Regulatory History

- RCRA Facility Investigations (Phases 1 and 2) conducted early to mid 1990’s
- Corrective Measures Study (CMS) Report with recommended final remedy submitted May 2003
- Public Hearing on CMS December 2004
- NMED issues Final Order May 2005 (with Permit Modification) requiring:
  - Cover (with biointrusion barrier) and monitoring
  - Corrective Measures Implementation (CMI) Plan
  - CMI Report
  - Long-Term Monitoring and Maintenance Plan (LTMMP)
  - 5-Year Reevaluation Reports
Regulatory History

- CMI Plan submitted November 2005, and approved December 2008
  - Cover installed 2009
- CMI Report submitted January 2010, and approved October 14, 2011
- LTMMP submitted March 2012
  - 60-day comment period ongoing September 14 - November 13, 2012
  - Public meeting held October 16, 2012
  - The Public Comment Period was Extended to February 11, 2013
What’s Next for the MWL?

- NMED will approve or approve with modifications LTMMP after consideration of public comment
- SNL will then submit a Permit Modification Request for Corrective Action Complete with Controls
  - Controls include monitoring of environmental media, maintenance, institutional and physical controls
  - LTMMP documents the controls to be implemented
Enforcement of the LTMMP

- The LTMMP will become part of SNL’s Hazardous Waste Permit
- Thus, it will become enforceable under the Permit
- This regulatory mechanism found in draft SNL Permit (which is also currently subject to public comment, see draft Permit Section 8.7.1).
- Public comment on draft Permit ends February 14, 2013.
NMED Contact Information

- John Kieling, Chief, Hazardous Waste Bureau
  - 505.476.6000
  - john.kieling@state.nm.us

- William Moats, ABQ Group Manager, Permits Management Program, Hazardous Waste Bureau
  - 505.222.9551
  - william.moats@state.nm.us

- LTMMP found at: