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**COMMENTS ON STATE OF NEW MEXICO OCD
NEW RULES GOVERNING SURFACE WASTE
MANAGEMENT**

Gary Kolbasuk
Raven Industries, Inc.

19.15.2.53.F.3.(b) LANDFILL DESIGN SPECIFICATIONS (lower geomembrane)

Current Wording:

“The lower geomembrane liner shall consist of a 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner approved by the division.”

Recommended Wording:

“The lower geomembrane liner shall consist of a 30-mil LLDPE liner, a 30-mil flexible PVC, a 60 mil HDPE liner, or an equivalent liner approved by the division.”

Reason:

30 mil LLDPE has been proven to outperform 30-mil PVC as a liner and should not be excluded from being listed as a pre-approved option.

19.15.2.53.F.3.(d) LANDFILL DESIGN SPECIFICATIONS (upper geomembrane)

Current Wording:

“The upper geomembrane liner shall be placed over the leak detection system and shall consist of a 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner approved by the division.”

Recommended Wording:

“The upper geomembrane liner shall be placed over the leak detection system and shall consist of a 30-mil LLDPE liner, a 30-mil flexible PVC, a 60 mil HDPE liner, or an equivalent liner approved by the division.”

Reason:

30 mil LLDPE has been proven to outperform 30-mil PVC as a liner and should not be excluded from being listed as a pre-approved option.

19.15.2.53.F.3.(h) & LANDFILL DESIGN SPECIFICATIONS (top landfill cover design)

Current Wording:

“The top landfill cover design shall consist of the following layers (top to bottom): a soil erosion layer composed of fertile topsoil (at least 6 inches) re-vegetated in accordance with the post closure provisions of Paragraph (1) of Subsection J of 19.15.2.53 NMAC; a protection or frost protection layer composed of native soil (12 to 30 inches), a drainage layer composed of sand or gravel (at least 12 inches) with a saturated hydraulic conductivity of 1×10^{-2} cm/sec or greater and a minimum bottom slope of four percent, a hydraulic barrier-layer- geomembrane (minimum 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner approved by the division), and a gas vent or foundation layer composed of sand or gravel (at least twelve inches) above waste with soils compacted to the minimum eighty percent Standard Proctor Density.”

Recommended Wording:

“The top landfill cover design shall consist of the following layers (top to bottom): a soil erosion layer composed of fertile topsoil (at least 6 inches) re-vegetated in accordance with the post closure provisions of Paragraph (1) of Subsection J of 19.15.2.53 NMAC; a protection or frost protection layer composed of native soil (12 to 30 inches), a drainage layer composed of sand or gravel (at least 12 inches) with a saturated hydraulic conductivity of 1×10^{-2} cm/sec or greater and a minimum bottom slope of four percent, a hydraulic barrier-layer- geomembrane (**minimum 30-mil LLDPE, 30-mil flexible PVC, 60-mil HDPE liner, or an equivalent liner approved by the division.** and a gas vent or foundation layer composed of sand or gravel (at least twelve inches) above waste with soils compacted to the minimum eighty percent Standard Proctor Density.”

Reason:

30 mil LLDPE has been proven to outperform 30-mil PVC as a cover and should not be excluded from being listed as a pre-approved option.

19.15.2.53.F.4.(a) (i) GEOMEMBRANE LINER SPECIFICATIONS

Current Wording:

“Geomembrane liner specifications. Geomembrane liners shall consist of a 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner approved by the division. All geomembrane liners shall have a hydraulic conductivity no greater than 1×10^{-9} cm/sec. Geomembrane liners shall be composed of impervious, geosynthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. Liners shall also be resistant to ultraviolet light, or provisions shall be made to protect the material from sunlight. Liner compatibility shall comply with EPA SW-846 Method 9090A.”

Recommended Wording:

“Geomembrane liner specifications. **Geomembrane liners shall consist of a 30-mil LLDPE, 30-mil flexible PVC, 60-mil HDPE liner, or an equivalent liner approved by the division.** All geomembrane liners shall have a hydraulic conductivity no greater than 1×10^{-9} cm/sec. Geomembrane liners shall be composed of impervious, geosynthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions.

Liners shall also be resistant to ultraviolet light, or provisions shall be made to protect the material from sunlight. Liner compatibility shall comply with EPA SW-846 Method 9090A.”

Reason:

30 mil LLDPE has emphatically been proven to outperform 30-mil PVC as a liner and should not be excluded from being listed as a pre-approved option.

19.15.2.53.I.2.(c) LINER SPECIFICATIONS

Current Wording:

“Liner specifications. All liners shall consist of a 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner approved by the division. Synthetic (geomembrane) liners shall have a hydraulic conductivity no greater than 1×10^{-9} centimeters per second. Geomembrane liners shall be composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. Liner materials shall be resistant to ultraviolet light, or provisions shall be made to protect the material from sunlight. Liner compatibility shall comply with United States Environmental Protection Agency SW-846 Method 9090A.”

Recommended Wording:

“Liner specifications. **All liners shall consist of a 30-mil LLDPE, 30-mil flexible PVC, 60-mil HDPE liner, or an equivalent liner approved by the division.** Synthetic (geomembrane) liners shall have a hydraulic conductivity no greater than 1×10^{-9} centimeters per second. Geomembrane liners shall be composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. Liner materials shall be resistant to ultraviolet light, or provisions shall be made to protect the material from sunlight. Liner compatibility shall comply with United States Environmental Protection Agency SW-846 Method 9090A.”

Reason:

30 mil LLDPE has emphatically been proven to outperform 30-mil PVC as a liner and should not be excluded from being listed as a pre-approved option.

Gary Kolbasuk

605-335-0174

Gary.Kolbasuk@RavenInd.com