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**ENVIRONMENT DEPARTMENT**

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PETER MAGGIORE  
SECRETARY

PAUL R. RITZMA  
DEPUTY SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

August 31, 2000

Pat Corser  
Montgomery Watson  
1475 Pine Grove Road, Suite 109  
P.O. Box 774018  
Steamboat Springs, Colorado 80477

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION AND  
RESPONSE TO COST ESTIMATE SUBMITTAL:  
RCRA PERMIT APPLICATION FINANCIAL ASSURANCE CLOSURE AND  
POST-CLOSURE COST ESTIMATE TECHNICAL ADEQUACEY FOR  
GANDY MARLEY, INC. TRIASSIC PARK LANDFILL  
EPA ID NUMBER NM0001002484**

Dear Mr. Corser:

The New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) has reviewed the financial assurance cost estimate for closure and post-closure care of the proposed

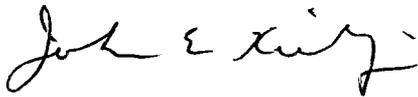
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Gandy Marley, Inc. Triassic Park RCRA Subtitle C landfill for technical adequacy. HWB has determined that supplemental information and changes to the cost estimate are required in order for HWB to approve of the landfill closure and post-closure cost estimates.

HWB requests that the changes included in Attachment A be incorporated into the cost estimate and that the additional information listed in Attachment A be provided to clarify selected details of the cost estimate. Changes to the financial assurance cost estimate must be incorporated into Section 8 (*Closure and Post-closure of Permitted Units*) of the Triassic Park Waste Disposal Facility Permit Application and any other applicable sections or attachments to the Permit Application.

Please call Dave Cobrain of my staff at 505-827-1561 if you have questions regarding this response to the financial assurance cost estimate.

Sincerely,



John Kieling  
Program Manager  
Permits Management Program

Attachment

cc: James Bearzi, HWB  
Dale Gandy, Gandy Marley, Inc.  
Diane Dwire, Montgomery Watson  
Stephanie Kruse, HWB  
Dave Cobrain, HWB  
Pam Allen, HWB

file: Red/GMI/00  
track: GMI/08-31-00/Corser/Kieling/Financial Assurance Cost Estimate Response and RSI

## ATTACHMENT A

### REQUESTED CHANGES TO THE CLOSURE AND POST-CLOSURE CARE FINANCIAL ASSURANCE COST ESTIMATES AND REQUEST FOR SUPPLEMENTAL INFORMATION

### TECHNICAL ADEQUACY REVIEW OF RCRA PERMIT APPLICATION FINANCIAL ASSURANCE COST ESTIMATE FOR THE PROPOSED GANDY MARLEY, INC., TRIASSIC PARK LANDFILL SUBMITTED BY GANDY MARLEY, INC.

August 31, 2000

The following changes should be made to tables 8-3 and 8-4 of Section 8 (*Closure and Post-closure of Permitted Units*) of the Triassic Park Waste Disposal Facility Permit Application. The following changes to the cost estimate also should be made to any other applicable references to closure and financial assurance within Section 8 of the Permit Application and to all other applicable sections or attachments to the Permit Application. Changes and additional line items requested by HWB for inclusion in Tables 8-3 and 8-4 are listed in **bold** type.

TABLE 8-3 CLOSURE COST ESTIMATE	COST (\$)	HWB Changes to Cost Estimate (\$)
<b>DRUM HANDLING UNIT</b>		
Stabilization and Disposal of Remaining Drum Waste Inventory	\$36,071	<b>36,064</b>
Decontamination of Equipment and Buildings	\$7,200	7,200
Stabilization and Disposal of Decontamination Water	\$14,630	<b>14,660</b>
<b>Chemical Testing of Decontamination Water</b>		<b>6,120</b>
Dismantling and Moving Structure and Equipment	\$155,371	<b>23,775</b>
Dismantling and Disposal of Concrete Floor and Secondary Containment	\$21,922	<b>122,570</b>
Soil Sampling and Chemical Analysis	\$138,720	138,720
Excavation of Contaminated Soils	\$7,307	<b>7,596</b>
<b>Disposal of Contaminated Soils</b>		<b>15,930</b>
Earth Backfill for Excavated Contaminated Soils	\$1,827	<b>4,500</b>
<b>Revegetation</b>		<b>91,960</b>
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	<b>20,000</b>
Subtotal	\$391,047	<b>492,095</b>

<b>EVAPORATION POND</b>	<b>COST (\$)</b>	<b>HWB Changes to Cost Estimate (\$)</b>
Stabilization and Disposal of Remaining Liquid Waste Inventory	\$342,954	<b>342,952</b>
Decontamination of Equipment	\$240	240
Stabilization and Disposal of Decontamination Water	\$7,315	7,315
<b>Chemical Testing of Decontamination Water</b>		<b>4,080</b>
Removal and Disposal of Liner and Leachate Collection System	\$81,984	<b>99,880</b>
Soil Sampling and Chemical Analysis	\$128,520	128,520
Excavation of Contaminated Soils	\$13,664	<b>18,019</b>
<b>Disposal of Contaminated Soil</b>		<b>37,790</b>
Earth Backfill for Excavated Contaminated Soils	\$3,416	<b>15,372</b>
<b>Revegetation</b>		<b>93,620</b>
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	<b>20,000</b>
Subtotal	\$586,093	<b>770,788</b>

<b>LIQUID WASTE RECEIVING AND STORAGE UNIT</b>	<b>COST (\$)</b>	<b>HWB Changes to Cost Estimate (\$)</b>
Stabilization and Disposal of Remaining Waste Inventory	\$52,668	<b>105,336</b>
Decontamination of Equipment and Buildings	\$2,400	2,400
<b>Chemical Testing of Decontamination Water</b>		<b>6,120</b>
Stabilization and Disposal of Decontamination Water	\$7,315	<b>14,630</b>
Removal and Disposal of Tanks and Concrete Pad	\$2,862	<b>21,139</b>
Soil Sampling and Chemical Analysis	\$22,440	<b>61,200</b>
Excavation of Contaminated Soils	\$218	<b>461</b>
<b>Disposal of Contaminated Soil</b>		<b>967</b>
Earth Backfill for Excavated Contaminated Soils	\$54	<b>491</b>
<b>Revegetation</b>		<b>37,200</b>
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	<b>15,000</b>
Subtotal	\$95,957	<b>267,944</b>

STABILIZATION UNIT	Cost (\$)	HWB Changes to Cost Estimate (\$)
Stabilization and Disposal of Remaining Waste Inventory	\$18,922	120,336
Decontamination of Equipment and Buildings	\$4,560	4,560
<b>Chemical Testing of Decontamination Water</b>		<b>6,120</b>
Stabilization and Disposal of Decontamination Water	\$14,630	14,668
Dismantling and Salvaging Tanks, Ancillary Equipment, and Building	\$60,959	24,905
Removal and Disposal of Tanks and Concrete Pad	\$14,700	57,980
Soil Sampling and Chemical Analysis	\$16,320	40,800
Excavation of Contaminated Soils	\$2,150	2,272
<b>Disposal of Contaminated Soil</b>		<b>4,766</b>
Earth Backfill for Excavated Contaminated Soils	\$538	2,421
<b>Revegetation</b>		<b>73,200</b>
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	15,000
Subtotal	\$140,779	370,028

ROLL-OFF STORAGE AREA	Cost (\$)	HWB Changes to Cost Estimate (\$)
Stabilization and Disposal of Remaining Waste Inventory	\$749,295	925,056
Decontamination of Equipment	\$2,400	0
<b>Chemical Testing of Decontamination Water</b>		<b>0</b>
Stabilization and Disposal of Decontamination Water	\$14,630	0
Demolition and Disposal of Liner System	\$80,960	192,407
Soil Sampling and Chemical Analysis	\$144,840	144,840
Excavation of Contaminated Soils	\$20,240	21,353
<b>Disposal of Contaminated Soil</b>		<b>44,781</b>
Earth Backfill for Excavated Contaminated Soils	\$5,060	22,770
<b>Revegetation</b>		<b>136,620</b>
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	15,000
Subtotal	\$1,025,425	1,505,827

TRUCK WASH UNIT	Cost (\$)	HWB Changes to Cost Estimate (\$)
Decontamination of Equipment and building		1,200
Chemical Testing of Decontamination Water		4,080
Off site disposal of Decontamination Water		2,250
Tank Removal and Salvage		4,520
Demolition and Disposal of Building and Unit		16,769
Soil Sampling and Chemical Analysis		20,400
Excavation of Contaminated Soils		285
Disposal of Contaminated Soil		598
Earth Backfill for Excavated Contaminated Soils		414
Revegetation		4938
Certification of Closure Inspection		3,000
Certification of Closure Report		5,000
Subtotal		63,454

LANDFILL CLOSURE ITEMS	Cost (\$)	HWB Changes to Cost Estimate (\$)
Landfill Excavation Backfill	\$4,120,000	7,210,000
Landfill Cover	\$2,372,508	4,831,235
Leachate Treatment Facility Construction	\$400,000	*
Leachate Treatment Facility Operations	\$32,120	*
Sump Vadose Zone Sampling and Analysis	\$8,000	8,000
Well Vadose Zone Monitoring System Sampling and Analysis	\$40,000	48,000
Soil Sampling and Analysis	\$104,040	104,040
Final Plat Survey	\$2,400	3,600
Certification of Closure Inspection	\$3,000	3,000
Certification of Closure Report	\$5,000	15,000
Total	\$7,087,068	*
Total from unit closures	\$2,239,301	3,470,136
Total Closure Cost	\$9,326,369	*

TABLE 8-4 LANDFILL POST-CLOSURE COST ESTIMATE		
LANDFILL POST-CLOSURE ITEMS	Cost (\$)	HWB Changes to Cost Estimate (\$)
Facility Inspection	\$201,600	201,600
Routine Landfill Cover Maintenance and Repair	\$600,000	600,000
Severe Landfill Cover Erosion Damage Repair	\$300,000	300,000
Perimeter Diversion Ditch Maintenance and Repair	\$300,000	300,000
Leachate Pumping and Treatment	\$481,800	*
Leachate Collection System Maintenance	\$67,200	*
Well and Sump Vadose Zone Maintenance	\$33,600	67,200
Sump Vadose Zone Sampling and Analysis	\$240,000	240,000
Vadose Zone Monitoring Wells Sampling and Analysis	\$1,200,000	1,440,000
Notation of Property Deed	\$2,500	2,500
Certification of Post-Closure Inspection	\$3,000	3,000
Certification of Post-Closure Report and Landfill Monitoring Reporting	\$5,000	160,000
Total	\$3,434,700	*
Total Closure and Post-closure	\$12,761,069	*

\* Total closure and post-closure costs cannot be calculated by HWB until additional information has been supplied by Gandy Marley, Inc. The additional information requested below must be incorporated into the Permit Application in addition to being provided for the HWB review of the financial assurance cost estimate. The additional items required from Gandy Marley in order to complete our review of the financial assurance cost estimate presented in Tables 8-3 and 8-4 above are listed below:

- 1) The construction drawings for the leachate treatment facility,
- 2) The details of the estimated \$400,000 cost of construction of the leachate treatment facility,
- 3) The method of treatment to be employed at the leachate treatment facility and details regarding the estimated per gallon cost (\$0.08) for leachate treatment,
- 4) A cost estimate for closure and post-closure care at the leachate treatment facility,
- 5) The basis for the estimated volume of leachate to be treated (listed as 401,500 gallons at closure and 6,022,500 gallons during the post-closure care period in the Cost Estimate of Landfill Closure Items table) during Closure and the Post-closure Care period,
- 6) The method and cost estimate for disposal of treated leachate generated at the leachate treatment facility,
- 7) The number and location of leachate storage tanks for the landfill unit,
- 8) A cost estimate for demolition and disposal of the leachate storage tank units,
- 9) Design drawings for the storm water detention basin liner.

In addition, the leachate treatment facility may require a RCRA operating permit therefore the following item also will be required:

- 10) A cost estimate for preparation of an application for a RCRA operating permit to treat the leachate after closure of the Triassic Park landfill.