Collective Drainage Clean-Up Approach

o What is it?

o Why is it needed?

o Where is it needed?

The LANL ER Project was restructured in 1994 from 24 operable units (OU) to 5 Field Units (FU); this was done for cost-effectiveness and to increase the overall efficiency of project. It should be noted that the 24 operable units were merely incorporated into the 5 Field Units, the old structures were left intact (e.g., number of TAs within OUs and PRS boundaries remained the same). Additionally, this scheme included reducing (lower salaried) LANL environmental contractors who were qualified to do environmental clean-up, rather than UC staff.

The LANL ER Project is currently attempting to decrease the number of its' 2000+ PRSs (remove them from the HSWA permit) through NFAs, ECs, and VCAs; many PRSs falling within the latter two categories are being addressed by FUs proceeding at their own risk. With NMED currently taking over HSWA and AIP currently using about 30% of its' time for ER issues, staffing needs must be addressed within HRMB to meet the workload. Good Luck!

In the past, funding of ER Project activities seems to have proceeded in a hap-hazard manner, and on a site-by-site basis; the townsite and other high visibility sites were usually prioritized and funded regardless to the degree or extent of their impact on the environment. Also, in 1993 all PRSs at LANL were ranked by a computer code site ranking system (SRS) modified from SNL. The ranking was to be conducted on a yearly basis, it has only been performed once to AIP's knowledge. AIP feels that the current SRS is inadequate and should be up-dated ASAP.

In order to lessen the Laboratory's historic and future operational impacts to New Mexico's environment, some NMED bureaus are expressing their concerns that the LANL ER Project prioritize funding so as to address:

- a regrouping of some PRSs across old OU boundaries that are located within a similar geographical or watershed region. Such a regrouping of PRSs should include all sources that might potentially impact a canyon or watershed's surface and ground water. These must include those PRSs which are most likely to have COCs leave the site or Laboratory boundary during snow-melt or storm events.

- mitigation of all PRSs located in a similar geographical or watershed region within a reasonable amount of time, rather than on a site-by-site basis, which would span years as funds allow.