



GARY E. JOHNSON  
GOVERNOR

**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



PETER MAGGIORE  
SECRETARY

RED TPDF G/00

FAX COVER SHEET

DATE: 07/19/00

TO: Diane Duise

COMPANY: Montgomery Watson

FAX NO.: 470/879-9048

TELEPHONE: 470/879-6260

MESSAGE: Here are the three sets of comments + a fourth  
set (7/9/00) I wrote to myself last wk. This should  
do it.

Love for a final wrap-up of Vol I.  
[Signature]

FROM: Stephanie Krause

NO. OF PAGES: 21  
(Including cover page)

COMPANY: **NEW MEXICO ENVIRONMENT DEPARTMENT**  
**HAZARDOUS & RADIOACTIVE MATERIALS BUREAU**

FAX: **(505) 827-1544**

TELEPHONE: **(505) 827-1557**

3/27/00 §§ 0.  
4/5/00 §§ 1, 2, 11  
4/7/00 §§ 5, 6, 7, 9  
7/19/00

July 9, 2000

## COMMENTS

### SECTION 1.0

1. **P. 1-1, Section 1.1, 2nd paragraph, 3rd sentence.** Delete "Toxic Substances Control Act (TSCA)-regulated". Amend paragraph to read, "...polychlorinated biphenyl (PCB) wastes that are not regulated by TSCA, i.e., PCB wastes at concentrations of less than 50 parts per million (ppm) in liquids and 500 ppm for bulk PCB remediation waste."

### SECTION 2

2. **P.2-3, Section 2.1.2, 5th line.** Change "Section 4.3.2.1" to "Section 4.4.3.1".  
**P.2-3, Section 2.1.2, 7th line.** Ditto.
3. **P. 2-5, Section 2.2.1.1, 2nd paragraph.** Explain LDRS and LCRS. Two collection systems per cell?
4. **P. 2-5, Section 2.2.1.1, last paragraph.** Remove "TSCA cells" and substitute "cells which will hold PCB-contaminated waste".
5. **P. 2-5, Section 2.2.1.3, 4th line.** Delete "TSCA" from, "to accommodate only TSCA PCB wastes." Aprons on the ends of the TSCA areas...." to read, "Aprons on the ends of the cells which will store PCB-contaminated wastes...."
6. **P. 2-6, Section 2.2.2, 2nd paragraph, last sentence.** What area is this? Where is it discussed? This is the only reference to the 25 year/24 hour storm inundating permitted areas. Section 1 says it is not in the 100 year flood plain. Why is the 25 year flood inundating areas?
7. **P.2-14, Section 2.4, 4th paragraph, 2nd line.** Should "compared" read "conducted"?
8. **P. 2-17, Section 2.5.1.1, 1st paragraph.** Why not delete list and just refer to Section 4.1.2.? In any case, get rid of "TSCA" in line 2.
9. **P. 2-26, Section 2.5.3.9, 4th bullet.** This is incomplete. What is it supposed to say? An older version combines the 3rd and 4th bullets, reading: "if during a heavy rain event, water ponds on the surface of the daily cover, utilize vacuum trucks to remove as much of this water as possible before it can seep into the waste;"
10. **P. 2-33, Section 2.6.3, 5th line.** Delete "TSCA".

### SECTION 3.0

Some references are included in Section 12.0. Some are not. Those that are not are:

McKee and Bump  
Richards  
Brooks  
Hillel

Bump and McKee  
Stoller  
Irmay

### SECTION 5.0

11. **P. 5-9, Section 5.3.3, 1st paragraph.** Where/how is this equipment stored for outdoor areas?
12. **P. 5-13, Section 5.4.8, line 12.** Change " regeant" to "reagent".
13. **P. 5-15, Section 5.5.3, 3rd paragraph, lines 5 and 6.** Change "seperate" to "separate".

July 11, 2000

### SECTION 11.0

14. **P. 11-1, Section 11.2.** Will wastes with organic concentrations greater than 10 percent by weight be accepted for storage and disposal directly in the landfill? [UTS prevent? **TREY.**]
15. **P. 11-1, Section 11.3.** The 1st and last sentences appear contradictory. Containers only need to meet Container Level 2 standards if they contain waste with volatile organic concentrations equal to or greater than 500 ppmw.
16. **P. 11-4, Section 11.3.7.2, 2nd bullet.** What is this about? What continuous monitoring?