



## Public Meeting on Annual Planning Process 2016 Compliance Order on Consent Los Alamos National Laboratory

December 16, 2019, 5:00 p.m. to 7:00 p.m.  
Los Alamos County Council Chambers  
1000 Central Avenue, Los Alamos, NM 87544

### AGENDA

Time	Topic	Presenter
5:00 p.m.	Welcome and Meeting Overview.....	Stephanie Stringer, New Mexico Environment Department
5:10 p.m.	Annual Planning Process.....	Stephanie Stringer, New Mexico Environment Department
5:40 p.m.	Milestones Achieved and Work Completed in FY 2019.....	Doug Hintze, DOE EM Los Alamos Field Office
6:15 p.m.	Public Comment Period.....	
7:00 p.m.	Adjourn.....	Stephanie Stringer, New Mexico Environment Department



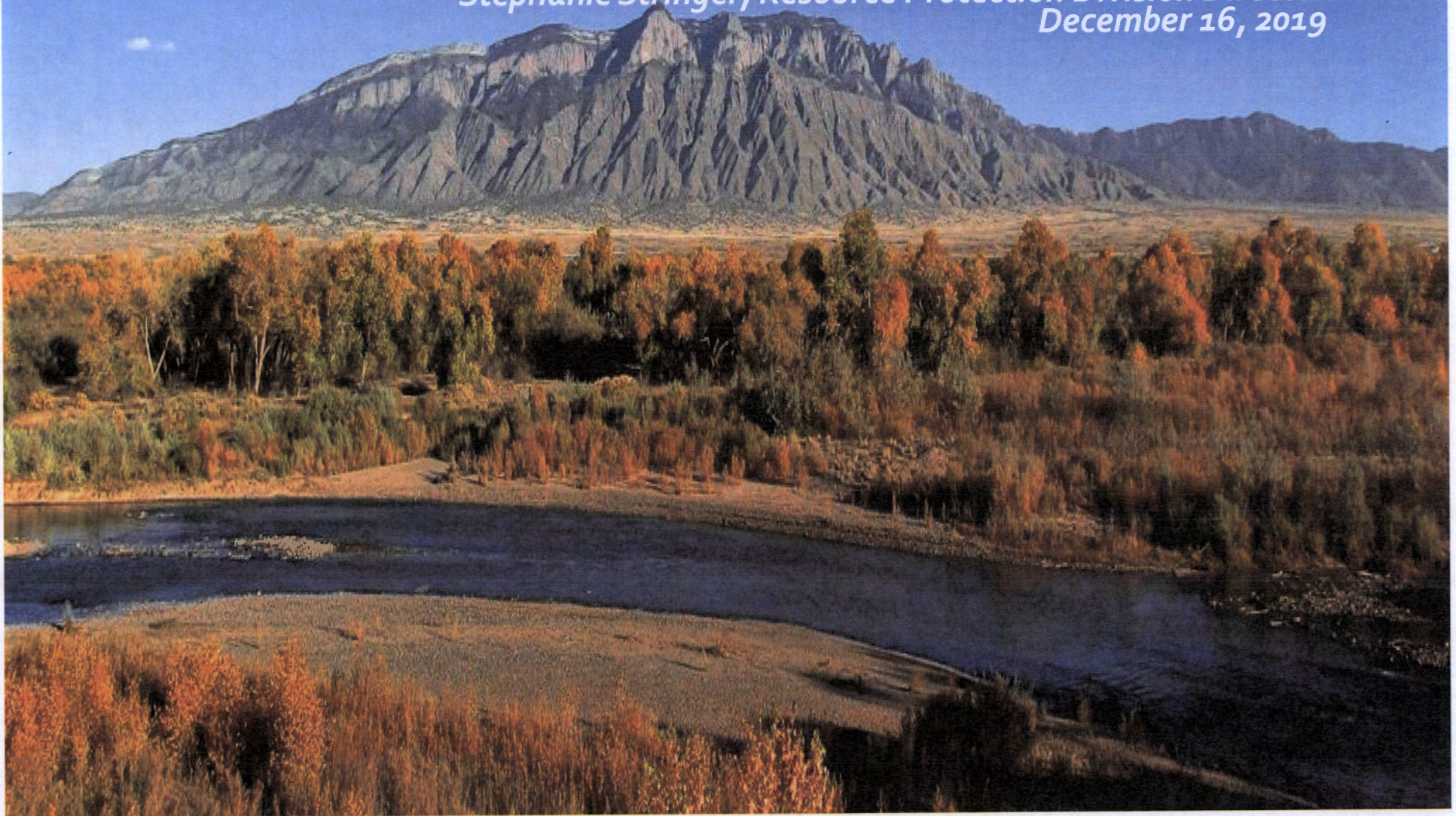




# New Mexico Environment Department

## Los Alamos National Laboratory Compliance Order on Consent Public Information Meeting – FY2020 Milestones (Appendix B)

*Stephanie Stringer, Resource Protection Division Director  
December 16, 2019*





# AGENDA

- NMED:
  - Corrective Action Overview
  - Annual Planning Process
  - Status Updates
- DOE:
  - Work completed in FY2019
- Public Comment Period





# Corrective Action Overview



# History and Relation to the Hazardous Waste Permit

- The Compliance Order on Consent (Consent Order) was signed by the New Mexico Environment Department (NMED) and the U.S. Department of Energy (DOE) in June 2016.
- Most corrective action for releases of hazardous waste or hazardous constituents at Los Alamos National Laboratory (LANL) are conducted under the Consent Order, not under the facility's Hazardous Waste Permit.
- Compliance with the terms of the Consent Order constitutes compliance with the requirements for corrective action under the federal Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act (HWA).
- The Consent Order is an "enforceable document" pursuant to 40 C.F.R. § 264.101 and is the sole mechanism for enforcing corrective action activities at LANL, with the exception of specific conditions which are addressed under the Permit.



# Campaign Approach


- Corrective action activities at LANL are organized by campaign using a risk-based approach.
- There are 17 identified campaigns (e.g., Chromium Interim Measures and Characterization, RDX Characterization Campaign and Remedy Campaign, Technical Area (TA)-21 Demolition & Decommissioning (D&D) and Cleanup Campaign, Material Disposal Area (MDA) C Remedy Campaign, etc.).
- Campaigns are provided in Appendix C and are updated as needed.



# Milestones and Targets

- Appendix B of the Consent Order.
- Current FY milestones are generally based on previous year's targets.
- Each year DOE identifies 10-20 milestones for the upcoming FY and 10-20 targets for the 2 subsequent FYs.
  - **Milestones** for upcoming FY are subject to stipulated penalties.
  - **Targets** for subsequent 2 FYs are not subject to stipulated penalties.





# Annual Planning Process



## Annual Planning Process

- The annual planning process (Section VIII.C) allows for revisions to **milestones, targets, and cleanup campaigns** due to factors such as actual work progress, changed conditions, risk, and funding.
- FY milestones and targets are finalized after DOE receives its FY appropriation. Upon finalization, an updated Appendix B is posted on NMED's Hazardous Waste Bureau's website and a public meeting is held to discuss work progress, facility's changed conditions, and funding levels.
- During each annual planning process, DOE is required to provide NMED with an estimated date as to when all work under the Consent Order will be completed.



## FY 2020 Planning

- DOE submitted updated proposed Appendix B on **July 31, 2019**.
- NMED met with DOE on **August 15<sup>th</sup>, October 15<sup>th</sup> and 30<sup>th</sup>** to discuss updated Appendix B.
- DOE submitted final FY2020 Appendix B on **November 7, 2019**.
- Updated estimated completion date: **2036**
- FY2020 Appendix B is available on the NMED website:  
*<https://www.env.nm.gov/hazardous-waste/lanl>*





# Status & Updates





## FY 2019 Milestones

Milestone Status	Summary		Comments
Completed	17	√	
Extensions Granted	2		#10, #19; no longer considered milestones
Extensions Denied	1		#14; \$58,000 penalty
Additional Deliverables Completed	71		Monthly notifications of groundwater data reviews, periodic monitoring reports, certificates of completion, etc.



## FY 2020 Milestones

- **17** milestones selected for FY2020
  - **8** milestones based on FY2019 targets
  - **2** milestones modified
  - **7** new milestones added
- **17** targets selected for FY2021
- **15** targets selected for FY2022
- Comparison Table describes milestone revisions (See handout)



## FY2020 Milestones (cont'd)

- **Chromium IM & Characterization Campaign-6 milestones**
  - 2 semi annual progress reports
  - 2 work plans for regional wells R-71 and R-72
  - 1 Pilot Scale Amendments testing report
  - 1 Assessment Report for conditions of Aquifer around R-70
- **RDX Characterization Campaign-2 milestones**
  - Fate and Transport Modelling and Risk Assessment Report
  - R-25 plugging and Abandonment Completion Report



## FY2020 Milestones (cont.)

- **Supplemental Investigation Reports-2 milestones**
  - Upper Mortandad Canyon Aggregate Area
  - Upper Canada del Buey Aggregate Area
- **TA-21 D&D and Cleanup Campaign-1 milestone**
  - DP Site Aggregate Area Progress Report
  -
- **Southern External Boundaries Campaign- 3 milestones**
  - Chaquehui Canyon Aggregate Area Investigation Report
  - South Ancho Canyon Aggregate Area Progress Report
  - Lower Water/Indio Canyon Aggregate Area Progress Report



## FY2020 Milestones (cont.)

- **MDAs G & L Remedies Campaign -1 milestone**
  - MDA L Vapor monitoring Report
- **Multi campaigns- 1 milestone**
  - Interim Facility-Wide Groundwater Monitoring Plan
- **No campaign- 1 milestone**
  - Reconfiguration Completion Report for R-31



# THANK YOU!

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