



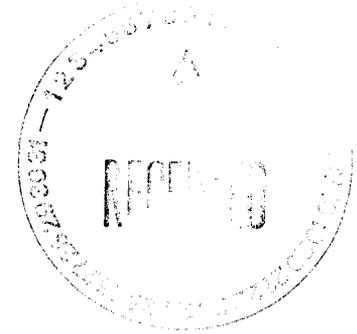
300 UNION BOULEVARD, SUITE 600, LAKEWOOD, CO 80228

**TECHLAW INC.**

PHONE: (303) 763-7188

FAX: (303) 763-4896

March 8, 2001



Mr. James Bearzi  
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, 06082.300; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Draft RCRA Operating Permit Review, Gandy-Marley Hazardous Waste Landfill; Work Plan Revision 3

Dear Mr. Bearzi:

Enclosed please find revision 3 for the Gandy-Marley Work Plan for the above-referenced work assignment. The revised Work Plan incorporates the following tasks:

- Assist NMED in preparing the fact sheet.
- Assist OGC in preparing expert testimony and cross-examination, as necessary, for the Permit hearing. TechLaw would be responsible for the aspects of the Application/Permit that TechLaw has assisted with.
- Assist NMED and OGC in preparing responses to comments received during the comment period and the hearing. This may involve preparing summaries of hearing testimony.
- Assist NMED in modifying and finalizing the Permit based on comments received.
- Assist NMED and OGC in preparing Findings of Fact and Conclusions of Law based on the Triassic Park administrative record.

Please note that the term "NMED" refers to work performed by TechLaw for both the Hazardous Waste Bureau (HWB) and the Office of General Counsel (OGC).



Mr. James Bearzi  
March 8, 2001  
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These tasks were identified in a discussion with Mr. Steve Pullen on February 16, 2001.

TechLaw has not been able to resolve the issue regarding subcontracting with Booze-Allen Hamilton for the services of Mr. Greg Starkebaum. Because of this, we have included an alternate engineer in the Work Plan. Mr. Steve Druschel who was previously involved in the Gandy-Marley review and was the Quality Control Engineer for the draft permit has been proposed as the alternate engineer. Mr. Druschel is eminently qualified for this task. Besides having previously worked on the Gandy-Marley review, he has a P.E. from several states and would be able to review and evaluate the historical information associated with the engineering design in a timely manner. The amount of time actually required for either Mr. Starkebaum or Mr. Druschel to re-familiarize himself with the engineering sections would depend on the number and complexity of the issues brought before NMED from the "parties" to the hearing. We believe a two-week preparation time to be the worst case situation. Any additional time beyond the two weeks required by Steve Druschel to "get up to speed" will be at the expense of TechLaw. It should however be noted in the Work Plan that Mr. Druschel has "other" tasks he will be involved in including QC and responding to public comments. These hours of course remain in the Work Plan. We hope this arrangement will meet the needs of NMED.

Ms. Charlotte Robinson, Esq., will be retained under the present agreement which will be modified in accordance with this work plan. A copy of the letter was also sent to you.

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

Sincerely,



June K. Dreith  
Project Manager

Enclosure

cc: Mr. John Kieling, NMED  
Mr. Steve Pullen, NMED  
Mr. B. Jordan, TechLaw Central Files

Work Assignment Y513; 06082.300  
Gandy-Marley Hazardous Waste Landfill  
Draft RCRA Operating Permit Review

Work Plan Revision No. 3  
February 2001

**PROPOSED WORK PLAN**

**Revision 3**

**Gandy-Marley Hazardous Waste Landfill  
Draft RCRA Operating Permit Review**

**Submitted by:**

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

**Submitted to:**

**Mr. Steve Pullen  
Mr. James P. Bearzi  
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**

**February 2001**

## **WORK TO BE PERFORMED**

TechLaw, Inc. (TechLaw) will assist NMED with the Gandy-Marley Hazardous Waste Facility Permit. The draft Operating Permit prepared by NMED includes Parts 1 through 11 and Attachments A through U. Tasks to be performed by TechLaw generally fall into 4 categories:

- (1) Evaluate the thoroughness of the draft Permit and attachments. As part of this task, TechLaw will perform a technical QC of the draft Permit and attachments including completion or refining those Permit modules which are not yet completed or lack sufficient detail, and assist NMED in developing a statistical approach for the vadose zone solid and non-leachate fluid sampling.
- (2) Prepare a technical review document which indicates areas of the draft Permit which are still technical deficiencies and suggest draft language which can be used by NMED as Permit conditions or compliance schedules to strengthen the draft Permit. It is expected that this technical document will focus only on major deficiencies which could impact the quality or enforceability of the Permit.
- (3) Participate in meetings and conference calls, including a scoping meeting. It is expected that this scoping meeting will include a break out session in the afternoon. In addition, technical conference calls have also been scheduled within the work plan.
- (4) Conduct an in-depth regulatory review of the draft Permit Application prior to release to the public. The regulatory review will be conducted to assist NMED attorneys in the evaluation of the draft Permit.
- (5) Assist NMED in preparing the fact sheet.
- (6) Provide expert testimony at the Permit hearing. TechLaw would be responsible for the aspects of the Application/Permit that TechLaw has assisted with.
- (7) Assist NMED in preparing responses to comments received during the comment period and the hearing. This may involve preparing summaries of hearing testimony.
- (8) Assist NMED in modifying and finalizing the Permit based on comments received.
- (9) Assist the Office of General Counsel (OGC) in preparing Findings of Fact and Conclusions of Law based on the Triassic Park administrative record.

Each of these tasks is addressed in greater detail below.

TechLaw intends to assign several highly qualified staff to perform these tasks. To conserve limited resources, clerical staff or lower level technical staff will be used to evaluate the Permit administratively, including checking the Permit tables and text for typographical errors or omissions, and reviewing the accuracy of cross-references within the draft Permit and Permit tables, as well as any references between Permit sections, Permit attachments, tables, etc. Since the project is time sensitive, a larger number of personnel have been assigned to perform the work assignment than would normally be used. In so doing, TechLaw can accomplish a quick turn-around without sacrificing product quality. Highly qualified staff familiar with RCRA permitting or familiar with the Gandy-Marley Permit Application will assist NMED in technically evaluating the draft Permit to ensure that all applicable regulatory requirements are met, and to compare the draft Permit with the EPA Model Permit as well as existing RCRA hazardous waste landfill operating Permits issued in the surrounding states. This review will provide suggestions on how to improve the draft Permit, modify existing Permit conditions, and add needed Permit conditions. Technical staff will also evaluate all Federal and New Mexico State citations and references in the draft Permit and attachments to the Permit. Specific staff assigned to the project have been outlined in the staffing and management section of this Work Plan. As part of the technical review process, technical staff will require some time to come up to speed and become familiar with the facility, the Permit and the associated attachments.

The TechLaw Project Manager, Ms. June Dreith, will maintain communication with Mr. Steve Pullen regarding the progress of activities and any unanticipated conditions encountered that will change the schedule, scope of work, or the estimated cost to complete this project.

After the NMED Program Manager and technical staff have evaluated TechLaw's QC review and suggested modifications to the draft Permit, TechLaw will schedule a meeting with the Program Manager and staff to review the comments and make necessary revisions. It is anticipated that TechLaw's technical staff will have full access to the professional NMED staff that prepared the specific modules. All verbal communications between TechLaw and NMED staff, including teleconferences to discuss the draft Permit, will be documented (hand written is acceptable), and a copy submitted to the NMED Program Manager and TechLaw Project Manager.

#### 1. Technical and Administrative Review

TLI will assist NMED by conducting a technical and administrative review of the draft Gandy-Marley Permit prepared by NMED. This task will consist of a complete and thorough Quality Control (QC) review of the draft Permit, including the following:

- Review the draft Permit to ensure that all applicable requirements of 40 CFR Parts 264 and 270 are included or appropriately referenced in the Permit.

- Review all Federal and New Mexico State citations and references in the draft Permit and Attachments for accuracy and applicability.
- Review all text and tables in the draft Permit for typographical errors or omissions.
- Compare all draft Permit requirements and conditions to the U.S. EPA model permit language.
- Review all text and tables for accuracy and completeness and provide suggestions, if necessary for changes or improvement to the draft Permit.
- Review, for accuracy, all cross-references within the draft Permit and Permit tables to other Permit sections, Permit Attachments, tables, design drawings and the Permit Application.
- Review the Groundwater Monitoring Waiver to determine technical adequacy.
- Review the waste analysis information contained in the draft Permit and associated attachments.
- Review all text in the draft Permit Attachments for accuracy, errors and omissions. Provide suggestions for changes or improvements to the Permit Attachments text or Appendices.
- Review all cross-references within the Permit Attachments to the draft Permit or Permit Application for accuracy and applicability.
- Evaluate the statistical procedures for vadose zone monitoring including procedures to establish baseline and background concentrations. Soil baseline concentrations will also be assessed as part of this procedure.
- Review and evaluate Module 10, Corrective Action, for regulated units.
- Assist in the review of outstanding NOD issues, and assist in drafting Permit conditions or compliance schedules for any issues which are not adequately addressed by Gandy-Marley. Provide an informal response to NMED regarding items which are still deficient.

2. Technical Review Document

TechLaw will prepare a technical review document which presents areas of the draft Permit and associated Attachments that are deficient. The technical review document will include suggested language for draft Permit conditions or language for compliance schedules. This comprehensive document will be based on the deficiencies noted during the review of the draft Permit (Task 1). TechLaw's technical review will focus on major areas of concern where the deficiency could impact the quality or enforceability of the Permit. This task may also require that TechLaw review previously submitted documents or correspondence from Gandy-Marley, including the most recent as well as previously submitted NOD responses, to assess if these responses have been properly incorporated into the Permit Attachments.

3. Participation in Meetings and Conference Calls

Communication is of the utmost importance to the timely completion of this project. Therefore, it is expected that at least two face-to-face meetings between NMED and TechLaw will be necessary. The first will be a scoping meeting to be held in Santa Fe with the Program Managers and key technical staff from both NMED and TechLaw. TechLaw believes the scoping meeting should be held approximately one to two weeks after receipt of the draft Permit and Attachments. This will provide TechLaw time to briefly review the documents and prepare for discussion of general questions or issues. Prior to the meeting TechLaw, with input from NMED, will prepare a draft agenda for the meeting. It is expected that after a morning of general discussions that the afternoon will consist of break-out sessions addressing specific Permit modules or technical topics of concern. TechLaw expects that approximately 4 people will need to participate in the scoping meeting. Based on discussions between the NMED Project Manager, Steve Pullen, and TechLaw Project Manager, June Dreith, determination may be made to schedule a conference call rather than travel to New Mexico for the scoping meeting. This determination will be made approximately two weeks after receipt of the draft Permit, Permit attachments, NODS, and associated materials.

It is anticipated that numerous technical conference calls will be necessary to support specific NMED needs. These conference calls will be documented by TechLaw as previously discussed. Once the TechLaw review of the draft Permit is complete and NMED has reviewed the deliverable, it is expected that another meeting will be needed. The level of effort for this meeting may be smaller in scope with fewer (e.g., 3) key staff in attendance. The NMED Program Manager will determine if the second meeting is necessary; however, to provide an estimate of cost and level-of-effort, this meeting has been proposed and is included in this Work Plan.

Travel is anticipated in association with this task. Cost and level-of-effort are provided in Attachment IV of the Work Plan.

4. Conduct In-Depth Review of Application

TechLaw, through its subcontract with Ms. Charlotte Robinson, Esq. will conduct an in-depth regulatory review of the complete draft Permit, including attachment. This review will be conducted to assist NMED and NMED attorneys in the final assessment of the draft Permit.

5. Assist NMED in Preparing the Fact Sheet

TechLaw will assist NMED in preparing and/or reviewing the fact sheet for Gandy-Marley. The fact sheet will contain a general description of all parts of the draft Permit.

In addition, TechLaw will assist NMED in preparing written testimony in support of certain imposed conditions in the draft Permit. This testimony will be divided into two sections: (1) a statutory and regulatory background section, and (2) a section that addresses imposed Permit conditions.

6. Provide Expert Testimony at the Permit Hearing

TechLaw is prepared to provide expert testimony at the public hearing on those areas of the Permit which were reviewed by TechLaw. At the present time, TechLaw believes that there is the potential that witnesses would only be needed in two areas, engineering and the Waste Analysis Plan. Those individuals would include Mr. Steve Druschel who would provide expert testimony on the engineering issues and Ms. Connie Walker who would provide expert testimony on the waste analysis issues. Ms. Charlotte Robinson may also be required to assist NMED with legal support at the hearing. Other individuals who worked on the draft Permit could also be available to participate in the public hearing, at the request of NMED. Travel is required.

7. Assist NMED in Preparing Responses to Comments Received During the Comment Period and the Hearing

TechLaw will assist NMED in responding to the comments from the public hearing and written comments obtained during the public comment period. In preparing responses to past NMED hearings, TechLaw has prepared "Response to Comment Matrices" that categorized the comments received from the public by Permit Part (Module). The matrix included the following information: identification of the commentor, comment subject, summary of comment, impact to draft Permit condition(s), NMED response, and whether the Permit was

modified based on the comment. This provided a useful tool in assuring that all comments were addressed in an acceptable manner and that the appropriate changes were made to the Permit. In addition, this provided a legal mechanism to track all relevant public comments. TechLaw suggests that the same procedure be utilized to address responses to public comment on the Gandy-Marley draft Permit. The matrix can address both oral and written comments obtained during the public hearing and public comment period, or separate matrices can be prepared for each. In addition, copies of all public comments received were maintained by TechLaw.

TechLaw can also prepare summaries of the hearing testimony which would be based on the transcriptions obtained during the public hearing.

8. Assist NMED in Modifying and Finalizing the Draft Permit Based on Comments Received

TechLaw will assist NMED in modifying the Permit based on public comment. This will be accomplished by identifying the comments which need to be included by preparation of the "Response to Comment Matrix" and then by preparing a redline/strikeout version of the final Permit for review by NMED. As was done by TechLaw in the draft Permit, "imbedded" descriptions will indicate the TechLaw personnel who modified that section of the Permit and the date it was modified.

9. Assist the Office of General Counsel (OGC) in Preparing Findings of Fact and Conclusions of Law

Ms. Robinson will assist NMED in preparing the Findings of Fact and Conclusions of Law and will assist at the public hearing as necessary. For the purpose of this Work Plan, we have assumed that Ms. Robinson will be present at the public hearing the entire time, and TechLaw has also included hours for Ms. Robinson in this Work Plan to perform a final legal review of the Permit.

**SUBCONTRACT**

TechLaw has subcontracted with Ms. Charlotte Robinson, Esq. to conduct in-depth regulatory and legal review to assist OGC in preparing for the public hearing, witness preparations, response to public comments, and preparing Findings of Fact and Conclusions of Law.

**PRIMARY INTENDED USE**

The purpose of this work assignment is to provide technical support to the NMED in review of the draft Permit, to assist in the public hearing and response to comments, and to assist in finalizing the Permit for the Gandy-Marley facility. TechLaw will provide information to assist

NMED in making decisions relative to the adequacy of information presented and assist in preparing the draft Permit and final Permit. The NMED will make the final determinations regarding the draft Permit and final Permit and determine whether the facility meets the regulatory requirements and technical standards of the New Mexico Hazardous Waste Management Regulations (NMHWMR).

### **PROJECTS AND TASKS**

- Task 1 - Conduct a Technical and Administrative Review of the draft Permit and associated Attachments, and evaluate the statistical procedures for vadose zone monitoring. In addition, technical staff will provide technical emphasis on the information pertaining to the waste analysis plan and waste characterization section of the Permit. Task 1 will also include an evaluation of the Corrective Action for regulated units, Module 10.
- Task 2 - Prepare a Technical Review Document which can be used as a NOD.
- Task 3 - Participate in meetings and conference calls.
- Task 4 - Conduct an in-depth regulatory review of the complete Application to assist the NMED attorneys.
- Task 5 - Assist NMED in preparing the fact sheet.
- Task 6 - Provide expert testimony at the Permit hearing. TechLaw would be responsible for the aspects of the Application/Permit that TechLaw has assisted with.
- Task 7 - Assist NMED in preparing responses to comments received during the comment period and the hearing. This may involve preparing summaries of hearing testimony.
- Task 8 - Assist NMED in modifying and finalizing the Permit based on comments received.
- Task 9 - Assist the Office of General Counsel (OGC) in preparing Findings of Fact and Conclusions of Law based on the Triassic Park administrative record.
- 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, conference calls,

and monthly reports are included in this task. In addition, clerical assistance will be billed to this task.

### **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 will serve as the TechLaw Project Manager, and will also assist in performing reviews of the general facility information as needed. Ms. June Dreith is an environmental specialist with 20 years professional experience, including management of permit application reviews and other projects. She has performed numerous Part B Permit Application reviews, oversight of incinerator trial burns, and Part B Permit Training Course presentations.

Mr. Gary Walvatne is a geologist with 19 years of professional experience including management of permit application review and drafting permits. He has evaluated numerous Part B Permit Applications, conducted corrective action reviews, and presented Part B Permit Training Courses including training on Subpart X units.

Mr. Mohamed Nur is a civil engineer with 8 years of professional experience that has included Part B Permit Application reviews with an emphasis on landfill, engineering design reviews, tank designs, and container storage areas.

Mr. Michael Smith is an environmental engineer and researcher with 19 years of experience. He has demonstrated expertise in RCRA permitting requirements for hazardous waste combustors such as incinerators, boilers and industrial furnaces (BIFs), landfills, tanks, surface impoundment, and Subpart X units. Mr. Smith has also presented training information in support of the RCRA program.

Ms. Connie Walker has over 18 years of experience in environmental consulting. Ms. Walker has managed and performed numerous projects including evaluation of RCRA detection/compliance monitoring systems, waste analysis plan reviews, and waste characterization. Additionally, she has provided expert witness testimony on behalf of NMED on RCRA waste analysis plans with respect to the WIPP.

Mr. Robert Thielke has a master in Environmental Management and a B.S. degree in chemical engineering. Mr. Thielke has RCRA experience in waste analysis plans and waste characterization, including quality assurance project plans and field audits. He has been involved in review of waste analysis plans for incinerators, BIFs, and other combustion units. Mr. Thielke is a Certified Hazardous Material Manager.

Mr. Kevin Higgins has a master in Environmental Science and a B.S. degree in Environmental Studies. He has over 8 years of experience and has been involved in statistical assessment for hazardous waste sites with regards to both groundwater and soils.

Mr. Steve Druschel is a registered professional engineer in 5 states including Massachusetts, Maine, Virginia, New York, and Connecticut and offers over 20 years of experience. He is specialized in many aspects of RCRA including engineering design, landfill construction, tanks, surface impoundments, and containers, but has in the last few years been heavily involved in Subparts AA/BB/ and CC. Mr. Druschel has conducted numerous training courses in Subpart AA/BB/CC as well as other RCRA permitting training courses.

Ms. Charlotte Robinson, Esq. is an attorney who specializes in environmental law. Her vast experience in the field includes transportation (Colorado) air quality, RCRA, NEPA, CERCLA and underground storage tanks, among others.

Ms. Jasmine Merkle has conducted and managed numerous RCRA training programs, seminars, and workshops including RCRA permit writer training courses.

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 II and hourly allocations are shown in Attachments III-A and III-B.

### **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 task 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. The proposed performance schedules are provided in Attachments I-A and I-B.

### **COST ESTIMATE**

The estimated costs for completing project tasks scheduled to date are included as Attachments IV-A and IV-B.

**ATTACHMENT I-A**

**TASKS 1 - 4**

**PROPOSED PERFORMANCE SCHEDULE**

DATE	ACTIVITY
September 13, 2000	NMED approves Work Plan.
September 29, 2000	HRMB delivers draft Permit and Attachments to TechLaw.
November 10, 2000 <sup>1</sup>	TechLaw delivers draft review and evaluation of statistical approach, and provides comments on Permit conditions and draft compliance schedules to HRMB (approximately 60 day review period).
November 20, 2000	HRMB delivers complete draft Permit Application to Ms. Robinson.
December 13, 2000	TechLaw delivers regulatory review to HRMB.

<sup>1</sup> This represents the final deliverable. If sections of the draft Permit are complete and delivered to TechLaw prior to the entire document, TechLaw will make every effort to review and comment on those sections in an expedited manner.

**ATTACHMENT I-B**

**TASKS 5 - 9**

**PROPOSED PERFORMANCE SCHEDULE**

DATE	ACTIVITY
March 9, 2001	NMED approves Work Plan.
March 12, 2001 <sup>1</sup> to March 31, 2001	Assist in preparation of fact sheet and with imposed conditions.
March 12, 2001 <sup>1</sup> to September 7, 2001	Assist in preparing the Findings of Fact and Conclusions of Law.
March 12, 2001 <sup>1</sup> to September 7, 2001	Response to public comment (oral and written).
March 15, 2001 <sup>1</sup> to July 16, 2001	Prepare written expert testimony (Mr. Steve Druschel and Ms. Walker).
July 16, 2001 to July 21, 2001	TechLaw assists at the public hearing. Participants include Ms. Robinson, Mr. Druschel, Ms. Walker and Ms. Dreith.
August 18, 2001 to September 7, 2001	Assist in finalizing the Gandy-Marley Permit

<sup>1</sup> Note: Some dates overlap since there is the possibility that comments and other information may be provided in phases as the information is submitted to NMED and provided to TechLaw.

**ATTACHMENT II**

**STAFF RESPONSIBILITY CHART**

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
J. Dreith	Project Manager Technical Staff	General program oversight, monitoring of project planning and implementation, including performance of activities. Overall project management including day-to-day management of project progress, project tracking, liaison to State, including performance of activities. Review of general facility, of Modules I and II. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.
G. Walvatne	Technical Staff	Review draft Permit sections for closure and post-closure. Perform review of corrective action modules, as necessary. Prepare technical review comments for Sections as needed. Attend scoping meeting with NMED.
M. Smith	Technical Staff	Review draft Permit sections for surface impoundments. Prepare technical review comments on the sections. Attend scoping meeting with NMED. QC of Subpart BB/CC sections. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
M. Nur	Technical Staff	Review draft Permit sections for containers and tanks. Prepare technical review comments on the sections. Attend scoping meeting with NMED. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.
C. Walker	Technical Staff	Review groundwater/vadose monitoring sections of the Permit and assist in review of WAP. Evaluate the Groundwater Monitoring Waiver. Prepare technical review comments on the sections. Attend scoping meeting with NMED. Assist in assessment of Module 10 (Corrective Action). Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.
K. Higgins	Technical Staff	Assist in the evaluation of statistical procedures for the vadose zone monitoring, as necessary. Prepare technical review comments. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.
C. Robinson, Esq.	Regulatory Staff	Conduct in-depth independent review of the complete draft Permit. Assist in preparing the Findings of Fact and Conclusions of law, assist at the public hearing, and conduct final legal review of Permit

<u>STAFF</u>	<u>ROLE</u>	<u>AREAS OF RESPONSIBILITY</u>
R. Thielke	Technical Staff	Review WAP section and assist in preparation of technical review comments.
S. Druschel	Technical Staff	Review Subpart BB/CC sections and perform QC of engineering sections and corrective action Permit modules. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested. Provide expert witness testimony at the public hearing as required by NMED.
J. Merkle	Technical Staff	QC of general sections and Permit modules associated with general facility information and closure/post-closure sections. Assist in preparing fact sheet, prepare response to comments received during public hearing and public comment period, assist in finalizing Permit, and if necessary provide support at public hearing, as requested.

**ATTACHMENT III-A**  
**STAFFING HOURLY ALLOCATIONS**  
**FOR TASKS 1 - 4**

<u>Name</u>	<u>Labor Category</u>	<u>Task</u>					<u>TOTAL</u>	
		<u>01</u>	<u>02</u>	<u>03</u>	<u>04</u>	<u>98</u>		<u>99</u>
<u>Project Manager/ Work Assignment Manager</u>								
J. Dreith		32	16	16			40	104
<u>Technical Staff</u>								
G. Walvatne	Technical Engineer	80	32	16				128
G. Koenig	Technical Engineer	90	40	32				162
M. Smith	Technical Engineer; QC	90	32	16				138
M. Nur	Technical Engineer	76	24	2				132
S. Druschel	Technical Engineer; QC	24	8	4		48		84
C. Walker	Geologist	120	24	32				176
R. Thielke	Chemist	24	8					32
J. Dreith	Technical	40	16	32				88
K. Higgins	Statistician	50		16				66
J. Merkle	QC			8		48		56
<u>Subcontract</u>								
C. Robinson, Esq.	Regulatory Specialist				100			100
<u>Clerical Staff</u>								
D. Romero	Clerical/ Administrative Review	60	20	16		8		104
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TOTAL		690	220	220	100	104	40	1,370

Task 98 - Quality Control

Task 99 - Project Management, including maintenance of the administrative record

**ATTACHMENT III-B**

**STAFFING HOURLY ALLOCATIONS  
 FOR TASKS 5 - 9**

<u>Name</u>	<u>Labor Category</u>	<u>Task</u>							<u>TOTAL</u>
		<u>05</u>	<u>06</u>	<u>07</u>	<u>08</u>	<u>09</u>	<u>98</u>	<u>99</u>	
<u>Project Manager/ Work Assignment Manager</u>									
J. Dreith		4	4	8	8	8		18	50
<u>Technical Staff</u>									
G. Walvatne	Technical Staff	20		24	24				68
M. Smith	Technical Engineer; QC	20		60	40				120
S. Druschel	Technical Engineer; QC		60	40	20		30		150
C. Walker	Geologist	40	60	60	20				180
R. Thielke	Chemist			20					20
J. Dreith	Technical	40	60	40	20				160
J. Merkle	QC						30		30
<u>Subcontract</u>									
C. Robinson, Esq.	Regulatory Specialist		160			160			320
<u>Clerical Staff</u>									
D. Romero	Clerical/ Administrative Review	8	8	28	28	8			80
TOTAL		132	292	280	160	116	60	18	1,178
GRAND TOTAL III-A and III-B									2,548

Task 98 - Quality Control

Task 99 - Project Management, including maintenance of the administrative record

**ATTACHMENT IV-A**  
**COST ESTIMATE**  
**TASKS 1 - 4**

Name	P-Level		Hours	Cost	
J. Dreith	P4		192.0	\$17,093.76	
G. Walvatne	R4		128.0	12,572.16	
G. Koenig	P4		162.0	10,863.72	
M. Smith	R4		138.0	13,285.26	
M. Nur	T3		132.0	8,556.24	
S. Druschel	T4		84.0	5,754.84	
C. Walker	R4		176.0	18,066.40	
R. Thielke	T4		32.0	2,294.08	
K. Higgins	T3		66.0	3,668.28	
J. Merkle	R3		56.0	3,647.28	
D. Romero	Clerical		104.0	3,246.88	
Subcontract - C. Robinson	Specialist		100.0	17,930.00	
<b>Total Labor</b>			<b>1,270.0</b>	<b>\$116,978.90</b>	
Other Direct Costs:					
Reproduction	Copies	5,000	\$0.06	\$300.00	
Telephone	Minutes	3,800	0.23	874.00	
Telephone - Conference Calls	Call	5	150.00	750.00	
Computer	DL hours	1,270	0.99	1,257.30	
Postage/Shipping	Lbs.	200	3.99	798.00	
Total Other Direct Costs				\$3,979.30	
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking
Denver – Albuquerque (2 persons, 2 trips)	\$1,400.00	\$326.00	\$308.00	\$160.00	\$248.00
Salt Lake - Albuquerque (1 person, 2 trips)	500.00	163.00	154.00	160.00	144.00
Wash. DC - Albuquerque (1 person, 1 trip)	400.00	85.00	77.00		72.00
Total	\$2,300.00	\$574.00	\$539.00	\$320.00	\$464.00
Total Travel Costs					\$4,197.00
<b>Total Other Direct Costs</b>					<b>\$3,979.30</b>
<b>Total Estimated Costs including Fee</b>					<b>\$125,155.20</b>

**ATTACHMENT IV-B**  
**COST ESTIMATE**  
**TASKS 5 - 9**

Name	P-Level		Hours	Cost	
J. Dreith	P4		210.0	\$19,834.50	
G. Walvatne	R4		68.0	6,678.96	
M. Smith	R4		120.0	11,552.40	
S. Druschel	T4		150.0	10,276.50	
C. Walker	R4		180.0	19,603.80	
R. Thielke	T4		20.0	1,521.00	
J. Merkle	R3		30.0	2,073.00	
D. Romero	Clerical		80.0	3,230.40	
<b>Total Labor</b>			<b>858.0</b>	<b>\$74,770.56</b>	
<b>Subcontract Personnel:</b>					
C. Robinson	Specialist		320.0	<b>\$57,376.00</b>	
<b>Other Direct Costs:</b>					
Reproduction	Copies	5,000	\$0.06	\$300.00	
Telephone	Minutes	2,000	0.23	460.00	
Telephone - Conference Calls	Call	4	150.00	600.00	
Computer	DL hours	858	0.99	849.42	
Postage/Shipping	Lbs.	300	3.99	1,197.00	
<b>Total Other Direct Costs</b>				<b>\$3,406.42</b>	
Travel	Airfare	Hotel	Meals	Rental Car	Mileage & Parking
Denver – Santa Fe (3 persons, 1 trip)	\$1,350.00	\$1,350.00	\$660.00	\$390.00	\$245.00
<b>Total Travel Costs</b>					<b>\$3,995.00</b>
<b>Total Estimated Costs including Fee</b>				<b>\$139,547.98</b>	