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To: Steve Pullen
New Mexico Environment Dept. **Date:** January 30, 2001

From: Diane Dwire **Reference:** 602

**Subject: Final Vadose Zone Monitoring
System Work Plan files** **Via: Fed X UPS US Mail**

Steve,

I have enclosed a CD which contains the electronic version of the document referenced above. As you requested, along with the text file, we have included the figures in bitmap format. Because the quality of the bitmap files is poor, we have also included the figures in pdf format. Please call if you have any questions or need anything further.



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Prepared for:

TRIASSIC PARK WASTE DISPOSAL FACILITY

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Final

**Vadose Zone Monitoring System
Work Plan**

July 2000

Prepared by:

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A	Meteoric Water Mobility Procedure

1.0 INTRODUCTION

1.1 BACKGROUND

The Gandy Marley Corporation (Gandy Marley) was granted a Groundwater Monitoring Waiver for its proposed Triassic Park Waste Disposal Facility by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environmental Department (NMED) on January 12, 2000. The Triassic Park Waste Disposal Facility will be located in Chaves County, New Mexico, east of Roswell (Figure 1, *Site Location Map*). The facility will be a full-service Resource Conservation and Recovery Act (RCRA) Subtitle C waste treatment, storage and disposal operation. Two treatment processes will be used at the facility. Evaporation ponds will be used for managing ~~wastewater~~~~leachate fluids~~ that meets landfill disposal restriction standards and a stabilization process will be used for treating fluids, sludge and solids prior to final disposal in the on-site landfill.

Site-specific hydrogeologic conditions and engineering safeguards for the regulated units were documented in the report titled *Groundwater Monitoring Waiver Request, Triassic Park Waste Disposal Facility* (Montgomery Watson, January 2000). The *Groundwater Monitoring Waiver Request* report indicated that hydrogeologic conditions at the site will minimize migration of potential ~~wastewater~~~~leachate fluids~~ from the facility to the uppermost aquifer. The conservative modeling calculations presented in the *Groundwater Monitoring Waiver Request* report estimated that the migration time for potential leaks from the disposal facility to the uppermost aquifer would be greater than 1000 years. As an alternative to conventional groundwater monitoring, the *Groundwater Monitoring Waiver Request* report recommended installation of a vadose zone monitoring system (VZMS) as a superior means for protecting human health and the environment because of its ability to detect potential leaks in a more timely manner.

This Work Plan presents the design of a VZMS at the site and will be an appendix to the Permit Application. It includes a discussion of the location and design of the vadose zone monitoring wells and methodologies for characterizing fluids that may accumulate in vadose zone wells and sumps from various sources. This Work Plan also discusses how data will be collected to select chemical parameters indicative of fluids (waste or non-waste) that may occur at the site. A summary of monitoring frequency, sampling procedures, laboratory analyses and data reporting associated with the monitoring system are also provided. Figure 2, *Location of Sumps and Monitoring Wells*, presents a map of the proposed facility showing significant site features including the locations of the waste management units, vadose zone monitoring wells and sumps.

1.2 PROJECT SCOPE AND OBJECTIVES

This Work Plan presents recommendations for a VZMS at the site. The vadose zone monitoring program for the facility allows collection of fluids beneath or downgradient of the facility and identification of the potential source(s) associated with these fluids. The following items are included as part of this Work Plan.

- A description of the methodology for installing a VZMS capable of detecting fluids migrating from the waste management units;
- A description of the methodology for developing baseline data characterizing the chemical characteristics of ~~non-wastewater~~~~non-leachate fluids~~ that may accumulate in sumps or vadose zone wells ;
- A methodology for selection of appropriate indicator parameters that could be used to identify ~~wastewaters~~~~leachate fluids~~ during future monitoring at the site;

Insert Figure 1, Site Location Map

Insert Figure 2, Location of Sumps and Monitoring Wells

- A description of the methodology to be used for collecting field and analytical data as part of the vadose zone monitoring program at the site; and,
- Description of the contingencies to the monitoring program if fluids are detected in the monitoring system. References to the Part B Permit Application or actual permit are presented where additional detail is required.

The primary VZMS consists of vadose zone monitoring sumps located beneath the landfill Phase IA cell and beneath each of two evaporation ponds. A secondary system consists of a series of vadose zone monitoring wells located adjacent to the landfill Phase IA cell and the evaporation ponds

This Work Plan also describes how the chemical characteristics of ~~non-wastewater~~non-leachate fluids from various sources (i.e., stormwater evaporation ponds, rainwater, consolidation water and water supply) are characterized. These data are used to develop a list of indicator parameters and/or water profiles that enable distinguishing between ~~non-wastewater~~non-leachate fluids and ~~wastewater~~leachate fluids.

Additional components of the vadose zone monitoring system presented in this Work Plan are listed below.

- Monitoring frequency
- Sampling procedures
- Laboratory analyses
- Data management
- Data reporting
- Health and Safety

The methods described within this Work Plan include the necessary elements for a Quality Assurance Project Plan (QAPP). The QAPP objectives are designed to assure that sampling, chain-of-custody, laboratory analysis, data measurements and reporting activities provide quality data that is representative of conditions at the site and legally defensible.

1.3 PROJECT ORGANIZATION

HRMB/NMED is the lead regulatory agency for this portion of the hazardous waste management Permit Application. Gandy Marley is the permittee and will review project documents prior to their submittal to the HRMB. Montgomery Watson, in conjunction with their sub-consultants, is the oversight contractor and responsible for coordination of field activities, subcontractors, data management, review and reporting of information concerning site characteristics and interpretation of data developed during the studies. Monitoring well construction and laboratory analyses will be conducted by a subcontractor to Montgomery Watson.

1.4 GEOLOGY AND HYDROLOGY

A detailed discussion of regional and site-specific geology and hydrology is provided in the *Groundwater Monitoring Waiver Request, Triassic Park Waste Disposal Facility* (Montgomery Watson, January 2000) and Section 3 (Volume I) of the Part B Permit Application. A brief summary of the site-specific geology and hydrology is presented below.

- Primary permeability (i.e., connected interstitial voids) ~~in either bedrock or alluvial material-~~
- Bedding planes (i.e., between interbeds within the Upper Dockum unit or along the contact between the Upper and Lower Dockum units).
- Secondary permeability (i.e., faults and fractures), ~~although there is no evidence of faults in the area-~~

Consequently, if there were a release of fluids from one of the ~~waste management~~ regulated units, ~~that migrated through the LLRS~~ fluid could migrate vertically and/or laterally via one of the above-mentioned conduits. It is likely that lateral migration of the fluids along the dip of the units (i.e., along bedding planes) would dominate the flow regime. Therefore, a monitoring well located down dip of the facility and screened across the Upper Dockum/Lower Dockum contact and up into the Upper Dockum unit (i.e., across the silty and sandy silty interbeds) would be the most likely locations to observe these fluids if they ever were to occur.

Additionally, fluids that may have been released from ~~the facility~~ a regulated unit, ~~such as the evaporation ponds,~~ could migrate through alluvium ~~(matrix flow)~~ and along the alluvium/Upper Dockum contact, such that a shallow well located down dip of the ~~facility unit~~ and screened across the contact and up into the alluvium would be the most like place to observe these fluids. Furthermore, all non-leachate fluids, except consolidation water, would be expected to appear first in the shallow wells.

~~This obviously will only be effective if the final design of the facility is such that the bottoms of the waste management units are stratigraphically above the alluvium/Upper Dockum contact.~~

Insert Figure 3, Schematic Site Model

2.0 VADOSE ZONE MONITORING SYSTEM INSTALLATION

The landfill cells and evaporation ponds will be constructed in phases. The Phase IA landfill cell will be completed first and will include a single central sump system. The Phase II and Phase III cells will be completed at a much later date and will also include individual sump systems. Evaporation Ponds 1A and 1B will be constructed first and each will have its own central monitoring sump system. Evaporation Ponds 2A and 2B will be completed at a later date.

This Work Plan only addresses the vadose zone monitoring sumps and vadose zone monitoring wells associated with the Phase IA landfill cell and Evaporation Ponds 1A and 1B. Additional monitoring sumps and vadose zone monitoring wells will be addressed in a permit modification request for the remaining landfill cells and evaporation ponds. Construction details for the vadose zone monitoring sumps are provided in the design document *Design Drawings, Triassic Park Waste Disposal Facility, Chaves County, New Mexico, TerraMatrix, Montgomery Watson, December 1997* (Revised January 2000).

2.1 VADOSE ZONE SUMPS

Each landfill cell will have a triple leachate detection/removal sump system. Figure 4, *Typical Landfill Sump Detail Cross-Section*, provides a cross-section of the landfill sump system. The uppermost leachate collection and removal system (LCRS) consists of collection piping located above a primary liner system. The LCRS is sloped so any leachate above the primary liner drains to the sump within the landfill cell. A secondary landfill leak detection and removal system (LDRS), similar in design to the LCRS, will be located below the LCRS and primary liner. Beneath the LDRS and its secondary liner will be a vadose zone monitoring sump fitted with a transducer that will serve as a detection and removal system in the event of leakage through the primary and secondary liners. The vadose zone sump piping and gravel arrangement will be similar to the LCRS and LDRS arrangements.

The evaporation pond vadose zone monitoring sumps will serve as a detection system for possible leakage from the LDRS sump associated with the ponds. Figure 5, *Evaporation Pond LDRS and Vadose Plan and Details*, provides a cross-section of the evaporation pond sump system. Leakage through the secondary liner system will flow into vadose zone monitoring sumps. This will allow the leakage to be detected, contained and properly treated and disposed. The vadose zone monitoring sump piping and gravel arrangement is similar to the LDRS arrangement. The Permit Application provides additional details on the sump transducers. Operation and maintenance of the sumps and transducer is covered in the Operation and Maintenance Manual included in the Permit Application.

2.2 VADOSE ZONE MONITORING WELLS

2.2.1 Well Locations

Nine vadose zone monitoring wells (VZMW-1 through VZMW-9) will be installed to detect potential migration of fluids from the landfill (Phase IA cell) and evaporation ponds (1A and 1B), as shown in Figure 2. Six of these wells will be deep (installed across the Lower Dockum/Upper Dockum contact and up into the Upper Dockum) and three will be shallow (screened across the Upper Dockum/alluvium contact), as detailed in Section 2.2.2. The shallow wells will be nested with a deep well and will be located 8 to 15 feet from the deep well. Two deep and one shallow monitoring well will be located immediately down dip (to the east) of the evaporation ponds (1A and 1B). Four deep and two shallow monitoring wells will be located along the down dip (east/northeast) side of the Phase IA landfill cell.

Insert Figure 4, Typical Landfill Sump Detail Cross-Section

Insert Figure 5, Evaporation Pond LDRS and Vadose Plan and Detail

bentonite grout (e.g., Aquaguard or equivalent) mixed to the manufacturer's specifications. The top of the well will be cemented with concrete and set with aboveground well protection. No water will be used in the construction of the well, except in the grout mixture, which will be pre-mixed aboveground prior to emplacement in the annulus to avoid any free water entering the well or annulus during well construction.

2.2.2.2 Shallow Monitoring Wells

If there is greater than four feet of alluvium present, the shallow vadose zone monitoring wells will be drilled to approximately three feet below the contact between the Upper Dockum and alluvium with a five foot screened interval extending two feet below the contact and with a one-foot long sump below that. If less than four feet of alluvium is encountered, no monitoring well will be installed at that location. A detail of the well construction is shown on Figure 2. The on-site geologist will log the boring and confer with the driller regarding lithology changes that identify the Upper Dockum/alluvium contact.

The thickness of the alluvium averages around 10 feet across the site. A minimum 3-foot seal or four feet of alluvium will be necessary to install a properly constructed monitoring well. One foot of solid 4-inch diameter Schedule 80 PVC casing will be placed at the bottom of the borehole to serve as a liquid collection sump. Above this casing, five feet of 4-inch diameter Schedule 80 PVC flush-threaded 0.010-inch well screen will extend to three feet above the Upper Dockum/alluvium contact.

Following placement of the well casing, fine-grained sand (e.g., 20/40 silica sand) will be placed in the annulus to form a filter pack. Sand will be placed between ½ and 1 foot above the top of the well screen followed by ½ to 1 foot of transitional sand. The actual thicknesses will be determined by the depth of the contact and a minimum 3-foot surface seal. The wells will be completed by emplacing a grout mixture to form the surface seal from the top of the bentonite to the top of the borehole. The grout mixture will be gravity emplaced if the wells are less than 50 feet deep and contain no formation water; if they are greater than 50 feet deep or contain formation water, the grout will be emplaced using the same procedures as the deep wells. The grout mixture will consist of a high solids (~20 to 30%) bentonite grout (e.g., Aquaguard or equivalent) mixed to the manufacturers specification. The top of the well will be cemented with concrete and set with aboveground well protection. No water will be used in the construction of the well, except in the grout mixture, which will be pre-mixed aboveground prior to emplacement in the annulus to avoid any free water entering the well or annulus during well construction.

2.2.2.3 Well Construction Information

Well construction information will be recorded on boring logs and well construction forms by the field geologist for each well and will contain the following information.

- Name of geologist, site location, and date of activity
- Description and identification of drilling and sampling equipment
- Name of drilling contractor
- Soils description using the Unified Soil Classification System
- Description of soil texture, color, density, odors and other appropriate descriptions
- Description of rock type
- Depth and thickness of groundwater (if encountered)
- Total depth of the boring and well.
- All applicable well construction details

subjected to ~~non-wastewater/non-leachate fluid~~ sources. Certain constituents listed in Table 1, such as Volatile organic compounds, are not expected to be detected during these tests, however their absence will be confirmed in case any natural organic materials (e.g., hydrocarbons) exist in the geologic materials.

Additionally, the samples collected of the Dockum cuttings during drilling will be used to analyze the material (solid) for background determination. These samples will be analyzed for heavy metals and radionuclides, as listed in Table 1, Baseline Chemical Analyses.

~~Solid and liquid wastes accepted by the facility, as well as wastewaters from the landfill LCRS (leachate) and from the evaporation ponds, will be sampled and analyzed separately and individually as per the WAP. These data will be used to develop a list of indicator parameters (i.e., waste constituents) to monitor for in the VZMS and will be used to determine if fluids detected in the VZMS are in fact wastewaters. Additionally, if based on these data it is not clear whether the fluids detected in the VZMS are wastewaters or not, additional samples of any fluids present in the LCRSs and the evaporation ponds will be collected and analyzed for major ions and metals, as per Table 1. These data will then be used to develop a chemical profile of these waters at the time of occurrence of fluids in the VZMS and used to compare to the baseline non-wastewater profile(s) to aid in determining the source of fluids in the VZMS.~~

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TABLE 1 BASELINE CHEMICAL ANALYSES			
Analytes	Analytical Method	Sample Containers	Preservation Method/Holding Time
General Water Quality			
Bicarbonate/carbonate	EPA 310.1	250 ml HDPE	4°C / 48 hours
Chloride	EPA 300.0	125 ml HDPE	4°C / 28 days
Dissolved major cations (Na, K, Mg, Ca, Fe)	EPA 6010B	500 ml HDPE	4°C / pH < 2 with HNO ₃ / 6mo.
Total dissolved solids	EPA 160.1	125 ml HDPE	4°C / 7 days
Sulfate	EPA 300	500 ml HDPE	4°C / 28 days
Heavy Metals			
Dissolved and total metals (Sb, As, <u>Ba</u> , Be, Cd, Cr, Cu, Pb, Hg, <u>Mn</u> , Ni, Se, Ag, Tl, Zn)	EPA 6010B/7000	1L HDPE	4°C pH < 2 with HNO ₃ / 6mo.; Hg – 28 days
Radionuclides			
Gross alpha, gross beta, gamma emitters	EPA 900.0/901.1	250 ml CWM glass jar	4°C / 6 months
Uranium, total	EPA 200.8	250 ml CWM glass jar	4°C / 6 months
Radium 226/228	EPA 903/9320	250 ml CWM glass jar	4°C / 6 months
Radon	EPA 913	250 ml CWM glass jar	4°C / 6 months
Organics			
Volatile Organic Compounds	EPA 624	3 x 40 ml VOA vial	4°C pH < 2 with HCl / 14 days
Semi-Volatile Organics	EPA 625	1 liter HDPE	4°C / 7 days extraction, 40 days analysis
Pesticides	EPA 608	1 liter HDPE	4°C / 7 days extraction, 40 days
Polychlorinated biphenyls	EPA 608	1 liter HDPE	4°C / 7 days extraction, 40 days
Perchlorate	EPA 300	1 liter HDPE	4°C / 2 days
Cyanide	EPA 335.3	1 liter HDPE	4°C / 2 days
Sulfide, reactive	EPA 376.2	1 liter HDPE	4°C / 14 days
TPH-Gasoline	EPA 8015M	3 x 40 ml VOA vial	4°C / 7 days extraction, 40 days analysis
TPH-Diesel	EPA 8015M	1 liter glass	4°C / 14 days
Oil & Grease	EPA 9071	1 liter HDPE	4°C, H ₂ SO ₄ / 28 days
Notes:			
VOA	- volatile organic analysis		
CWM	- clear wide-mouth jar		
HDPE	- high density polyethylene bottles		
HNO ₃	- nitric acid		
HCL	- hydrochloric acid		

- A light source, such as a flashlight or mirror, will be directed down the well and used to inspect for a reflection off fluids.
- An interface probe, capable of detecting water as well as petroleum hydrocarbons, will be lowered down the well and used to measure the depth of any water and/or the thickness of any petroleum hydrocarbons present.
- If fluids or petroleum hydrocarbons are suspected, a clean disposable bailer will be lowered into the well to collect a sample of the fluid for visual inspection and confirmation of its presence prior to collecting any for laboratory analysis.

The interface probe will be decontaminated prior to using it at each well. The results of this monitoring will be documented.

The procedures and schedule for inspection and maintenance of the VZMS sumps are described in the Operations and Maintenance Manual included in the Permit Application. The wells will be visually inspected for damage or malfunction at the time of each monitoring event. Any problems will be communicated to the NMED and fixed in a timely manner.

4.4 SAMPLE COLLECTION

Consolidation water from prepared subgrade or GCL will be sampled for baseline characterization if and when it occurs. The most likely locations for consolidation water to collect ~~are~~ in the LDRS and VZMS sumps, as shown on Figure 5. As such, if it occurs prior to initial placement of waste in the landfill, it likely will represent consolidation water, provided there is no other significant source of fluids in the LDRS sump, like rainwater. If it is observed after initial placement of waste in the landfill, it will still be sampled, but may not represent consolidation water. The exact nature of that water will be determined at the time of occurrence.

If fluids are encountered in the sumps or vadose zone monitoring wells, samples will be collected as described below. The vadose zone monitoring sumps will each be equipped with a bladder pump. Samples will be collected from the pump using the minimal flow rate if sufficient volume exists in the sump. Laboratory analyses of samples will be completed by a chemical laboratory, as described in the Waste Analysis Plan/WAP.

Groundwater is not anticipated in the vadose zone monitoring wells based on results from previous hydrogeologic investigations at the site. In the unlikely event groundwater is encountered following well installation, the wells will be initially sampled approximately one week after installation and development, or whenever water shows up.

Static water level measurements will be taken in the wells using an interface probe prior to sampling. Measurements will be taken to the nearest 0.01 foot from the surveyed reference point on the well casing. The interface probe will be cleaned between each well using a non-phosphate biodegradable detergent and fresh tap water followed by a distilled or de-ionized water rinse. New chemical-resistant disposable sample gloves will be used while collecting samples at each sump or well.

Following water-level measurement, well purging will commence and field measurements of pH, conductivity, temperature and turbidity will be recorded every 2 to 5 minutes to demonstrate parameter stabilization prior to sampling. Purging will be discontinued once the parameters have stabilized or when three well volumes of water have been purged from the well, whichever occurs first. If there is insufficient recharge ~~to for the well to fully recover within 12 hours purge the well 3 times within a practical amount of time~~, the well will only be purged once and sampled as soon as sufficient volume is recharged to the well, as per the guidelines in the Technical Enforcement

Guidance Document (EPA, 1989). Groundwater samples will be collected using a disposable polyethylene bailer attached to a nylon rope. However, groundwater may also be collected from a submersible pump under a reduced flow to prevent volatilization if sufficient water exists.

Groundwater samples will be placed in appropriate containers provided by the laboratory. Table 1 indicates the appropriate sample containers, volumes and preservation required for each analyte. Samples will then be labeled and immediately placed in a refrigerated cooler for transport to the laboratory. Sample information will also be recorded in the field log book.

4.5 SAMPLE PRESERVATION AND TRANSPORTATION

After sealing the sample container, samples will be placed into a cooler as soon as possible and maintained at a temperature of approximately 4 degrees Celsius. Samples will be transported to the analytical laboratory at the end of each sampling event. Samples in breakable containers will be packed in such a way as to prevent breakage during transportation. Table 1 provides a summary of sample preservation and holding times required for each analyte.

4.6 QUALITY ASSURANCE SAMPLES

Duplicate samples will be collected in order to check the precision of laboratory analyses. Duplicates will be included for each parameter requested with samples sent to the laboratory and labeled so that the samples are not identified as quality assurance samples. Approximately one duplicate sample will be collected for each ten samples sent to the laboratory or one per sample batch, whichever is less.

One trip blank sample will also be sent with each cooler containing samples for volatile organics analysis. Blank samples will be labeled so that the samples are not identified as quality assurance samples.

4.7 CHAIN-OF-CUSTODY PROCEDURES

Chain-of-custody documentation will be used to ensure the integrity of samples from the time of collection to reporting of analytical results. This documentation will permit tracing of the possession and handling of samples from the time of collection through analysis and final disposition. Copies of the chain-of-custodies will be kept in the facility operating record.

Sample custody will be initiated at the time of sample collection by placing a label on the sample container and filling out a chain-of-custody form. Each sample collected will be identified in the chain-of-custody form. Each person handling the sample will be identified on the form.

4.8 FIELD EQUIPMENT

Field equipment required for collecting samples will include: sample containers; gloves; refrigerated cooler; sample labels; physical parameter meter; log book; and miscellaneous equipment.

Calibration of field equipment (e.g., pH meter or organic vapor meter) will be conducted at the beginning and end of each work day.

4.9 DECONTAMINATION

In order to prevent cross contamination between sampling sites, sampling equipment will be decontaminated according to the following procedures.

- Remove excess soil or other adhering substances

- Wash with a solution of non-phosphate detergent in tap water
- Rinse with tap water
- Double rinse with distilled water

Decontamination of all equipment that comes into direct contact with sampled media will be carried out between samples and prior to equipment leaving the site. If a pump and hose system is used, the system will be cleaned prior to each groundwater sampling event by pumping a non-phosphate detergent dissolved in fresh tap water followed by a double rinse with de-ionized water. Should bailers be necessary, an unused, disposable bailer will be used at each well to prevent cross contamination.

5.0 LABORATORY ANALYSIS

5.1 ANALYTICAL METHODS

Table 1 summarizes the analytical program for the baseline liquid characterization program, as well as for water detected in vadose zone monitoring wells and sumps. Detection limits will be below drinking water standards for applicable parameters. This analytical program is designed to “fingerprint” fluids associated with the landfill operations so that if water is detected in the vadose zone sumps or monitoring wells, the source of that water can be determined. As such, it may become justifiable to revise the vadose zone sump and monitoring well analytical program based on the results of the baseline liquid characterization program. NMED approval will be obtained prior to making any changes to the program.

5.2 LABORATORY QUALITY ASSURANCE/QUALITY CONTROL

Internal laboratory Quality Assurance/Quality Control procedures will include the following:

- Laboratory chain-of-custody tracking of samples.
- Instrument calibration using calibration check standards and laboratory blanks.
- Use of reagent and method blanks.
- QC spike samples (approximately one every 20 samples).
- Matrix spike samples (approximately one every 20 samples).
- Laboratory split sample duplicates (approximately one every 20 samples).
- Laboratory check standards (approximately one every 20 samples).

5.3 DATA REVIEW, VALIDATION, AND VERIFICATION REQUIREMENTS

All analytical laboratory data will be presented as SW-846 [i.e., EPA SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition* (EPA, 1986)] documentation packages that provide the same level of detail as EPA Contract Laboratory Program (CLP) Level IV [see OLM02.1, *USEPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-Media, Multi-Concentration* (EPA, 1990a) and OLM03.0, *USEPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-Media, Multi-Concentration* (EPA, 1990b)]. A tabular key will be provided with the package that relates field/laboratory sample numbers to: 1) QA and QC samples; 2) cooler receipt form(s); 3) reporting requirements for organic and inorganic analyses; 4) reporting of internal QC results (e.g., laboratory blanks, surrogate spike samples, matrix spike samples, laboratory duplicates and/or matrix spike duplicate pairs, and laboratory control standards); and 5) identification of field duplicates and all types of blanks. Actual chromatograms will be provided for all samples analyzed by gas chromatography (GC) methods.

At a minimum, data package verification will include evaluation of sampling documentation and representativeness, technical holding time, instrument calibration and tuning, field and lab blank sample analyses, method QC sample results, field duplicates, compound identification and quantification, the presence of any elevated detection limits, and a summary of qualified data. All data will be flagged with appropriate qualifiers.

The data validation and verification procedures will include: 1) an initial review or verification of the completeness of individual data packages for each sample delivery group; 2) validation of the data using guidelines tailored to the type of analyses performed (i.e., organics, inorganics, or radiochemical); 3) resolution of data discrepancies, where possible, by liaison with the responsible laboratory; 4) qualification of data by flagging with appropriate codes, with emphasis on data usability

for decision-making purposes; and 5) preparation of sample delivery group specific data assessment summaries and a narrative report.

The report will also include the items listed below.

- Maps illustrating facility waste management units and monitoring sump and well locations
- Maps illustrating groundwater depth, gradient and flow direction (if appropriate)
- Map (plan view or cross-section) illustrating groundwater pathways (if appropriate)
- Graphs and/or tables depicting water quality
- Laboratory documentation, chain-of-custody and QA/QC documentation
- Copies of well and sump sampling logs and other pertinent documentation
- Conclusions and recommendations

If fluids are detected in either the sumps or wells, NMED ~~and the Cabinet Secretary~~ will be notified within 24 hours. Subsequently, an additional report (i.e., not a regularly scheduled quarterly report) will then be submitted to NMED within 14 days of fluid appearance. This report will include an assessment of the amount and source of the fluids; the possible size, location, and cause of the leak; and the seriousness of the any leak in terms of potential releases to the environment. It will also include a summary of any immediate short or long term response actions to be taken. The report will also include those items listed below.

- Monitoring results from the sumps and wells (volumes/fluid levels and analytical results)
- A comparison to the baseline characterization results
- Analytical results for all fluids

Within 30 days of fluid appearance, a report will be submitted to NMED describing the effectiveness of the response actions. Monthly reports will be submitted to NMED as long as fluids are present in the VZMS.

6.6 DATA STORAGE

All completed data analyses and reports from this project will be stored electronically. Copies of the electronic data and hard copies of the data and laboratory reports will be placed in the facility record during the operating and post-closure periods.

7.0 HEALTH AND SAFETY

If there is reasonable potential for exposure to toxic compounds, field personnel will be required to have current certification of 40-hour health and safety training per OSHA 29 CFR 1910.120(e). Personnel will adhere to proper health and safety protocols as described in a separate Health and Safety Plan that will be submitted to NMED for review and approval prior to initiation of Work Plan activities. The selected contractor will also provide a health and safety plan relating to their operation (e.g. drilling equipment).

A Health and Safety Officer (HSO) will be designated that will be responsible for monitoring potentially hazardous situations during all field activities, ensuring that all personnel know the potential physical and chemical hazards and are trained in the proper use of personal protective equipment (PPE). It is anticipated that safety Level D will be the highest level of PPE necessary (i.e., work clothes, hard hats, steel-toed boots and safety glasses). The HSO will make the decision when it is necessary to upgrade to a higher level of PPE. The HSO will also conduct periodic air monitoring (documented following Rule 1166-type requirements) and determine if conditions require an immediate termination of work.

8.0 REFERENCES

Environmental Protection Agency, 1989, Technical Enforcement Document.

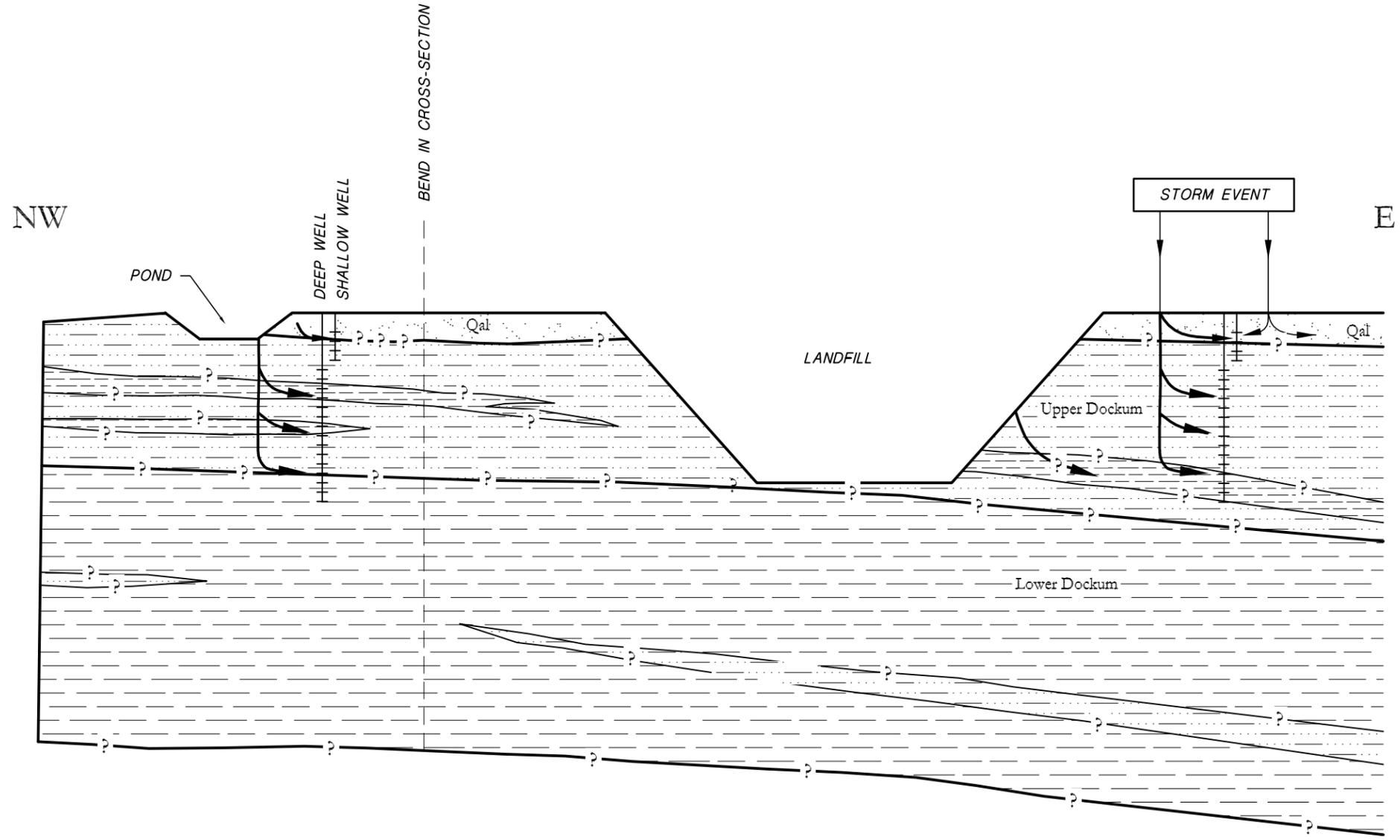
Montgomery Watson Mining Group, October 1999, Groundwater Monitoring Waiver Request, Triassic Park Waste Disposal Facility.

TerraMatrix, Montgomery Watson, December 1997 (Revised November 1998), Design Drawings, Triassic Park Waste Disposal Facility, Chaves County, New Mexico.

TerraMatrix, Montgomery Watson, December 1997 (Revised January 2000), Design Drawings, Triassic Park Waste Disposal Facility, Chaves County, New Mexico.

APPENDIX A
METEORIC WATER MOBILITY PROCEDURE

AutoCAD FILE: schematic-s1e2.dwg PROJECT NUMBER: 1342602-02190200



Average $k = 1.2 \times 10^{-5}$ cm/s

Average $k = 5.7 \times 10^{-8}$ cm/s

LEGEND

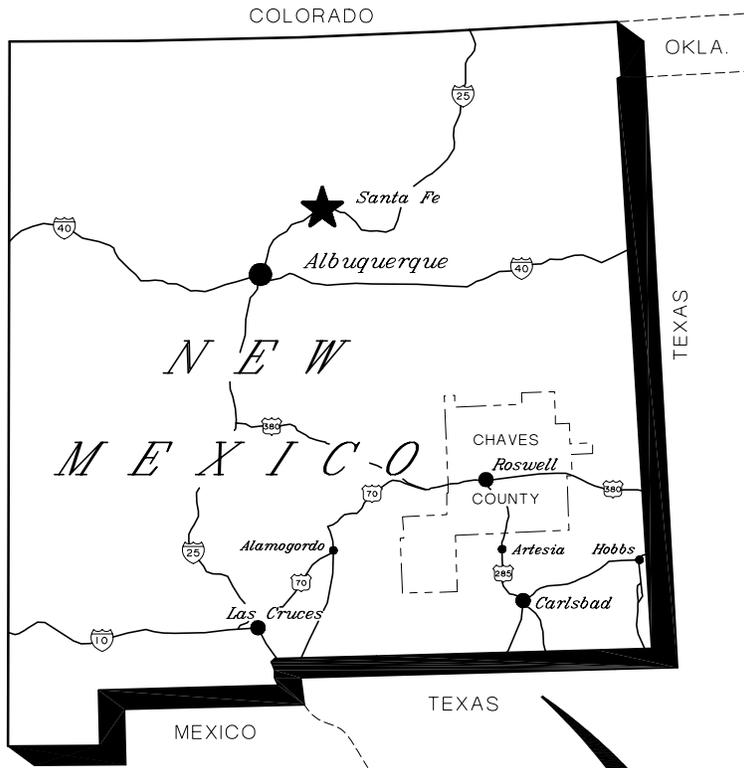
- POTENTIAL CONTAMINANT TRANSPORT PATHWAY
- MONITORING WELL
- Screened Interval

NOTE:
THIS FIGURE IS STRICTLY SCHEMATIC, NOT TO SCALE, AND NOT MEANT TO PRESENT THE ACTUAL STRATIGRAPHY OR CONSTRUCTION OF TRUE REGULATED UNITS.

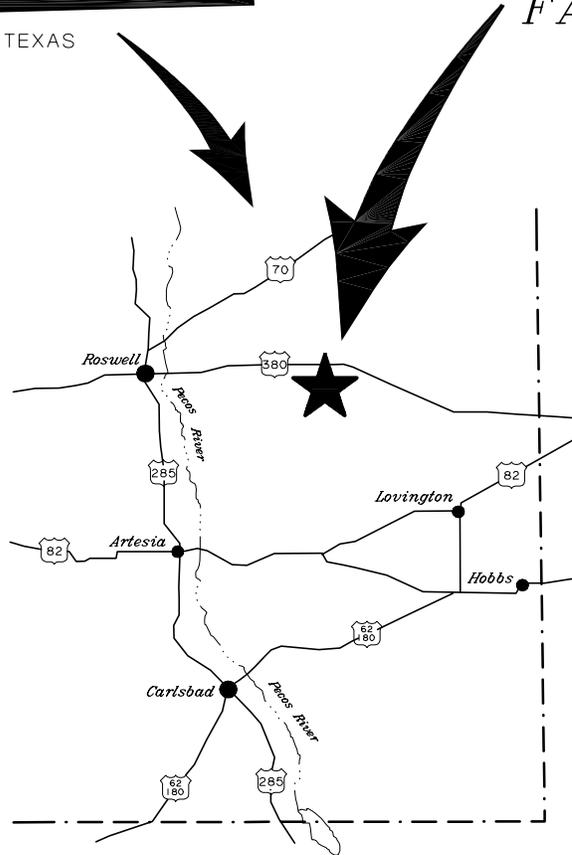


Not to Scale

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REV. No.	REVISIONS	DATE	DESIGN BY	DRAWN BY	REVIEWED AND SIGNED BY
TRIASSIC PARK					
WASTE DISPOSAL FACILITY					
PROJECT: VADOSE ZONE MONITORING SYSTEM WORK PLAN					
DRAWING TITLE: SCHEMATIC SITE MODEL					
			Sheet <u>1</u> Of <u>1</u> Sheets		
			SCALE: Not to Scale		
			Figure No.: 3		
MONTGOMERY WATSON					



*TRIASSIC
PARK
FACILITY*

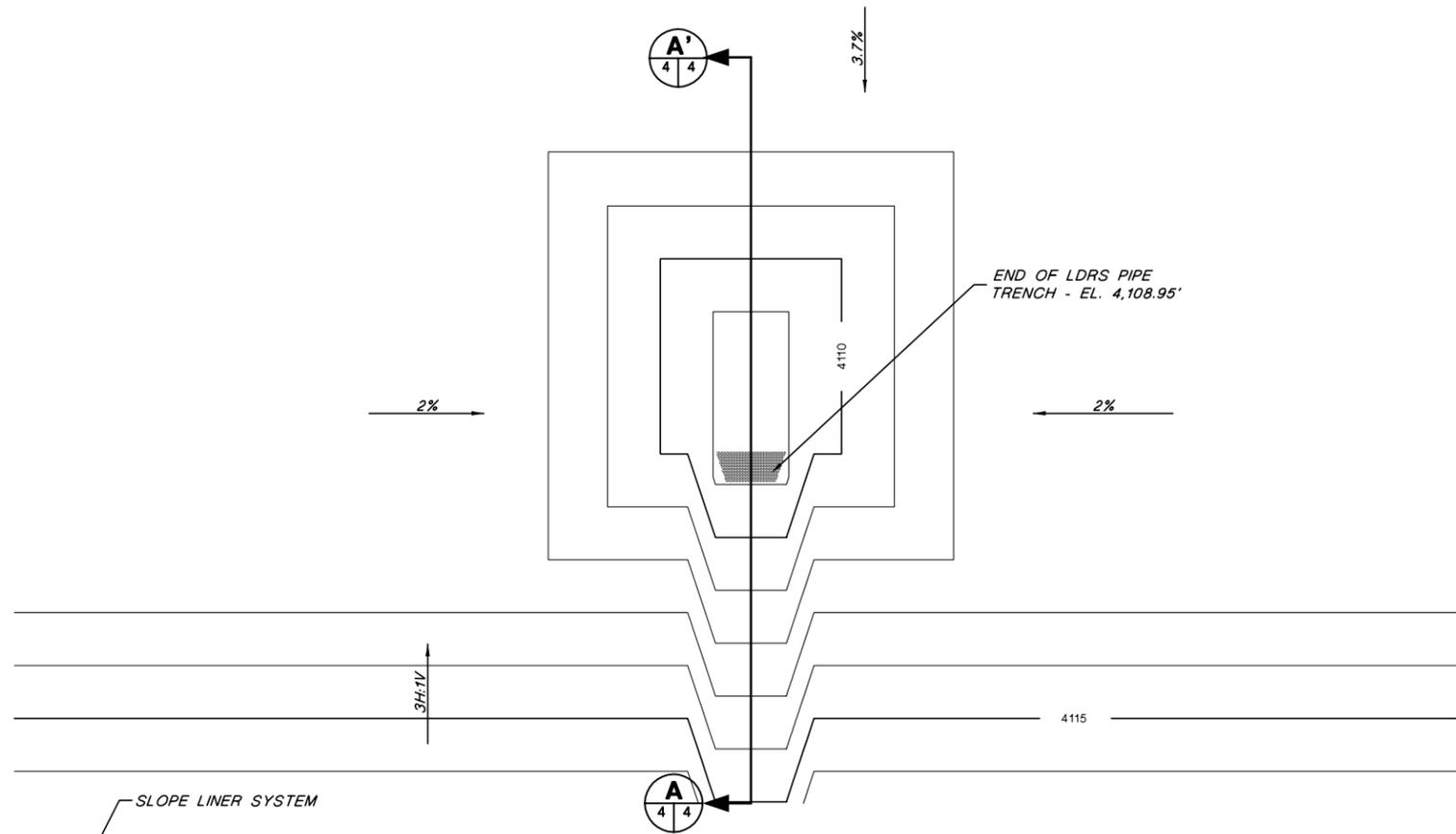


*TRIASSIC PARK
WASTE DISPOSAL FACILITY*

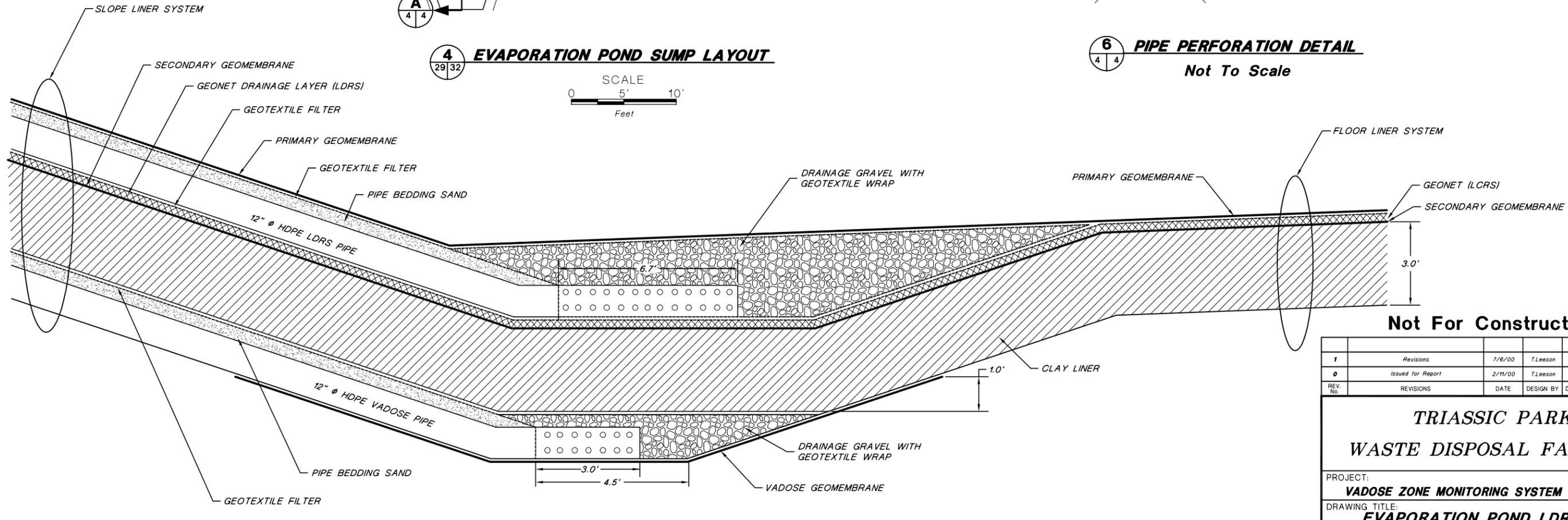
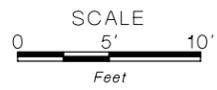
SITE LOCATION

1	Reissue	7/6/00	T.Leeson	K.Conrath	T.Leeson
	Issued for Report	2/11/00	T.Leeson	K.Conrath	T.Leeson
REV. No.	REVISIONS	REV. DATE	DESIGN BY	DRAWN BY	REVIEWED AND SIGNED BY
PROJECT No: 1342602.02190200			AutoCAD FILE: SITELOC.DWG		
SCALE: N/A			FIGURE No: 1		
MONTGOMERY WATSON					

PROJECT NUMBER: 1342602
AutoCAD FILE: WP-LDRSPLAN.DWG



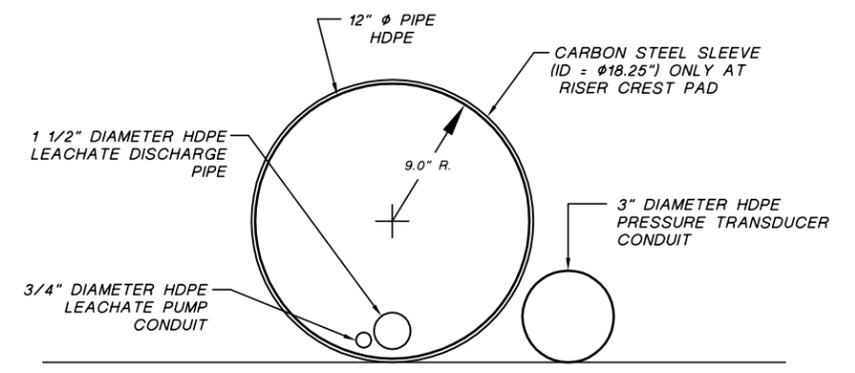
4 EVAPORATION POND SUMP LAYOUT



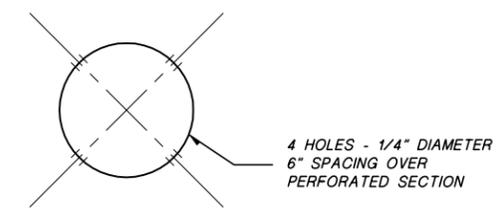
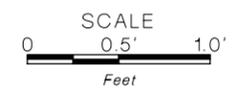
A EVAPORATION POND SUMP CROSS-SECTION

NOTE:
FOR GENERAL NOTES AND LEGEND INFORMATION SEE DRAWING No. 2,
"INDEX, LEGEND AND GENERAL NOTES".

Not To Scale



5 LDRS RISER PIPE DETAIL



6 PIPE PERFORATION DETAIL

Not To Scale

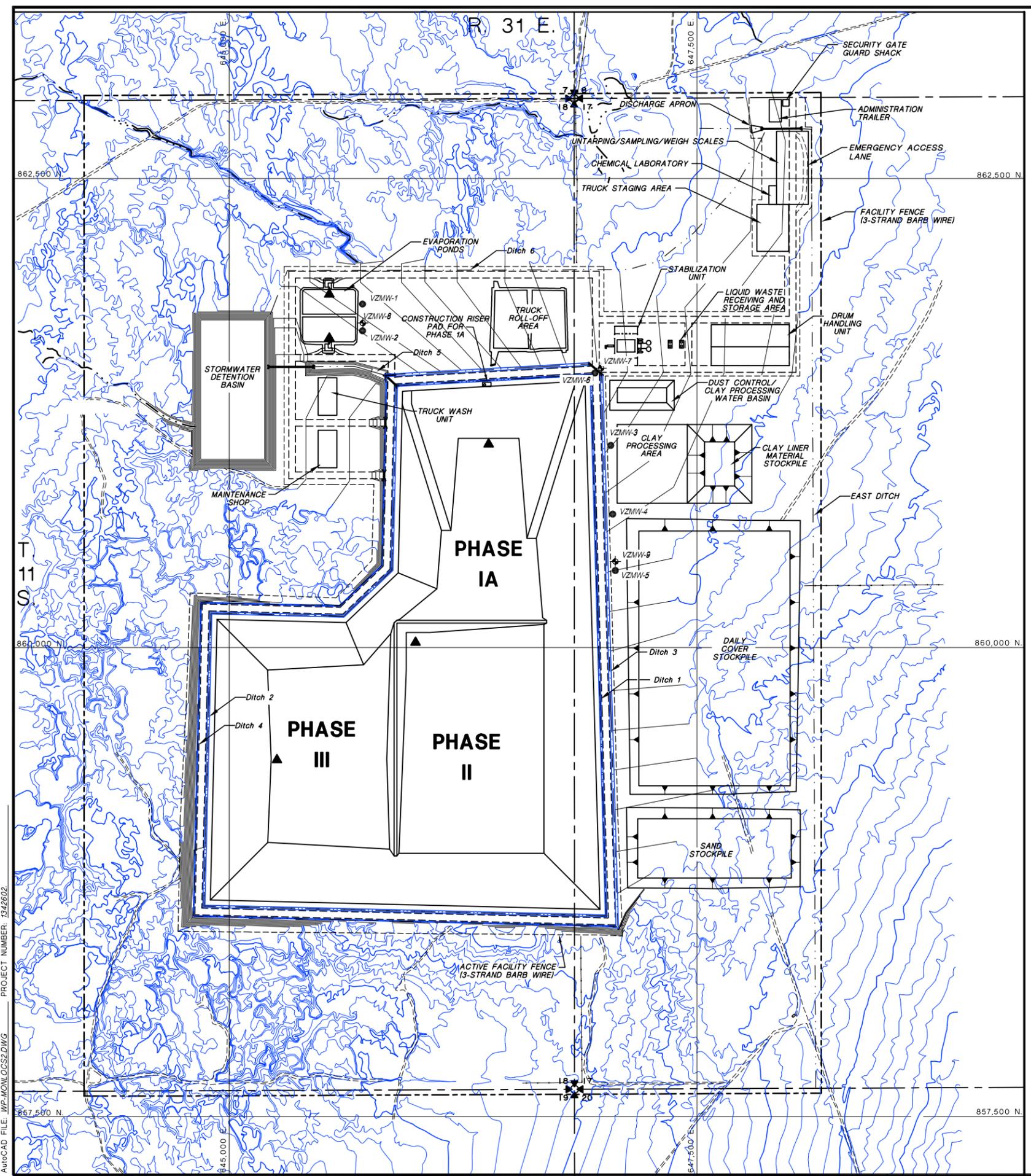
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REV. No.	REVISIONS	DATE	DESIGN BY	DRAWN BY	REVIEWED AND SIGNED BY
1	Revisions	1/6/00	T.Leeson	K.Conrath	T.Leeson
0	Issued for Report	2/11/00	T.Leeson	K.Conrath	T.Leeson

**TRIASSIC PARK
WASTE DISPOSAL FACILITY**

PROJECT:
VADOSE ZONE MONITORING SYSTEM WORK PLAN

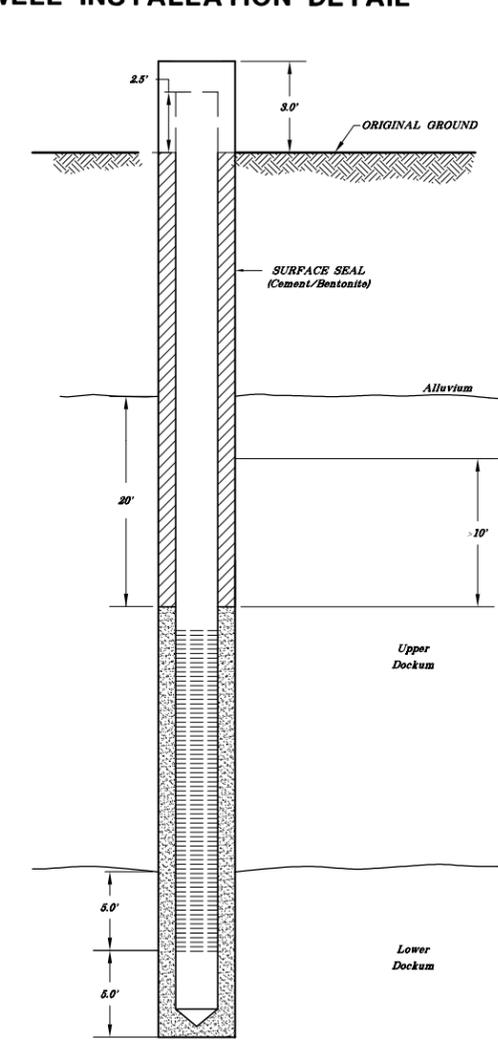
DRAWING TITLE:
**EVAPORATION POND LDRS AND
VADOSE PLAN AND DETAILS**



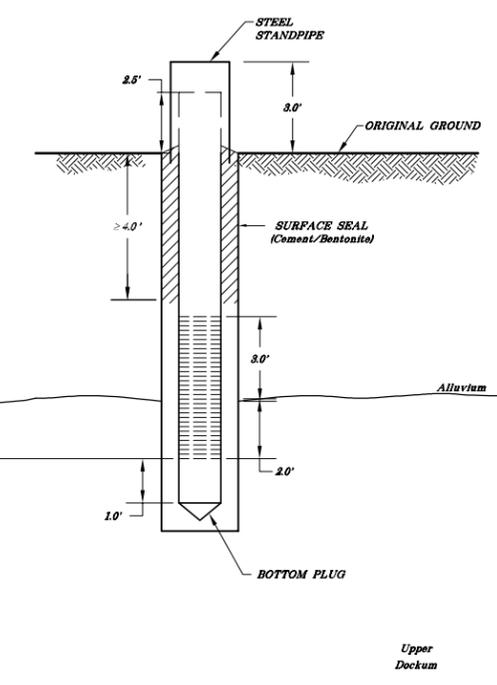
LEGEND

- EXISTING CONTOUR
- REGRADED CONTOUR
- DEEP MONITORING WELL
- NESTED SHALLOW MONITORING WELL
- VADOSE ZONE SUMP
- FACILITY AND ACTIVE FACILITY FENCES (3-Strand Barb Wire)

DEEP MONITORING WELL INSTALLATION DETAIL



SHALLOW MONITORING WELL INSTALLATION DETAIL



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REV. No.	REVISIONS	DATE	DESIGN BY	DRAWN BY	REVIEWED AND SIGNED BY
2	Revisions	7/6/00	T.Leeson	K.Conrath	T.Leeson
1	Revisions	5/9/00	T.Leeson	K.Conrath	T.Leeson
0	Issued for Report	2/11/00	T.Leeson	K.Conrath	T.Leeson

**TRIASSIC PARK
WASTE DISPOSAL FACILITY**

PROJECT:
VADOSE ZONE MONITORING SYSTEM WORK PLAN

DRAWING TITLE:
LOCATION OF SUMPS AND MONITORING WELLS

MONTGOMERY WATSON

Sheet **1** Of **1** Sheets
SCALE: As Shown
FIGURE No. **2**



AutoCAD FILE: _WP_MONL_CG2.DWG PROJECT NUMBER: 1542602

