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Los Alamos Legacy Cleanup Compliance Order on Consent Campaigns Fiscal Year 2022



ENVIRONMENTAL MANAGEMENT SAFETY & PERFORMANCE & CLEANUP & CLOSURE **David Nickless, Director, Completion Project Delivery Environmental Management** Los Alamos Field Office September 29, 2021



Consent Order

What is the Consent Order?

- The 2016 Consent Order with the state of New Mexico provides the framework for current and future actions to implement regulatory requirements and establish an effective structure for accomplishing the cleanup on a priority basis.
- The 2016 Consent Order established a corrective action process to satisfy the Resource Conservation and Recovery Act (RCRA) requirements contained in the 2005 Consent Order and encompasses all work scope included within the 2005 Consent Order.





EM-LA Consent Order Scope:

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 Corrective actions for releases of hazardous waste or hazardous waste constituents from solid waste management units (SWMUs) and areas of concern (AOCs).

Consent Order Scope

- Corrective actions for releases of groundwater contaminants, toxic pollutants, and explosive compounds.
- Groundwater monitoring, characterization, and corrective action activities.





EM-LA Non-Consent Order Scope:

- Transuranic (TRU) radioactive waste/Area G operations
- Individual Permit for stormwater management (EPA)
- Decontamination and Decommissioning (D&D) of excess facilities





Milestones & Targets

What are Milestones and Targets in the Consent Order?

- Milestone
 - An enforceable deadline listed in Appendix B for the current fiscal year (FY).
 - Appendix B will include between 10 and 20 milestones for each current FY.
- Target
 - A non-enforceable deadline listed in Appendix B for the next two FYs (i.e., FY+1 and FY+2).
 - Appendix B will include between 10 and 20 targets for each of the next two years.





Campaign Approach

Corrective action activities required by the Consent Order will be organized into campaigns, generally based upon a risk-based approach to grouping, prioritizing, and accomplishing corrective action activities at SWMUs and AOCs.

Consent Order Campaigns

A campaign may consist of one or more projects; campaigns and projects consist of one or more tasks and deliverables.





Consent Order FY22 Campaigns

Campaigns in Fiscal Year 2022

- □ Chromium Interim Measures and Characterization
- Royal Demolition Explosives (RDX) Characterization
- Supplemental Investigation Reports
- Southern External Boundary
- Material Disposal Areas G and L (Technical Area 54) Remedies





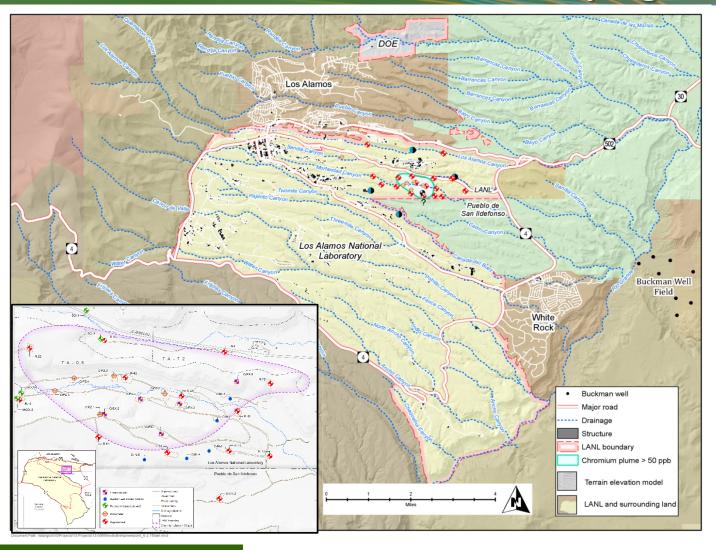
Chromium Interim Measures and Characterization Campaign

- Includes the installation and operation of three wells (R-71, R-72 and R-73) and associated equipment necessary to meet three primary objectives:
 - 1) provide interim measures to prevent migration of the plume beyond the Laboratory boundary;
 - 2) perform scientific studies and aquifer testing to obtain data necessary to conduct a corrective measures evaluation; and
 - 3) conduct a corrective measures evaluation.





Location of Chromium Campaign







R71 Well Construction



Drilling angled injection well for Interim Measure





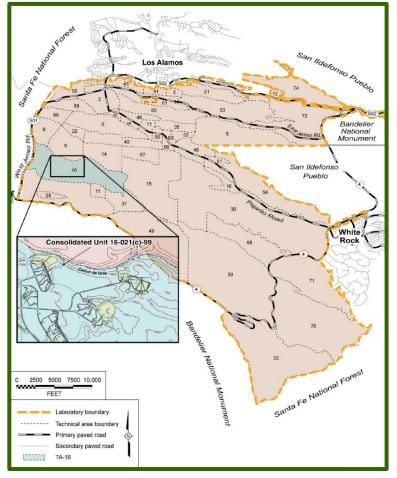
Royal Demolition Explosives (RDX) Characterization Campaign

- Includes potential interim measures or surface activities to prevent further migration of RDX, and characterization of the intermediate/regional groundwater, through well installation, tracer studies, and other evaluations necessary to complete the investigation of nature and extent.
- EM-LA/N3B will determine the need for further remediation to protect groundwater.





RDX Campaign



Location of RDX Campaign with respect to Laboratory TAs



Regional well R-68 under construction





Supplemental Investigation Reports Campaign

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- Includes the submission of ten aggregate area supplemental investigation reports (SIRs) that reevaluate the nature and extent of contamination and risk to human health and the environment.
- All SIRs will be submitted in FY22. Previously submitted SIRs are under review by NMED, and comments will be addressed and revisions submitted.





Southern External Boundary Campaign

- Includes initial investigating and remediation needed of five aggregate areas.
- Field activities for FY22 include two aggregate areas: North Ancho and Potrillo/Fence Canyons.





MDA G and MDA L Campaign

Material Disposal Areas G and L Remedies Campaign

- Includes completion of corrective measures evaluations (CMEs) at MDAs G and L.
- This campaign also includes soil vapor extraction (SVE) of volatile organic compounds (VOC) as an interim measure at MDA L.

