

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Solid Waste Bureau

1190 Saint Francis Drive, Room N-2150

P.O. Box 5469

Santa Fe, New Mexico 87502-5469

Telephone: (505) 827-0197 Facsimile: (505) 827-2902

www.env.nm.gov/swb/



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

September 12, 2018

Ms. Shirlene Sitton, Environmental Services Director
City of Santa Fe
1142 Siler Road, Building A
Santa Fe, New Mexico 87507

Re: Paseo de Vista Landfill Methane Remediation Plan

Dear Ms. Sitton:

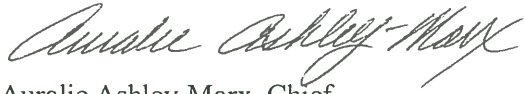
The Solid Waste Bureau (Bureau) has reviewed the 2018 Methane Remediation Plan (Plan) for the closed Paseo de Vista Landfill (Landfill), received on August 20, 2018. The Plan included four action items to be performed at the Landfill: additional methane monitoring after events with precipitation greater or equal to 0.25 inches; installation of a meteorological station to measure temperature, precipitation, wind speed, and wind direction at the Landfill; installation of passive gas vents at the Landfill; and installation of settlement benchmarks. The last three action items are to be completed within 12 months of Plan approval.

While the Plan states installation of the passive gas vents will occur within 12 months after completion of the six additional methane monitoring events, which will occur only after precipitation events of 0.25 inches or greater, the Bureau requests that passive vents be installed expeditiously to address elevated methane conditions that have been observed at the Landfill since 2016. Please revise the Plan to propose the installation of at least four passive vents along the eastern boundary of the Landfill where elevated methane concentrations have been detected, and revise the schedule to indicate that these passive vents will be installed within 60 days of Plan approval. Provide a site map showing the proposed passive vent locations. Please be aware that the requested passive vent installation represents an initial phase of remediation at the Landfill; the Bureau may request the installation of additional passive vents or other remedial actions based on future methane monitoring results from the Landfill.

Additionally, during installation of passive vents, the Plan proposes the annular space between the perforated PVC casing and the borehole wall will be filled with pea gravel, and the annular space between the solid PVC riser casing and the borehole wall from the top of waste to the ground surface will be backfilled with "auger spoils." The Bureau proposes the placement of a two-foot thick annular seal, composed of bentonite pellets or chips and hydrated with a minimal amount of water, immediately above the pea gravel. The remaining annular space above the bentonite seal may be filled with auger spoils.

Please revise the Plan to address the passive vent installation proposal and placement of annular seals during construction of passive vents as described above. The Bureau is prepared to approve the Plan if the City of Santa Fe concurs with these revisions. Please feel free to contact me at (505) 827-2775, or by e-mail at auralie.ashley-marx@state.nm.us, if you have any questions or require additional information.

Sincerely,



Auralie Ashley-Marx, Chief
NMED-Solid Waste Bureau

AAM/jrd

cc: Matt Somogyi, Golder Associates, 5200 Pasadena Blvd. NE, Suite C, Albuquerque, NM 87113
Cameron Beul, 44 Union Boulevard, Suite 300 Lakewood, CO, 80228
Michael Crepeau, P.E., Gordon /PSC, 333 Rio Rancho Blvd. NE, Suite 400, Rio Rancho, NM 87124
George Schuman, Permit Section Manager, NMED-Solid Waste Bureau
Chuck Akeley, Enforcement Section Manager, NMED-Solid Waste Bureau
Paseo de Vista Landfill Methane Monitoring Facility File
Auralie Ashley-Marx Reading File
James Dyer Reading File

New Mexico Environment Department
Solid Waste Bureau
P.O. Box 5469
1190 St. Francis Dr.
Santa Fe, NM 87502-5469

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Matt Somogyi
Golder Associates
5200 Pasadena NE Ste. C
Albuquerque, NM 87113

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