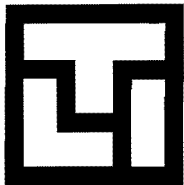


General



300 UNION BOULEVARD, SUITE 600, LAKEWOOD, CO 80228

PHONE: (303) 763-7188

FAX: (303) 763-4896

TECHLAW INC.

July 2, 2001



Mr. James Bearzi
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building I
Santa Fe, New Mexico 87505-6303

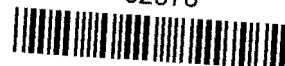
Reference: Work Assignment No. Y513, 06082.700; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Administrative Record Assistance, Los Alamos National Laboratories; Draft Work Plan

Dear Mr. Bearzi:

Enclosed please find the Work Plan for the above-referenced work assignment. The Work Plan is based on a discussion between Mr. Carl Will and Mr. John Young of the NMED staff and myself on June 19, 2001. This Work Plan incorporates information discussed during that conversation. The Work Plan has been drafted to provide Mr. Will and Mr. Young with maximum flexibility and includes lower level technical staff and administrative staff members who will be utilized to compile the administrative record for the LANL permit. Mr. Wally O'Rear has been selected as the Work Assignment Manager.

This project will require travel to Santa Fe and to the EPA Region 6 office. Personnel have been selected out of the TechLaw Dallas office in order to provide a cost effective solution to travel cost.

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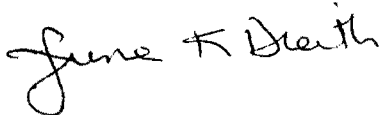
Mr. James Bearzi

July 2, 2001

Page 2

If you have any questions, please feel free to contact me at (303) 763-7188.

Sincerely,

A handwritten signature in black ink, reading "June K. Dreith". The signature is written in a cursive style with a large, stylized "J" and "D".

June K. Dreith
Project Manager

Enclosure

cc: ✓ Mr. John Kieling, NMED
Mr. Carl Will, NMED
Mr. John Young, NMED
Mr. Wally O'Rear, TechLaw
Mr. B. Jordan, TechLaw Central Files
D. Romero, Denver TechLaw Files

PROPOSED WORK PLAN

**Administrative Record Assistance
Los Alamos National Laboratories (LANL)**

Submitted by:

**TechLaw, Inc.
300 Union Boulevard, Suite 600
Lakewood, CO 80228**

Submitted to:

**Mr. Carl Will
Mr. John Young
Mr. James P. Bearzi
State of New Mexico Environment Department
Hazardous and Radioactive Material Bureau
P. O. Box 26110
2044 Galisteo
Santa Fe, New Mexico 87502**

In response to:

Work Assignment No. Y513, 06082.700

WORK TO BE PERFORMED

- (1) Provide management oversight of the project, which will include availability of the TechLaw Program Manager and TechLaw Work Assignment Manager to NMED. Conference calls, project tracking, and monthly reports are included in this task.
- (2) Prior to beginning the inventory of Region 6 EPA files on LANL, NMED will provide TechLaw copies of the information they have in their database system on LANL. This will save inventory time since redundant files will not have to be inventoried. TechLaw will enter relevant EPA files into the software program or a compatible program, which will be able to transfer data into NMED system. If necessary, TechLaw will obtain the NMEDs database software, at cost to NMED.

Inventory Region 6 EPA LANL files for records that should be contained in the administrative files. Special emphasis should be given to RCRA Permitting files prior to 1985 and HSWA files prior to 1996. Files include correspondence and documents such as Part A Applications, Closure Plans, and RFI Reports, Notice of Deficiencies, etc. Discussion with Dallas TechLaw staff indicates a very limited database for the RCRA files is available. Therefore, much of the inventory work will require a file search. Document all relevant files.

The file inventory will focus on several technical areas (TA) that are permitted by NMED including but not limited to, TAs 3, 14, 15, 16, 36, 39, 50, 54 and 55. However NMED has indicated that there may be other areas of potential concern such as additional closure plans not associated with the TAs mentioned above. These other potential areas of concern will be developed as part of a list, discussed below.

During the inventory phase, TechLaw will input data on the database system. Fields to be input into the data system will be finalized by TechLaw prior to the initial inventory process, but we will include such fields as: Title of Document, Operable Unit, Date Document was Received, PRS # (NMED specific number), Agency Generating the Document. A "screening" list will be developed by NMED and the NMED attorneys which provide TechLaw employees conducting the file search at EPA a general category list of topics and correspondence which should be inventoried from the EPA files. This listing is necessary since lower level staff will be utilized during the file search.

If deemed necessary by NMED, the inventory activities may include comparison of the EPA and NMED files with the LANL database to ensure completeness.

- (3) Inventory NMED RCRA files. This may require that TechLaw personnel check files, boxes in the library (since the library has not been entirely unpacked due to the recent move), employee working files, and archived files. The database system should be evaluated first to determine relevant files. TechLaw employees will document all relevant files.
- (4) A comparison between the NMED files and EPA files will be conducted. Files that are located at NMED will be removed from the list of files needed to be copied at EPA. This task will require that NMED, an NMED attorney, and TechLaw determine which files contained in the inventory list should be copied.
- (5) TechLaw will copy relevant EPA files. There are two options here. The most desirable is to have NMED contact their EPA liaison and have TechLaw obtain the authority to check files out of the Record Center, and then return the file within a few days. Under the scenario, EPA may limit the number of files that can be checked out. Therefore it may take several trips. Files will be copied at the TechLaw office. The other options are to be able to have TechLaw copy the files at EPA. We will either need to have a copy machine and bring it to the EPA office, or allow TechLaw access to the EPA copy machine. NMED and EPA should determine which option is most desirable and least disruptive to EPA. Copied files will be inventoried, organized, and shipped directly to NMED.
- (6) TechLaw at the Santa Fe office will merge the existing database and files with the more complete database as well as the missing EPA files and NMED files, organize the files in a logical sequence and file the materials in the library. This will require that NMED determine the location in the library that they would like to have the files and set aside the space. TechLaw will work closely with the NMED library staff to ensure that the library filing and inventory system presently used by NMED is followed.
- (7) Participation in Meetings and Conference Calls - Communication is of the utmost importance to the timely completion of this project. Therefore, it is expected conference calls between NMED and TechLaw will be necessary.
- (8) Quality control - Perform QC on all deliverables.

SUBCONTRACT

No subcontractors are associated with this project.

PRIMARY INTENDED USE

The purpose of this work assignment is to provide technical support to the NMED for the LANL RCRA permitting and corrective action order activities. TechLaw will provide information to assist NMED in making decisions relative to the adequacy of information presented and provide assistance in determining any deficiencies. The NMED will make the final determinations.

PROJECTS AND TASKS

- Task 2 - Inventory EPA files.
- Task 3 - Inventory NMED files.
- Task 4 - Compare the information contained in the two files to determine which files should be copied.
- Task 5 - Copy relevant EPA and NMED files.
- Task 6 - Organize administrative record, establish record in NMED library, and input data into the NMED database.
- Task 7 - Participate in meetings and conference calls.
- Task 8 - Perform quality control review on draft deliverable.
- Task 9 - Provide management oversight for the project, which will include availability of TechLaw Program Manager and TechLaw Project Manager to NMED. Conference calls, project tracking and performance evaluation, and monthly reports are included in this task.

PROGRESS REPORTS

Information regarding the status of this project will be included in monthly progress reports prepared by TechLaw, Inc. The reports will be a brief summary of project status, to include:

- Work completed to date,
- Difficulties encountered and remedial action taken,

- Anticipated activity during the subsequent reporting period,
- Funding status, and
- Issues/topics that have arisen.

QUALITY CONTROL PLAN

The TechLaw Project Manager will review all deliverables prior to provision to the NMED to ensure product quality. In addition, each deliverable will undergo independent QA/QC so that the highest quality deliverable is provided to NMED. The Project Manager will also conduct milestone checks on each task outlined in the SOW and all other activities to ensure that the project is proceeding as scheduled. The Project Manager will be in constant communication with NMED to ensure task accomplishment.

STAFFING AND MANAGEMENT

Ms. June Dreith will serve as the TechLaw Program Director. Ms. June Dreith is an environmental specialist with 20 years professional experience, including management of permits and other projects.

Mr. Wally O'Rear has managed a \$1.2 million Superfund File room Reorganization Work Assignment for EPA Region 6, which included the reorganization of over 4,000 linear feet of files. The reorganization effort included the management of dBase software for the site files and indexing the NPL site documents using INMAGIC. Created a custom output design using INMAGIC. Managed the procurement of microfilming services for No Further Remedial Action Required (NFRAP) files (over 2,500 files). Mr. O'Rear managed the implementation for the indexing of RCRA Administrative Records (AR) for three corrective action sites for EPA Region 6. The sites included Sparton, Pantex and Formosa. The effort included setting up the dBase IV database and indexing forms along with the output. The effort also included converting the dBase files to an Access database. The output was scanned using OCR and placed on CDs for easier access.

Ms. Tami Engle is an environmental scientist with approximately two years of experience. Ms. Engle has updated databases designed for GIS capabilities for two sites located in California as well as entering sampling data into various databases designed for inspection for EPA. Ms. Engle has also participated on the EPA Enforcement Support Services (ESS) contract. The tasks included assisting with the Superfund Administrative Records (AR) and also with Potential Responsible Party (PRP) mailing databases. While assisting with the AR, Ms. Engle conducted research, editing, and coding for the AR databases (SDMS, ARIS, and CIA).

Mr. Cedric Cascio served as a project manager, team leader, and team member on environmental projects for ten years. He has a wide variety of experience, education, and training in (1) project management, (2) team coordination, (3) environmental regulations, (4) hazardous waste investigation and assessment, and (5) environmental hazard priority evaluation. Mr. Cascio has performed RCRA facility assessments and corrective action evaluations in Texas, Arkansas, and Louisiana (served as liaison between EPA and state regulatory agencies). He has performed CERCLA Remedial Investigations in Louisiana and Texas. He also performed EPA and state assessments under the EPA Superfund program. Mr. Cascio completed due diligence activities (Phase I ESAs) for U.S. Government Services Administration at (1) future border station site in Eagle Pass, Texas, and (2) future federal building complex in Oklahoma City, Oklahoma.

Ms. Delores Romero is the Administrative Assistant for the Denver office and has over 20 years experience in project assistance and administrative and clerical responsibilities. She will be involved in the Denver office files but may be called upon to provide support in Dallas.

Clerical Assistance/Data Input (Dallas)

This individual, or individuals, have as of yet to be identified. The tasks associated with the person will be clerical support such as assistance in copying, organization, and boxing of materials, as well as possible data input into the database system, under the TechLaw WAM.

Individual staff responsibilities are shown in Attachment I, and hourly allocations are shown in Attachment II.

PERFORMANCE SCHEDULE

TechLaw shall complete the tasks in accordance with a schedule agreed upon with NMED. TechLaw is aware of the need by NMED to expedite the schedule and will work in a timely fashion and meet the schedules agreed upon. Work on the tasks will not occur until NMED agrees to the costs related to the specific task assignments, the schedule, and final written approval from NMED is received. NMED is aware that delay in the approval of cost may impact the final schedule provided. It is expected that much of the work will occur in the next two months.

COST ESTIMATE

The estimated cost for completing project tasks scheduled to date is included as Attachment III.

ATTACHMENT I

STAFF RESPONSIBILITY CHART

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
J. Dreith	Project Manager	General program oversight, monitoring of project planning and implementation, including performance of activities. Program management including tracking financial activities.
W. O'Rear	Work Assignment Manager	Overall project management including day-to-day management of project progress, project tracking, liaison to State, including performance of activities. Mr. O'Rear will also be actively involved in determining documents to be placed in administrative record and the database system. Provide working support as necessary.
T. Engle	Staff	Review file material and determine which documents, correspondence, plans (closure/post-closure, permits, etc.) must be contained in the administrative records. Input data into the database system, and provide support organizing, copying, and transporting files to NMED. Provide on-site support to NMED to set up and organize the files at NMED.
C. Cascio	Staff	Review file material and determine which documents, correspondence, plans (closure/post-closure, permits, etc.) must be contained in the administrative records. Input data into the database system, and provide support organizing, copying, and transporting files to NMED. Provide on-site support to NMED to set up and organize the files at NMED.
Clerical/Data Input (Dallas)	Clerical	Assist (Dallas) in copying files, organizing files, and data input.

ATTACHMENT II

STAFFING HOURLY ALLOCATIONS

<u>Name</u>	<u>01</u>	<u>02</u>	<u>03</u>	<u>04</u>	<u>05</u>	<u>06</u>	<u>07</u>	<u>08</u>	<u>TOTAL</u>
<u>Project Manager</u>									
J. Dreith	20						20		40
<u>Work Assignment Manager</u>									
W. O'Rear	8	16	20	24	32	12	12	24	148
<u>Staff</u>									
T. Engle		40	60	16	100	60			276
C. Cascio		40	40	16	100	40			236
<u>Subcontract</u>									
None									
<u>Clerical Staff</u>									
D. Romero									
Clerical/ Administrative Review	10	6	6	0	6	6			34
Clerical Staff/Dallas		24			32				56
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						-	-	-	
TOTAL	38	126	126	56	270	118	32	24	790

ATTACHMENT III

COST ESTIMATE

Name	P-Level	Hours	Cost			
J. Dreith	P-4	40.0	\$ 3,778.00			
W. O'Rear	P-3	148.0	9,474.96			
T. Engle	P-1	276.0	9,974.64			
C. Cascio	P-2	236.0	9,732.64			
Clerical	Clerical	56.0	2,261.28			
D. Romero	Clerical	34.0	1,372.92			
Total Labor		790.0	\$36,594.44			
Other Direct Costs:						
Reproduction	Copies 15,000	\$0.06	\$ 900.00			
Telephone	Minutes 180	0.23	41.40			
Computer	DL hours 790	0.99	782.10			
Postage/Shipping	Lbs. 100	3.99	399.00			
Total Other Direct Costs			\$2,122.50			
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking	Total
Dallas – Santa Fe (2 trips, 2 persons)	\$1,530*	\$1,170*	\$690*	\$450*	\$120*	\$3,960*
Total Travel Costs	\$1,530*	\$1,170*	\$690*	\$450*	\$120*	\$3,960*
Total Estimated Costs including Fee						\$42,676.94

* Based on two trips