

WORK PLAN

SANDIA NATIONAL LABORATORIES EXPERT WITNESS SUPPORT

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. 06110.310

July 2004

WORK TO BE PERFORMED

- (1) Provide management oversight of the project, which will include availability of the TechLaw Program Manger and TechLaw Work Assignment Manager to NMED. Conference calls, project tracking, and monthly reports are included in this task.
- (2) Specialized technical support to NMED in the area of explosives, propellants and unexploded ordnances (UXO). Two specialists have been proposed, Mr. Thomas Hall and Dr. Bill Mabey.

Travel is included in the work plan for both specialists to provide expert witnesses to NMED for the administrative hearing. It is expected that the hearing will last 3 days.

SUBCONTRACT

No subcontractors are associated with this project.

PRIMARY INTENDED USE

The purpose of this work assignment is to provide specialized technical expertise to NMED regarding explosives, propellants and unexploded ordnances (UXO).

PRIMARY REPORTS

Information regarding the status of this project will be included in monthly progress reports prepared by TechLaw. 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 Program Manager will review all deliverables prior to providing the deliverables to the NMED. The Program 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 Director. Ms. Dreith is an environmental specialist with 20 years professional experience, including management of permits and other projects.

Mr. Thomas Hall – is an Unexploded Ordnance Expert and has over 35 years of experience in nuclear, industrial, chemical weapons, and explosive safety, including explosives and munitions manufacturing, storages, and disposal. Mr. Hall has served as a team member of the Department of Energy Environmental Management Assessment of Lawrence Livermore National Laboratories and the Integrated Safety Management Evaluation of the Nevada Test Site. He has industrial safety, high explosives safety, nuclear explosives safety, radiation safety, risk management, waste, occupational medicine and industrial hygiene programs while serving as the Division Manager at the Battelle Pantex Plant.

Dr. Bill Mabey – has over 29 years experience evaluating the transformation and transport of chemicals in soil, water, and air environments. His experience with chemical groups of concern includes munitions chemical warfare agents, chlorinated and hydrocarbon/fuel chemicals, a wide variety of pesticides, PCBs and chlorinated dioxins/furans, metals, and other inorganic/metalorganic chemicals. In the specific area of munitions and chemical agents, he has conducted research to understand transformation and transport processes and performed critical reviews of work plans, reports, and published literature.

Ms. Christi Olin – is the Administrative Assistant for the Denver office and has over 15 years experience in project assistance and 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.

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. Work on the tasks will not occur until NMED agrees to the costs related to the specific tasks assignments, the schedule, and final written approval from NMED is received. NMED is aware that delay in the approval of cost may impact the final schedule provided. It is expected that much of the work will occur in the next two months.

COST ESTIMATE

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

ATTACHMENT I

STAFF RESPONSIBILITY CHART

STAFF	ROLE	AREAS OF RESPONSIBILITY
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.
T. Hall	UXO Expert	Expert witness for administrative hearing, other technical support to NMED as needed.
B. Mabey	Technical Staff	Expert witness, technical research as needed by NMED.
C. Olin	Administrative Assistant	General administrative assistance.

ATTACHMENT II

STAFFING HOURLY ALLOCATIONS

<u>Name</u>	<u>01</u>	<u>02</u>	<u>Total</u>
<u>Project Manager</u>			
J. Dreith	16	20	36
<u>Staff</u>			
T. Hall	--	60	60
B. Mabey	--	60	60
<u>Administrative Assistant</u>			
C. Olin	4	4	8
TOTAL	<u>20</u>	<u>144</u>	<u>164</u>

ATTACHMENT III

COST ESTIMATE

NAME	P-LEVEL	HOURS	COST
J. Dreith	R-4	36	\$4,214.88
B. Mabey	R-4	60	6,086.40
T. Hall	R-4	60	7,024.80
C. Olin	T-1	8	338.88
Total Labor			\$17,664.96
Other Direct Costs:			
Reproduction (2,000 Copies @ .08/each)		\$ 160.00	
Telephone (300 Minutes @ .20/each)		60.00	
Telephone-Conference Calls (3 Calls @ 150/each)		450.00	
Computer (164 DL hours @ 1.07/each)		175.48	
Postage/Shipping (50 Lbs. @ 3.99/pound)		199.50	
Total Other Direct Costs			\$1,044.98
Travel Cost:			
Little Rock/Sante Fe (1 person, 3 days)			
Airfare		\$ 1,600.00	
Hotel		300.00	
Meals		150.00	
Rental Car		167.00	
Mileage & Parking		60.00	
Subtotal		\$2,277.00	
Philly/Sante Fe (1 person, 3 days)			
Airfare		\$ 1,600.00	
Hotel		300.00	
Meals		150.00	
Rental Car		167.00	
Mileage & Parking		60.00	
Subtotal		\$2,277.00	
Total Travel Costs:			\$ 4,554.00
Total Estimated Costs Including Fee			\$23,263.00