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January 24, 2008

DCN 06280.130.ID.011

Mr. David Cobrain  
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. 06280.130: State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Sandia National Laboratories; Technical review of the Sandia Corporation, DOE/Sandia Responses to NMED's "Notice of Disapproval: Mixed Waste Landfill Corrective Measures Implementation Work Plan, November 2005" Comment Set 2 dated January 15, 2007 – Evaluation of Attachment 1 CD; Task 02 Deliverable

Dear Mr. Cobrain:

TechLaw, Inc. (TechLaw) previously evaluated the *Sandia Corporation, Albuquerque, New Mexico, DOE/Sandia Responses to NMED's "Notice of Disapproval: Mixed Waste Landfill Corrective Measures Implementation Work Plan, November 2005" Comment Set 2*, dated January 15, 2007. We submitted our evaluation of the response to comments (RTC) document to the New Mexico Environment Department (NMED) on December 28, 2007. In that deliverable, TechLaw discussed that Technical Comment Number 11 expressed concern that sufficient documentation was not provided showing how the probabilistic model operated with regard to software quality assurance, validation and verification, and an assessment of bias. In the comment, the model was referred to as a "black box." In the RTC, Sandia stated that additional operational tests, links to the Mathcad models, input and output files, and all simulation realizations were presented on a compact disk (CD) that was included as Attachment 1 to the RTC document. However, TechLaw was not provided with a copy of the CD during our initial review of the RTC document, and consequently, could not evaluate the adequacy of the response.

In an email from NMED to TechLaw dated January 11, 2008, NMED representative, Mr. Will Moats requested that TechLaw review the contents of the CD and provided the link where the CD could be found on the Sandia National Laboratory (SNL) website. TechLaw has reviewed the CD contents and has determined that the response adequately addresses TechLaw's previous concerns. In the CD folder entitled "Supplemental Information on Models and Software Used", Sandia provides eighteen Microsoft Word<sup>®</sup>, Excel<sup>®</sup>, and PowerPoint<sup>®</sup> files, and Adobe Acrobat<sup>®</sup> files that provide the governing equations for the models, input and output files for the 100 computer realizations, and a slide show of a training course presented by Sandia on the Framework for Risk Analysis in Multimedia Environmental Systems (FRAMES) and Multimedia Environmental Pollutant Assessment System (MEPAS) programs. Furthermore, Sandia demonstrates model verification and implementation through mass-balance calculations and comparisons to analytical models. In light of this information, TechLaw has no further concerns regarding the robustness or quality assurance of the models used to simulate the Mixed Waste Landfill.

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If you have any questions, please feel free to contact me at (770) 752-7585 extension 105, or Mr. Jim Ashworth at (770) 752-7585 extension 102.

Sincerely,



Jasmine S. Merkle

Program Manager

cc: Mr. Will Moats, NMED  
Mr. Jim Ashworth, TechLaw  
TechLaw Atlanta Files