



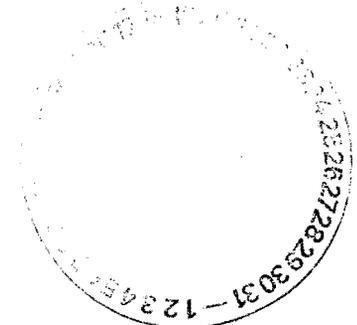
General



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July 16, 2004

Mr. David Cobrain  
State of New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303



RE: Work Assignment No. 06110.240; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Second Work Plan for Support for the Los Alamos National Laboratory; Work Plan

Dear Mr. Cobrain,

Enclosed please find a revised Work Plan (previous number 06110.150) to assist New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) in providing RCRA permitting assistance. The Work Plan is based on an e-mail from you on April 23, 2004. The work plan addresses both technical and research support. Due to complexity of the tasks involved, tasks have been separated into major categories. In addition, the tasks have been written very broadly to provide NMED maximum flexibility.

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

Sincerely,

*June K. Dreith*  
June K. Dreith  
Program Manager

Enclosure

cc: Mr. Steve Zappe, NMED, HWB  
Ms. Cindy Abeyta, NMED, HWB  
Denver Files



**SECOND WORK PLAN**

**PERMITTING SUPPORT FOR  
LOS ALAMOS NATIONAL LABORATORY**

**Submitted by:**

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

**Submitted to:**

**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. 06110.240**

**July 2004**

## **WORK TO BE PERFORMED**

- (1) Provide management oversight of the project, which will include availability of the TechLaw Program Manager and TechLaw Work Assignment to NMED. Conference calls, project tracking, and monthly reports are included in this task.
- (2) Provide technical support for various technical areas at LANL. Evaluate any outstanding new issues, as requested by NMED. 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 evaluating 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.

## **QUALITY CONTROL PLAN**

The TechLaw Project Manager will review all deliverables prior to providing the deliverables to the NMED. 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 Manager/Work Assignment Manger 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 application reviews and other projects.

Ms. Paige Walton – will serve as Assistant Work Assignment Manager and as a 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 the 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 Mesurer 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. Nur – is a civil engineer with 12 years of professional experience. He is specialized in many aspects of RCRA including engineering designing container and tank designs, landfill construction, and has heavily been involved in Subpart AA/BB and CC.

Ms. Hellen 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.

Mr. Bert O'Connell, PE – 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 hydrogeology, corrective action and corrective action monitoring. He has reviewed RCRA RFIs, Corrective Measures 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 an Administrative Assistant in the Denver office and has over 10 years of experience in administrative and clerical responsibilities. She will be involved in the Denver office files.

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.

### **COST ESTIMATE**

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

Travel costs have been added to the project, assuming costs for 1 meeting in Santa Fe, and assistance at an administrative hearing. It is unknown at this time which technical support personnel will be required to attend the administrative hearing therefore, this cost may need to be modified at a later date. However, for costing purposes TechLaw has assumed that two people will attend the meeting.

**ATTACHMENT I**

**STAFF RESPONSIBILITY CHART**

<b>STAFF</b>	<b>ROLE</b>	<b>AREAS OF RESPONSIBILITY</b>
J. Dreith	Project Manager	General program oversight, monitoring of project planning and implementation, including performance of activities. Program management including tracking financial 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 engineering review, air modeling and other general sections.
C. Walker	Technical Staff	Provide assistance in the review, Waste Analysis Plans, or geology or groundwater sections as necessary.
R. Young	Technical Staff	Provide technical assistance associated with groundwater or corrective action.
M. Nur	Technical Staff	Provide technical assistance in the engineering sections and corrective action as assigned, or any other technical issues.
H. Sellers	Technical Staff	QC of general sections and Permit modules associated with general sections.
N. Khyrd	Technical Staff	Provide technical assistance in air modeling, engineering and fate and transport modeling.
B. O'Connell	Technical Staff	Provided 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.
C. Olin	Administrative Assistant	General administrative assistance.
S. Pearson	Clerical	Assist in copying and organizing files.

ATTACHMENT II

**STAFFING HOURLY ALLOCATIONS**

<u>Name</u>	<u>1</u>	<u>02</u>	<u>03</u>	04	05	06	<u>Total</u>
<u>Project Manager/Work Assignment Manager</u>							
J. Dreith	60	--	--	--	--	--	60
<u>Technical Leads</u>							
P. Walton	20	16	--	--	--	--	36
G. Walvatne	20	--	--	--	--	--	20
<u>Technical Staff</u>							
M. Smith	--	--	--	16	--	--	16
J. Ashworth	--	--	--	TBD	--	--	TBD
C. Walker	--	--	--	40	--	--	40
R. Young	--	--	40	--	--	--	40
M. Nur	--	--	--	TBD	--	60	60
P. Walton	--	60	24	--	20	40	144
G. Walvatne	--	40	60	--	--	20	120
J. Dreith	--	60	--	--	--	180	240
B. O'Connell	--	--	--	--	--	200	200
N. Khurd	--	--	--	48	--	--	48
H. Sellers	--	32	--	8	24	16	80
<u>Clerical/Administrative Staff</u>							
S. Pearson	4	4	--	--	--	8	16
C. Olin	8	--	4	4	4	--	20
TOTAL	<u>112</u>	<u>212</u>	<u>124</u>	<u>116</u>	<u>48</u>	<u>524</u>	<u>1,140</u>

**ATTACHMENT III**

**COST ESTIMATE**

NAME	P-LEVEL	HOURS	COST
J. Dreith	R-4	300	\$35,124.00
P. Walton	R-3	180	18,259.20
G. Walvatne	R-4	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
M. Nur	T-4	60	6,086.40
H. Sellers	R-3	80	6,027.20
N. Khurd	T-2	48	2,854.08
C. Olin	T-1	20	847.20
S. Pearson	C	16	588.96
<b>Total Labor</b>			<b>\$117,080.32</b>
Other Direct Costs:			
Reproduction (1,500 Copies @ .08/each)		\$ 120.00	
Telephone (3,800 Minutes @ .23/each)		760.00	
Telephone-Conference Calls (5 Call @ 150/ea.)		750.00	
Computer (1,140 DL hours @ 1.07/each)		1,219.80	
Postage/Shipping (400 Lbs. @ 3.99/pound)		1,596.00	
<b>Total Other Direct Costs</b>			<b>\$ 4,445.80</b>
Travel Cost:			
Denver/Sante Fe (1 person, 2 trips)			
Airfare		\$ 900.00	
Hotel		928.00	
Meals		534.00	
Rental Car		580.00	
Mileage & Parking		232.00	
<b>Subtotal</b>		<b>\$3,174.00</b>	
Salt Lake City/Sante Fe (1 person, 2 trip)			
Airfare		\$1,500.00	
Hotel		464.00	
Meals		267.00	
Rental Car		232.00	
Mileage & Parking		116.00	
<b>Subtotal</b>		<b>\$2,579.00</b>	
<b>Total Travel Costs:</b>			<b>\$ 5,753.00</b>
<b>Total Estimated Costs Including Fee</b>			<b>\$127,279.12</b>