



General

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ENTERED

June 21, 2006

Mr. Dave Cobrain
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. 06280.170; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Permitting Support for the Los Alamos National Laboratory; Work Plan

Dear Mr. Cobrain:

Enclosed please find the newly issued Work Plan to assist the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) in providing RCRA permitting assistance for the Los Alamos National Laboratory (LANL). The Work Plan is based on discussions between Mr. David Cobrain of NMED and Ms. June Dreith of TechLaw which discussed the new work plans needed for the new contract. The Work Plan has been written very broadly to provide technical support staff, and to maximum flexibility.

If you have any questions, please feel free to contact me at (303) 464-6525.

Sincerely,

June K Dreith

June K. Dreith
Project Manager

cc: Dallas Files
TechLaw files



WORK PLAN

PERMITTING SUPPORT FOR LANL

Submitted by:

**TechLaw, Inc.
3920 West 98th Place
Westminster, CO 80031**

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. 06280.170

June, 2006

INTRODUCTION

The New Mexico Environmental Department, Hazardous Waste Bureau (NMED-HWB) has requested assistance from TechLaw, Inc. (TechLaw) in providing RCRA permitting support to the LANL site. This support is to assist NMED in making draft and final permit determinations, and may include evaluation of any type of permitting technical assistance, including engineering, technical or administrative assistance. It may also involve evaluation of corrective action sections of the permit, or unit design evaluations. This work plan presents the technical approach, task description, progress reports, quality control, staff and management, subcontracting, performance evaluation criteria and cost estimate.

TECHNICAL APPROACH

TechLaw will review and evaluate at the request of NMED, any permit related information or technical document related to LANL. The reviews will be completed using NMED and U.S. EPA guidance documents or checklist as well as other known and acceptable guidance documents or practices. TechLaw will consult and coordinate with NMED to resolve any issues or to obtain direction or guidance. TechLaw shall provide written comments (electronic and hard copy) to NMED, as draft deliverables and shall finalize this deliverable to include NMED comments. TechLaw will attend meetings and participate in conference calls as needed to discuss the comments with NMED, or with facility representatives at the request of NMED.

SUBCONTRACT

No subcontractors are expected to be used for this assignment.

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 evaluating permit attachments. Assist in the evaluation of closure or post-closure plans. Assist in any corrective action permitting technical tasks, and at the direction of NMED assist in the evaluation of any other technical documents or plans. Participate in any public meeting or hearing as directed. Provide expert witnesses at the public meetings as needed. Please note that no travel has been included in this work assignment.

Task 03 Provide senior level quality control reviews of all deliverables.

The TechLaw Program Manager, Ms. June Dreith, will maintain communication with Mr. Dave Cobrain of NMED regarding the progress of activities and any unanticipated conditions.

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 is a geologist and will serve as technical support. 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. Steve Phillips is a geologist and will serve as technical support for this project. Mr. Phillips has over 20 years experience in RCRA corrective action, permitting and RCRA remediation.

Mr. Greg Starkebaum is an environmental engineer and researcher with over 26 years of experience. He has worked with both corrective action issues and RCRA permitting requirements in the permitting area.

Mr. Mo Nur is an engineer and has over 10 years experience. He is specialized in many aspects of RCRA including engineering designing, landfill construction, corrective action reviews and has been involved remediation work.

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.

COST ESTIMATE

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.
P. Walton	Technical Staff	Assist in drafting permit as needed and other technical assistance as assigned. Assist in corrective action document review
G. Starkebaum	Technical Staff	Provide technical assistance in the engineering review, air modeling and other general sections.
S. Phillips	Technical Staff	Provide technical assistance in the groundwater monitoring sections, as needed.
M. Nur	Technical Staff	Provide technical assistance in the engineering review, air modeling and other general sections.
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>TOTAL</u>
<u>Project Mgr/ Work Assignment Mgr</u>					
J. Dreith	R-4	40			40
<u>Technical Staff</u>					
P. Walton	R-3		60		60
S. Phillips	T-4		40		40
G. Starkebaum	T-4		80	24	104
J. Dreith	R-4		32		32
M. Nur	T-4		68		68
<u>Clerical Staff</u>					
C. Olin		4	4	4	12
S. Pearson		4	4	4	12
TOTAL		44	288	32	368

ATTACHMENT III

COST ESTIMATE

Name	P-Level	Hours	Cost			
J. Dreith	R-4	72	\$ 8,744.40			
P. Walton	R-3	60	\$ 6,274.80			
S. Phillips	T-4	40	\$ 4,183.20			
G. Starkebaum	T-4	104	\$ 9,693.84			
M. Nur	T-4	68	\$ 7,111.44			
C. Olin	Clerical	12	\$ 660.60			
S. Pearson	Clerical	12	\$ 478.32			
Total Labor			\$ 37,146.60			
Other Direct Costs:						
Reproduction	Copies	500	\$0.08	\$ 40.00		
Telephone	Minutes	1,000	0.20	200.00		
Telephone	Conferences	5	150.00	450.00		
Computer	DL hours	368	1.07	393.76		
Postage/Shipping	Lbs.	200	3.99	798.00		
Total Other Direct Costs				\$ 1,881.76		
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking	Total
To Be Determined						\$ 00.00
Total Travel Costs						\$ 00.00
Total Estimated Costs including Fee						\$ 39,028.36