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Subject: Closure Soil Sampling
Frequency Proposal

Date: 06/02/00

Reference: 602

Charged Amt:

No. of Pages: 2
(including cover)

Stephanie,

Attached is a proposal by Montgomery Watson and GMI on the closure soil sampling frequency for the Triassic Park facility. We are proposing a sampling frequency of 1 per 2,000 square feet as a compromise. This sampling rate still provides more than an adequate number of samples in relation to other facilities, as shown on the soil sampling comparison table we sent previously. Please consider this proposal and review it with Steve, Dave, and others, if appropriate.

Please confirm whether this proposal is acceptable so that we can resolve this issue and move forward on the Closure Plan and Closure Cost Estimate. Feel free to call me to discuss, or with any questions.

Regards,

Diane Dwire

cc: Dale Gandy
Ken Schultz
Trey Greenwood
Pat Corser

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Closure Soil Sampling Frequency Proposal Triassic Park Facility – Part B Permit Application

Background

The Closure and Post-Closure section of the Triassic Park Part B Permit Application includes the soil sampling activities required for each facility unit at closure. The sampling frequency rate based on surface area has not yet been agreed upon by GMI, Montgomery Watson and NMED. Montgomery Watson has provided a soil sampling frequency comparison table for discussion, which shows the soil sampling rate and total number of samples required for various facilities at closure. The sampling frequency at these sites varies from 1/300 ft² to 1/170,000 ft² (or none at all if no indication of leak or damage observed), and the most total samples required for a facility is 100. For comparison, two sampling frequencies were evaluated for the Triassic Park facility, 1/400 ft² (approximately 850 total samples) and 1/4,000 ft² (approximately 200 total samples).

Proposal

Montgomery Watson and GMI would like to resolve the soil sampling frequency issue, so that the Closure Plan and Closure Cost Estimate may be finalized and the Permit Application may continue to move toward completion. Therefore, Montgomery Watson and GMI propose an area-based closure soil sampling frequency rate of 1/2,000 ft², which is a compromise between the two frequencies previously discussed. Sampling at this rate will be performed based on a grid system, where 1 sample is taken within each 2,000 ft² grid. Individual samples will only represent one grid area and will not be permitted to represent more than 2,000 ft² of surface area (i.e. samples taken at grid corners to represent the four intersecting grids will not be sufficient). The sampling resulting from this proposed area-based frequency is in addition to required specific location samples already identified in the Closure Plan (e.g. beneath sumps, tanks, drainage ditches, etc.).