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FAX COVER SHEET

DATE: Sept. 6, 2000

TO: Dale Gandy

COMPANY: Gandy Marley

FAX #: 505/398-6887

TELEPHONE #: 505/398-4960

MESSAGE: This is the NOD letter. We will Fed Ed the ltr + attachments Tomorrow.

FROM: Stephanie Krause

NO. OF PAGES: 3
(Including cover page)

If you did not receive all pages, please call me at (505) 827-1558

HAVE A GREAT DAY

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Rec'd 9/00

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 6, 2000

Larry Gandy, Vice President
Gandy Marly, Inc.
1109 East Broadway
P.O. Box 827
Tatum, New Mexico 88267

Dear Mr Gandy:

RE: Notice of Deficiency (NOD) - Technical Adequacy Review of Triassic Park RCRA Part B Permit Application Revision April 2000.
EPA ID No. NM0001002484

The Hazardous Waste Bureau (**HWB**) of the New Mexico Environment Department (**NMED**) has completed its technical adequacy review of the treatment/storage/disposal permit application from Gandy Marly, Inc. (**GMI**) for the proposed Triassic Park Waste Disposal Facility. This application is required under the Resource Conservation and Recovery Act (**RCRA**), as incorporated within the New Mexico Hazardous Waste Management Regulations, 20.4.1 NMAC. The application describes the disposal of hazardous waste in a Phase 1 landfill, and the storage and treatment of hazardous waste at the surface. Our review includes all revisions submitted by GMI through April 2000.

As previously discussed in a telephone conversation between GMI and HWB on August 30, 2000, HWB has found the application to be technically deficient. The enclosed Attachments A and B constitute the NOD by listing the requested information necessary for HWB to partially finalize preparation of a draft permit. Attachment A contains requests for specific information from Volumes I and III of the application, particularly regarding the landfill construction and operation. Attachment B contains additional information requests. Issues that will remain outstanding after resolution of this NOD will be those regarding the Waste Analysis Plan, inspection checklists, Construction Quality Assurance Plan, and the closure cost estimates.

Also attached for your information are copies of formal and informal correspondence between your contractor, Montgomery Watson (**MW**), and the HWB project staff, generally in the form of a faxes or electronic mail. These correspondence are concerned with other issues that arose during the permit application review process. MW has resolved, or has committed to resolve, these issues to the satisfaction of the HWB. The correspondence is organized according to the HWB staff person involved and is contained in Attachment C.

Please submit the information listed in Attachments A and B to HWB within sixty (60) days of receipt of this NOD. Failure to submit the information within this designated time may result in the denial of the Permit Application. We understand some information listed in this NOD may require more than 60 days to develop. For this reason, HWB will consider a petition to extend the deadline for portions of the required information if you provide a written justification and expected submittal dates for each portion.

If you have any questions about this NOD, please contact Ms. Stephanie Kruse, or me at (505) 827-1558.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

Enclosures
cc: w/attachments
Greg Lewis, NMED WWMD
Stephanie Kruse, HWB
Susan McMichael, NMED OGC
Dale Gandy, GMI
Ken Schultz, GMI
Pat Corser, MW
David Neleigh, EPA Region 6
TP File – Red 2000
cc: w/o attachments
John Kieling, HWB
Steve Pullen, HWB
Glenn von Gonten, HWB
David Cobrain, HWB

C:/MF/TP/NOD.9.6.2000
9/6/2000 sdp

APPENDIX A

NOTICE OF DEFICIENCY:
TRIASSIC PARK HAZARDOUS WASTE DISPOSAL FACILITY
PERMIT APPLICATION

NOTICE OF DEFICIENCY

Hazardous Waste Bureau staff have reviewed the Landfill sections of Vols. I and III of the Triassic Park Hazardous Waste Disposal Facility permit application, and have noted several deficiencies. These deficiencies, along with staff comments and requests for clarification, are detailed below:

Landfill Sections

Volume I

1. **P. 2-17, Section 2.5, Landfill.**

   Phase 1A implies the existence of a Phase 1B. There is no discussion in the permit application of Phase 1B, which, under Phase 1A, is the site of the collection basin (according to the drawings). Will Phase 1B be included in the development of Phase II? Or will it be developed for waste disposal later on in this initial permitting action? (Probably a good place to insert details on this clarification is in Section 3.1.4, Waste Filling Sequence.)

   From review of the Permit Application, staff's current working assumption is that removal of the collection basin located in Phase 1B will be done as part of the Permit modification to develop Phase II. If Triassic Park intends to remove the basin before this permit modification, this must be made clear.

   Triassic Park must clarify this issue.

2. **P. 2-17, Section 2.5.1.1, Nature and Quantity of Waste.**

   The first sentence says that the Facility will accept TSCA PCB waste. This is not strictly correct. Liquid waste with PCB concentrations under 50 ppm is not regulated by TSCA. Bulk PCB-contaminated remediation waste is regulated under TSCA, but TSCA regulations permit this waste to be disposed in a hazardous waste landfill under certain conditions. There is no upper concentration limit on these wastes.

   The list of waste which the Facility will not accept is not complete nor is it completely accurate. It might be better to refer to the list in the Waste Analysis Plan, Section 4.2.

   The last bullet is incorrect (see above).

   Triassic Park must correct this list.

3. **P. 2-18, Section 2.5.1.1.**

Staff's current working assumption is that the Phase 1A landfill area of 47 acres is the upper, outer limits of the landfill sides, i.e., the area which will receive final cover, while the fill area of 15.6 acres is measured at the landfill floor, including the unlined area occupied by the contaminated water basin. Is this correct?

4. **P. 2-19, Section 2.5.1.3, Leachate Collection and Removal System (LCRS), 4th paragraph. "Pumps will be hard piped to the leachate storage tanks,..."**

Will landfill leachate be stored only in the leachate storage tanks? Will leachate from the evaporation pond be stored in the leachate storage tank?

Triassic Park must clarify these points.

5. **P. 2-21, Section 2.5.1.6, Run-On/Run-Off Control. "Run-off from the Facility, but not from the active portion of the landfill (including run-on/run-off from the landfill perimeter ditch), will be directed to the stormwater retention basin. The retention basin will be pumped after rainfall events that result in the accumulation of water in the basin."**

Should the first sentence read, "Run-off from the Facility (including run-on/run-off from the landfill perimeter bench), but not from the active portion of the landfill,..."?

Should the second sentence refer to the collection basin rather than the stormwater retention basin"?

Triassic Park must make corrections as necessary.

6. **P. 2-26, Section 2.5.3.9, Response Action Plan: Reducing the Head on the Landfill Liner, last bullet.**

This sentence is incomplete. Triassic Park must make the necessary corrections.

Vol. III

7. **P. 3-1, Section 3.1.2, Landfill Layout and Phasing: Ultimate Landfill Configuration, 1st paragraph. "...The final cover area for Phase 1A is approximately as shown in Drawing No. 23,..."**

   Drawing No. 23 is labeled, "Final Cover Details", and does not show the final cover area. Triassic Park must make the necessary correction.

8. **P. 3-1, Section 3.1.2, Ultimate Landfill Configuration, 3rd paragraph. "As shown on Drawing Nos. 6, 7, and 22, the final cover system will reach a maximum elevation of approximately 4,205 ft."**

   Drawing No. 6 shows the ultimate excavation plan. Triassic Park must make the necessary correction.

9. **P. 3-2, Section 3.1.3, Subgrade Excavation, Liner System, LCRS, LDRS, and Vadose Zone Sump Design: Liner System: 16-foot wide compacted clay liner (CCL) around landfill perimeter**

   The 2nd sentence of text states, "...As shown on Drawing No. 23, a 16-foot thickness of this sand material will be removed and replaced with a compacted CCL component...." Triassic Park must bring these two statements and the drawing into accordance.

10. **P. 3-3, Section 3.1.3, Liner System: Geosynthetic Clay Liner, 2nd paragraph. "Manufacturer published information on the compatibility of the GCL with typical leachate materials is provided in Appendix H-5."**

    There is no Appendix H (Appendix H in Vol. II is the Waste Profile Form). Triassic Park must provide Appendix H.

11. **P. 3-3, Section 3.1.3, Liner System: 60-mil thick high density..., 2nd paragraph.**

    See Comment 10.

12. **P. 3-4, Section 3.1.3, Liner System: 60-mil HDPE geomembrane...., 2nd paragraph.**

    See Comment 10.

13. **P. 3-5, Section 3.1.3, Liner System:Leachate Collection and Removal, Leak Detection and Removal, and Vadose Zone Monitoring Sump Systems, 1st and 2nd paragraph.**

See Comment 10.

14. **P. 3-6, Section 3.1.3, Liner System: Crest Riser Pad Arrangement. 2nd paragraph.**

See Comment 10.

15. **P. 3-6, Section 3.1.4, Waste Filling Sequence, 2nd paragraph. "...Liner installation in Phase 1A will take place in two stages: the slope and floor area below the access ramps and the slope area above the access ramps. Once the waste fill approaches the limits defined in Drawing No. 10, the cut slope will be advanced southward into Phase 2 and the remaining floor and slope areas of Phase 1 will be lined....As the waste fill extends beyond and above the access ramps, a ramp will be established in the south waste fill slope to provide access to the newly lined floor areas of Phase 1...."**

These sentences are unclear with regard to the timing, primarily because the section seems to discuss development of all three phases of the landfill and development of Phase 1A indiscriminately. This is also true for the drawings. (The timing of the south fill slope ramp is a good example.)

For purposes of permitting the initial phase of landfill development, which is staff's immediate concern, staff's working assumptions are as follows:

Lining the slope and floor area below the access ramps covers all the area which will receive hazardous waste under the initial (permitted) stage of Phase 1A. This will be done before the facility initiates operations and will be certified by the Construction Quality Assurance (CQA) officer.

The timing of the second part of liner installaton to be accomplished in Phase 1A - lining the slope area above the access ramps - therefore must coincide with the beginning of Phase II development - which will also include removal of the contaminated water basin and the clean water basin in Phase II. Development of Phase II will be carried out under a permit modification, which will include the second liner installation stage in Phase 1A development. Is this correct?

Staff assumptions with regard to removal of the contaminated water collection basin and the stormwater collection basin are that this will be covered by the permit modification request. Is this correct?

If this is not correct, and these activities will occur before the permit modification, then:

The second stage of Phase 1A liner development and liner development for Phase 1B must be certified by the CQA officer; and

The following information must be provided in the permit application:

Details of how run-on will be prevented after the slope areas above the access ramps are used for waste disposal;

Details of the removal of the two collection basins, and details regarding how contaminated water and stormwater will be handled in the changeover period; and

Details for lining the remaining floor of Phase 1A and the floor of Phase 1B.

Also: There will already be a ramp on the south waste fill slope, which will be constructed before the initiation of operations. Is this correct? Or will this also be constructed under the permit modification for Phase II?

Triassic Park must clarify these points.

Also: Triassic Park must identify the acreage of the initial stage of Phase 1A, e.g., the area identified as lined on Drawing 10.

16. **P. 3-6, Section 3.1.4, last sentence.**

The sentence should read, "Daily cover soil thicknesses will be at least 0.5 ft".

17. **P. 3-7, Section 3.1.5, Interim and Final Covers, 1st full paragraph.**

Where is the source of the interim soil cover? Please provide a description of the soil and explain why it is appropriate for use as soil cover. Please provide a drawing which shows how run-off from interim cover areas reach the perimeter drainage ditch system.

18. **P. 3-9, Section 3.1.6. Landfill Storm Water Control Features.**

Contaminated water basin. A lined contaminated water basin is shown on Drawing 10. It is not shown on any other drawing. It is discussed in the Operations and Maintenance Plan. It is not discussed at all either in Vol. I or Vol. III.

Triassic Park must identify the contaminated water basin and discuss maintenance in Vol. I and must provide information on its construction, dimensions, capacity, and timing of its construction and removal in Vol. III. Please correct drawings as appropriate.

Stormwater collection basin. The stormwater collection basin is shown as unlined on Drawings 8-10 and as lined on Drawing 13. Vol. III, Section 3.1.6, p. 3-5, 2nd paragraph, indicates that this basin is lined.

Triassic Park must correct as appropriate.

Berms. Drawing 13 - Collection Basin Plan and Details - shows a surface water diversion berm blocking the bottom of the south ramp. How do vehicles using the south ramp enter the landfill floor? Drawing 24 shows the Interphase Berm Section. Staff assumes that this is the berm that separates the stormwater collection basin from the contaminated water basin.

As with the evaporation pond berm, no information is provided on the landfill berms (and there is no reference to these drawings) anywhere in the text. Triassic Park must provide information on the dimensions, construction materials, and maintenance of these berms.

19. **P. 3-17, Section 3.2.10, Surface Water Drainage Analyses, 1st sentence. "Design parameters for HDPE lined Channels 7 and 8 located above the landfill access ramps are presented on Drawing No. 25...."**

All ditches except 7 and 8 are shown on Drawing 25. (Design parameters for 7 and 8 are provided on Drawing 25 (2 of 2)).

20. **P. 3-27 Section 3.2.10, 2nd paragraph. "The clean water collection basin...will contain the run-off from the 15 acres of unlined area of the Phase 1A...."**

Does this refer to the slopes above the access ramps? Triassic Park must clarify.

APPENDIX B

NOTICE OF DEFICIENCY:
TRIASSIC PARK HAZRDOUS WASTE DISPOSAL FACILITY
PERMIT APPLICATION

OUTSTANDING ISSUES

1. April 14, 2000 correspondence from HWB to MW regarding the Revised Draft Section 10, Corrective Action. In this correspondence HWB suggested that portions of the application would conflict with the final permit and that if the application was to be approved in its entirety that the conflicting portions would have to be removed. GMI should abide by the suggestion of the April 14 letter or propose an alternative.
2. April 14, 2000 faxed table of MW responses to HWB's March 16, 2000 "comments" regarding the Draft Vadose Zone Monitoring System Work Plan. General Comment #8 "abandonment of boreholes" remains unresolved. HWB understands that there may be some difficulty locating the boreholes in question, but GMI should formally respond to the inquiry.

APPENDIX C

COMMENTS AND QUESTIONS (APRIL-SEPTEMBER 2000): TRIASSIC PARK HAZARDOUS WASTE DISPOSAL FACILITY PERMIT APPLICATION

The following numbered items are faxed, e-mailed or otherwise transmitted correspondence in Steve Pullen's files dating to April 1, 2000 and containing significant issues/questions regarding the Triassic Park permit application. This list is created to insure that all correspondence is accounted for in the State's Administrative Record. The list is ordered reverse chronologically and where possible the issues are identified, as is the appropriateness of the applicant's response.

1. July 14, 2000 e-mail from MW (Diane Dwire) to HWB (Steve Pullen). A HWB concern regarding the lack of a conceptual site model in Section 3 of the application was satisfactorily responded to by addressing the issue in the Vadose Zone Monitoring System Work Plan. HWB's concern regarding figure references was appropriately addressed.
2. July 12, 2000 e-mail from MW (Toby Leeson) to HWB (Steve Pullen). MW provided a revised Vadose Zone Monitoring System Work Plan addressing comments provided verbally in a conversation between Steve Pullen and Pat Corser on July 11, 2000. The issues were; a revised Schematic Site Model, a proposed Class 1 Permit modification for augmenting indicator parameter list, and problematic page numbering. All these issues were appropriately addressed in Final Work Plan except the concern regarding the comparison of the F039 list and the Table 1 list. This issue was resolved by making the sampling for all constituents in F039 a permit condition.
3. July 7, 2000 fax from MW (Toby Leeson) to HWB (Steve Pullen). The fax resolved an earlier concern regarding a Figure #2 *Location of Sumps and Monitoring Wells* where the vertical distance between the screened intervals of the shallow and deep wells was not specified. This fax also included the appropriately revised Figure #3 *Schematic Site Model.*
4. July 3, 2000 e-mail from Montgomery Watson (MW) (Pat Corser) to the Hazardous Waste Bureau (HWB) (Steve Pullen). HWB posed two questions: (1) Will evaporation pond fluid be characterized? (2) Why doesn't the exemption from LDRs for treatment in surface impoundments specified in 268.4 apply to the TP application? The first question was satisfactorily answered. The second question was not answered but was later determined to be irrelevant.
5. June 28, 2000 MW Comments on HWB's Module X.A – Corrective Action for Regulated Units. All relevant comments were appropriately responded to.
6. June 23, 2000 faxed revised paragraph regarding data analysis is an appropriate response to a concern raised by HWB the previous day in a telephone conversation.
7. April 14, 2000 correspondence from HWB to MW regarding the Revised Draft Section 10, Corrective Action. HWB identified numerous deficiencies and inconsistencies and suggested that significant portions of the application language should be withdrawn. This issue is discussed further below in the Outstanding Issues section, issue #1.
8. April 14, 2000 faxed table of MW responses to HWB's March 16, 2000 "comments" regarding the Draft Vadose Zone Monitoring System Work Plan. All issues were appropriately addressed but issue #2 below.

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PAUL R. RITZMA
DEPUTY SECRETARY

April 14, 2000

Patrick Corser
Montgomery Watson
P.O. Box 774018
Steamboat Springs, Colorado 80477

RE: REVISED DRAFT SECTION 10, CORRECTIVE ACTION (CA), DATED JANUARY 7, 2000 - TRIASSIC PARK WASTE DISPOSAL FACILITY PERMIT APPLICATION

Dear Mr. Corser:

The New Mexico Environment Department (the Department) Hazardous and Radioactive Materials Bureau (HRMB) has completed its review of the above referenced submittal. The Department has determined that the CA Section does not sufficiently specify all of the corrective actions that must occur in the event of a release. The Department has also determined that much of the CA Section is inconsistent with anticipated draft Permit language.

The above referenced deficiencies and inconsistencies are identified in the attached comments. These comments are provided for informational purposes only and GMI should not revise the CA Section to incorporate the comments. GMI should, however, remove the inconsistent portions by withdrawing all language including and below the first full paragraph on page 10-2. The Department will proceed with establishing CA requirements in the draft Operating Permit. If GMI finds it needs to reference CA requirements in its Application, it should simply reference the Corrective Action Module of the Permit.

The Department would like to thank GMI for undertaking the unusual process of submitting CA commitments in its Permit Application.

If you have any questions regarding this letter or the attached comments, please contact Steve Pullen of the HRMB at (505) 827-1558 ext. 1020.

Sincerely,

Stephen Pullen

for Stephanie Kruse,
Project Manager
Triassic Park Project

cc: w/attachment

James Bearzi, NMED/HRMB
Carl Will, NMED/HRMB
Dale Gandy, GMI
David Neleigh, EPA
John Kieling, NMED/HRMB
Steve Pullen, NMED/HRMB
John Pellicer, MW

NMED Comments
April 2000

CORRECTIVE ACTION (CA)- SECTION 10
(draft)
Triassic Park Waste Disposal Facility Permit Application

The New Mexico Environment Department (the Department) provides the following comment on eleven (11) issues associated with the Corrective Action Section. The 11 issues constitute neither a comprehensive nor a definitive list of Department concerns, but they suffice to show that the CA Section is deficient and that the Department should proceed with establishing the corrective action requirements in the draft Permit. As stated in the associated cover letter, these comments are provided solely as a response to the CA Section and for informational purposes. Gandy-Marley, Incorporated (GMI) should not augment its Application based on these comments, but should remove those portions that the Department anticipates will be inconsistent with the Permit and has identified below.

Of the 11 issues identified in the CA Section, Issues 1 through 3 are the general deficiencies. Issues 4 through 8 are commitments that conflict with the anticipated CA module of the Permit, and thus require removal. Issues 9 through 11 are considered appropriate and may remain in the Application.

General Deficiencies
- **Issue #1** The distinction between CA responses for regulated units (RU) and solid waste management units (SWMU)
- **Issue #2** A response to the detection of non-contaminated fluids in the Vadose Zone monitoring System (VZMS)
- **Issue #3** The recognition of the response actions in other portions of the Application

Conflicting Commitments
- **Issue #4** Investigation commitments
- **Issue #5** Response actions beyond an investigation
- **Issue #6** Notification commitments
- **Issue #7** Record keeping commitments
- **Issue #8** Contaminant level that would trigger a response

Other issues
- **Issue #9** Distinguishing contaminated from non-contaminated fluids
- **Issue #10** Identification of existing release sites
- **Issue #11** Identification of future SWMUs

GMI agreed at a September 23, 1999 meeting, held to discuss the groundwater monitoring waiver and the associated VZMS, that it would provide as part of its Permit Application a plan for responding to releases to the VZMS. GMI agreed that the following three response commitments would be provided:

- a methodology to distinguish contaminated fluids from waste management units and presumably non-contaminated fluids from other sources **(Issue #9)**;
- an investigation of the extent of contamination **(Issue #4)**; and,
- the removal of contamination and an approach to stop the release **(Issue #5)**.

GMI's draft CA Section contains the following descriptions and commitments:
- a statement that there are no previous releases at the proposed site **(Issue #10)**;
- an identification of all future SWMUs as determined in the RCRA Facility Assessment **(Issue #11)**;
- a commitment to notify the regulatory authority according to the Contingency Plan (CP) **(Issue #6)**;
- a commitment to keep records according to the CP **(Issue #7)**;
- a commitment to perform a RCRA Facility Investigation (RFI) should a release occur **(Issue #4)**; and,
- a commitment to perform a Corrective Measures Study (CMS) should a release pose an unacceptable risk **(Issue #5)**.

General Deficiencies

(Issue #1) The CA Section does not make the required distinctions between corrective actions for the RUs and SWMUs. Of the units proposed in GMI's Permit Application, the landfill and the evaporation pond are regulated units (RU) and have special regulatory considerations because they have hazardous wastes intentionally placed on the land (albeit on top of barriers).

CA regulations for both RUs and SWMUs are stipulated at 20 NMAC 4.1.500 (incorporating by reference 40 CFR §264.100 and §264.101). §264.100 requires an owner/operator (O/O) to take the corrective action needed to ensure that groundwater impacted by RUs attain the appropriate groundwater protection standard. The groundwater monitoring requirement for GMI's RUs is currently waived for reasons provided in the Department's letter to GMI dated January 12, 2000. However, because a VZMS takes the place of the groundwater monitoring system, and as a condition of GMI's groundwater monitoring waiver, the Application, or alternatively the Permit, must maintain the same level of protectiveness by having special vadose zone CA requirements for the RUs.

40 CFR §264.101 requires an O/O to institute corrective action as necessary to protect human health and the environment for all releases of hazardous wastes or constituents from all SWMUs. This regulation, and EPA's corresponding Subpart S Guidance, will form the basis for the corrective action requirements for all the SWMUs identified in the CA Section. The Department believes that the CA process for RUs and SWMUs are so distinct that it anticipates two sections in the Permit addressing the issues, Modules 10A and 10B respectively.

(Issue #2) The CA Section does not sufficiently address what response GMI would take if non-contaminant fluids were detected in the VZMS. A previous GMI submittal, the

VZMS Work Plan, proposes that if non-contaminated fluids were detected, the permittee would propose "no-further-action" (NFA). This proposal is not considered by the Department to be sufficiently protective.

For the VZMS to effectively monitor for releases from a waste management unit, the wells and sumps should not be allowed to retain non-contaminated fluids. Among other things, the Department is concerned that non-contaminated fluids allowed to remain in the system would either create a reverse gradient precluding contamination from entering the system, or it would dilute entering contamination to below detection limits. The Department anticipates that the Permit will have similar requirements for the notification, investigation and removal for non-contaminated fluids as for contaminated fluids.

In conversation between HRMB and GMI representatives on April 10, 2000, GMI agreed that the response to non-contaminated fluids being detected in the VSMZ would be addressed in the VZMS WP. GMI also agreed that the response would be, at a minimum, a commitment to investigate the extent of the non-contaminated fluids and to remove those fluids to maintain the effectiveness of the system.

(Issue #3) The CA Section does not sufficiently cross reference other portions of the Application that also address corrective action. The Application's CP addresses releases to all environmental media including soils. The Department recognizes that the CP generally addresses surficial releases requiring an immediate response, and the CA Section generally addresses subsurface releases requiring a more deliberative evaluation. These two response plans should be distinguished and should cross-reference each other.

Conflicting Commitments

(Issue #4) The CA Section commits to investigating the extent of the contamination by performing a RFI. The CA Section lacks detail as to what constitutes a RFI, and the Department presumes GMI is referring to the RFI described in EPA's Subpart S Guidance. In general the Department feels this is an appropriate approach. However, the Department feels that the RFI process does not appropriately reflect the necessary urgency of responding to a contaminant release from a RU.

The Department's experience is that, in general, the RFI process takes approximately one year to propose, perform and report. The Department considers the regulatory requirements and time restraints specified in the Application's Response Action Plan (RAP) for leaks through the primary liner of the landfill, to also be an appropriate corrective action for releases through the secondary liner into the VZMS. To paraphrase the RAP, if a serious release has been detected, the permittee will "submit a written assessment to the Department within 14 days of the determination as to the amount and source of liquids; information on possible size, location and cause of the leak; ... and any immediate and short term actions to be taken;...". Furthermore, the permittee will "submit a report to the Department within 30 days ... describing how effective the response actions have been at reducing the leakage rate ... ". The Department anticipates

that the Permit will have a combination of RAP and RFI requirements for RUs, and slightly less urgent RFI requirements for SWMUs.

(Issue #5) The CA Section's commitment to remove contamination is via a CMS process. Like the RFI, the CMS process is not extensively described in the CA Section and the Department assumes GMI is referring to the process described in EPA guidance. Here too the Department believes this may be appropriate, but that elements of the RAP should be combined with CMS processes to establish a more comprehensive response action.

The elements of the RAP that should be incorporated into the response action, besides the reporting requirements mentioned earlier, include:

- increasing the pumping rate on the leachate collection system pump (this may also apply to the Leak Detection Removal System and the vadose zone monitoring pumps);
- removal of all standing water from the surface of the landfill (and possibly all fluids from the evaporation ponds); and,
- assessment of operations to determine if waste receipt should be curtailed or wastes should be removed for liner inspection, repair or control.

(Issue #6) The CA Section commits to notifying the regulatory authority according to the CP. The CP states that the emergency coordinator (EC) will follow the off-site notification requirements when it is determined that a release poses an "immediate threat". The Department is concerned that the CP is obviously meant to address emergencies that occur at the surface (i.e., it makes no specific mention of a release detected in the VZMS) and that the EC will not consider the detection in the VZMS an immediate threat.

(Issue #7) Regarding record keeping commitments for corrective actions. Again, the Department is concerned that GMI is referencing the CP as describing those commitments, yet the CP makes no specific reference to subsurface releases.

(Issue #8) The CA Section suggests that corrective measures might be initiated should released hazardous wastes "pose a concern to human health or the environment". The Department anticipates that corrective measures will be required in the Permit for any and all releases from SWMUs, including RUs, that exceed the anticipated Permit mandated standard of background concentrations. The background standard is consistent with Section 8 of the Application, Closure and Post-closure of Regulated Units.

Other Issues

(Issue #9) The methodology to distinguish fluids from the waste management units and other sources was not addressed in the CA Section, but is addressed in the draft VZMS Work Plan (WP) dated February 11, 2000. The Department identified its concerns regarding that WP in correspondence to you dated March 16, 2000. The Department believes that the VZMS WP is the appropriate location to address the fluid distinction issues, and only mentions it here because it was suggested to be included in the CA

Section in the September 23rd meeting. The Department proposes that the corrective action process be defined as those actions taken when a release is confirmed.

The WP also contains corrective action commitments that the Department deemed inappropriate. The WP states that if the fluids are not from a waste management unit, GMI would take "no-further-action", and, if fluids are from a unit, a "detection monitoring" program would be developed. Besides being inappropriate response actions, the WP is not the appropriate location for CA commitments, and the WP should be changed to reference the Corrective Action Module of the Permit.

If fluids detected in the VZMS are contaminated, the WP's suggestion to initiate detection monitoring is considered by HRMB to be non-protective. Detection monitoring, as described in 40 CFR § 264.98, is a method of measuring groundwater in the uppermost aquifer at the point-of-compliance for a statistically significant detection of contamination in reference to groundwater protection standards. GMI's detection monitoring proposal is inappropriate for the following reasons: contamination will have already been confirmed; the measuring point is not in the upper-most aquifer and not at a point-of-compliance; and, concentrations will not be compared to groundwater standards. Any detection of contamination in the VZMS will indicate a significant release, and will require investigation and control measures.

(Issues #10 and #11) The CA Section's identification of no existing release sites and potential future SWMUs is appropriate.

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GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

FAX COVER SHEET

DATE: 4/13/00

TO: Pat Corser

COMPANY: Montgomery Watson

FAX NO.: 9-1-970-879-9048

TELEPHONE:

MESSAGE: Pat,

Please let me know if you plan to discuss this extensively on Monday. Some of our folks may not get to see it before then.

Tx. Steve.

FROM: Steve Pullen

NO. OF PAGES: 8
(Including cover page)

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

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

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

ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
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GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

FAX COVER SHEET

DATE: 8/22/00

TO: Diane Duire

COMPANY: Montgomery Watson

FAX NO.: 970/879-9048

TELEPHONE: 970/879-6260

MESSAGE: Diane - Here are comments I noted during review of:

Vol I Section 2.6 (Surface Impoundment)

Vol III Section 4.0

O&M Plan

FROM: Stephanie Kruse

NO. OF PAGES: 7
(Including cover page)

COMPANY: NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

FAX: (505) 827-1544

TELEPHONE: (505) 827-1557

August 20, 2000

Comments: Part 5 (Surface Impoundment)

1. Vol. I, Section 2.6.1, p. 2-29, paragraph 1, 1st sentence.

   264.221(c) refers only to the LDRS. Reference should be to 40 CFR 264.221.

2. Vol. I, Section 2.6.1, p. 2-29, first paragraph.

   I get 75, 240 sq ft. (285 x 132 x 2 - from Vol. III, Section 4.1.2, paragraph 3).

3. Vol. I, Section 2.6.1.1, p. 2-30, l. 1. "...to accept high concentrations of organic, therefore...."

   Should be something like, "...organic - materials? contaminants?..."

4. Vol. I, Section 2.6.1.2, p. 3-31, 1st sentence below bullets.

   "...presented Drawing 32...." Should be "presented in Drawing 32".

5. Vol. I, Section 2.6.1.4, p. 2-32. "...Run-off in the pond will be pumped out within 24 hours of a storm event with vacuum trucks. Contaminated water will be treated in the stabilization bins and treatment residuals will be disposed of in compliance with appropriate regulations."

   DISCUSS.

6. Vol. III, Section 4.1.2, p. 4-2. "2-ft freeboard".

   From the drawing, the berm is 11 ft in height. So is the maximum operational level 9 ft? Or 10 ft?

7. Vol. III, Section 4.1.3, p. 4-2. No plan drawing (similar to the Drawing 41 for the Truck Roll-Off Area) showing extent of liner? What is the extent of the liner? Where is this discussed?

8. Vol. III, Section 4.1.3, p. 4-3, "Leak Detection and Removal and Vadose Monitoring Sump Systems".

   Lines 2 and 8 refer to the landfill. Should refer to the evaporation pond.

9. Vol. III, Section 4.1.4, p. 4-3.

Is the Discharge Pad used for incoming trucks also? Drawing No. 40 for the Roll-Off Container Storage Area shows incoming and outgoing flows of waste well. It would be nice if Drawing 31 showed something similar for the Surface Impoundment. (Is addressed in (O&M Plan.)

10. Vol. III, Section 4.2.1, p. 4-4, 1st paragraph, l. 5.

"of the of site". One too many "ofs".

11. Vol. III, Section 4.2.8, p. 4-7, paragraph 2, l. 4.

"affects" should be "effects".

12. Vol. III, Drawing Nos. 28 and 29.

Please label, "Phase I".

13. Surface Impoundment - permit for treatment only? or treatment and storage?

14. Again, I find little about construction or maintenance of the berm. Is it earthen? How wide is it? Where is this discussed?

15. Volume I, RAP, Section 3.7.2, - refers only to Landfill.

[Will discuss RAP in relation to the evaporation pond in Comments re the landfill - Stay tuned!]

16. 264.228(a)(2)(ii). "Stabilize remaining wastes to a bearing capacity sufficient to support final cover...."

DISCUSS.

Comments: Operations and Maintenance Plan

1. Section 2.1, p.2, paragraph 4.

   [Will discuss this section after I have reviewed the landfill sections.]

2. Section 2.2, p. 2, paragraph 1, l. 1.

   See Comment No. 2 in Surface Impoundment section.

3. Section 2.2, p. 2, paragraph 2.

   See Comment No. 5 in Surface Impoundment section.

4. Section 2.6, p. 3, paragraph 2. "...4 to 8 feet high berm"

   Vol. III, Section 5.1.2, p. 5-1, says, "...from 6 ft to 10 ft...." Vol. I, Section 2.2.2.1, paragraph 4, says, "...from 4 feet to 8 feet." Please make necessary corrections and let me know.

5. Section 3.1.1, p. 5, Subsection C.1.

   Table references are to the WAP? There is no table - now - listing minimal parameters to be shown in the waste stream profile. Instead of referring to Table 4.3, refer to Sections 4.3.3 and 4.5.2.

6. Section 3.1.1, p. 6, C. 6

   "...has been treated...." should read, "has treated".

7 Section 3.1.1, p. 6, D, l. 3.

   "...tested for compatibility with the landfill and surface impoundment containers...." What surface impoundment containers? How about the stabilization bins?

8. Section 3.1.1, p. 6, E.

   WAP has changed. Required/supplemental analyses have kind of gone by the boards (whatever that means). Best to refer to Section 4.5.5.5 for discussion of incoming waste that is directly landfilled. Refer to Tables 4.2 and 4.3.

9. Section 3.1.3, p. 7, A. "Confirmatory analyses will be performed according to Section 4.1.8.1."

There is no longer a Section 4.1.8.1. What does this refer to?

10. Section 3.1.3, p. 7, B.

Refer to Section 4.5.4, rather than to Table 4.5.

11. Section 3.2.1, p. 7, .D.

I think (but wouldn't swear to - I get this from context while reading the regs) that shipping papers are for train shipments.

12. Section 3.2.2, p. 8, B.

Not biennially, but annually. (This is from the WAP Guidance, and is part of the QA/QC procedure.)

13. Section 3.2.4, p. 9, M.

Ck Section 4.1.2 for how to word this. The 50 ppm cut-off refers to liquid PCB-contaminated waste. There is no cut-off for bulk PCB-contaminated remediation waste.

14. Section 3.3, p. 9, A.
No Table 4.7 now. I think these areas are listed in Section 10.0?

15. "...Leachate that doesnot meet applicable LDR requirements will be treated before landfilling.

Treated by stabilization.

16. Section 3.3, p. 10, E. "...For most materials, the TCLP extraction method will be performed, followed by an analysis of the leachate for the appropriate parameters...."

DISCUSS.

17. Section 3.4.5, p. 12, L. "...Contaminated water that does not meet applicable LDR requirements will be treated before landfilling."

See Comment No. 15 above.

18. Section 3.5.3, p. 13, A.

Also, wastes that require compliance with 264, Subparts BB and CC will not be placed in the evaporation pond.

19. Section 3.5.3, p. 13, C. "Tanker trucks will be unloaded directly into the evaporation pond through a series of hoses, valves and pipes."

Where are these shown?

20. Section 3.5.3, p. 13, D., l. 1.

"be" should be "by".

21. Section 3.5.3, p. 13, H.

See Comment No. 5 in Surface Impoundment section.

22. -

23. Section 3.8.5, p. 18, E.

264.1086(c)(4)(iii) for Container Level 1 standards and 264.1086(d)(4)(iii) for Container Level 2 standards.

24. Section 3.9.3, p. 20, A., l. 1.

One too many "will be"s.

25. Section 3.9.3, p. 20, I. "Individual bins will be physically separated from each other by a minimum of 1 foot...."

Vol. I, Section 2.2.2, p. 2-6, paragraph 2, says, "...physically separated from each other by 4 feet side to side, and 2.5 feet end to end,...." (What does this mean?) K., below, says, "Roll-off containers will be spaced 4 feet apart...."

DISCUSS.

26. Section 3.9.3, p. 21 N.

Fix wording.

27. Section 3.9.4, p. 21, F.

See Comment No. 23 above.

28. Section 4.2, p. 22, C.

Needs to be finished.

29. Section 4.1, p, 22, D.

And transducers.

GARY E. JOHNSON
GOVERNOR

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PETER MAGGIORE
SECRETARY

FAX COVER SHEET

DATE: August 14, 2000

TO: Diane Dunne

COMPANY: Montgomery Watson

FAX NO.: 970/879-9048

TELEPHONE: 970/879-6260

MESSAGE: Comments re the Container Module.

FROM: Stephanie Kruse

NO. OF PAGES: 2
(Including cover page)

COMPANY: NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

FAX: (505) 827-1544

TELEPHONE: (505) 827-1557

August 13, 2000

COMMENTS: CONTAINERS

1.Vol. I, Section 2.2, p. 2-4, paragraph 1, first sentence.

Drawing 39 is Liquid Waste Tanks.

2.Vol. I, Section 2.2.2, p. 2-6, paragraph 3, first sentence.

"Landfill operational staff...." This section discusses roll-off containers. Should the sentence read, "Facility operational staff..."?

3.Vol. III, Section 7.1.3, p. 7-3, paragraph 3, 5th sentence.

"Drawing No. 44 shows the rebar types and concrete details for the floor." Section 7.1.3 discusses the Drum Handling Building. Drawing 44 is Truck Wash Layout and Details. Say something like, "similar to the rebar types shown on Drawing 44"? Also, not much detail on floor provided on Drawing 44.

4Vol. III, Section 5.1.1, p. 5-1, paragraph 1, last sentence.

"The liner system incorporated in the unstabilized waste roll-off area is included as a precautionary measure." The drawing shows the liner under the entire Roll-Off Container Storage Area. Vol. 1, Section 2.2.2, p. 2-6, paragraph 2, 3rd sentence, reads, "The individual steel roll-off bins will be stored in the HDPE-lined areas of the roll-off storage unit." Which is correct?

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GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

TANKS

FAX COVER SHEET

DATE: 8/8/00

TO: Diane Duire

COMPANY: Montgomery Watson

FAX NO.: 970/879-9048

TELEPHONE: 970/879-6260

MESSAGE: Diane - Here is a list of comments I scribbled and transcribed while writing the Tank Permit Module - including a few sentences I would like to discuss.

FROM: _____

NO. OF PAGES: _____
(Including cover page)

COMPANY: NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

FAX: (505) 827-1544

TELEPHONE: (505) 827-1557

August 10, 2000

1. Vol. III, 2.3, paragraph 2.

   Refers to Appendix E-34. There is no Appendix E-34.

2. 2.3 and 2.3.1 - refer to tank "elevated above" or "placed on" pad. Which?

3. -

4. Vol I, 2.3, paragraph 2.

   Compatibilities "assessed" in Vol III. Compatabilities are mentioned, but not assessed.

5. Vol. III, 8.1.2, paragraph 1, last sentence.

   DISCUSS.

6. Vol. III, 8.1.2, paragraph 1.

   Drawing 41 is Truck Roll-Off Area.

7. Vol. III, 8.1.3.

   Pls I.D. where specification section is located (IV, App. C).

8. Vol III, 8.2.3

   Drawing 44 is Truck Wash Area.

9. Vol. IIIm 8.2.1, last sentence.

   There is no Appendix H-3.

10. Drawing 40, Note 3.

    Are there 4 or 2 tanks to be permitted?

11. Vol III, 8.1.1, last paragraph

    DISCUSS.

12. Vol III., p. 6-3, paragraph 2. Not Drawing 24. 34? Anyway, there is no table on Drawing 34. Also, p. 6-6, 6.2.4 refers to a table on Drawing 34.

13. Liquid Waste Storage Tanks - No berm? So pad not secondary containment? But does have LDRS in pad?

14. Vol III, p. 6-2, 6.1.3, paragraph 1. Drawing 35 doesn't show location of leak detection and removal piping.

15. Vol III, 6.2.3, paragraph 1. No piping from liquid waste storage area. Delete "or in the double walled stabilization bins."

16. Vol III, 8.2.3. Drawing 44 is the Truck Wash Area.

17. Vol III, p. 8-2, 8.2.2. No pumping/piping/control features on Drawing 41.

18. Vol III, 6.1.3, p. 6-2, paragraph 1. Where do LDRS pipes come out? How is liquid removed?

19. Vol. III, 6-1, 6.1.1, last sentence. Put in Permit.

20. Vol I, 2.3.8. No "discussion" of excluded waste in Vol. III.

21. Vol I, 2.3.9. "limited piping system" - Hard-plumbed? Attached to what? Drawings?

22. Pls add sentence to WAP, Section 4.1.2, Prohibited Waste, - No hazardous waste containing volatile organic concentrations equal to or greater than 500 ppmw in tanks or evaporation pond.

23. Vol III, 6.1.3, paragraph 2, last sentence.

    DISCUSS.

24. 264.193 and 4.4.2.c. and 4.4.2.d.

    Portion of a tank system component not readily available for visual inspection?

25. Permit Condition 4.5

    No pr/temp gauges?

26. 4.5.2 Tank inspection for stabilization tanks.

    Anything similar for Liquid Waste Storage Tanks?

GARY E. JOHNSON
GOVERNOR

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PETER MAGGIORE
SECRETARY

FAX COVER SHEET

DATE: 07/19/00

TO: Diane Duire

COMPANY: Montgomery Watson

FAX NO.: 970/879-9048

TELEPHONE: 970/879-6260

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

Yours for a final wrap-up of Vol I.

SH

FROM: Stephanie Kruse

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 §§ 8.0.
4/5/00 §§ 1,2,1
4/7/00 §§ 5,6,7,9
7/9/00

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	Bump and McKee
Richards	Stoller
Brooks	Irmay
Hillel	

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?

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GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

REC'D TPDF 5/00

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 7, 2000

Mr. Patrick Corser, P.E.
Principal
Triassic Park Permit Application
Montgomery Watson Mining Group
P.O. Box 774018
Steamboat Springs, Colorado 80477

Dear Mr. Corser:

The Hazardous and Radioactive Material Bureau (HRMB) of the New Mexico Environment Department has completed its review of Sections 5, 6, 7, and 9 (as revised January 7, 2000) of the Triassic Park Hazardous Waste Disposal Facility. HRMB's comments are attached.

HRMB's review of Section 10 will be sent under separate cover.

Please call me at 505/827-1558 ext. 1016 if you have any comments or questions.

Sincerely,

Stephanie Kruse

Stephanie Kruse
Project Leader
Triassic Park Project

cc: James Bearzi, NMED/HRMB
John Kieling, NMED/HRMB
Carl Will, NMED/HRMB
John Pellicer, Montgomery Watson
Dale Gandy, Triassic Park
David Neleigh, EPA

April 2000

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU COMMENTS

Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9

Section 5.0, Procedures to Prevent Hazards

1. Page 5-2, Section 5.2.1, carry-over paragraph, 1st sentence. "Sections 5.2.2 through 5.2.9" should be changed to "Section 5.2.2 through 5.2.10."

2. Page 5-2, Section 5.2.1.1, 3rd paragraph, 2nd sentence. With regard to the inspection checklists, it was agreed at the review of the August 18, 1999 revision of the Permit Application in Santa Fe that additional checklists would be included. Mr. Pat Corser was provided with examples of these checklists.

3. Page 5-4, Section 5.2.5, 1st paragraph, last sentence. "(4) the Gathodic Protection Systems" should read "the Cathodic Protection Systems".

4. Page 5-5, Section 5.2.7, 1st sentence. Table 5-1 says that a Facility guard will make the rounds of the Facility daily to check for any abnormalities. Please revise this sentence to agree with Table 5-1.

5. Page 5-6, Section 5.2.10. Please include a discussion of appropriate sampling and analysis of the wash water collected at the truck wash area.

6. Page 5-7, Section 5.3.5, last sentence. "Staked" should be "stacked".

7. Page 5-7, Section 5.3.4. NMED remains concerned about the possible insufficiency of water in case of fire outside of buildings or in the Landfill. Discussion with NMED's Solid Waste Bureau regarding water supply at similarly situated solid waste landfills determined the following:

   A regional landfill near Wagon Mound, New Mexico has a 5 000 gal tank; and

   The Lea County (New Mexico) Landfill has a 10 000 gal tank.

   At a minimum, the Landfill must meet the requirements of the New Mexico State Fire Marshal's Office.

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU COMMENTS

Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9

8. Page 5-7, Section 5.4, 1st full paragraph, 2nd sentence. These employees should also receive the annual 8-hour refresher course.

9. Page 5-8, Section 5.4.1, 1st full paragraph, last sentence. See Comment 6.

10. Page 5-8, Section 5.4.2.1, 2nd paragraph. Please add the run-off/run-on inspection to Table 5-1.

11. Page 5-8, Section 5.4.2.2. Please add a sentence addressing maintenance as needed.

12. Page 5-12, Section 5.5, carry-over paragraph. References to Section 4.0 should be checked, following approval of the latest revision.

13. Page 5-12, Section 5.5.2, 1st sentence. Please change "40 CFR 261.2" to "40 CFR 261.21".

14. Page 5-14, Table 5-1. Please add the inspection schedule for the stormwater retention basin and associated ditches to Table 5-1.

Section 6.0, Contingency Plan

15. Section 6.0. This section should include a discussion of inspections for emergency equipment, including a table similar to Table 5-1.

16. Page 6-1, Section 6.0, 2nd paragraph., 2nd sentence. Please delete this sentence. A final contingency plan is required as part of the permit application. Please indicate the specific information (referring to the list in the next paragraph) that will be submitted to NMED 60 days prior to initiation of operations (e.g., the list of Emergency Coordinators, signed agreements with local authorities).

17. Page 6-5, Section 6.3.4, 2nd bullet, last line. Should not this line include hazards to human health and/or the environment inside the Facility as well as outside?

18. Page 6-7, Section 6.3.5.1, 3rd paragraph. Please change "effected" to "affected".

19. Page 6-8, Section 6.3.5.2, 5th bullet. Please change "the regional administrator" to "the NMED Secretary".

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU COMMENTS

Triassic Park Hazardous Waste Disposal Facility
January 7, 2000 Revisions
Sections 5, 6, 7, and 9

Section 7.0, Personnel Training

20. Page 7-5, Section 7.1.5, 7th bullet. Please replace "fingerprint testing confirms" with "the initial and annual full chemical analysis and fingerprint analysis confirm".

21. Page 7-5, Section 7.1.6, 1st sentence. Please include ditches in the list.

22. Page 7-6, Section 7.2.1.1, 1st paragraph. Please review this section. The outline of the RCRA training class course contents contained in paragraph 2 seems very ambitious for an 8-hour session.

State of New Mexico
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Hazardous & Radioactive Materials Bureau
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GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

RED TPDF 5/00

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 5, 2000

Mr. Patrick Corser, P.E.
Principal
Triassic Park Permit Application
Montgomery Watson Mining Group
P.O. Box 774018
Steamboat Springs, Colorado 80477

Dear Mr. Corser:

The Hazardous and Radioactive Material Bureau (HRMB) of the New Mexico Environment Department has completed its review of Sections 1, 2, and 11 (as revised December 7, 1999) of the Triassic Park Hazardous Waste Disposal Facility. HRMB's comments are attached.

As you know, HRMB's review of Section 8 was sent to Mr. Trey Greenwood under separate cover.

Please call me at 505/827-1558 ext. 1016 if you have any comments or questions.

Sincerely,

Stephanie Kruse

Stephanie Kruse
Project Leader
Triassic Park Project

cc: James Bearzi, NMED/HRMB
John Kieling, NMED/HRMB
Carl Will, NMED/HRMB
John Pellicer, Montgomery Watson
Dale Gandy, Triassic Park
David Neleigh, EPA

April 2000

NEW MEXICO ENVIRONMENT DEPARTMENT

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU COMMENTS

Triassic Park Hazardous Waste Disposal Facility
Permit Application
December 7, 1999 Revisions
Sections 1, 2, and 11

Section 1.0, General Description

1. Page 1-1, Section 1.1, 2nd paragraph. Please review this paragraph in the context of the section title. If this section contains a general description of the Facility, why discuss only the evaporation pond in the General Description section? Waste is also stored and treated and also goes directly to the landfill. Perhaps only the last sentence of the paragraph is needed.

2. Page 1-3, Section 1.1.11. Please clarify that sanitary liquid wastes will be disposed off-site.

3. Page 1-9, Section 1.3.1, 3rd paragraph. Are the calculations for derivation of storm run-off flows in the Engineering Report in Vol. III or in another supporting volume of the Permit application? If so, please cite. If not, please provide. (Staff notes on the review of the August 18, 1999 revision in Santa Fe with Pat Corser read, "Pat C. will provide calculations. Or will get into III, App. F.")

Section 2.0, Treatment, Storage, and Disposal

4. Page 2-4, Section 2.2.1.3. Please change "The Facility will contain seven separate containment areas" to "The drum handling unit will contain seven separate containment areas".

5. Page 2-5, Section 2.2.2, 3rd paragraph. Trucks should not pick up an accumulation of waste at the Roll-Off StorageArea. Should this paragraph be transferred to the landfill or truck wash, etc., section?

6. Page 2-5, Section 2.2.2, 4th paragraph. The first sentence states that the roll-off storage area is restricted to wastes that do not contain free liquids. However, the second sentence of Section 2.2.2.1 (page 2-6) states, "The roll-off storage area is designed to store any non-stabilized waste that may contain free liquids." Please explain this discrepancy.

HRMB COMMENTS

Triassic Park Hazardous Waste Disposal Facility
Permit Application
December 7, 1999 Revisions
Sections 1, 2, and 11

7. Page 2-5, Section 2.2.2, 1st paragraph. Please discuss measures that will provide for the segregation of containers which may hold PCB-contaminated soils or other solids.

8. Page 2-6, Section 2.2.2.1, 1st paragraph, 2nd sentence. "The roll-off storage area is designed to store any non-stabilized waste that may contain free liquids." This sentence contradicts the previous sentence (page 2-5, Section 2.2.2, 4th paragraph, 1st sentence), "This area is restricted to wastes that do not contain free liquids." Please correct the discrepancy.

9. Page 2-8, Section 2.2.8. Please correct Part A, Section XII, which identifies the design capacity of the roll-off storage unit in gallons.

10. Page 2-11, Section 2.3.8, 1st sentence. The written assessment attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste should be included in the Permit application, in compliance with 20 NMAC 4.1.500 (incorporating 40 CFR 264.192(a)).

11. Page 2-12, Section 2.3.9, 2nd paragraph. 2nd sentence. Please add this sentence to Section 8.0, *Closure Plan*.

12. Page 2-13, Section 2.4, 4th paragraph. This paragraph is not clear to the reviewer. How will the determination be made that specific stabilized wastes can go directly to the Landfill for disposal without testing?

13. Page 2-13, Section 2.4, 6th paragraph. 150,000 cubic yards (amount treated per day) divided by 2,500 cubic yards (maximum amount per batch) = 60 batches per day. 60 batches per day divided by 4 bins = 15 batches per bin per day. Please assure HRMB that this is feasible.

14. Page 2-15, Section 2.4.7, 1st paragraph, 4th sentence. All designs for the stabilization bins must be final.

15. Page 2-15, Section 2.4.8, 1st sentence. Please see Comment No. 13.

16. Page 2-15, Section 2.4.8, 2nd sentence. Please change the 2nd sentence from "the preliminary tank design" to "the final tank design".

HRMB COMMENTS

Triassic Park Hazardous Waste Disposal Facility
Permit Application
December 7, 1999 Revisions
Sections 1, 2, and11

17. Page 2-16, Section 2.5. Please change "The overall landfill will be constructed in Phases. As shown on drawing 4." to read, "The overall landfill will be constructed in Phases, as shown on drawing 4."

18. Page 2-16, Section 2.5.1.1. Please add the identification of permitted wastes from Section 4.0 to this section.

19. Page 2-16, Section 2.5.1.1. Please add waste containing organic concentrations of at least 10 percent by weight to the list of unacceptable wastes.

20. Page 2-17, Section 2.5.1.1,2nd sentence. The area of Phase 1A given in this sentence (553,200 cubic yards) does not agree with Part A, Section XII (533,000 cubic yards). Please correct this typographical error.

    Please remove the last two words of the sentence.

21. Page 2-20, Section 2.5.1.8,3rd paragraph, 3rd sentence. Changes at closure in response to gas build-ups beneath the barrier layer of the Landfill cover may require a modification to the Permit.

22. Page 2-23, Section 2.5.3.6, 1st sentence. The 1st sentence refers to Section 4.3.1.2. Please be aware that Section 4.0, the Waste Analysis Plan, has been revised and all references to particular subsections of 4.0 should be rechecked.

23. Page 2-25, Section 2.5.3.9,3rd bullet. The third bullet reads, "Utilizing if during a heavy rain event, water ponds on the surface of the daily cover." Please clarify this bullet.

24. Page 2-28, Section 2.6.1.1,1st paragraoh. Please provide references for the documents cited at the end of the section.

25. Page 2-30, Section 2.6.1.2,1st sentence. Add "in" between "presented" and "Drawing".

26. Page 2-32, Section 2.6.3. Please remove "and Quantity" from the heading.

27. Page 2-32, Section 2.6.3. Please indicate that the evaporation pond will not accept wastes covered by 20 NMAC 4.1.500 (incorporating 40 CFR 264, Subparts BB and CC).

28. Page 2-35, Figure 2-1. Figure 2-1 is the same as Figure 1-2. Is this figure discussed in the Section 2.0 text?

Section 11.0, 40 CFR 264 Subpart AA, BB & CC Regulations

29. Page 11-1, Section 11.2. Please discuss whether wastes with organic concentrations of 10 percent or greater by weight will be accepted for storage in containers and/or placement in the Landfill.

30. Page 11-1, Section 11.3, 2nd paragraph. "Potential air pollution from these containers will be controlled in accordance with the container level 2 standards specified in CFR 264.1086(d)." This sentence is repeated in Section 11.3.2.

    Please note that a container with a design capacity less than or equal to 0.1 m^3 is exempt from the requirements of Subpart CC (20 NMAC 4.1.500 (incorporating 40 CFR 264.1080(b)(2)). A container with a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 must meet Container Level I standards (20 NMAC 4.1.500 (incorporating 40 CFR 264.1087(b)(1)(i)).

31. Page 11-1, Section 11.3.1. The second sentence reads, "The waste determination shall be made at the point where the Facility first takes possession of the waste." Please change this sentence to indicate that the waste determination will be made at the point of waste origination (20 NMAC 4.1.500 (incorporating 40 CFR 264.1082(c)(1)).

32. Page 11-2, Section 11.3.5, 1st sentence. Add "be" between "will" and "limited".

33. Page 11-2, Section 11.3.6. The correct cite is 40 CFR 264.1088(b).

Subject: **Section 3 Figures**
Date: Mon, 24 Jul 2000 08:54:16 -0600
From: Glenn von Gonten <glenn_vongonten@nmenv.state.nm.us>
Organization: NMED-HRMB
To: Diane.L.Dwire@us.mw.com
CC: Stephanie Kruse <stephanie_kruse@nmenv.state.nm.us>

Diane,

I would like to see the revised figures before I review the revisions to
Section 3. If you have any questions, please call me at 505-827-1558, ext. 1024.

Glenn

G[illegible]nn's Comments

Review of Triassic Park Permit Application - Section 3 (revis

- The cover letter indicates that this revision to Section [illegible] March 2000 comments and incorporates new/additional data from 1999-2000, plus a structure contour map of the Top - Lower Dockum.

- This revision did not provide a redline-strikeout version or list or table to indicate where the above specified revisions are located.

- This revision did not include revised figures. Figures 3-1 through 3-11appear to be unchanged from the 1998 version of Section 3. However, Figures 3-12 through 3-26 have been changed and do not correspond to the 1998 Version of Section. Gandy Marley should immediately submit a complete set of the revised figures and should revise the text to ensure that the text and figure citations are in agreement. Additional discrepancies, such as inconsistencies between the text, the table of contents, and the figures titles should also be addressed at this time.

- This revision did include a new section on the results of the 1999 drilling program and a structure contour map of the Top - Lower Dockum. However, despite the language of the cover letter, it does not appear that this revision directly addressed HRMB's comments of March 2000. Again a redline/strikeout version or table indicating where changes have been made is needed to ensure that this revision has, in fact, addressed HRMB's comments. Specifically, HRMB's request for a conceptual site model (Comment # 3) does not appear to have been addressed.

- § 3.4.1.1 (p. 3-6) GM should provide a figure with the five shall core-holes and the two deep bore holes located north and south of the proposed site.

- Figure 3-12 is not discussed the text of Section 3.

- § 3.4.3.2 (p. 3-12) Paragraph 3 of this section indicates that ground water was detected via geophysical logs; however, the text states that there is no saturated in the Upper Dockum in this area. GM should revise this section to resolved this inconsistency.

- § 3.6.1 (p. 3-15) The text specifies a total of 16 water wells, but the discusses only 12. GM should revise this section to resolved this inconsistency.

- § 3.6.1.1 GM should revise this section, and elsewhere as appropriate, to use consistent hydraulic conductivity units (i.e. cm/sec vs. ft/day).

- § 3.6.1.2 GM should revise this section to eliminate the repeated text in this section.

- § 3.6.3.1 HRMB suggests that the "worst case" scenario should assume that migration will occur in the facies with the highest hydraulic conductivity values. Therefore, the calculations should use the highest hydraulic conductivity value that was either calculated or measured from any of the Upper Dockum samples.

- GM should revise this section to indicate where the hydraulic conductivity and porosity values came from.

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau
2044-A Galisteo Street
Santa Fe, New Mexico 87505
Telephone (505) 827-1557
Fax (505) 827-1544

GARY E. JOHNSON
GOVERNOR

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

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

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

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

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
Chemical Testing of Decontamination Water		**6,120**
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**
Disposal of Contaminated Soil		**4,766**
Earth Backfill for Excavated Contaminated Soils	$538	**2,421**
Revegetation		**73,200**
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**
Chemical Testing of Decontamination Water		**0**
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**
Disposal of Contaminated Soil		**44,781**
Earth Backfill for Excavated Contaminated Soils	$5,060	**22,770**
Revegetation		**136,620**
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.

Subject: **Storm Water Runoff Basin**
Date: Fri, 25 Aug 2000 14:09:25 -0600
From: david cobrain <david_cobrain@nmenv.state.nm.us>
Organization: nmed-hrmb
To: diane dwire <Diane.L.Dwire@us.mw.com>,
"Patrick.G.Corser@us.mw.com" <Patrick.G.Corser@us.mw.com>
CC: Stephanie Kruse <stephanie_kruse@nmenv.state.nm.us>,
John Kieling <John_Kieling@nmenv.state.nm.us>,
James Bearzi <james_bearzi@nmenv.state.nm.us>

Diane,
Chapter 8 (Closure and Post-closure of Permitted Units), Section 8.1.6 of the Permit Application indicates that the Stormwater Runoff Basin will be sampled at a frequency of 1 sample per 40,000 square feet. I discussed the sampling frequency with Pat Coarser and Stephanie Kruse in a phone call earlier this month and agreed to the sampling frequency after Pat informed me that the Storm Water Runoff Basin will be lined. I am unable to locate any documentation in the Permit Application text or design drawings regarding the Storm Water Runoff Basin liner. Please send the Permit Application references or design drawings for the Storm Water Runoff Basin liner or let me know where I might find those references in our copy of the Permit Application. This information is required in order to approve the sampling frequency in Chapter 8 of the Permit Application and also to use in calculating the financial assurance portion of the Application. Please call with questions. Thank you,
Dave Cobrain

COMMUNICATION RECORD

Job No. 50580015		
Phone In ☒ Meeting ☐ Prospective Job ☐ Past Job ☐ Marketing ☐ Phone Out ☐ Other ☐ Current Job ☒ Admin. ☐	Route to: File, Stephanie Kruse, John Kieling	Date: 08/25/00
File Name (owner): Gandy Manley - Triassic Park		Time: AM or (PM) 1:31
Person: Diane Divine	Firm: Montgomery Watson	Phone No.: (970)879-6300
		Recorded By: DWC

Subject: Landfill Closure

Remarks: Diane left a message stating that waste storage will include only Phase 1A but that backfilling will include Phase 1A and Phase 1B. She also said that she would fax the list of closure soil sample analytical methods and price list.

Action Required: None

Action Taken: Sent an email asking for documentation of the stormwater retention basin liner

COMMUNICATION RECORD

Job No.. 50580015		
Phone In ☐ Meeting ☐ Prospective Job ☐ Past Job ☐ Marketing ☐ Phone Out ☒ Other ☐ Current Job ☒ Admin. ☐	Route to: Red File John Keiling Stephanie Knuse	Date 8/24/00
File Name (owner) Gandy Marley - Triassic Park		Time: AM or PM 310
Person Diane Dwire Firm Montgomery Watson	Phone No.. 970 879 6260	Recorded By: DWC

Subject: Landfill Closure

Remarks: Asked Diane if the Landfill waste storage will include Phase 1A and Phase 1B or just Phase 1A because that would significantly affect the volume of backfill required to fill the Landfill excavation at closure. She did not know but said that she would contact Pat Coarser for the information and call with an answer.

I also asked if she had received the email regarding the leachate treatment facility sent by me to Pat Coarser with cc: to her email address. She confirmed receipt of the email message.

In addition, I asked for the chemical analytical cost data that I requested from her in a voice mail message left on August 14, 2000. She said she would fax the laboratory price list and the list of anticipated chemical analyses to be requested for closure soil samples.

Action Required: Wait for additional information to be supplied by Montgomery Watson

Action Taken:

Subject: GMI Cost Estimate
Date: Fri, 11 Aug 2000 12:03:48 -0600
From: david cobrain <david_cobrain@nmenv.state.nm.us>
Organization: nmed-hrmb
To: "Patrick.G.Corser@us.mw.com" <Patrick.G.Corser@us.mw.com>
CC: diane dwire <Diane.L.Dwire@us.mw.com>,
Stephanie Kruse <stephanie_kruse@nmenv.state.nm.us>,
John Kieling <John_Kieling@nmenv.state.nm.us>,
James Bearzi <james_bearzi@nmenv.state.nm.us>

Pat,

During review of the financial assurance documentation, it has come to my attention that Gandy-Marley (GMI) anticipates construction and operation of a leachate treatment facility after closure of the GMI Triassic Park Facility. I was unable to locate any reference in the permit application to a leachate treatment facility that was to operate after closure of the landfill. Please provide information regarding where this leachate treatment facility is referenced in the permit application. In addition, please provide the following information so that NMED's evaluation of the financial assurance cost estimate can continue:

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 information 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.

Please be aware that the leachate treatment facility may require a RCRA operating permit therefore the following item also will be required:

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

Please call with questions. Thank you.
Dave Cobrain