Mark

Here is the chronology of events regarding an inconsistency in the permit as it stands today and a change that needs to be made in the final DAC permit that Zappe will issue.

Statistical sampling of thermally treated waste

A class 2 permit modification request was submitted to NMED in April of 2000 to statistically sample headspace gas from waste that was thermally treated. It applied to ALL summary category groups (debris, soils/gravels and homogenous solids).

This modification was approved by NMED on August 8, 2000. NMED changed the language in the final version to indicate that this modification would apply only to soils/gravels and homogenous solids. NMED was immediately contacted and several emails went back and forth during which time Steve Zappe agreed that this was a mistake on the part of NMED and suggested we submit a Class 1 to resolve the issue. A class 1 was submitted on September 18, 2000 to correct the language and was formally approved by NMED on August 31, 2001.

Changes were made to Section B1-1a to show that this modification applied to all waste types but a change was not made to Section B-3a(1)(ii). Therefore the permit has an inconsistency regarding the waste types to which this modification may be applied. We would like the following statement changed:

Section B-3a(1)(ii) Reduced Sampling Requirements for Thermally Treated Waste Streams

Headspace gas sampling of homogenous solid and soil/gravels wastes that have undergone high-temperature thermal process.....

This will resolve the current inconsistency.

DAC New Permit

Figure B1-1 has a decision box that is incorrect. The box should be revised as follows:

Select default packaging configuration for Scenario 3 (Table B1-8)