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July 10, 2006

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



Reference: Work Assignment No. 06280.170.0002; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Technical Review of the Remedy Design Work Plan For The Los Alamos Site Office TA-73 Airport Landfill, Revision 2, Dated April 2006; Los Alamos National Laboratory, Los Alamos, New Mexico; Draft Deliverable

Dear Mr. Cobrain:

Enclosed please find the deliverable for the above-referenced work assignment. The deliverable consists of a technical review of the "Remedy Design Work Plan for the Los Alamos Site Office (LASO) TA-73 Airport Landfill, Revision 2," dated April 2006 (electronic tracked version).

TechLaw conducted a complete review of the following components of the Remedy Design Work Plan, Revision 2 (RDWP) dated April 2006 and responses to the March 20, 2006 NMED comments.

- RDWP Design Basis
- Final Design Package including design drawings and calculations
- Construction Specifications
- Construction Plan
- Construction Quality Control Plan
- Waste Management Plan
- Post-Closure Care and Monitoring Plan (PCMP)

In general, the RDWP Revision 2 appears to adequately address most of the NMED prior comments. Any unresolved issues are identified in the attached deliverable.

It must be noted that the RDWP Revision 2 stipulates provisions of the following after construction contract award.

- Test pads test results to demonstrate cover performance
- Final Settlement Calculations



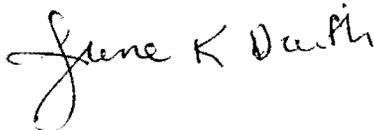
Mr. Cobrain
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TechLaw has no problems with the gas collection and monitoring procedures described in Section 3.5 of the PCMP, however, NMED may wish to verify they are acceptable to NMED.

The document is formatted in Microsoft Word. The deliverable was emailed to Mr. David Cobrain on July 10, 2006 at David.Cobrain@state.nm.us and Ms. Darlene Goering at Darlene.Goering@state.nm.us. A formalized hard (paper) copy of this deliverable will be sent vial mail in a few days.

Please feel free to contact me at (303) 763-7188, or Mr. Mohamed Nur, the reviewer, at (703) 818-3244, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "June K Dreith". The signature is written in a cursive style with a large initial "J".

June K. Dreith
Project Manager

Enclosures

Cc. D. Goering, NMED
M. Nur, TechLaw
G. Starkebaum, TechLaw
Denver Files

**Los Alamos National Laboratories
Los Alamos, New Mexico**

**Technical Review of the Remedy Design Work Plan
For The Los Alamos Site Office TA-73 Airport Landfill
Revision 2, dated April 2006**

Submitted to:

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

Submitted by:

**Ms. June Dreith
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**Work Assignment No.
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Darlene Goering
(505) 428-2500
June Dreith
(303) 763-7188**

July 10, 2006

**Technical Review of the Remedy Design Work Plan
For The Los Alamos Site Office TA-73 Airport Landfill
Revision 2, dated April 2006
Los Alamos National Laboratory (LANL), New Mexico**

COMMENTS

1. It appears that most of the NMED March 20, 2006 NOD comments have been technically adequately addressed. However, it must be noted that the Remedy Design Work Plan (RDWP) Revision 2 stipulates provisions of test pads test results to demonstrate cover performance and final settlement calculations after construction contract award. In addition, since some of the following are provided as draft, please indicate when they will be finalized and issued as final.
 - The final design for the MatCon cover.
 - The final design for the retaining walls.
 - The final design for the hangar pads.

2. The Permittees' response to NMED General Comment 3 regarding the concern for the potential for run-on to infiltrate under the cap at the interface of the Matcon cover and the taxiway is not clearly documented in the RDWP Revision 2. The response states the design was revised to eliminate the potential for run-on to infiltrate under the cap and references Drawing 2005 Section G. Drawing 2005 Section G shows that a 40 mil smooth very flexible polyethylene (VFPE) has been added to the design of the sloping interface between the taxiway and the Matcon. Although the general specifications for the VFPE liner are provided in Section 06005 of the Construction Specifications, no specific installation procedures of this feature are provided in any of the documents. It is unclear how the non-woven geotextile and the VFPE liners will be anchored or constructed at the point of interface between the rip rap covered grade and the Matcon or how far they extend onto the Matcon. As shown on Section G, the rip rap is directly placed on the geotextile which is underlain by the VFPE liner. No provisions for protecting the liners or preventing water from getting under the liner are discussed. It appears the non-woven geotextile is provided as a protection for the VFPE liner, but it is not discussed whether that would be sufficient, especially during construction. How run-off water along this interface will be managed and any interconnection between this interface and the storm sewer features shown on Drawing 2003 are not discussed or shown on the drawings. Since this feature spans a great distance (i.e., the interface area east of Section C on Drawing 2005 to the east slopes) a more detailed design and construction specifications should be provided.

3. The settlement evaluation text and tables reference figures not provided in the RDWP. In

additions references are made to Sites C and D. These sites are not described in the RDWP. In the final settlement calculations, please clarify these references.

4. Section 2.2 (Design Basis) of the RDWP indicates that the new cover design for the eastern and northern slopes will produce a more stable slope. However, it does not appear slope stability calculations are provided for the proposed new cover design for the northern and eastern slopes. Revise the RDWP to provide slope stability calculations for the armored portions of the landfill cover.