

Sept 22, 2016

 ENTERED

VanHorn, Kristen, NMENV

From: Kieling, John, NMENV
Sent: Friday, September 16, 2016 10:03 AM
To: VanHorn, Kristen, NMENV; Dhawan, Neelam, NMENV; Cobrain, Dave, NMENV
Subject: FW: Western Aeration Basin

twice AB Report letter to
fit int requirement for

How does Thursday afternoon next week look to meet with Katie on this?

interim status - Close Plan
Steps to take / what is the process closure
- define extent of contamination → see App W/MS letter
- revise WP
- happy to meet with you

From: VanHorn, Kristen, NMENV
Sent: Friday, September 9, 2016 9:43 AM
To: Roberts, Kathryn, NMENV
Cc: Kieling, John, NMENV; Dhawan, Neelam, NMENV
Subject: Western Aeration Basin

Katie-

In July, Western presented an interim measure for the Aeration Basin and we said we needed to think about their proposed method. Since then, I did some research and ended up contacting the EPA for guidance.

Remediating the Aeration Basin is more complicated than it first appeared.

To be able to conduct the proposed in situ treatment, Western must apply for a treatment permit. However, because Western's proposal for in situ treatment would leave the waste in place, the unit must be closed as a landfill and meet the requirements for a RCRA landfill (e.g., double liner, leak detection) and go through long term monitoring. Unfortunately, the Aeration Basin does not meet RCRA landfill requirements and is not located in an area that is suitable for a landfill, because the waste is and would be in contact with groundwater.

We believe that source removal rather than source stabilization will be most protective of human health and the environment. However, source removal adds another layer of complication, because of the presence of metals (specifically mercury and chromium) in the sludge the waste may not meet LDRs once it is removed from the Aeration Basin. Also, the waste contains listed waste (F037/038) which means that the waste must be disposed of in a permitted unit to accept listed waste and hazardous waste.

We worked to come up with some options for Western to close the Aeration Basin to meet RCRA regulations. Western can:

- 1) Remove the waste and affected soils from the unit and send the waste off-site for proper treatment and disposal.
- 2) Apply for a treatment permit, remove the waste and affected soils for on-site treatment and then:
 - a) Send the treated waste off-site for disposal at a RCRA-permitted facility; or
 - b) Permit and construct a CAMU that meets the requirements of 40 CFR 264.552(e) for on-site disposal; or
 - c) Permit and construct a hazardous Waste landfill that meets the requirements of 40 CFR 264 subpart N for on-site disposal.

Also, because Western has not determined the vertical extent of soil contamination in the unit, they must conduct confirmation sampling after removal of the waste and affected soils before filling in the excavation.

Please let me know if you have any questions.

Thank you,

Kristen

2025-01-14 10:00 AM
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