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TECHLAW INC.

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

December 15, 1998

Mr. Benito Garcia
State of New Mexico Environment Department
Hazardous and Radioactive Material Bureau
P. O. Box 26110
2044 Galisteo
Santa Fe, New Mexico 87502



Reference: Work Assignment No. Y513; State of New Mexico Environment Department,
Santa Fe, New Mexico; General Permit Support Contract; Triassic Park
Engineering Design Review; Work Plan Rev. 0

Dear Mr. Garcia:

Enclosed please find a copy of the proposed Work Plan for the above-referenced work assignment. This Work Plan calls for TechLaw, Inc., to support the New Mexico Environment Department with review of the Triassic Park Hazardous Waste Landfill engineered design submittals, including the landfill, surface impoundments, stabilization unit, tanks, container storage areas, and truck wash facility.

Please sign the attached Work Plan Approval and send to me at the following address:

June K. Dreith
TechLaw, Inc.
300 Union Boulevard
Suite 600
Lakewood, CO 80228

Sincerely,

June K. Dreith
Project Manager

Mr. Benito Garcia
December 15, 1998
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cc: Cornelius Amindyas, NMED
Robert S. (Stu) Dinwiddle, Ph.D
W. Jordan, TechLaw
M. Nur, TechLaw
G. Starkebaum, TechLaw
K. Dare, TechLaw
D. Romero (file: NMED5)

PROPOSED WORK PLAN

Revision 0

**Triassic Park Hazardous Waste Landfill
Engineer Design Submittal Review**

Submitted by:

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

Submitted to:

**Mr. Benito Garcia
State of New Mexico Environment Department
Hazardous and Radioactive Material Bureau
P. O. Box 26110
2044 Galisteo
Santa Fe, New Mexico 87502**

In response to:

Work Assignment No. Y513

December 15, 1998

Work Assignment No. G976
Triassic Park Hazardous Waste Landfill
Engineer Design Review

Work Plan Revision No. 0
December 15, 1998

Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s). The projected cost, staff hour estimates, and tentative schedule are also acceptable.

APPROVAL:

NMED Project Officer

Date

APPROVAL:

NMED Bureau Chief

Date

APPROVAL:

TechLaw Program Director

Date

WORK TO BE PERFORMED

TechLaw, Inc. (TLI) will perform a review of the engineered design submittals and specifications included in Attachment 1 for the Triassic Park Facility included in the December 1997 Part B Permit Application prepared by S. M. Stoller Corporation and Terra Matrix / Montgomery Watson. In addition, TLI will evaluate the engineering section of the previous Notice of Deficiency (NOD) to ensure that the NOD comments were adequately addressed. The work plan has also been costed to include expert testimony support by the Senior Engineer at a public hearing on the issuance of the draft permit pursuant to 20 NMAC 4.1.901A.5 and 901.E. The instructions from NMED indicated the public hearing testimony could last from one to ten days. To cost the public meeting, we have utilized an intermediate time period of five (5) days. It is assumed that the public hearing will be in either Santa Fe or Roswell, New Mexico. The work plan has also been estimated to include one meeting with the Senior Engineer in Santa Fe, New Mexico, and to modify the deliverable as needed to incorporate NMED's comments, based on that meeting. The review will determine whether the designs meet the requirements of the regulations governing hazardous waste landfills, surface impoundments, treatment units, tanks, and container storage areas, including those requirements specified at 20 NMAC 4.1.500, incorporating 40 CFR § 264.19, §264.175(b), §264.191, §264.193, §264.194, §264.221, §264.223, §264.301, and §264.302, and 20 NMAC 4.1.900, incorporating §270.14(a) and (b), §270.15, §270.16, §270.17, and §270.21.

PRIMARY INTENDED USE

The main purpose of this work assignment is to provide technical engineering support to the NMED for its review of the Triassic Park Part B Permit Application. The primary function of the TechLaw deliverable(s) will be to provide information so that NMED can make decisions relative to the adequacy of information presented in the Permit Application, and to provide expert engineering support for the public hearing.

PROJECTS AND TASKS

- Task 1 - Evaluate responses to the engineering section of the previous NOD.
- Task 2 - Perform technical adequacy review of selected portions of the Part B Permit Application specified in Attachment 1.
- Task 3 - Meet with NMED and modify the review as necessary to incorporate NMED comments.
- Task 4 - Prepare for and assist in providing expert engineering technical testimony. The work plan has estimated a five (5) day period for testimony, a three-day period has been included in this estimate for technical preparation.

- Task 98 - Perform quality control review on draft deliverable.
- Task 99 - Provide management oversight for the project which will include availability of TechLaw Project Manager to NMED. Work Plan preparation is also included in this task.

PROGRESS REPORTS AND CONFERENCE CALL MEETINGS

Information regarding the status of this project will be included in weekly 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 phase of the Part B Permit Application review 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

Mr. William Jordan will serve as the Program Director. Ms. June Dreith will serve as the TechLaw Project Manager, and Mr. Greg Starkebaum will serve as the Senior Engineer and oversee all engineering requirements, conduct QC review of the tank impoundment and container storage area, and also perform technical review of the landfill engineering design. Ms. June Dreith will perform the QC of the landfill review; Mr. Mohamed Nur and Ms. Cathy Dare shall also perform technical review of the engineered designs for the tanks, impoundment and container storage areas. Individual staff responsibilities are shown in Attachment II. Hourly allocations are shown in Attachment III.

Mr. Greg Starkebaum is a registered professional engineer in the State of New Mexico, and offers over 19 years of experience. He is specialized in landfill and impoundment design and construction, and while at the State of Colorado Department of Health, drafted landfill design, construction, operation and groundwater monitoring conditions in a permit (issued in 1986) for the first new commercial hazardous waste landfill (Concord Group/BFI/Highway 36) to be

permitted in the U. S. since 1980. Mr. Starkebaum was involved in the previous review of the March 14, 1996, Triassic Park Disposal Facility Permit Application.

Mr. Mohamed Nur is a civil engineer with eight years of professional experience that has included Part B Permit Application reviews with an emphasis on landfill, tank and container storage engineering design reviews. Mr. Nur was also involved in the previous Triassic Park application review.

Ms. Cathy Dare is a civil engineer with nine years of professional engineer experience that has included Part B Permit Application reviews, including tank and container storage area reviews. She is a registered Engineer In Training in Pennsylvania.

Ms. June Dreith is an environmental specialist with 20 years professional experience, including Part B Permit reviews, incinerator trial burns, Part B Permit Training Course presentations, and project management.

Mr. William Jordan has over 20 years experience in RCRA EPA program management.

PERFORMANCE SCHEDULE

TechLaw shall complete the Permit Application review and other tasks in accordance with the following proposed schedule. Work on the application review will not occur until NMED agrees to the costs related to the specific task assignments, and final approval from NMED is received. NMED is aware that delay in the approval of cost may impact the final schedule provided below in Table 1.

TABLE 1 - PROPOSED SCHEDULE

DATE	ACTIVITY
December 4, 1998	Department delivers Permit Application to TechLaw.
February 15, 1999	TechLaw delivers draft review Report to the Department.
February 26, 1999	Approximate date of Department/TechLaw meeting.
March 15, 1999	TechLaw delivers final review Report to the Department and returns the Permit Application to the Department.

April 30, 1999	Approximate time period TechLaw is on call for public hearing testimony as necessary, for from one to ten days (five days used as an estimate).
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COST ESTIMATE

The estimated cost for completing project tasks scheduled to date is included as Attachment IV.

ATTACHMENT I

SPECIFIC ENGINEER REVIEW SECTIONS

Unit/Document Review	Staff
<p>I. <u>Landfill</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.5, Landfill 2. Volume III, Section 3.0, Landfill 3. Volume III, Appendix A, Drawing Nos. 6 through 24 	<p>Greg Starkebaum</p>
<p>II. <u>Surface Impoundment/Evaporation Pond</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.6, Treatment in Surface Impoundment 2. Volume III, Section 4.0, Evaporation Pond 3. Volume III, Appendix A, Drawing Nos. 28 through 32 	<p>Mohamed Nur</p>
<p>III. <u>Liquid Waste Storage Facility</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.3, Storage in Tanks 2. Volume III, Section 8.0, Liquid Waste Storage Facility 3. Volume III, Appendix A, Drawing No. 40 	<p>Mohamed Nur</p>
<p>IV. <u>Stabilization Facility</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.4, Stabilization 2. Volume III, Section 6.0, Stabilization Facility 3. Volume III, Appendix A, Drawing Nos. 33 through 36 	<p>Mohamed Nur</p>
<p>V. <u>Roll-Off Storage Area</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.2, Roll-Off Storage Area 2. Volume III, Section 5.0, Truck Roll-Off Area 3. Volume III, Appendix A, Drawing Nos. 41 through 43 	<p>Cathy Dare</p>
<p>VI. <u>Drum Handling Facility</u></p> <ol style="list-style-type: none"> 1. Volume I, Section 2.2.1, Drum Handling Facility 2. Volume III, Section 7.0, Drum Handling Facility 3. Volume III, Appendix A, Drawing Nos. 37 through 39 	<p>Cathy Dare</p>

<p>VII. <u>Truck Wash Facility</u></p> <ol style="list-style-type: none"> 1. Volume III, Section 9.0, Truck Wash Facility 2. Volume III, Appendix A, Drawing No. 44 	<p>Mohamed Nur</p>
<p>VIII. <u>General Facility Design</u></p> <ol style="list-style-type: none"> 1. Volume I, Part A, Drawing No. 1 2. Volume III, Section 2.0, General Facility Design 3. Volume III, Appendix A, Drawing Nos. 4, 5, 25, 26, 27, and 45 	<p>Cathy Dare</p>
<p>IX. <u>Construction Plans, Specifications, and Equations</u></p> <ol style="list-style-type: none"> 1. Volume IV, Appendix B, Construction Quality Assurance Plan (Cost and hours included in review of the specific unit design review.) 2. Volume IV, Appendix C, Specifications for Landfill, Surface Impoundment and Associated Facilities Liner and Cover System Construction. (Cost and hours included in landfill and surface impoundment review.) 3. Volume IV, Appendix D, Laboratory Test Results. 4. Volumes V and VI, Appendix E, Calculations (Cost and hours included in specific unit design review.) 5. Volume VI, Appendix F, Surface Water Control Plan 6. Volume VI, Appendix G, Landfill Action Leakage Rate and Response Action Plan. (Cost and hours included in landfill review.) 	<p>As Specified by Unit</p> <p>As Specified by Unit</p> <p>As Specified by Unit</p> <p>Cathy Dare</p> <p>Greg Starkebaum</p>

ATTACHMENT II

STAFF RESPONSIBILITY CHART

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
W. Jordan	Program Director	General program oversight, monitoring of project planning and implementation, including performance of Tasks.
J. Dreith	Project Manager	Overall project management including day-to-day management of project progress, project tracking, liaison to State, including performance of Tasks.
G. Starkebaum	Senior Engineer, Technical Staff, Quality Control	Review of engineer design submittals for landfill design, provide technical direction to junior level staff, perform QC of review deliverables.
M. Nur	Technical Staff	Review of engineer design submittals for surface impoundments, liquid waste storage facility, stabilization facility and truck wash.
C. Dare	Technical Staff	Review of engineer design submittal including roll-off storage area, drum handling facility, general design, and surface water control plan.

ATTACHMENT III

STAFFING

<u>Name</u>	<u>STAFFING Labor Category</u> ¹	<u>STAFFING</u>						<u>TOTAL</u>
		<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u> ^{4/}	<u>98</u> ^{2/}	<u>99</u> ^{3/}	
<u>Program Director</u> W. Jordan	Director	0	0	0	0	0	4	4
<u>Project Manager</u> J. Dreith	Manager	4	8	8	4	12	24	60
<u>Technical Staff</u>								
G. Starkebaum	Sr. Engineer	12	110	24 ^{4/}	68 ^{4/}	24	0	238
M. Nur	Engineer	10	140	8	0	0	0	158
C. Dare	Engineer	10	72	8	0	0	0	90
<u>Clerical Staff</u>								
D. Romero		8	12	4	8	8	0	40
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TOTAL		44	342	52	80	44	28	590

^{1/} Provides Labor Classification for Each Staff Person

^{2/} Task 98 - Quality Control

^{3/} Task 99 - Project Management, including maintenance of the administrative record

^{4/} Hours including travel time

ATTACHMENT IV

COST ESTIMATE

Name	P-Level	Hours	Cost				
W. Jordan	P-4	4	\$645.14				
J. Dreith	P-4	60	\$5,341.77				
G. Starkebaum	P-4	238	\$24,358.18				
C. Dare	P-3	90	\$5,276.74				
M. Nur	P-3	158	\$10,242.17				
D. Romero	Clerical	40	\$1,522.53				
Total Labor		590	\$47,386.53				
Other Direct Costs:							
Reproduction	3,000 Pages @ 0.060/page		\$180.00				
Telephone			\$200.00				
Computer Recovery	(.99/hour)		\$584.10				
Postage/Shipping			\$200.00				
Total ODC			\$1,164.10				
<u>Travel</u>	# of Persons	Trips	Air-fare	(2) Hotel	(2) Per Diem	(2) Car	Total
Santa Fe / Denver 2 days	1	1	\$1,064.78	\$83 x 2 (\$166)	\$42 x 2 (\$84)	\$142	\$1,456.78
Santa Fe / Denver 5 days	1	1	\$1,064.79	\$83 x 5 (\$415)	\$42 x 5 (\$210)	\$355	\$2,044.79
Total Travel		2	\$2,129.57	\$581	\$294	\$497	\$3,501.57
Subtotal			\$52,052.20				
Less: N.M. Gross Receipts Tax (6.25%)			\$3,253.26				
TOTAL			\$48,798.94				