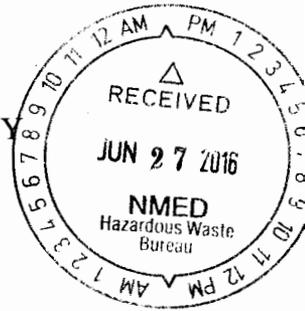




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



JUN 21 2016

Mr. Dave Cobrain
Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Review of the Resource Conservation and Recovery Act (RCRA) Draft Permit for Triassic Park Disposal Facility, EPA ID No. NM0001002484.

Dear Mr. Cobrain:

We have completed our review of the draft permit, dated April 8, 2016, for the facility referenced above. Enclosed is a copy of our review checklist, which includes: permit conditions; types of units; compliance schedules; financial assurance requirements; and consistency of data in RCRA Info. The purpose of this letter is to document our review process, while providing oversight for the hazardous waste permitting.

If you have any questions regarding this letter, please contact James Sales of my staff at (214) 665-6796.

Sincerely,

Kishor Fruitwala, Ph.D.
Chief, RCRA Permits Section
Multimedia Division

Enclosure

cc: Melissa Smith, 6MM-RS

Oversight Checklist for Operating/Post-Closure Permits

**Triassic Park Disposal Facility, EPA ID #NM0001002484,
Draft Permit Dated 4-8-16**

Performance Standards	Comments
1. Permit conditions are consistent with the authorized state program and the intent of the regulations regarding level of control, containment, cleanup or protection.	Permit language is consistent with the authorized state program.
2. Permit conditions are clear, understandable and enforceable.	Permit conditions are clearly divided into subject categories and permit language is understandable and enforceable.
3. Proper documentation and an administrative record are maintained.	Administrative Record and Fact Sheet will be prepared just before the draft permit Public Notice.
4. Post-closure care, monitoring and maintenance controls are provided.	Part 5 of the draft permit covers general Closure and Post-closure care requirements including monitoring and maintenance requirements. Specifics appear in various named Attachments.
5. Controls address: enforceability	Closure and post-closure care requirements are enforceable.
6. Controls address: compliance schedules.	Compliance schedules are included in Attachment P which addresses the specifics of post-closure care.
7. Controls address: soil and ground-water monitoring requirements.	Permit addresses post-closure care monitoring of the landfill in Attachment P, Section 1.2 in adequate detail.
8. Controls address: cleanup levels in adequate detail and mechanisms for measuring achievement of post-closure and operating performance standards.	Permit addresses post-closure care monitoring of the landfill in Attachment P, Section 1.2 in adequate detail including mechanisms for meeting post-closure operating performance standards.
9. Controls address: review of cost estimates and financial assurance instruments to assure they accurately reflect closure and post-closure costs and are sufficient to cover cost estimates. Also financial assurance for corrective action if included.	Financial assurance for closure and post-closure care are under Part 5.4 which require NMED approval in accordance with RCRA regulations. Specifics are presented in Attachments 02 and P1.
10. Public participation requirements are met.	The draft permit contains a public notice schedule that is required when the facility is preparing to being operation. NMED has prepared a public notice for the draft permit in English and Spanish which will be published Albuquerque, Roswell, and Carlsbad newspapers for the re-issuance of the draft permit.

Oversight Checklist for Operating/Post-Closure Permits

11. Describe the permitted units, including general information on capacity. Verify that all units described in the application are included in the permit.	The permit authorizes Phase 1A of the Landfill encompassing about 47 acres with 35 acres of fill area with a capacity of about 553,200 cubic yards. PCB remediation wastes are permitted at less than 50 ppm. There are no other ancillary units in this draft permit.
12. Describe the closed units including general information on post-closure requirements. Verify that all units described in the application are included in the permit.	Since this facility has not yet been built, there are no closed units.
13. Verify RCRA Info data is up to date	Triassic Park permit is not in the system. After permit is issued, it should be updated in RCRA Info.