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TECHLAW INC.

June 26, 2000

Steph

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RECEIVED

Mr. James P. Bearzi
State of New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044 Galisteo
Santa Fe, NM 87502

Reference: Work Assignment Y513; State of New Mexico Environment Department, Santa Fe, NM; General Permit Support Contract; Triassic Park Engineering Design Review; Review of Montgomery Watson's May 25, 2000 Memorandum "Response to NMED/TechLaw Inc. Comments on Triassic Park Engineering Report;" Draft Deliverable

Dear Mr. Bearzi:

We have reviewed Montgomery Watson's response and the accompanying Triassic Park Part B Permit Application revisions assigned to TechLaw by the HRMB. This review was performed to verify adequate response to comments raised in NMED's May 12, 2000 letter to Montgomery Watson. All comments have been adequately responded to except for Comment Number D-2c(1), which addresses the Hazardous Waste Tank System Integrity Assessment. This is explained in the body of this report.

Enclosed is a hard copy and a file of the deliverable on a 3.5 inch diskette in Word 97. format. In addition, the file was e-mailed to Ms. Stephanie Kruse of your staff.

Please call me if you have any questions.

Sincerely,

June K Dreith

June K. Dreith
Project Manager

enclosure



RED IP 2000

Mr. James P. Bearzi
June 26, 2000
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cc: S. Kruse (e-mail)
W. Jordan
G. Koenig
D. Romero (file)

TRIASSIC PARK HAZARDOUS WASTE FACILITY

PART B APPLICATION REVISION

Dated May 25, 2000

REVIEW COMMENTS

These comments are based on the May 25, 2000 Montgomery Watson Memorandum "Response to NMED/TechLaw, Inc. Comments on Triassic Park Engineering Report" and accompanying Part B Permit Application revisions (the Response) faxed to TechLaw, Inc. on June 14, 2000. The updated documents were reviewed only to verify that the remaining proposed comment resolutions (appearing in the July 21, 1999 Montgomery Watson Response to NMED's Request for Supplemental Information) that were identified as deficient in the May 11, 2000 TechLaw review, were actually incorporated into the updated application.

The comments that were still unresolved in the May 11, 2000 review are addressed below. Comments which were adequately responded to and incorporated into the application (as noted in the May 11 review) were deleted.

D-1a(3) Secondary Containment System Design and Operation: 270.15(a)(1), 264.175(a), 264.175(d)

The comments are adequately addressed in the revised general text (pages 2-6 and 2-10). The accompanying calculations that explain the rolloff container storage area stormwater containment volumes should be added to the Permit Application (Appendix E, Engineering Calculations).

D-2c(1) Assessment of New Tank System's Integrity: 270.16, 264.192

The Response is not adequate. Comments raised in the May 11, 2000 review as well as the comments raised in the May 16, 2000 TechLaw, Inc. review of the May 8, 2000 Draft Tank System Certification were not addressed in the Response. The Response also challenges NMED's requirement (Letter, Stephanie Kruse, NMED to Patrick Corser, Montgomery Watson, May 12, 2000) that the tank integrity assessment must be signed by an engineer who does not work for the company which prepared the tank system design.

Revise the application to provide the information requested in the May 12, 2000 NMED letter and the May 11, 2000 and May 16, 2000 TechLaw, Inc. reviews.

D-4i Leakage Response Action Plan: 270.17(b)(5), 264.223(b) and (c)

The comments are adequately addressed in the revised Appendix G (page 7-1).

D-4j(3) Prevention of Overtopping: 270.17 (b)(2), and 264.221(g)

The comments are adequately addressed in the revised Operations and Maintenance Plan (page 15).

D-6f(4) Maximum Leachate Head: 270.21(b)(1), 264.301(a)(2),264.301(c)(2)

The comments are adequately addressed in the revised Operations and Maintenance Plan (pages 11 and 14).

D-6g(4) Maintenance Procedures for Leachate Collection & Leak Detection Systems: 270.21(b)(1), 264.301(a) and (c)

The comments are adequately addressed in the revised Operations and Maintenance Plan (page 24).

D6h Action Leakage Rate: 270.21(b)(1)(v), 264.302

The comments are adequately addressed in the revised Operations and Maintenance Plan (pages 12 and 13) and the general text (pages 2-26, 2-27, and 2-28).

D-6k Control of Wind Dispersion: 270.21(b)(5), 264.301(j)

The comments are adequately addressed in the revised Operations and Maintenance Plan (page13).