

Dreith, June

ENTERED

**From:** Smith, Michael  
**Sent:** Wednesday, October 25, 2000 7:17 AM  
**To:** Dreith, June  
**Subject:** NOD Comments Related to Evaporation Ponds

Dear June,

The attached file contains my review comments on the issues I identified in the 9/6 and 9/12 NODs related to the Evaporation Pond. It turns out that I was able to confirm all GMI responses except the typo in Chapter 4 (Waste Analysis Plan). If you need anything else on this, let me know. I'll be busy composing permit language today.

Best Regards,  
Jules Verne (AKA Mike Smith)



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## NOTICE OF DEFICIENCY, 9/6/2000

### Landfill Sections

#### Volume I

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.

**Review of GMI Response:** With respect to leachate from the evaporation pond, GMI indicated that no leachate from the evaporation pond sumps would be pumped to the leachate storage tank. This statement agrees with other discussions in the Triassic Park permit application that indicate that leachate from these sumps will be pumped to tanker trucks. This response adequately addresses the issue raised in comment number 4.

## NOTICE OF DEFICIENCY, 9/12/2000

### Vol. I, Section 4.0, Waste Analysis Plan

#### Deficiencies

#### Editorial Comments

23. Typographical errors should be corrected in the phrases indicated below:

- Section 4.5.6, p. 26, 4th paragraph. **"Leak detection and removal/vadose zone monitoring for evaporation pond leachate..."**

**Review of GMI Response:** GMI claims that all typographical errors listed in comment number 23 were corrected. This could not be confirmed for Section 4.5.6, however, as the revised text was not provided for review.

## Inspection Checklists

### 33. P. 15, Evaporation Pond (Daily)

Please explain item f. - Liquids present in secondary containment for leachate storage tanks and g. - Liquid levels above max storage capacity in leachate storage tanks. NMED is unaware of any leachate storage tanks associated with the evaporation pond. GMI must add "Average Daily Flow Rate" to the list of inspection items. This additional item is required for GMI to determine whether they have exceeded the Action Leakage Rate (ALR).

**Review of GMI Response:** The facility response adequately addresses this issue. GMI indicated that the references to tanks in items f and g were inadvertent and that they were removed from the Inspection Checklist. This was confirmed by inspection of the revised checklist for the daily inspections of the Evaporation Pond.

### 34. P. 16, Evaporation Pond (Weekly)

GMI should revise "Weekly" to read, "Weekly and after Storms".

**Review of GMI Response:** GMI has responded adequately to this issue. The title of the appropriate section of the Inspection Checklist has been changed to read "Weekly and after storms."

Please explain how item b. -sloughing or damage to berms will be inspected. NMED understands that the earthen berm will be covered by the liner. How will sloughing be detected? By slumping?

**Review of GMI Response:** GMI has responded adequately to this issue. In the response, GMI stated that the exposed outboard side of the perimeter dikes (not covered by the liner system) would be inspected for slumps, seeps, and bulging at the toe. The inboard side of the perimeter dikes and the separation dike (earthen berm) would be inspected for irregularities in the liner that would indicate the presence of slumping or bulging at the toe.

GMI should revise this section to meet all of the inspection requirements specified at 20.4.1.500 NMAC, incorporating 40 CFR 264.226. Omitted items include, but are not limited to: a sudden drop in liquid level (20.4.1.500 NMAC, incorporating 40 CFR 264.226(b)(2)) and the amount of liquids removed from sump (20.4.1.500 NMAC, incorporating 40 CFR 264.226(d)(1)).

**Review of GMI Response:** GMI has responded adequately to this issue. GMI has added a sudden drop in impoundment contents and the amount of liquids removed from the sump to the items addressed during the weekly operational

inspection. These additions bring the weekly operational inspection into compliance with 20.4.1.500 NMAC, incorporating 40 CFR 264.226.

GMI must include inspection of the protective netting in the weekly inspection to protect local and regional bird life.

**Review of GMI Response:** GMI has responded adequately to this issue. The inspection of bird netting has been added to the items inspected during the weekly inspections of the Evaporation Pond.