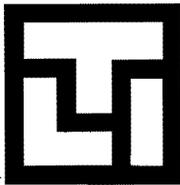


General



560 GOLDEN RIDGE ROAD, SUITE 130, GOLDEN, CO 80401

**TECHLAW INC.**

PHONE: (303) 763-7188  
FAX: (303) 763-4896

July 22, 2003

Ms. Sandra Martin  
State of New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, New Mexico 87505-6303



Reference: Work Assignment No. 06110.150; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Research and Permitting Support for the Los Alamos National Laboratory; Work Plan

Dear Ms. Martin:

Enclosed please find the new Work Plan for the assistance to the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) in providing research and RCRA permitting assistance. The Work Plan is based on discussions between Mr. David Cobrain of NMED and Ms. June Dreith of TechLaw on June 12, 2003. The Work Plan addresses both technical and research support. Due to the complexity of the tasks involved, tasks have been separated into major categories. In addition, the tasks have been written very broadly to provide both technical and research staff maximum flexibility.

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

Sincerely,

June K. Dreith  
Project Manager

cc: Mr. Carl Will, NMED, HWB  
Ms. Cindy Abeyta, NMED, HWB  
Mr. David Cobrain, NMED, HWB

Mr. Gary Walvatne, TechLaw  
Ms. Paige Walton, TechLaw



**WORK PLAN**

**PERMITTING SUPPORT FOR LANL**

**Submitted by:**

**TechLaw, Inc.  
560 Golden Ridge Road, Suite 130  
Golden, CO 80401**

**Submitted to:**

**Ms. Sandra Martin  
and  
Mr. David Cobrain  
State of New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, New Mexico 87505**

**In response to:**

**Work Assignment No. 06110.150**

**July 2003**

**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) Provide technical support for various technical areas at LANL. The support under this task will include drafting the permit, drafting specific permit conditions, providing QC regarding the permit conditions, or drafting and evaluating permit attachments. In addition, TechLaw will assist in the evaluation of any closure or post-closure plans or permit conditions, as directed by NMED.
- (3) Assist NMED in drafting and evaluation the Corrective Action Module of the permit, including any attachments. Assist in ensuring that the draft permit and Corrective Action order are consistent.
- (4) Evaluate other technical documents associated with the LANL site which is not included in the above tasks. This may include, but is not limited to, air modeling reports, groundwater monitoring plans, waste analysis plans, SWMU reports, etc. Draft comments on the reports as directed by NMED.
- (5) Participate in public meetings, public hearings as directed by NMED, provide expert witnesses for the meetings and hearings. Assist NMED in permitting support such as prepare fact sheets, public notices, public informational materials as requested.
- (6) Provide permitting support for the waste treatment vitrification unit. Evaluate the permit application, provide comments to NMED. Assist NMED in determining a performance criteria for the unit. Provide oversight in any performance tests or performance burns, or pilot studies which may be performed. Evaluate facilities response to NOD comments. Assist NMED in drafting permit conditions as directed.

TechLaw intends to assign several highly qualified staff to perform these tasks. Since part of this project is time sensitive, a larger number of personnel have been assigned to perform the work assignment than would normally be used. In doing so, TechLaw can accomplish a quick turn-around without sacrificing product quality. Highly qualified staff familiar with RCRA permitting or familiar with the legal issues will assist NMED. As part of the technical review, technical staff will require some time to come-up to speed and become familiar with the facility.

The TechLaw Program Manager, Ms. June Dreith, will maintain communication with Mr. David Cobrain, of NMED regarding the progress of activities and any unanticipated conditions encountered that will change the schedule, scope of work, or the estimated cost to complete this project.

## **SUBCONTRACT**

NONE

## **PRIMARY INTENDED USE**

The purpose of this work assignment is to provide technical support to the NMED HWB in their preparation of the RCRA permit renewal for the LANL. The NMED will make all final determinations regarding the permit.

## **PROJECTS AND TASKS**

**Task 01** Provide management oversight for the project, which will include availability of the TechLaw Program Manager and TechLaw Project Manager to NMED. Conference calls, project tracking and performance evaluation, and monthly reports are included in this task

**Task 02** Provide technical assistance in drafting permit conditions, QC of draft conditions and evaluate attachments. Assist in the evaluation of closure or post-closure plan.

**Task 03** Assist NMED in Corrective Action module of the permit.

**Task 04** Evaluate other technical documents as directed by NMED.

**Task 05** Participate in public meetings, conference calls, public hearings. Provide expert witnesses. Assist in drafting fact sheets, public notices, public announcements as directed by NMED.

**Task 06** Provide permit support for the waste vitrification unit.

## **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 providing the deliverable. 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 is the TechLaw Program Manager/Work Assignment Manager for the State of New Mexico general permit support contract. Ms. Dreith is an environmental specialist with 20 years professional experience, including management of permit applications reviews and other projects.

Ms. Paige Walton will serve as the Assistant Work Assignment Manager and as Technical Lead. Ms. Walton is an environmental scientist with over nine years experience in risk/dose assessments, RCRA corrective action, permitting, geology/hydrology and radiological decontamination and decommissioning. Ms. Walton is well qualified to provide technical assistance to the NMED HWB.

Mr. Gary Walvatne is a geologist and will serve as the other technical lead for this project. Mr. Walvatne has over 20 years experience in RCRA corrective action, permitting and RCRA remediation.

Mr. Jim Ashworth is a geologist/hydrogeologist with extensive experience in reviewing the geologic and hydrogeologic sections of RFIs, Corrective Measure Studies, Corrective Measures Implementations and Part B permits.

Mr. Michael Smith is an environmental engineer and researcher with over 19 years of experience. He has worked with both corrective action issues and RCRA permitting requirements in the permitting area.

Ms. Connie Walker is a geologist with over 18 years experience. She has managed and performed numerous projects including evaluation of groundwater monitoring systems, waste analysis plan, reviews and waste characterization.

Mr. Steve Druschel is a registered professional engineer in 5 states including New Mexico, and has over 20 years experience. He is specialized in many assets of RCRA including engineering designing, landfill construction, and has heavily been involved in subpart AA/BB and CC.

Ms. Helen Sellers has conducted numerous technical and completeness part B reviews of RCRA permit applications and has been involved in drafting part B permits for regulatory agencies.

Ms. Jennifer Leeson is an environmental health scientist with 4 years experience in reviewing part B permit applications and over-viewing RFI and performing RFA.

Mr. Bert O'Connell, P.E. is a civil engineer with extensive practical experience in incinerators, BIF units and vitrification units.

Mr. Nandar Khurd is an environmental engineer with experience with fate and transport codes, air dispersion modeling, and has expertise in human health risk assessment.

Mr. Rob Young is a hydrogeologist with extensive experience in evaluating hydrology, corrective action and corrective action monitoring. He has reviewed RCRA RFIs, Corrective Measure Studies and Corrective Measures Implementation Plans.

Ms. Christi Olin is an Administrative Assistant in the Denver office and has over 15 years experience in project assistance and administrative and clerical responsibilities.

Ms. Susan Pearson is the Administrative Assistant for the Denver office and has over 10 years experience in project assistance and administrative and clerical responsibilities.

Individual staff responsibilities are shown in Attachment I, and hourly allocations are shown in Attachment II. The hourly staffing allocations are based upon a worst-case scenario, as the actual amounts of documentation required for review is unclear at this time.

## **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. TechLaw has received verbal approval on this project.

The estimated cost for completing project tasks scheduled to date is included as Attachment III. Travel is included in this Work Plan.

**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. Overall Project Management including day-to-day management of project progress, project tracking, liaison to State, including performance of activities. Technical support for the vitrification unit.
P. Walton	Assistant Project Manager Technical Lead/ Technical Staff	Assist in general program oversight. Assist in drafting permit as needed and other technical assistance as assigned. Including other TA-permit sections and evaluation of general sections.
G. Walvatne	Technical Lead/ Technical Staff	Technical lead; Provide assistance in drafting permits. Other technical tasks may include evaluations of other TA-permit sections and evaluation of other technical sections.
M. Smith	Technical Staff	Provide technical assistance in the engineering review, air modeling and other general sections.
J. Ashworth	Technical Staff	Provide technical assistance in the groundwater monitoring sections, as needed.
C. Walker	Technical Staff	Provide assistance in the review, Waste Analysis Plans, or geology or groundwater sections as necessary.

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
J. Leeson	Technical Staff	Provide technical assistance in the general sections, or other TA sections.
R. Young	Technical Staff	Provide technical assistance associated with groundwater or corrective action.
S. Druschel	Technical Staff	Provide assistance in engineering sections and corrective action section as assigned, or any other technical issues.
H. Sellers	Technical Staff	QC of general sections and Permit modules associated with general sections.
B. O'Connell	Technical Staff	Provide technical assistance with the review and evaluation of the vitrification unit located at LANL TA-55. Provide engineering and performance based support for the units.
N. Khurd	Technical Staff	Provide technical assistance in air modeling, engineering and fate and transport modeling.
C. Olin	Administrative Assistance	Project assistance and clerical responsibilities.
S. Pearson	Administrative Assistance	Project assistance and clerical responsibilities.

**ATTACHMENT II**

**STAFFING HOURLY ALLOCATIONS**

<u>Name</u>	<u>Labor Category</u>	<u>01</u>	<u>02</u>	<u>03</u>	<u>04</u>	<u>05</u>	<u>06</u>	<u>QC</u>	<u>TOTAL</u>
<u>Project Mgr/ Work Assignment Mgr</u>									
J. Dreith	R-4	60							60
<u>Technical Leads</u>									
P. Walton	R-3	20	16						36
G. Walvatne	R-4	20							20
<u>Technical Staff</u>									
M. Smith	T-4				16				16
J. Ashworth	T-4				TBD				TBD
C. Walker	T-4				40				40
R. Young	T-4			40					40
S. Druschel	T-4				TBD		60		60
J. Leeson	T-3		24			24			48
P. Walton	T-1		60	24		20	40		144
G. Walvatne	T-3		40	60			20		120
J. Dreith	T-4		60				180		240
B O'Connell	T-4						200		200
N. Khurd	T-2				48				48
H. Sellers	T-3		8		8		16		32
<u>Clerical Staff</u>									
C. Olin		4	4				8		16
S. Pearson		8		4	4	4			20
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TOTAL		112	212	128	116	48	524		1140

**ATTACHMENT III**

**COST ESTIMATE**

Name	P-Level	Hours	Cost			
J. Dreith	R-4	300	\$35,124.00			
P. Walton	R-3	180	15,193.80			
G. Walvatne	R4	140	16,391.20			
M. Smith	R-4	16	1,873.28			
B. O'Connell,	T-4	200	20,288.00			
C. Walker	R-4	40	4,683.20			
R. Young	P-4	40	4,057.60			
S. Druschel	P-4	60	6,086.40			
H. Sellers	R-3	32	2,410.88			
J. Leeson	T-1	48	2,033.28			
N. Khurd	T-2	48	2,854.08			
C. Olin	Clerical	16	588.96			
S. Pearson	Clerical	20	736.20			
<b>Total Labor</b>		<b>1,140</b>	<b>\$112,320.88</b>			
<b>Other Direct Costs:</b>						
Reproduction	Copies	15,000	\$0.08	\$ 1,200.00		
Telephone	Minutes	3,800	0.23	874.00		
Telephone	Conferences	5	150.00	750.00		
Computer	DL hours	1,140	1.07	1,219.80		
Postage/Shipping	Lbs.	400	3.99	1,596.00		
<b>Total Other Direct Costs</b>				<b>\$5,,639.80</b>		
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking	Total
Denver – Santa Fe (2 persons, 1 trip)	\$ 928.00	\$ 9280.00	\$ 534.00	\$ 580.00	\$232.00	\$3,202.00
Salt Lake – Santa Fe (1 person, 1 trip)	580.00	464.00	267.00	290.00	116.00	1,717.00
<b>Total Travel Costs</b>						<b>\$4,919.00</b>
<b>Total Estimated Costs including Fee</b>						<b>\$122,879.68</b>