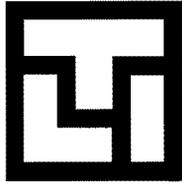


RED UNL G/P/01

Permit

Port Allan



300 UNION BOULEVARD, SUITE 600, LAKEWOOD, CO 80228

TECHLAW INC.

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

June 4, 2001

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

Reference: Work Assignment No. Y513, 06082.600.0001; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Review of NMED-HSW Corrective Action Chapter of the RCRA Permit Renewal for the Los Alamos National Laboratory, Work Plan, Revision 2

Dear Mr. Bearzi:

Enclosed please find revision 2 of the Work Plan for the assistance to the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) in drafting the Corrective Action Chapter of the RCRA permit renewal for the Los Alamos National Laboratory (LANL). The revised work plan incorporates NMED's decision to have TechLaw review eighteen LANL Standard Operating Procedures (SOPs) as identified by NMED and other miscellaneous non-investigative requirements identified by NMED. Evaluation of remedial options will also include alluvial groundwater systems within specified canyons as well as the alluvial and surface water bodies in watersheds to the canyons. These review of SOPs have been included in the work plan as task 10. Task 3 was modified to include review of canyon watersheds. At this time an additional 168 hours have been added to the Work Plan to include the new task 10 and additional work identified by NMED in task 3.

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

Sincerely,

June K. Dreith
Program Manager

Enclosure



32375



Mr. James Bearzi
June 4, 2001
Page 2

cc: Mr. Carl Will, NMED, HWB
Ms. Pam Allen NMED, HWB
Mr. John Kieling, NMED, HWB
Ms. Cindy Abeyta, NMED, HWB

Mr. John Young, NMED, HWB
Ms. Paige Walton, TechLaw
Mr. B. Jordan, TechLaw Central Files

WORK PLAN, Revision 2

**REVIEW OF THE NMED-HWB CORRECTIVE ACTION CHAPTER OF THE RCRA
PERMIT RENEWAL APPLICATION FOR THE LANL**

Submitted by:

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

Submitted to:

**Mr. James P. Bearzi
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building One
Santa Fe, New Mexico 87505**

In response to:

Work Assignment No. Y513

June, 2001

WORK TO BE PERFORMED

TechLaw, Inc. (TechLaw) will assist the New Mexico Environment Department Hazardous Waste Branch (NMED HWB) with the Corrective Action Section of the RCRA permit renewal for the Los Alamos National Laboratory (LANL). TechLaw understands that the focus of the corrective action section of the permit is not to specify remedial actions, but rather requests additional characterization data where necessary so that the NMED HWB can ascertain whether remedial actions will be required. TechLaw will review existing information (e.g., RFIs, Work Plans and other pertinent documents) on an area-specific basis. Using this information, TechLaw will review the corrective action chapter of the permit to ascertain whether they are in agreement with the additional informational requests made by the NMED HWB. The final goal of the HWB is to determine whether remedial action is or is not warranted at each area. TechLaw will also research the different options for well construction and well drilling and discuss which of the techniques are applicable for use at LANL. TechLaw will provide research on methodologies that may be applied in assessing the condition of the two plutonium tubes at MDA-W, and will include how risks may be determined should a failure of the tube encasement occur. Remedial options for the MDA-W tubes will be presented. TechLaw will also review LANL Standard Operating Procedures (SOPs) to determine adequacy. Qualified personnel from TechLaw will include a geologist/hydrogeologist, a corrective action specialist, and a human health and ecological risk assessor.

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 corrective action sections of the RCRA permit renewal for the LANL. The corrective action chapter will include three broad categories: 1) the regional aquifer; 2) individual canyons and watershed; and 3) individual Technical Areas (TAs), Solid Waste Management Units (SWMUs), and/or Areas of Concern (AOCs) otherwise not covered. TechLaw will review background documents and other relevant background information. Based upon the existing information from the background documents, TechLaw will assess the characterization requires set forth by the HWB to determine if the requires are adequate and justified to determine both present and future risk to human health and the environment. TechLaw will also perform a technical review of the HWB's requirements for additional investigation and remediation to determine whether the remedial action as required by the HWB is adequate and justified. In cases where the HWB is not requiring remedial action, TechLaw will review the criteria to determine if remedial action should be required due to a potential threat to human health or the environment. It is understood that the risk assessment (human and ecological) will be a qualitative assessment only. The NMED will make all final determinations regarding the corrective action permit section.

PROJECTS AND TASKS

- Task 1 - 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 2 - Background document familiarization and preparation for technical reviews. Approximately 40 documents, one for each high-priority site.
- Task 3 - Perform technical review of the corrective action sections of the RCRA permit renewal for the LANL and preparation of a Technical Review Document. Will also include review of remedial options for alluvial groundwater systems in the canyons and all alluvial and surface water bodies within the canyon watersheds.
- Task 4 - Participate in meetings and conference calls.
- Task 5 - Perform quality control review on draft deliverables.
- Task 6 - All clerical assistance, including document copying and filing.
- Task 7 - Research applicable drilling and well construction techniques for use on the plateaus at LANL and related LANL Standard Operating Procedures (SOPs). Includes a one-day site visit.
- Task 8 - Research monitoring methods for the two coolant tubes at MDA-W, determine how risks may be estimated in the event of tube failure, and potential remedial options.
- Task 9 - Provide assistance in reviewing the applicability and input parameters to the Finite Element Heat and Mass Transfer Code
- Task 10- Review LANL Standard Operating Procedures (SOPs) and other non-investigative requirements

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

Mr. Bret Kendrick is a corrective action specialist and geologist with experience in mixed waste. He has reviewed RCRA RFIs, Corrective Measure Studies and Corrective Measures Implementation Plans.

Dr. Rick Kulthau is a hydrologist whose professional experience includes review of groundwater modeling, corrective actions and working with modeling codes, including Monte Carlo simulations and finite element codes.

Mr. Michael Smith is an environmental engineer and researcher with over 19 years of experience. He has worked with fate and transport codes, air dispersion modeling, and has expertise in RCRA permitting requirements.

Ms. Robin Blackburn is an ecological risk assessor with extensive experience in RCRA and CERCLA risk assessments. She was involved with preparing and with Quality Control for the

Risk Assessment Guidance document prepared for NMED. Ms. Blackburn has over 10 years of experience in reviewing and preparing risk assessments.

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. Delores Romero is the Administrative Assistant for the Denver office and has over 20 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 type 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 will complete its review of all sections (approximately 20 total) within two weeks after TechLaw's receipt of the last section completed by the NMED HWB.

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	Program Manager	General program oversight, monitoring of project planning and implementation, including performance of activities.
P. Walton	Work Assignment Manager Technical Lead	Overall project management including day-to-day management of project progress, project tracking, liaison to State, including performance of activities. Review of background documents and technical review of permit, including risk assessment sections. Research MDA-W options. Quality control reviews.
J. Ashworth	Technical Staff	Technical review of geologic and hydrogeologic sections. Research well drilling and construction methods.
B. Kendrick	Technical Staff	Technical review of documents and background information review. Focus on corrective action and geologic sections.
R. Kulthau	Technical Staff	Review Finite Element Heat and Mass Transfer Code
M. Smith	Technical Staff	Review Finite Element Heat and Mass Transfer Code
R. Blackburn	Technical Staff	Technical review of ecological risk assessment.
R. Young	Quality Assurance	Provide quality control for corrective action measures and hydrogeologic sections.
D. Romero	Administrative Assistant	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>Task</u> <u>05</u>	<u>06</u>	<u>07</u>	<u>08</u>	<u>09</u>	<u>10</u>	<u>Total</u>
<u>Program Manager</u>												
J. Dreith		40										40
<u>Project Manager/Work Assignment Manager</u>												
P. Walton		96										96
<u>Technical Staff</u>												
P. Walton	Technical Lead/Risk Assessment		128	208	16			12	60		40	464
B. Kendrick	Corrective Action		32	32	16						48	128
J. Ashworth	Hydrologist		40	160	16			96				312
R. Blackburn	Ecological Risk		30	30	4							64
R. Young	Quality Control				4	32						36
R. Kulthau	Hydrologist									TBD		
M. Smith	Modeler									TBD		
<u>Clerical Staff</u>												
D. Romero	Clerical/Administrative Review						68					68
TOTAL		136	230	430	56	32	68	108	60	TBD	88	1208

ATTACHMENT III

COST ESTIMATE

<u>Name</u>	<u>P-Level</u>	<u>Hours</u>	<u>Cost</u>			
J. Dreith	P-4	40.0	\$ 3,778.00			
P. Walton	P-3	560.0	40,056.80			
B. Kendrick	P-3	128.0	7,747.84			
J. Ashworth	P-4	312.0	28,476.24			
R. Blackburn	P-4	64.0	5,491.20			
R. Young	P-4	36.0	3,045.60			
R. Kulthau *	P-4	0.0	0.00			
M. Smith *	P-4	0.0	0.00			
D. Romero	Clerical	68.0	2,745.84			
Total Labor		1,208.0	\$91,341.52			
Other Direct Costs:						
Reproduction	Copies	8,000	\$0.06	\$480.00		
Telephone	Minutes	3,800	0.23	874.00		
Telephone	Conference Calls	5	150.00	750.00		
Computer	DL hours	1,208	0.99	1,195.92		
Postage/Shipping	Lbs.	200	3.99	798.00		
Total Other Direct Costs			\$4,097.92			
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking	Total
Atlanta – Santa Fe	\$850.00	\$192.00	\$76.00	\$180.00		\$1,298.00
Total Travel Costs						\$1,298.00
Total Estimated Amount						\$96,737.44

* Associated with optional task.