Status Report

## Triassic Park Facility - Part B Permit Application

### April 16, 2000

#### Item 1 – Permit Modules

##### Volume I – Revised Permit Section

###### Section 1 - General Facility Standards

- Comments from NMED incorporated
- Hard copy submitted on December 7, 1999

###### Section 2 – Treatment, Storage, and Disposal

- Comments from NMED incorporated with redline/strikeout
- Hard copy submitted on December 7, 1999

###### Section 3 – Groundwater Protection

- **Hard copy submitted on February 5, 2000** - NEED DISCUSSION
- **Comments on VZMS will require revisions** - NEED REVISED WP/CHECK.

###### Section 4 – Waste Analysis Plan

- **Submitted revised WAP to NMED for review in December 1999**
- **Need to confirm current status.**

###### Section 5 – Procedures to Prevent Hazards

- Comments from NMED incorporated with redline/strikeout
- Hard copy submitted January 7, 2000

###### Section 6 – Contingency Plan

- Comments from NMED incorporated with redline/strikeout
- Hard copy submitted on January 7, 2000

###### Section 7 – Personnel Training

- Comments from NMED incorporated with redline/strikeout
- Hard copy submitted on January 7, 2000

###### Section 8 – Closure and Post-Closure or Permitted Units

- **Revised text submitted on April 6, 2000**
- **Waiting for NMED comments**
- **Need to resolve sampling frequency rate**
- **Closure Costs will be very dependent on sampling frequency rate**

###### Section 9 – Waste Management

- Comments from NMED incorporated with redline/strikeout
- Hard copy submitted on January 7, 2000

###### Section 10 – Corrective Action

- **Comments from NMED incorporated with redline/strikeout**
- **Hard copy submitted on January 7, 2000**
- **Received additional comments from NMED dated April 14, 2000**
- **GMI is evaluating comments**

*I'm working on CA module.*

###### Section 11 – 40 CFR 264 Subpart AA and BB Regulations

- Comments from NMED incorporated with redline/strikeout
- Hard copy was submitted on December 7, 1999

###### Section 12 - References

## Volume II – Appendices A-M

- **New appendix proposed to present the Vadose Zone Monitoring System – Work Plan (Appendix N)**
  - **We have received comment on the Draft VZMS Work Plan (February 1, 2000) and have provided draft response to NMED. Based on telephone conversations with NMED the primary remaining issue is the number and depth of additional monitoring wells.**
  - **History**
    - **Outline for VZMS submitted to NMED December 15, 1999**
    - **Conference call and NMED comments December 17, 1999**
    - **Draft VZMS WP submitted February 11, 2000**
    - **Comments from NMED received March 16, 2000**
    - **Conference call and preliminary draft response from GMI April 10, 2000**
    - **Written response documents faxed on April 14, 2000 to NMED**
  - **Remaining comments to be addressed:**
    - **General Comments: 7 and 8**
    - **Specific Comments: 30, 42, 46, 49, 50,**
- **New appendix to include the Operations and Maintenance Plan (Appendix O)**
  - **Received comments on plan dated March 4, 2000**
  - **GMI has incorporated and addressed comments**
  - **Suggest meetings with TechLaw to review edits and then submit final**
- **New appendix to present the Groundwater Monitoring Waiver Request and Approval (Appendix P)**
  - **Final plan was submitted January 24, 2000**
  - **NMED approval January 12, 2000**

## Volume III - Engineering Report and Appendix A Drawings

- **NMED and Techlaw comments have been incorporated and we have reviewed with Greg Starkebaum on October 10, 1999**
- **All revisions were verbally accepted**  
Operations and Maintenance Plan was submitted to NMED and TechLaw on January 15, 2000 (Sections 1, 2, 4, 5, 6, 7, 8, 9, 10 and 11, Engineering Report, Specifications, CQA Plan, Drawings, Draft Operations and Maintenance Plan)
- **March 4, 2000 received additional comments on review of above submittal**
- **Majority of comments related to engineering calculations and O&M plan**
- **Suggest meeting with TechLaw for review**
- **GMI to submit appendices with comments incorporated and signed and stamped report and drawings.**

Volume IV – Engineering Report,

Appendix B – CQA Plan

Appendix C – Construction Specifications

- NMED and Techlaw comments have been incorporated and we have reviewed with Greg Starkebaum October 10, 1999
- All revisions were verbally accepted
- Submitted hard copy of text sections January 15, 2000 (Sections 1, 2, 4, 5, 6, 7, 8, 9, 10 and 11, Engineering Report, Specifications, CQA Plan, Drawings, Draft Operations and Maintenance Plan)
- **March 4, 2000 received additional comments on review of above submittal**
- **Majority of comments related to engineering calculations and O&M plan**
- **Suggest meeting with TechLaw for review**
- **GMI to submit appendices with comments incorporated and signed and stamped CQA Plan and Specifications**

Volume V – Engineering Report,

Appendix D – Laboratory Test Results

Appendix E – Engineering Calculations

- NMED and Techlaw comments have been incorporated and we have reviewed with Greg Starkebaum, October 10, 1999
- All revisions were verbally accepted (hard copy of Appendices have not been submitted)
- **March 4, 2000 received additional comments on review of above submittal**
- **Majority of comments related to engineering calculations and O&M plan**
- **Suggest meeting with TechLaw for review**
- **GMI to submit appendices with comments incorporated and signed and stamped calculations.**

Volume VI – Engineering Report,

Appendix E – Engineering Calculations, continued

Appendix F – Surface Water Control Plan

Appendix G – Landfill Action Leakage Rate and Response Action Plan

- NMED and Techlaw comments have been incorporated and we have reviewed with Greg Starkebaum, October 10, 1999
- All revisions were verbally accepted. (hard copy of Appendices have not been submitted)
- **March 4, 2000 received additional comments on review of above submittal**
- **Majority of comments related to engineering calculations and O&M plan**
- **Suggest meeting with TechLaw for review**
- **GMI to submit appendices with comments incorporated and signed and stamped calculations, ALR report and Response Action Plan.**