

## TECHLAW MEMO

To: Ms. Stephanie Kruse, NMED, J. Dreith, Triassic Park file

From: G. Starkebaum

Subject: Meeting with Montgomery Watson Regarding Triassic Park Application

Date: April 20, 2000

I met this afternoon from 1:00 to 5:15 with Montgomery Watson engineers Pat Corser and Jorge Trancoso at their office at 165 S. Union in Lakewood. Mr. Corser requested the meeting to discuss their July 21, 1999 responses to the TechLaw/NMED Notice of Deficiency comments dated June 23, 1999, and the TechLaw comments dated February 16, 2000.

Mr. Corser explained that in recent months, attention has been focused on the groundwater monitoring waiver or exemption request for the Triassic Park site. NMED apparently approved the waiver in January, but considerable additional effort is now being directed to development of a vadose zone monitoring work plan.

There is considerable concern about the complications (additional fees) that may be involved in submitting an entirely revised permit application, according to Mr. Corser. This was the only other reason he gave to explain the absence of the revised calculations, geotechnical data and other appendixes from the pieces of the application submitted for review on January 15, 2000.

We discussed the approximately 50 outstanding comments identified in the February 16, 2000 TechLaw review. Several of the comments had already been adequately addressed in revised draft redline/strikeout sections of the application and O&M Plan text, new drawings (e.g., for tank footings and tie-down details), and other supporting data (e.g., chemical compatibility charts for polyethylene tanks and HDPE liner material). (This material was not included in the pieces of the application provided for review in January.) Most of the comments we discussed required additional revisions to the current text, and Mr. Corser prepared handwritten draft language for insertion at approximately 30 locations. With few exceptions, Mr. Corser insisted on providing only general descriptions of design details, operating procedures, or decision criteria. This approach is difficult to implement in a way that demonstrates compliance with the regulations, but is considered necessary (by Montgomery Watson) because the final design details for piping and valve locations, leachate flowmeter design, operation and data recording, and many other items, have not been finalized. Mr. Corser is very concerned that any "minor" changes during final procurement or construction might result in requirements to obtain permit modifications, which he wants to minimize.

Several items of missing information are still "to be prepared" or obtained from Montgomery Watson files for insertion into the application. These include PE stamps and signatures for all

documents and drawings (General Comment), runoff containment zone calculations for the rolloff storage areas (D-1a(3)), PE assessment of tank systems' integrity (D-2c(1)), and a new table of bearing capacity data (D-6d(4)(b)).

I explained to Mr. Corser and Mr. Trancoso that I will be leaving TechLaw at the end of next week. They expressed confidence that they can get the agreed revisions to the application completed and submitted by Wednesday (April 26) for me to review before I leave the firm. I agreed to do my best to accomplish the review, if so directed by NMED.