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**TECHLAW INC.**

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November 28, 2000



Mr. Steve Pullen  
State of New Mexico Environment Department  
Hazardous and Radioactive Material Bureau  
P. O. Box 26110  
2044 Galisteo  
Santa Fe, New Mexico 87502

Reference: Work Assignment No. Y513, 06082.300; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Draft RCRA Operating Permit Review, Gandy-Marley Hazardous Waste Landfill

Dear Mr. Pullen:

Per your request, TechLaw has evaluated the list of deliverables submitted to NMED to determine if the responses to comments from Gandy-Marley sufficiently address the engineering design requirements for the landfill and surface impoundments. In addition, TechLaw has also provided support to NMED in the evaluation of the tank certification requirements. Based on our evaluations of the deliverables listed below, TechLaw has determined that the Gandy-Marley engineering sections of the application are substantially complete. It should be noted, however, that there are requirements contained in the Compliance Schedule of the draft Permit which require submittal of detailed engineering "as-built" construction information to NMED as the facility and units undergo construction. These design and operating requirements must be addressed by Gandy-Marley and approved by NMED.

The following deliverables have been submitted to NMED which address the engineering sections of the Gandy-Marley Permit Application:

- Draft Deliverable, Review of Facility's Response [May 1999] (Section D), Triassic Park Engineering Design Review, letter to J. Bearzi from J. Dreith, June 23, 1999

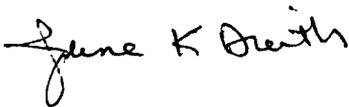


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- Draft Deliverable, Review of Facility's July 1999 Responses (Section D), Triassic Park Engineering Design Review, August 2, 1999
- Triassic Park Meeting, Memo from G. Starkebaum to J. Dreith, October 29, 1999; E-mailed to Ms. Stephanie Kruse from G. Starkebaum on October 29, 1999
- Draft Deliverable, Review of Facility's January 2000 Submittal, Triassic Park Engineering Design Review, February 16, 2000
- Memo from G. Starkebaum to S. Kruse, Meeting with Montgomery Watson Regarding Triassic Park Application, April 20, 2000
- Draft Deliverable, Review of Facility's April 2000 Submittals, Triassic Park Engineering Design Review, May 11, 2000
- Draft Deliverable, Review of Tank Certification, Triassic Park Engineering Design Review, letter to J. Bearzi from J. Dreith, May 16, 2000
- Review of Montgomery Watson's May 25 Memo "Response to NMED/TechLaw, Inc. Comments on Triassic Park Engineering Report," June 26, 2000
- Informal Review of the September 6, 2000 and September 12, 2000 NMED NODs, Memo from J. Dreith of TechLaw to S. Pullen and S. Kruse of NMED, October 26, 2000

Should you require any additional information, please feel free to contact me at (303) 763-7188.

Sincerely,



June K. Dreith  
Project Manager

cc: Mr. James Bearzi, NMED  
Mr. B. Jordan, TechLaw Central Files