



**MWH**

AR/03-005

TP 03



(via FedEx)

May 8, 2003

Mr. Steve Pullen  
State of New Mexico – Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East – Building 1  
Santa Fe, New Mexico 87505-6303

**Subject: Triassic Park Facility, Permit No. NM-00010024484 – Draft Facility Corrective Action Work Plan (Revised)**

Dear Mr. Pullen:

Please find enclosed a revised draft of the Facility Corrective Action Work Plan for the Triassic Park Facility. The FCAWP is required under the Facility's RCRA Permit Attachment R, *Facility Corrective Action Work Plan Outline*. Also enclosed is a checklist that shows the location of the required elements in the FCAWP.

The submission of this revised FCAWP meets the requirements of NMED's letter, dated March 26, 2003, requiring that the revised FCAWP be provided within 45 days (by May 9, 2003) from the date of the letter. MWH believes that the revised draft work plan meets the requirements contained in your letter dated March 26, 2003. MWH would appreciate your concurrence that the document is now administratively complete.

Please contact us at your convenience should you have any questions regarding the document. MWH will look forward to your comments and finalization of the document in the near future.

Sincerely,

**MWH**

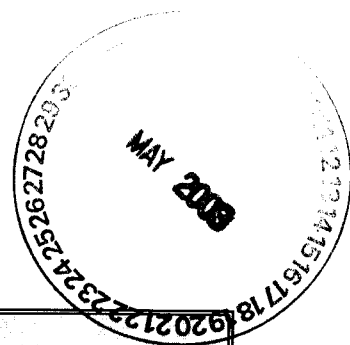
Patrick G. Corser, P.E.  
Vice President

Kenneth Kloska  
Environmental Services Manager

cc: Larry Gandy – GMI  
Dale Gandy – GMI

**Triassic Park Site - FCAWP Checklist**

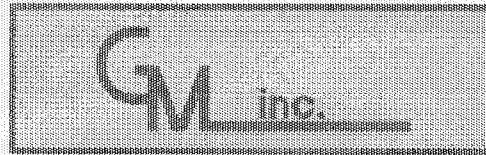
May 8, 2003



<b>Triassic Park – Facility Corrective Action Work Plan Checklist</b>	
<b>FCAWP REQUIREMENT (ATTACHMENT R)</b>	<b>FCAWP REFERENCE</b>
<b>Task I Corrective Action Data Collection Quality Assurance Plan</b>	2.0
Prepare a plan to document all monitoring procedures during the investigation (sampling, field measurements, sample analysis)	
<b><i>Strategy Section</i></b>	
Description of the intended uses of the data	2.2.1.2
Description of the necessary level of precision and accuracy for intended data uses	2.2.1.2
Description of methods and procedures to be used to assess precision, accuracy, and completeness of data	2.2.1.2, 2.2.2, 2.2.1.4, 2.4.6
Quality Assurance Reports schedule for periodic assessment of measurement data accuracy, precision, and completeness	2.2.3.1, 2.4.6
Results of performance audits	2.2.3.2
Results of systems audits	2.2.3.2
Significant quality assurance problems and resolutions	2.2.3.3
<b><i>Sampling and Field Measurements Section</i></b>	
Selecting appropriate sampling and field measurements locations, depths, and other pertinent information	2.3.2
Providing a statistically sufficient number of sampling and field measurement sites	2.3.2
Determining conditions under which sampling or field measurements shall be conducted	2.3.2
Determining which parameters are to be measured and where	2.3.2
Selecting the frequency of sampling and length of sampling period	2.3.2
Selecting the types of samples and number of samples to be collected	2.3.2, 2.3.3, 2.3.5
Delineating procedures designed to prevent contamination of sampling or field measurements equipment and cross-contamination between sampling points	2.3.6.1, 2.3.6.2
Documenting field sampling operations and procedures	2.3.7, 2.3.7.1, 2.3.7.2, 2.3.7.3, 2.3.7.4, 2.3.7.5, 2.3.7.6, 2.3.7.7 Appendix C

Selecting appropriate sample containers	2.3.8
Preserving samples	2.3.9
Controlling chain-of-custody	2.3.10.1, 2.3.10.2, 2.4.1.1
Disposing of all contaminated materials generated by activities in a manner compliant with all State and Federal regulations	2.3.11
<b><i>Sample Analysis Section</i></b>	
Chain-of-custody procedures	2.4.1
Sample storage procedures and holding times	2.4.2
Sample preparation methods	2.4.3
Analytical procedures	2.4.4
Calibration procedures and frequency	2.4.5
Data reduction, validation, and reporting	2.4.6
Frequency of internal quality control checks and laboratory performance audits	2.2.3.2, 2.4.6 2.3.5
<b>Task II Corrective Action Data Management Plan</b>	
<b><i>General</i></b>	
Develop a plan for investigation data and results to be tracked and documented	3.2, 3.2.2
Identify and setup data documentation materials and procedures (data record)	3.1.3, 3.2.2, 3.2.2.2
Identify and setup project file requirements	3.3, 3.3.2, 3.2.2.3, 3.2.2
Identify and setup project-related progress reporting procedures and documents	3.2.2
<b><i>Data Records Requirements for Sample and Field Measurements</i></b>	
Unique measurement code	3.2
Measurement location	3.2
Measurement type	3.2
Laboratory ID number	3.2
Property or component analyzed	3.2
Results of analysis	3.2
<b><i>Provide format for presenting data and conclusions of the investigation and other pertinent information</i></b>	
Tables containing raw data, sorted data based on location, media, and constituent; data reduction for statistical analysis; and summary data	3.1.3, 3.2.1 3.2.2.1, 3.2.2.2, 3.2.2.3
Graphical formats containing sampling location and grid, levels of contamination for each location, Geographical extent of contamination, Changes in concentration relative to sources, time, depth, and other parameters	3.1.3, 3.2.1, 3.3.2

<b>Task III Health and Safety Plan</b>	4.0
Facility description, including resource availability (roads, water supply, electricity and telephone service)	4.1, 4.1.1, 4.1.2, 4.2, 4.3, 4.4
Description of known hazards and evaluation of risks associated with each activity conducted including on- and off-site exposure to contaminants during implementation of interim measures	4.5.1, 4.5.2, 4.5.3, 4.5.4, 4.5.5
List of key personnel and alternates responsible for site safety, response operations, and for protection of public health	4.6, 4.6.1.1
Delineation of the work area	4.7
Description of the levels of protection to be worn in the work area	4.8, 4.8.1, 4.8.2, 4.8.3, 4.8.4, 4.8.5
Procedures established to control site access	4.9
Decontamination procedures for personnel and equipment	4.9, 4.10
Site emergency procedures	4.11, 4.11.1, 4.11.2, 4.11.3
Emergency medical care procedures for injuries and toxicological problems	4.11.4, 4.11.5
Requirements for an environmental field monitoring program	4.12
Routine and special training requirements for responders	4.9.1.1, 4.13, 4.13.1, 4.13.2, 4.13.3, 4.13.4
Procedures for protecting workers from weather-related problems	4.14, 4.14.1, 4.14.2
Health and safety plan consistent with NIOSH, EPA, OSHA, approved Facility Contingency Plan, and State/local regulations and other EPA guidance	4.9, 4.9.1, 4.9.1.1, 4.9.1.2, 4.9.2, 4.9.3, 4.9.3.1, 4.9.3.2, 4.9.3.3, 4.9.3.4
<b>Task 4 Community Relations Plan</b>	5.0
Plan to disseminate information to the public regarding investigation activities and results	5.1, 5.2, 5.3, 5.4, 5.4.1, 5.4.2, 5.4.3, 5.4.4, 5.4.5, 5.4.6, 5.4.7, 5.5
<b>Task 5 Corrective Action Project Management Plan</b>	6.0
Discuss technical approach	6.1, 6.1.1, 6.1.1.1, 6.1.1.2, 6.2, 6.5, 6.5.1, 6.5.1.1, 6.5.1.2, 6.5.1.3, 6.5.1.4, 6.5.1.5, 6.5.1.6, 6.5.1.7, 6.5.1.8, 6.5.1.9, 6.5.1.10, Appendix A, Appendix B, Appendix E
Discuss Schedules	6.3, Appendix D
Discuss Budget	6.3
Discuss Key project personnel	6.4
Description of Key project personnel qualifications for those directing or performing the investigation	6.4.1, 6.4.2
Overall management approach to the investigation	6.6, 6.6.1, 6.6.1.1, 6.6.1.2, 6.6.1.3, 6.6.1.4, 6.6.1.5, 6.6.1.6, 6.6.1.7, 6.6.1.8, 6.6.1.9, 6.6.1.10, 6.7.1, 6.7.1.1, 6.7.1.2, 6.7.1.3, 6.7.1.4, 6.7.1.5, 6.7.1.6, 6.7.1.7, 6.8, 6.9, 6.10, 6.10.1, 6.10.2, 6.10.3, 6.10.4, Appendix A, Appendix B



Gandy Marley, Inc.

P.O. Box 827  
1109 East Broadway  
Tatum, New Mexico 88267

**DRAFT**  
**Facility Corrective Action Work Plan**  
**Triassic Park Site, New Mexico**  
**May 2003**

Prepared By:



**MWH**