



**Certified Mail – Return Receipt Requested No. 7020 3160 0000 0515 4468**

August 29, 2023

Ravi Bhasker  
Mayor, City of Socorro  
P.O. Box K  
Socorro, New Mexico 87801

**Re: Notice of Inspection – City of Socorro Landfill**

Dear Mayor Ravi Bhasker,

On July 6, 2023, Ken R. Churan and Daniel R. Galasso, Enforcement Officers, Solid Waste Bureau (“SWB”), New Mexico Environment Department (“NMED”), inspected the City of Socorro Landfill to determine compliance with the New Mexico Solid Waste Rules (“SWR”), 20.9.2 – 20.9.10 NMAC, and the New Mexico Recycling, Illegal Dumping and Scrap Tire Management Rule (“RIDSTMR”), 20.9.20 NMAC. The following violations were observed:

1. **Failure to control litter** – The inspection documented excessive litter at the landfill due to limited cover on top of the upper portion of the active cells. Excessive wind-blown litter was evident along the fence line east of the active tipping face, which is downslope of the upper limited cover portion of the active landfill. It is apparent that more daily cover is needed at the landfill to limit the movement of wind-blown waste at the facility.

The SWR, 20.9.5.8.A(2) NMAC, states that owners and operators of each solid waste facility shall “control and mitigate odor and litter.” The SWR, 20.9.5.9.L NMAC, further states that all municipal and special waste landfill owners and operators shall “control litter, disease vectors, dust and odors.”

2. **Failure to provide adequate daily cover** – The inspection documented limited daily cover (less than a six-inch layer of earth) located on the active portion of the landfill, located directly above the active tipping face.

The SWR, 20.9.5.9.N NMAC, states that all municipal and special waste landfill owners and operators shall “cover the active face with a six-inch layer of earth or specifically approved alternate daily cover at the conclusion of each day’s operation or more often as conditions may dictate...”

3. **Failure to provide adequate intermediate cover** – The inspection documented limited intermediate cover (less than one foot thick) located on the active portion of the landfill, located in a large area directly above the active tipping face.

The SWR, 20.9.5.9.O(1)&(2) NMAC, states that all municipal and special waste landfill owners and operators shall provide intermediate cover which shall be “at least one foot thick, or other specifically approved thickness [and] placed on all areas of a landfill that have not received waste for 60 days or longer, or have not reached final elevation.”

4. **Failure to control the scrap tire pile size** – The inspection documented a scrap tire pile which exceeded the regulatory dimensions allowable by the SWR and did not maintain a minimum separation with other scrap tire piles in the area.

The RIDSTMR, 20.9.20.37.D NMAC, states that scrap tire piles or stacks of tire bales shall be no greater than 10 feet in height, nor shall the pile or stack be more than 50 feet wide by 100 feet long. The RIDSTMR, 20.9.20.37.E NMAC, further states that there shall be a minimum separation of 40 feet between outdoor scrap tire piles, bale stacks, and other stored materials, designated as a fire lane that totally encircles the tire piles. In addition, the RIDSTMR, 20.9.20.37.G NMAC, states that when there are more than three (3) outdoor storage piles of scrap tires or scrap tire bales that are 10 feet high by 50 feet wide by 100 feet long, the separation between the groups shall be at least 75 feet wide.

5. **Failure to properly complete a scrap tire manifest** – The inspection documented a scrap tire manifest that was missing the required name and contact information. According to the facility staff, the manifest form was completed by a new employee. The facility staff indicated that the new employee will be reminded and trained to completely fill out the manifest forms in the future.

The RIDSTMR, 20.9.20.50.A(1) NMAC, states that the manifest form shall include “the name, physical address, mailing address and telephone number of the generator.”

The NMED is seeking your voluntary cooperation in the immediate correction of these violations. Please assure that corrective action has been taken by October 14, 2023, as indicated upon the Solid Waste Facility Inspection Report (“SWFIR”). The failure to assure corrective action or continued non-compliance may result in additional enforcement action.

If you have any questions, please call me at (505) 699-7224. You may also contact Daniel R. Galasso, Enforcement Coordinator, Solid Waste Bureau, at (505) 795-1232 or [daniel.galasso@env.nm.gov](mailto:daniel.galasso@env.nm.gov).

Sincerely,

Ken R. Churan  
Enforcement Officer  
Solid Waste Bureau

Enclosure – Copy of SWFIR

KRC:drg:krc

cc: Rick Shean, Director, Resource Protection Division and Acting Chief, Solid Waste Bureau  
*[via electronic mail]*  
Daniel R. Galasso, Enforcement Coordinator, Solid Waste Bureau *[via electronic mail]*