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**ENTERED**

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September 21, 2001

Steve Pullen  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502



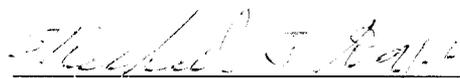
RE: HRM 01-02(P)  
Triassic Park Waste Disposal Facility

Dear Mr. Pullen:

Enclosed please find a copy of Gandy Marley, Inc.'s Supplemental Clarification Comment for Triassic Park Draft Permit. Please call me if you have any questions.

Sincerely,

DOLAN & DOMENICI, P.C.

  
Michael J. Doyle, Esq.

Encls. as noted

SUPPLEMENTAL CLARIFICATION COMMENT FOR TRIASSIC PARK DRAFT PERMIT

Permit Attachment F, Section 4.1.2 includes the following description of the organic liquids/sludges that are prohibited from acceptance at the Facility.

- **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);

It should be clarified that this description of prohibited waste is intended to refer only to organic liquids/sludges for which 40 CFR 264 Subpart AA or CC apply. Any waste that would not be subject to the requirements of these subparts are not intended to be prohibited by this section. We believe that this clarification is consistent with Section 11 of the Permit Application that discusses the Subpart AA, BB and CC wastes and with the Draft Permit text.

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