



**MONTGOMERY WATSON**  
Mining Group



June 14, 2001

Mr. Steve Pullen  
New Mexico Environmental Department (NMED)  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Re: Insertion Instructions for revisions to the *December 1997 (Revised October 2000) Part A and Part B Permit Application for the Triassic Park Waste Disposal Facility*

Dear Mr. Pullen:

We are submitting recently revised pages of the *Triassic Park Part B Permit Application* that were originally submitted in December 1997 (revised October 2000 and March 2001). We have included two hard copy versions and an electronic version has already been submitted via e-mail (sent on May 31, 2001).

The following sections were revised to resolve issues expressed by NMED during a conference call on May 18, 2001 and subsequent conversations. Please follow the instructions listed below for inserting replacement pages into these sections of the permit application.

- **Section 4 – Waste Analysis Plan** (revised March 2001): Replace pages 4-1, 4-2, 4-3, 4-6 and 4-7 in Vol. I, Section 4 with revised pages enclosed.
- **Section 5 – Procedures to Prevent Hazards** (revised October 2000): Replace page 5-9 in Vol. I, Section 5 with revised page enclosed.

The revisions included in this transmission do not alter the structure or pagination of the permit application, therefore the existing Table of Contents does not require revision. If you have any questions, please contact us.

It is our understanding that the revisions included in this submission complete all outstanding issues relating to our permit application, and that NMED will proceed immediately with the issuance of a draft permit for the Triassic Park Facility.

Sincerely,

Montgomery Watson

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Principal

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## 4.0 WASTE ANALYSIS PLAN

The Triassic Park Hazardous Waste Disposal Facility (the facility) is a commercial facility that receives hazardous waste generated off-site for treatment, storage, and disposal. This waste analysis plan establishes facility requirements for accepting and characterizing hazardous waste generated both off-site and on-site. The waste analysis plan requirements are established in the 1995 New Mexico Hazardous Waste Management Regulations at 20 NMAC 4.1.500 incorporating 40 CFR 264.13, 20 NMAC 4.1.800 incorporating 40 CFR 268.7, and 20 NMAC 4.1.900 incorporating 40 CFR 270.14(b)(3). The most recent revision of this waste analysis plan will be maintained at the facility as part of the facility Operating Record. The facility will continually upgrade the waste analysis plan with regard to the Land Disposal Restrictions (LDR) regulations contained in 40 CFR 268.

Section 4.1 identifies wastes which will be accepted at the facility and wastes which are prohibited. Section 4.2 lists criteria for waste acceptance and management. Sections 4.3 and 4.4 contain pre-acceptance procedures for initial acceptance of hazardous waste received from off-site generators and management procedures for incoming shipments of waste. The various waste analysis protocols that will be required at the facility are contained in Section 4.5. Sampling and analytical methods and protocols for quality assurance/quality control (QA/QC) are discussed in Sections 4.6 and 4.7. Section 4.8 explains the facility's waste tracking system. Section 4.9 summarizes notification, certification, and recordkeeping requirements related to waste analysis.

### 4.1 PERMITTED AND PROHIBITED WASTE

Section 4.1.1 identifies hazardous waste permitted for acceptance at the facility. Hazardous waste prohibited at the facility is identified in Section 4.1.2.

#### 4.1.1 Permitted Waste

The facility will treat, store, and/or dispose only those hazardous wastes listed in Part A of the facility permit application. Only hazardous waste which meets the Land Disposal Restrictions (LDR) treatment standards identified in 40 CFR 268, Subpart D, or can be treated at the facility to meet these standards, will be accepted. These treatment standards are applicable to both primary contaminants and underlying constituents.

#### 4.1.2 Prohibited Waste

The Facility will not accept the following wastes from off-site generators:

- **dioxin-contaminated wastes.** - Wastes listed in 40 CFR 268.31 as adopted by 20 NMAC 4.1.800;
- **certain PCB-contaminated liquids.** - Ignitable PCB-contaminated liquids or liquids with PCB concentrations greater than or equal to 50 ppm;
- **certain PCB-contaminated soils.** - Soils with PCB concentrations greater than or equal to 500 ppm will not be accepted at the facility, except for those soils (or other wastes) which are PCB bulk product waste or PCB remediation waste (40 CFR 761). The facility may obtain a permit from EPA for management of Toxic Substances Control Act (**TSCA**) wastes in order to accept other wastes containing PCB concentrations greater than 500 ppm,. A copy of this

permit will be transmitted to the New Mexico Environment Department (NMED) before such waste is accepted;

- **organic liquids/sludges.** - Liquids/sludges with organic concentrations at levels that make them subject to the treatment, storage, and disposal requirements described in 40 CFR 264 Subpart AA or CC; and that have not been treated, prior to receipt at the facility, to applicable LDR treatment standards (40 CFR 264 Subpart AA and CC as adopted by 20 NMAC 4.1.500);
- **explosives.** - Any substance or article, including a device, which is designed to function by explosion (i.e., an extremely rapid release of gas and heat) or which, by chemical reaction within itself, is able to function in a similar manner even if not designed to function by explosion;
- **radioactive/nuclear materials.** - Materials regulated by the NMED or the New Mexico Oil Conservation Division and defined in 20 NMAC 3.1 Subpart 14, or materials regulated under the Atomic Energy Act of 1954, as amended (including source, special nuclear materials and byproduct materials as defined in 10 CFR 20.1003);
- **medical waste.** - Waste including infectious/biologic/pathogenic solid waste generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals. This also includes infectious waste as defined in NMAC 9.1.105.AL.;
- **Packing house and killing plant offal.** - Defined as a special waste by 20 NMAC 9.1.105. BZ;
- **certain hazardous debris.** - Hazardous debris which has not been treated, prior to receipt at the facility, to meet the LDR treatment standards;
- **certain lab packs.** - Lab packs which contain wastes [identified in 40 CFR 268, Appendix IV (adopted by reference in 20 NMAC 4.1.800)] excluded from lab packs under the alternative treatment standards of 40 CFR 268.42(c) (adopted by reference in 20 NMAC 4.1.800);
- **compressed gases.** - Gases stored at pressures higher than atmospheric; and
- **unknown or unidentified waste.** - These wastes cannot be accepted at the Facility except by special provision and direction from the NMED Secretary (e.g., emergency clean-up operations) or until full characterization has been performed.

## 4.2. CRITERIA FOR WASTE MANAGEMENT AT THE FACILITY

Waste managed at the facility must meet the facility's criteria for acceptance and management. Waste analysis (or, in some cases, acceptable process knowledge) will be used to ensure determination of:

- complete characterization of the waste;
- compliance with LDR treatment standards, including, where applicable, underlying constituents. If the waste stream does not meet the LDR treatment standards, the waste will be rejected if the facility does not have the appropriate treatment capability to bring it into compliance;
- compliance with the facility's regulatory and operational limits (e.g., the waste is not included in the permitted wastes listed in Part A of this application or the waste does not meet other operational boundaries established by this WAP).

## 4.3 PRE-ACCEPTANCE PROCEDURES FOR OFF-SITE WASTE

Before a waste stream is accepted, all off-site generators will be required to provide a complete waste characterization (Section 4.3.1). After evaluating the paperwork supplied by the generator (Section 4.3.2), the facility will send a representative sample of the waste to a laboratory for analysis and will evaluate the analytical results (Section 4.3.3). Finally, the facility will notify the generator that the facility will accept the waste stream (Section 4.3.4).

### 4.3.1 Waste Characterization Information Provided by the Generator

The activities associated with pre-acceptance of off-site waste streams are shown in Figure 4-1. The generator must provide the following waste characterization information for each waste stream:

- a completed Waste Profile Form signed by an authorized agent of the generator. An example of a Waste Profile Form is contained in Vol. II, Appendix H, of this application. This form may be changed if the facility believes that more information is warranted or if there are changes in regulations governing the facility;
- other documentation that supports the information presented on the Waste Profile Form (e.g., Material Safety Data Sheets);
- a description of the process that generated the waste;
- a completed Land Disposal Restriction Notification;
- all other supporting data required by 40 CFR 268.7;
- all required certifications;
- waste analysis data used to characterize the waste and/or process knowledge documentation; and
- a representative sample of the waste, of adequate volume for analysis

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*This submittal supersedes all previous information.*

### 4.3.2 Paperwork Evaluation

The facility will evaluate all of the waste characterization paperwork to determine if it adequately represents the physical and chemical characteristics of the waste stream and whether the waste stream is appropriate for management at the facility. As part of the pre-shipment process, the facility will work with the off-site waste generator to ensure that all necessary waste analyses and waste characterization information are provided to meet the applicable requirements for acceptance.

If waste analysis was used to characterize the waste, the facility will evaluate the data to determine that:

- appropriate extraction and preservation techniques were used;
- appropriate sampling strategies were used;
- appropriate sample types were collected (e.g., to demonstrate compliance with the LDR treatment standards, hazardous waste regulations require that grab samples be collected for nonwastewaters and composite samples be collected for wastewaters);
- appropriate parameters were selected for analysis;
- appropriate analytical methods were used;
- recommended holding times were met;
- detection limits were below applicable standards (e.g., the LDR standards); and
- the quality of the analytical data is adequate for making a waste determination based on an evaluation of the final laboratory reports.

If the data supplied are not adequate to provide a complete characterization of the waste stream, the facility will either require additional information from the generator or will not agree to accept the waste.

All of the waste characterization information supplied by the generator will be maintained in the facility's Operating Record. In addition, the facility's evaluation of this information and the results of the independent analysis will be maintained in the Operating Record.

### 4.3.3 Representative Sample Assessment

After evaluation and approval of the sample representativeness and waste characterization data paperwork, the representative sample submitted by the generator will be analyzed by a qualified laboratory other than the one used by the generator. Based upon the facility evaluation of the information supplied by the generator, the facility will inform the laboratory of the medium type (e.g., liquid, aqueous, solid) and appropriate parameters for analysis. The rationale for selection will be maintained in the facility Operating Record.

The generator's Waste Profile Form will be compared with the results of the laboratory analysis of the representative sample and with the facility's permit to ensure that the waste is acceptable for storage, treatment, and/or disposal at the facility. Should there be a discrepancy between the analytical results

and the generator information, the facility will contact the generator to resolve the discrepancy. The generator will not be authorized to ship the waste until all discrepancies are resolved. If the discrepancies cannot be resolved with the information provided by the generator, the facility will request a new Waste Profile Form and any additional information that may be required to characterize the waste adequately. In addition, the facility may require the generator to submit additional samples of the waste for analysis. If the generator cannot supply adequate information to provide a complete characterization of the waste stream the facility will not accept the waste. The generator will submit a new Waste Profile Form for each new waste stream and for an existing waste stream if it is modified significantly.

#### **4.3.3.1 Major Discrepancies**

Major discrepancies include the following:

- analytical results indicating that the generator applied an incomplete or wrong waste code to the waste stream;
- analytical results indicating that the generator submitted incomplete or wrong information on the LDR Notification Form;
- analytical results including constituents or underlying hazardous characteristics that are not explained by a description of the process; and
- other information indicating that the waste stream is not characterized properly.

In the event of a major discrepancy, the facility will reject the paperwork and require the generator to analyze the waste in accordance with a sampling plan that is consistent with the guidance in EPA document SW-846, *Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods*, Chapter 9. The facility will require the generator to resubmit the waste characterization information listed in Section 4.3.1 and one or more additional representative samples for analysis.

#### **4.3.3.2 Minor Discrepancies**

Minor discrepancies include any other waste characterization discrepancy (e.g., discrepancies which do not question hazardous waste code assignments, waste treatment, or the presence of prohibited items). In the event of a minor discrepancy, the facility will work with the generator to resolve the discrepancy. For example, uncertainties regarding whether sorbents are present will be handled as minor discrepancies. The facility will contact the generator if the Waste Profile Form does not indicate whether a sorbent was added to the waste, or it indicates that a sorbent was added but does not specify the name and type of sorbent and whether it is biodegradable. If the generator cannot provide this documentation, the waste must be tested to determine if it contains a biodegradable sorbent. If the waste is determined to contain a biodegradable sorbent, it will be stabilized prior to disposal or rejected.

#### **4.3.3.3 Additional Waste Acceptance Conditions**

In addition to complete characterization of the waste, the facility will also evaluate the waste to ensure that it can be managed at the facility. Waste analysis will be conducted where necessary to ensure

Inspection of the run-off and run-on ditches for the above facilities will be made during weekly site inspections and after storms.

#### **5.4.2.2 The Landfill and Evaporation Pond**

The landfill run-on control system will be capable of preventing flow onto the active portion of the landfill during peak discharge from at least a 24-hour, 25-year storm. The run-on control system will consist of unlined ditches for diverting run-on from off site around the landfill. Water from outside the landfill will be prevented from entering the active portion of the landfill by the waste processing corridor drainage ditch.

The run-off management system will be capable of collecting the water volume resulting from at least a 24-hour, 25-year storm. Run-off in the active portion of the landfill will be collected in the LCRS. The run-on and run-off control system for the landfill is described in greater detail in Section 2.5.1.6.

The area surrounding the evaporation pond will be graded to carry stormwater run-off towards the drainage ditch to the south of the evaporation pond area. This ditch will ultimately empty into the site stormwater detention pond. The perimeter of the evaporation pond is elevated to prevent stormwater run-on into the pond from surrounding areas.

Inspection of the run-off and run-on ditches for the landfill and evaporation pond will be made during weekly site inspections and after storms. Maintenance and repair of the ditches will be performed as necessary and in accordance with the Operations and Maintenance Manual (Volume II, Appendix O) and the Design Drawings (Volume III).

#### **5.4.3 Wind Dispersal Control System**

The active portion of the landfill will either be covered or managed to control the wind dispersal. In general, dust control will be accomplished by spraying water on the active portion of the landfill and any road or area subject to wind dispersal. Adding water to prevent wind erosion will be limited so that ponding in the landfill does not occur. Additional detail about wind dispersal procedures can be found in Section 2.5.1.7.

#### **5.4.4 Water Protection**

There is an existing underground water line from a spring located approximately one mile east of the Facility in the Ogallala formation, which is used for domestic water supply. This water source, and any others in the Caprock area, will not be used for facility operations and will be protected through the following measures: (1) natural means because of its location; (2) the design of the landfill; (3) the type of waste that will be accepted at the Facility; and (4) the method of response to releases to soil. Each is discussed in more detail below.

Natural geologic and hydrologic conditions in the area include the following characteristics.

- the Upper Dockum unit is unsaturated beneath the selected site;
- the Lower Dockum consists of a 600-foot thickness of homogeneous, lacustrine mudstone. This sequence of unsaturated, low permeability mudstones represents a geologic barrier to potential downward migration of contaminants from the landfill (see Section 3.0); and,