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# **Los Alamos Legacy Cleanup Strategic Vision Presentation**

DOE Environmental Management, Los Alamos Field Office (EM-LA)







#### **For More Information**

- Visit: www.energy.gov/em-la/strategic-vision-development
- Contact us: emla\_strategicvision@em.doe.gov







#### U.S. DEPARTMENT OF OFFICE OF ENVIRONMENTAL MANAGEMENT

### Acronym List

AOC	area of concern	LANL	Los Alamos National Laboratory
AA	aggregate area	MDA	material disposal area
ВОК	basis of knowledge	MDPR	Middle DP Road
CGP	Construction General Permit	MSGP	Multi-Sector General Permit
CH-TRU	contact-handled transuranic waste	N3B	Newport News Nuclear—BWXT Los Alamos
CME	corrective measures evaluation	NMED	New Mexico Environment Department
СМІ	corrective measures implementation	NNSA	National Nuclear Security Administration
СМР	corrugated metal pipe	NPDES	National Pollutant Discharge Elimination System
СО	Consent Order (2016 Compliance Order on Consent)	РАН	polycyclic aromatic hydrocarbons
D&D	decommission and demolition	РСВ	polychlorinated biphenyl
DOE	Department of Energy	RCRA	Resource Conservation and Recovery Act
EJ	environmental justice	RDX	Royal Demolition Explosive
EM-LA	Environmental Management Los Alamos Field Office	SSLs	soil screening levels
ENS	early notification system	SVE	soil vapor extraction
EPA	Environmental Protection Agency	SVOC	semi-volatile organic compound
ER	environmental remediation	SWB	standard waste box
FRP	fiberglass-reinforced plywood	SWMU	solid waste management unit
HAZCat	hazard category (1, 2, 3 or below 3)	ТА	technical area
HWFP	Hazardous Waste Facility Permit	TRU	transuranic
IP	Individual Permit	VOC	volatile organic compound
IWL	industrial waste line	WIPP	Waste Isolation Pilot Plant
L&A	Longenecker & Associates		







## Commonly Used Terms and Definitions

**aggregate area:** a geographic area defined by watershed and canyon running east to west toward the Rio Grande River

**AOC:** an area where a potential release of hazardous waste or constituents may have occurred; not for solid waste management

**CO:** an enforceable agreement between NMED and DOE for the cleanup of legacy waste at LANL; issued in 2016 and modified in 2017; establishes an effective structure for accomplishing cleanup work on a priority basis through the use of dedicated campaigns with achievable and enforceable milestones and targets

**CO campaign:** consists of one or more projects, and includes one or more milestones and targets; may be revised annually based on work progress, changed conditions, risk and funding; are prioritized based on risks to workers, the public, and the environment, as well as stakeholder priorities, as agreed by DOE and NMED

**corrective measure alternative:** all actions taken to clean up, remove, remediate, contain, treat, monitor, assess, evaluate or in any other way address hazardous materials in the indoor and outdoor environment (aka alternative, cleanup alternative, cleanup approach, cleanup strategy, remediation strategy, remedy)

**deferred site:** the SWMUs and AOCs for which full investigation and/or remediation is deferred until such time as the SWMU or AOC is taken out of service or otherwise becomes accessible (e.g., firing sites and active facilities)

environmental media: soil, sediment and surface water and groundwater

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## Commonly Used Terms and Definitions

HAZCat 1: hazard analysis shows the potential for significant off-site consequences

- HAZCat 2: hazard analysis shows the potential for significant on-site consequences
- HAZCat 3: hazard analysis shows the potential for only significant localized consequences
- legacy waste: waste generated before 1999
- **non-CO campaigns:** base program compliance monitoring activities (e.g., groundwater monitoring, surface water monitoring, sediment sampling) that are not specifically part of a campaign, but are done continuously according to existing work plans
- slab: a building's foundation (aka concrete slab)
- **SWMU:** any discernible unit where solid waste was placed at any time, and from which NMED determines there may be a risk of a release of hazardous waste or hazardous waste constituents, irrespective of whether the unit was intended for the management of solid or hazardous waste; such units include any area at which solid wastes have been routinely and systematically released; and they do not include one-time spills
- **TRU waste:** materials containing alpha-emitting radionuclides; with half-lives greater than twenty years and atomic numbers greater than 92; and in concentrations greater than 100 nanocuries per gram of waste







## What is the EM-LA Strategic Vision

#### Strategic Vision Development | Department of Energy

#### **General Overview**

In 2022, the Department of Energy (DOE) Environmental Management Los Alamos (EM-LA) initiated the development of a long-term strategic vision for future LANL Legacy Cleanup Campaigns. The goals of the EM-LA strategic vision are to enhance stakeholder engagement in cleanup decisions, and to align with the objectives of the Los Alamos Legacy Cleanup Contract, regulatory interfaces, anticipated cleanup funding and desired outcomes. The EM-LA strategic vision will be integrated with DOE's broader goals for the legacy cleanup completion.









- Develop a long-term strategic vision from the "ground-up" for the remaining legacy cleanup that is based on consensus of values and priorities from stakeholders and pueblos in northern New Mexico
- Obtain vision through sustained and robust education and engagement
- Aid EM-LA in prioritizing the remaining cleanup work







- Provide stakeholders and pueblos (i.e., engagement groups) an opportunity to play a meaningful role in shaping the direction and completion of remaining legacy cleanup work at Los Alamos
- Build and strengthen relationships with stakeholders and pueblos
- Develop a realistic and stakeholder-informed vision document for remaining LANL legacy cleanup to assist DOE in prioritization
- Consider existing regulatory commitments
- Determine how best to use available funding and resources







## What is the EM-LA Strategic Vision Phases



We envision a multi-phase process that we anticipate will wrap up at the end of 2024

Note: There are no pre-determined conclusions for this process—this vision will be developed through the values and feedback we hear from you



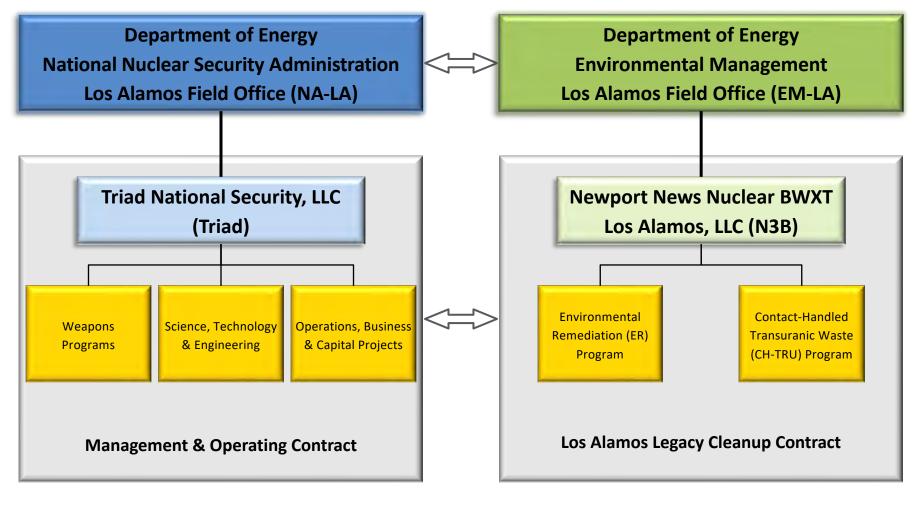




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#### **Organizational Structure**









## Los Alamos Legacy Cleanup Mission









#### Legacy Cleanup Scope

#### **EM-LA Scope Areas**

<b>Contact-Handled Tra</b>	nsuranic Waste (CH-TRU) Program
Waste Management, Char	acterization and Shipping
Transuranic Waste	
Mixed/Low-Level Waste	
Remediation Waste	
Hazardous Waste	
Other Waste Streams	
Legacy Waste Retrieval a	nd Processing
Above Ground Inventory W	aste Processing
Below Ground Waste Proce	essing: Corrugated Metal Pipes
Below Ground Waste Proce	essing: Pit 9 Waste Processing
Below Ground Waste Proce	essing: Trenches A-D Waste Processing
Below Ground Waste Proce	essing: Shafts Waste Processing

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#### **Other Work**

Ion Beam Facility D&D

- FY22 approved budget: \$292 million
- N3B FY22 cleanup budget: \$236 million

Environmental Remediation (ER) Pro	ogram
Groundwater Monitoring	
Interim Facility-Wide Groundwater Monitoring Plan	
Surface Water Monitoring	
Multi-Sector General Permit	
Individual Permit	
Consent Order Campaigns	
Chromium Interim Measures & Characterization	
Chromium Final Remedy	
Royal Demolition Explosives Characterization	
Royal Demolition Explosives Remedy	
Historical Properties Completion	
Supplemental Investigation Reports	
Southern External Boundary	
Sandia Canyon Watershed	
Pajarito Watershed	
Upper Water Watershed	
TA-21 D&D and Cleanup	
Material Disposal Areas (MDAs) A & T Remedy and Gene	eral's Tanks
MDA C Remedy	
MDA AB Remedy	
MDA H Remedy	
MDAs G & L Remedy	
Soil Remediation	
Middle DP Road Site Completion	







#### **Regulatory Framework**

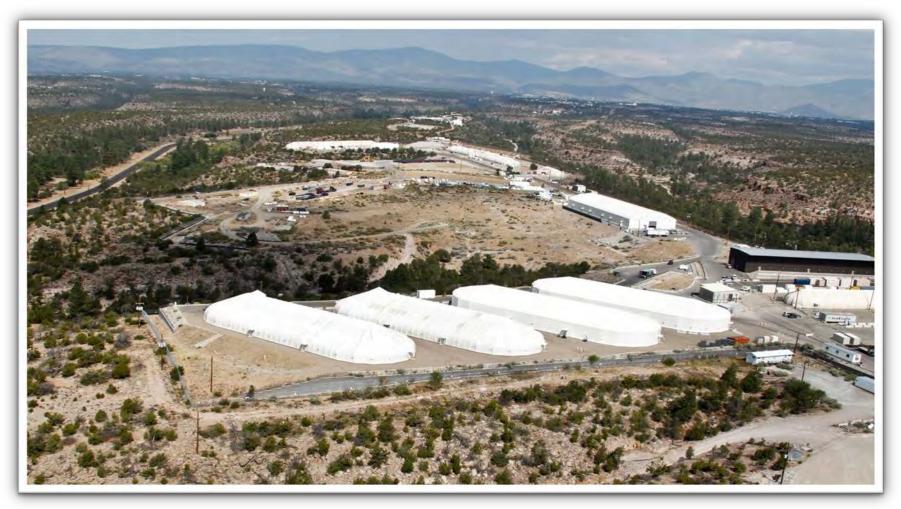
Clean Water Act (Regulator: U.S. EPA)				
National Pollutant Discharge Elimination	Authorizes storm water discharges associated with industrial activities			
System (NPDES) Multi-Sector General Permit	• N3B maintains authorization for two separate facilities, Areas G and L and the TA-54			
	Maintenance Facility			
	<ul> <li>N3B is the signatory for this permit</li> </ul>			
NPDES Construction General Permit • Eligible projects are authorized to discharge storm water associated with cons				
	activities			
	Currently, N3B has six projects with active coverage under this general permit			
	<ul> <li>N3B is the signatory for this permit</li> </ul>			
NPDES Individual Permit	For discharges of storm water associated with industrial activities from specified solid			
	waste management units and areas of concern			
	• EM-LA and N3B are signatories to the current, administratively continued permit			
	EPA Region 6 issued a new permit in August 2022			
Discharge Permits (Regulator: NMED Groundw	ater Quality Bureau)			
Discharge Permit (DP) 1793: General Land	<ul> <li>EM-LA and N3B are signatories</li> </ul>			
Application of Treated Groundwater				
DP 1835: Injection Wells for Chromium Project	EM-LA and N3B are signatories			
Clean Air Act (Regulator: NMED Air Quality Bur	reau)			
Title V/VI: Stationary Sources (Small Site	<ul> <li>EM-LA and N3B sources are integrated with site-wide program</li> </ul>			
Generator) Permit	EM-LA, N3B, NA-LA and Triad (i.e., all four parties) are signatories			
Resource Conservation and Recovery Act (Regulator: NMED Hazardous Waste Bureau)				
Los Alamos National Laboratory Hazardous	<ul> <li>EM-LA and N3B have a separate program for their operations</li> </ul>			
Waste Facility Permit	All four parties are signatories			
2016 Compliance Order on Consent	EM-LA is the signatory			
This table is a general listing of regulatory requirements. EM-LA and its contractor must also comply with the National Environmental Policy Act (NEPA), DOE Orders and other applicable local, state or federal regulations. Additional information on regulatory requirements can be found in the Los Alamos Legacy Cleanup Contract (https://www.energy.gov/em-la/contracts).				
state of rederan regulations. Additional mornation of regulatory requirements can be round in the Los Alamos Legacy Cleanup Contract (https://www.energy.gov/en-la/contracts).				







## **Overview: CH-TRU Program**

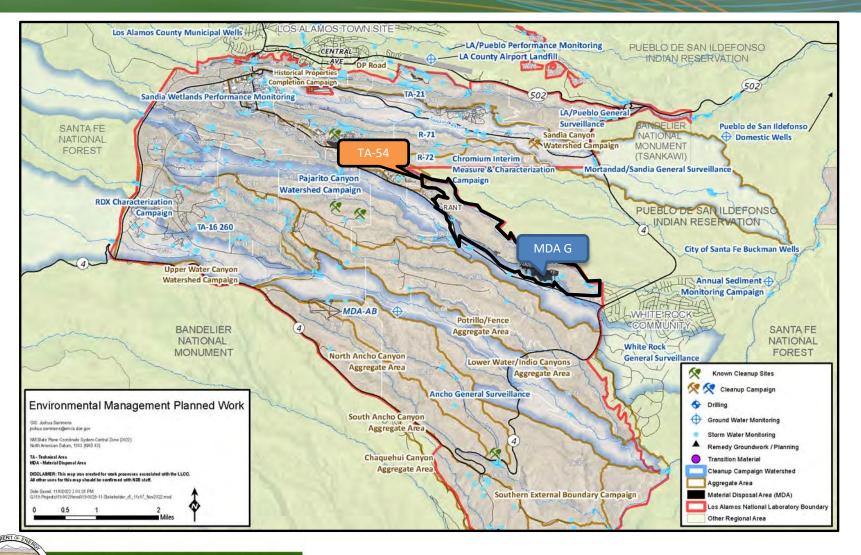








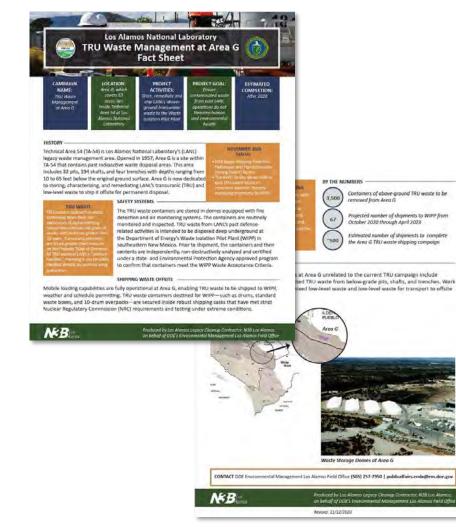
#### **TA-54: CH-TRU Projects**







#### **TA-54: CH-TRU Fact Sheet**









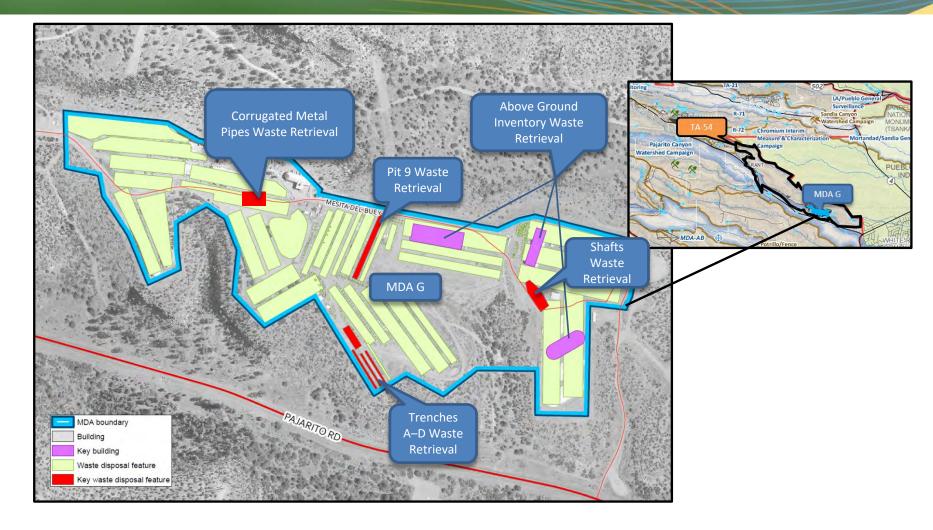


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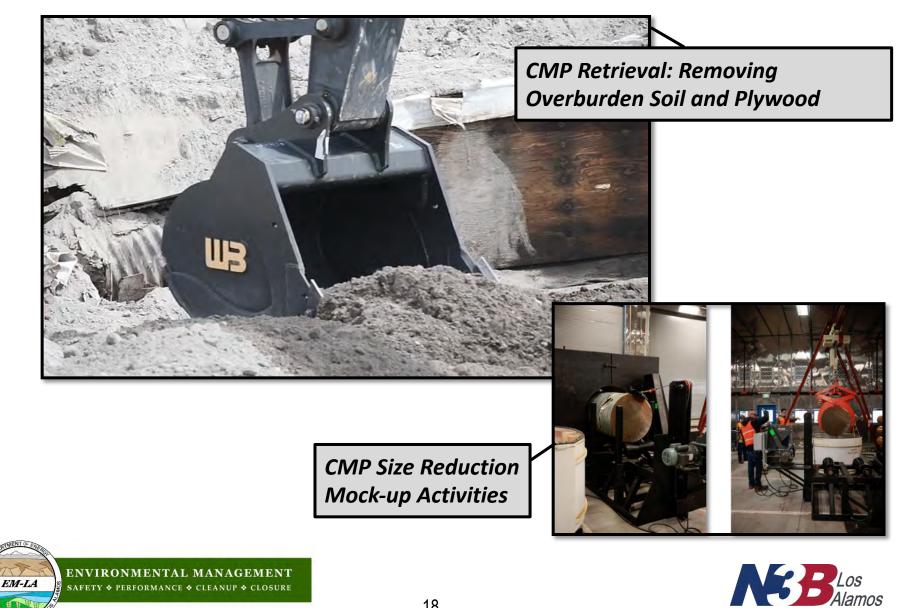
### **TA-54: CH-TRU Projects**







### **CMPs Excavation and Processing**



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### **Pit 9 Waste Emplacement**





Waste Containers Were Placed into *Pit 9 from 1974 through 1979* 

Fiberglass-reinforced Plywood Boxes in Pit 9







#### **Trenches A–D Waste Emplacement**



Arrays Have the Capacity to Hold Two 30-Gallon Drums Stacked One Above the Other



Arrays of Sealed Concrete Casks







#### **33 Shafts**







### **Above Ground TRU Waste Storage**

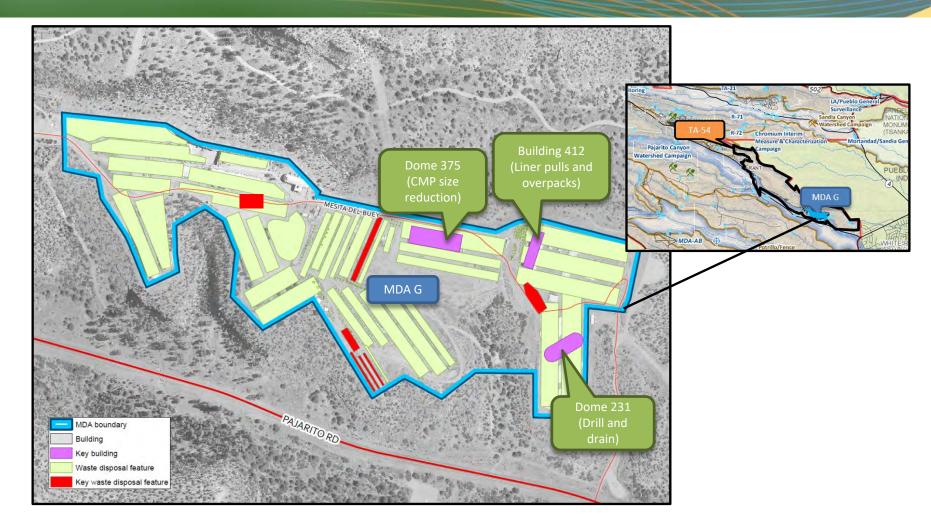


Above Ground Waste Inventory





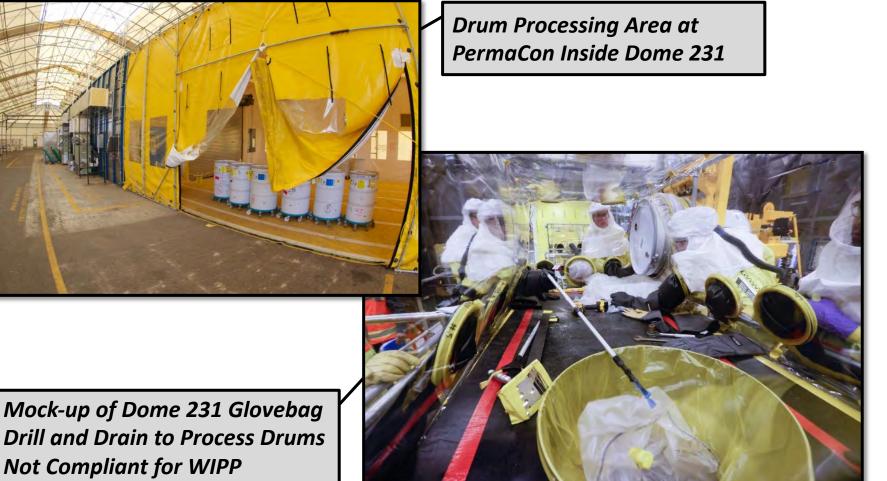
#### **TA-54: Processing Facilities**

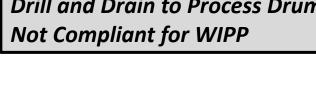






### **Processing Facilities: Dome 231**







**AB**Los Alamos

### **Processing Facilities: Dome 375**



Dome 375 PermaCon, Looking East into Cell 3



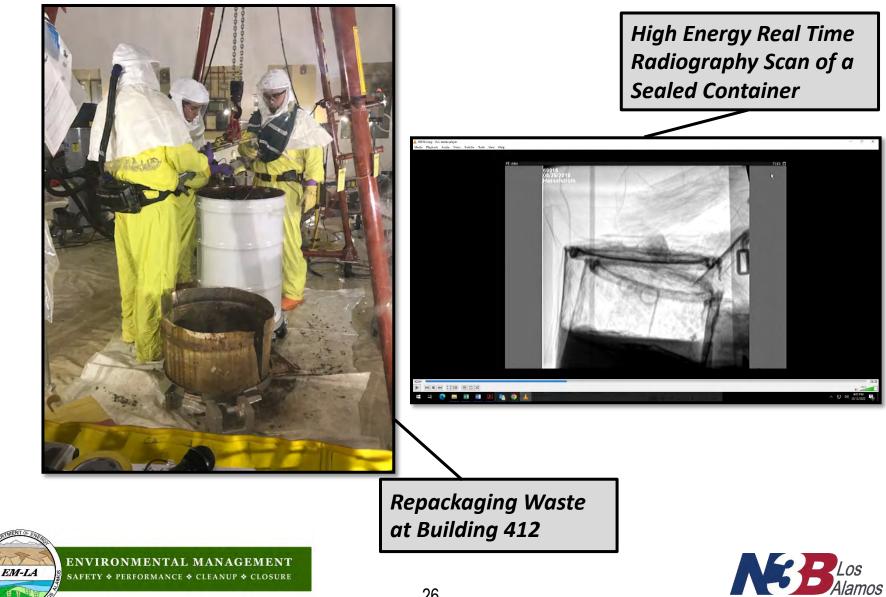
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CMP Shear Ventilation Contamination Enclosure (Shown During Mock-ups)



### **Processing Facilities: Building 412**



## **CH-TRU Complexity, Risks and Challenges**

CH-TRU Projects	Complexity, Risks and Challenges <sup>1</sup>	Status
CMPs Waste Processing	<ul> <li>Located in TA-54, Area G, there are 158 CMPs, totaling 439 m<sup>3</sup> of cemented radioactive waste</li> <li>CMPs are approx. 20 feet long and 30 inches in diameter with approximately 4- to 59-inch thick concrete plugs at each end</li> <li>Each CMP will be moved into Dome 375, size reduced, characterized and then loaded in SWBs; processing time for size reduction will vary due to the nature of the material</li> <li>Once loaded in a SWB, it must be certified for TRU disposal and shipped to WIPP; the timeline for certification varies</li> <li>Work safety hazards involve high temperature environment, industrial hazards, heavy equipment hazards and radiological equipment hazards</li> </ul>	In process
Pit 9 Waste Processing	<ul> <li>Located in TA-54, Area G, there are 4,079 containers, totaling 1,583 m<sup>3</sup> of waste</li> <li>Before processing, each drum must be radiographed to learn about contents and determine how the drum will be processed and repackaged</li> <li>Challenge in processing capacity and timeline due to Dome 375 setup for CMP size-reduction; Dome 375 will require facility modifications before initiating processing</li> </ul>	Not started
Trenches A–D Waste Processing	<ul> <li>There are 710 containers, which are organized in arrays of sealed concrete casks with a capacity to hold two 30-gallon drums stacked one above the other</li> <li>There are 420 concrete casks, and of those, 357 casks were used to store TRU waste</li> <li>Will retrieve 81 m<sup>3</sup> of waste to process in Dome 375</li> <li>However, the challenge in processing capacity and timeline is because Dome 375 is setup for CMP size-reduction, and will require facility modifications to process Pit 9 waste and additional modifications for Trenches A–D</li> <li>Additionally, Trenches A–D contain the most highly concentrated and technically challenging waste streams that will have to be redistributed to process</li> </ul>	Not started





## **CH-TRU Complexity, Risks and Challenges**

CH-TRU Projects	Complexity, Risks and Challenges <sup>1</sup>	Status
Shafts Waste Processing	<ul> <li>Located in TA-54, Area G, stored in vertical shafts that are buried 100 feet deep with CMPs lined near top surface</li> <li>Contain five hot cell liners, five tritium packages, and a single waste package referred to as the 17<sup>th</sup> Canister; each requires separate retrievals</li> <li>Challenge in processing capacity and timeline due to Dome 375 setup for CMP size-reduction, which will require facility modifications</li> </ul>	Not started
Above Ground Inventory Waste Processing	<ul> <li>Located at multiple storage units across TA-54, Area G, totaling 2,327 containers (e.g., 55-gallon drums, 85-gallon drums, 110-gallon drums and SWBs)</li> <li>In various phases of characterization, remediation and packaging for shipment off-site facilities, including WIPP</li> <li>Diamond saw required for size-reduction of large items (i.e., Bolas Grandes)</li> <li>There is a standard operating process involving the design, procurement, installation and startup of a Hi-MAR glovebox, and the timeline for each process varies</li> <li>Challenge and complexity is the timeline related to waste certification via BOK process that may take up to a year</li> </ul>	In process
<ul> <li>Worker sa</li> <li>Staffing ch</li> <li>Inventory s</li> <li>Equipment</li> </ul>	n-level complexities, risks and challenges that apply to all projects include: fety allenges: clearance (obtaining and maintaining), specialty certifications, SMEs shortage: SWBs, etc. :: maintenance, scheduling of equipment to be delivered (subcontractors bringing drills could take up to a year to or unforeseen events	o schedule)

- Natural disasters: fires, droughts, etc.
- Transportation and injuries







#### **Overview: ER Program**

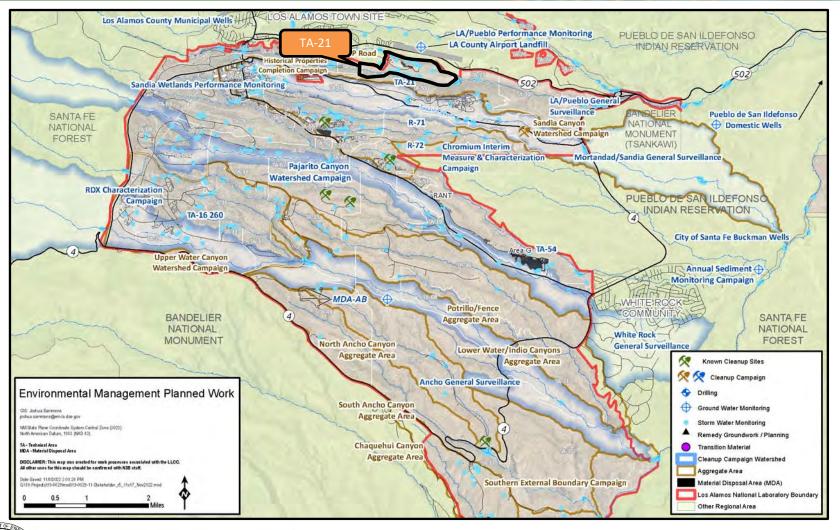








#### TA-21: D&D

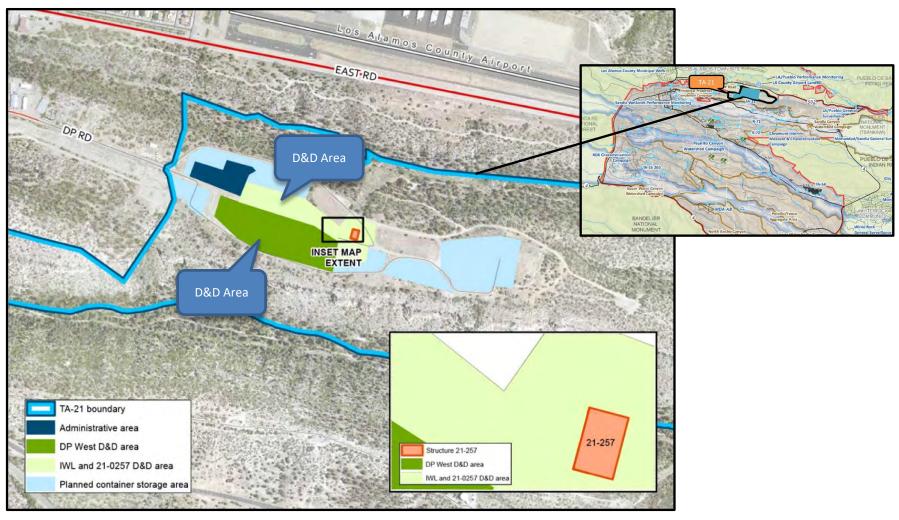








#### TA-21: D&D







#### **TA-21 D&D**



Decommissioned and Demolished





#### **TA-21 Fact Sheet**



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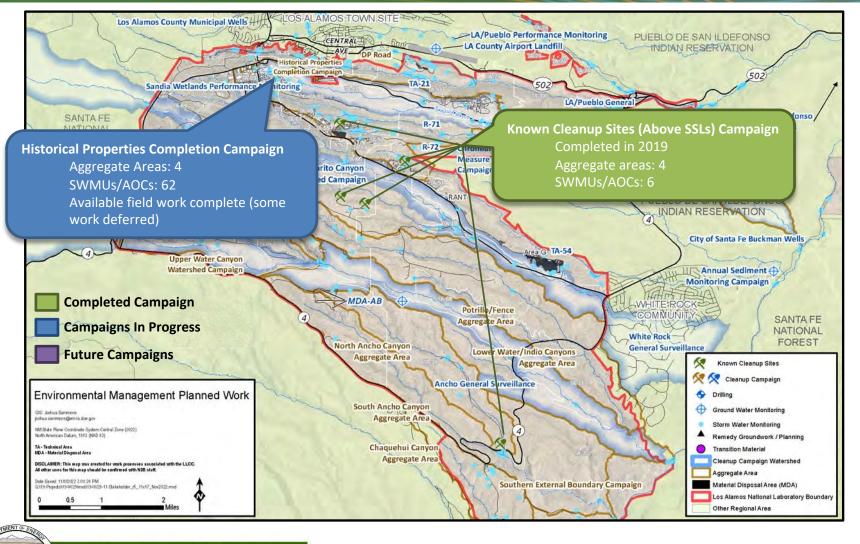




Produced by Los Alamos Legiosy Cleanap Contractor, N38 Los Alamos, on behalf of DOE's Environmental Management Los Alamos Field Office



#### **Aggregate Areas**

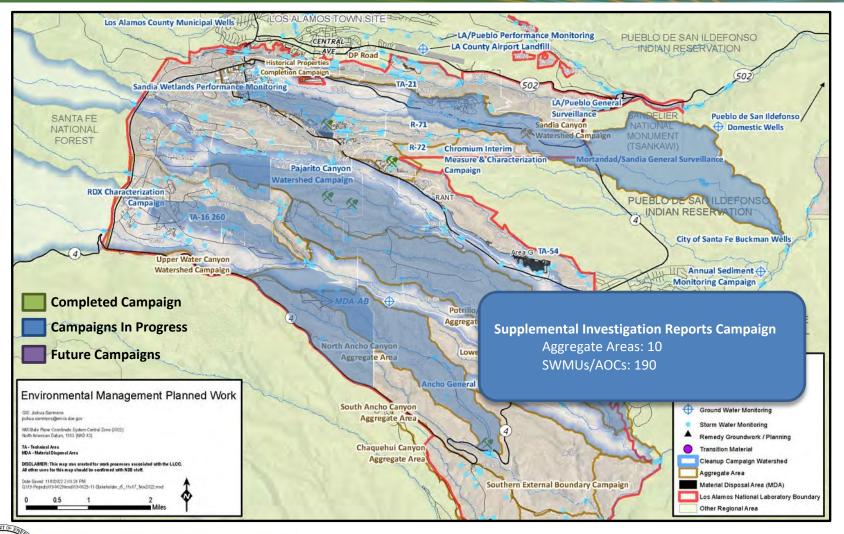








#### **Aggregate Areas**

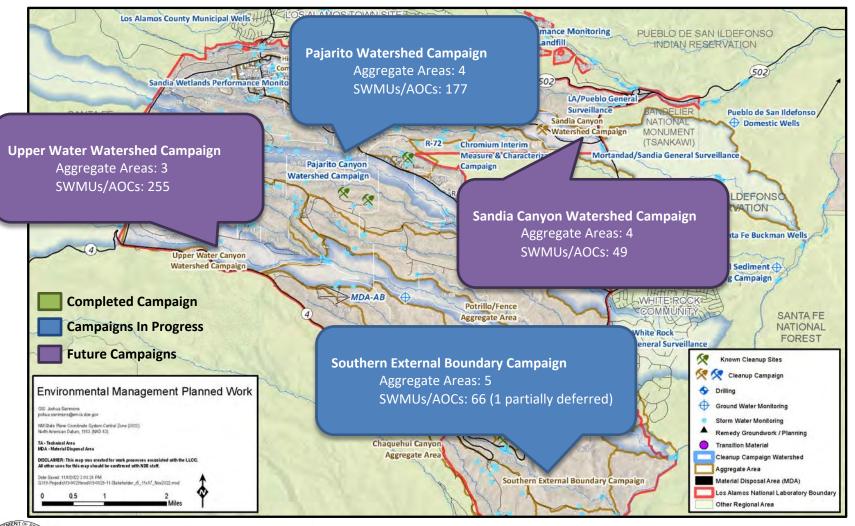








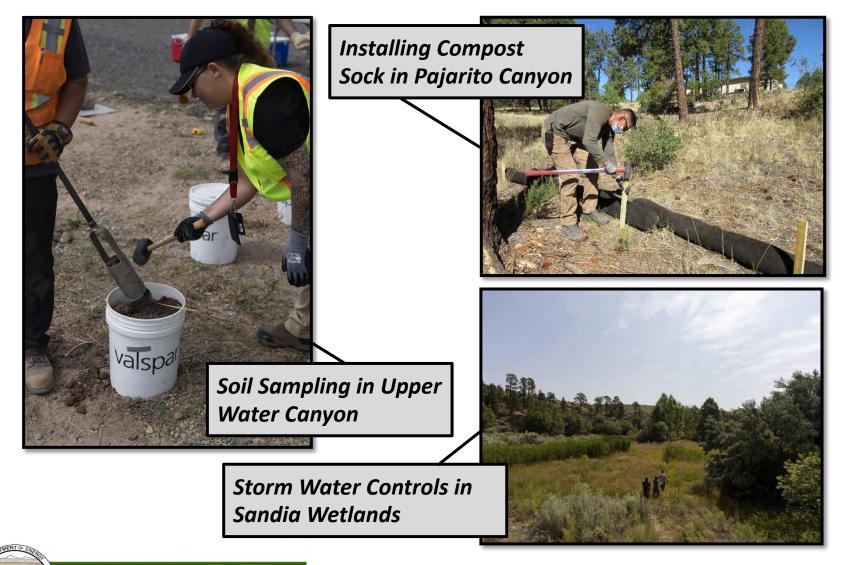
#### **Aggregate Areas**







## **Aggregate Area Photos**

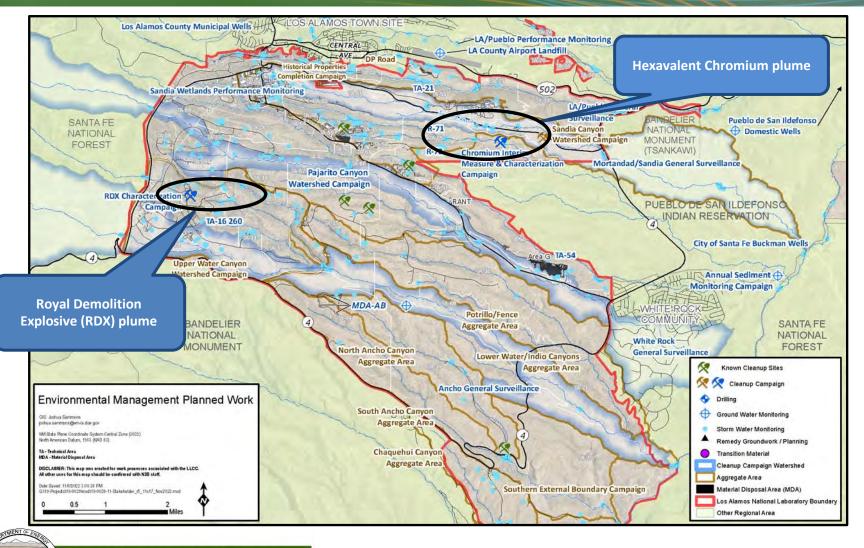




EM-LA



#### Groundwater







## **Hexavalent Chromium Plume Fact Sheet**



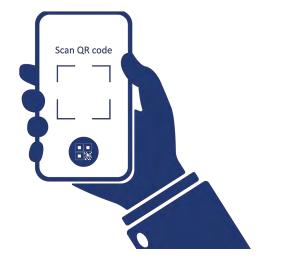




### **RDX Fact Sheet**











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## **Hexavalent Chromium Plume Interim Measures**



Ion Exchange Unit Where Groundwater Contaminated with Hexavalent Chromium is Treated



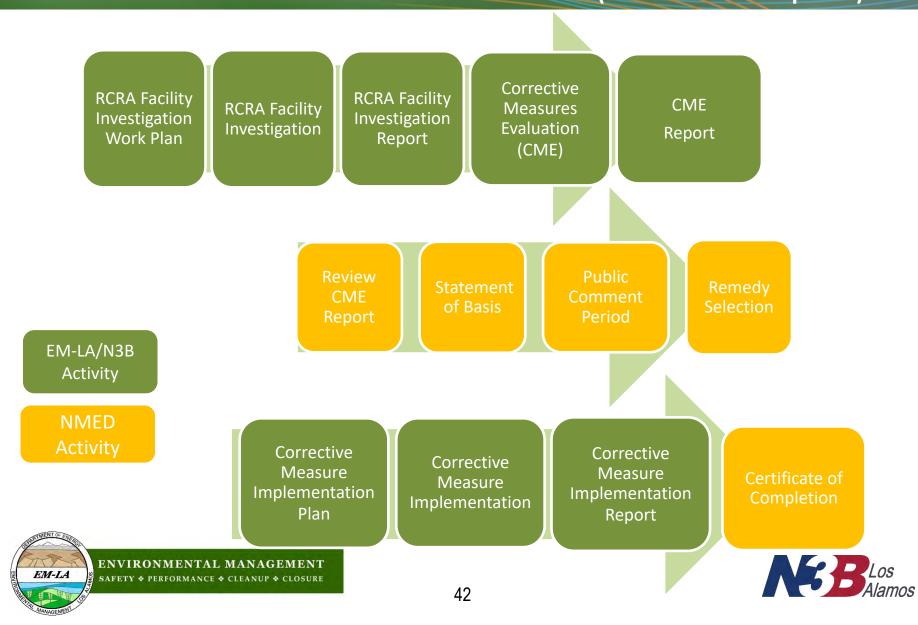
Drilling Operations for Groundwater Monitoring Well R-71







Consent Order Corrective Action Process (where CME is required)





#### **CME** Process

Threshold Criteria	Balancing Criteria
Be protective of human health	Long-term reliability and effectiveness
Attain media cleanup objectives	Reduction of toxicity, mobility or volume of waste and contaminated media
Control the source(s) of releases	Short-term effectiveness
Comply with applicable standards for management of wastes	Implementability
	Cost

See EM-LA website for detailed info on criteria: https://www.energy.gov/em-la/strategic-vision-development

A cleanup approach must achieve all four threshold criteria to move on to balancing criteria.

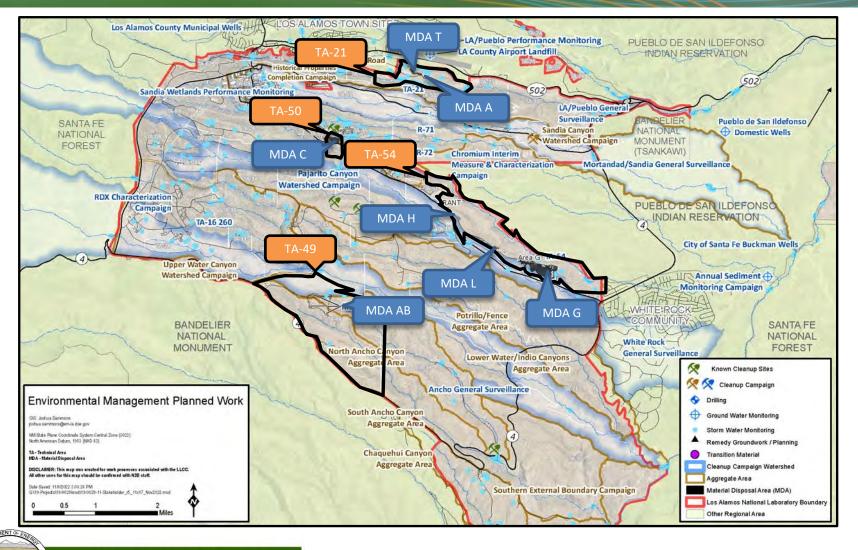








#### **MDAs**



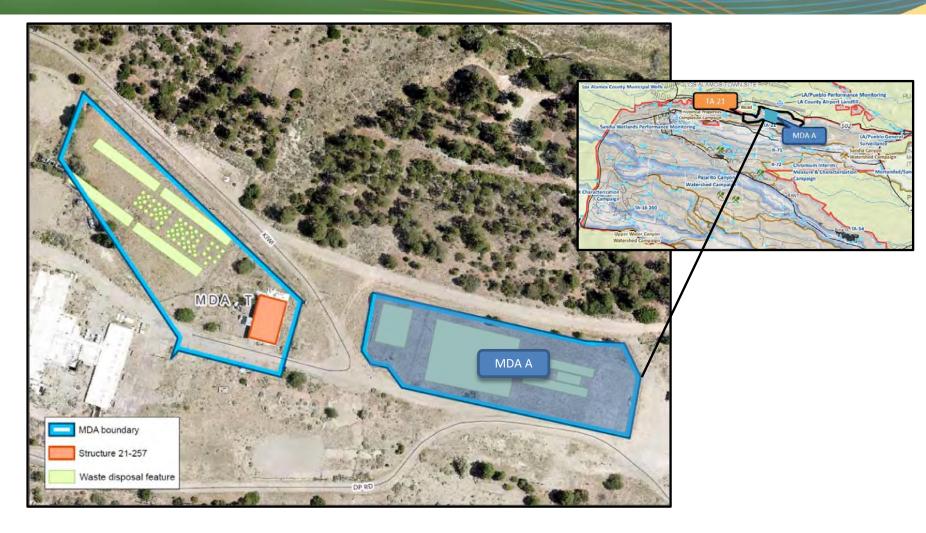


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### **TA-21: MDA A**









#### **TA-21: MDA T**

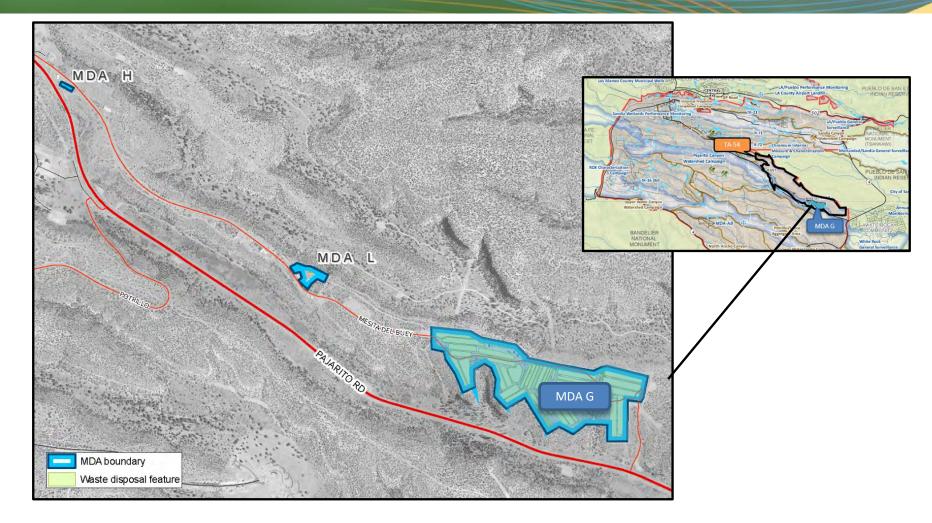








### TA-54: MDA G

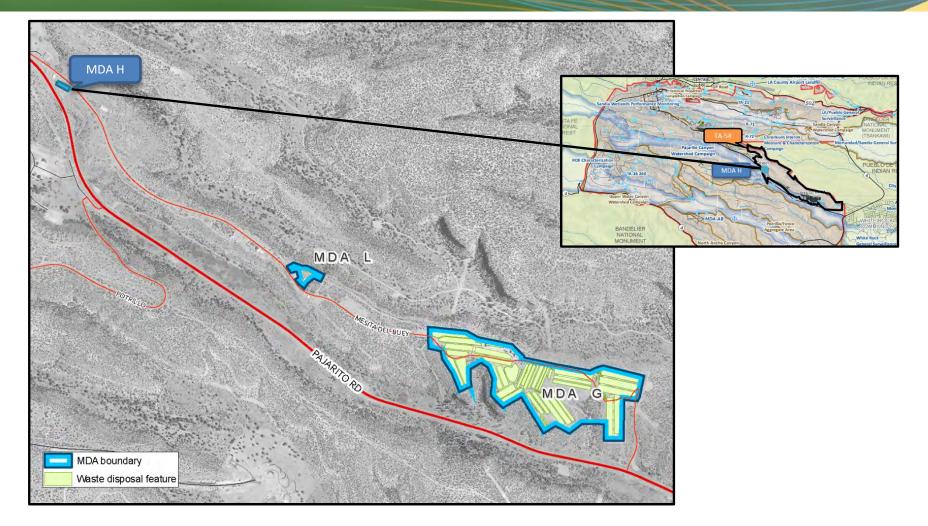








### TA-54: MDA H

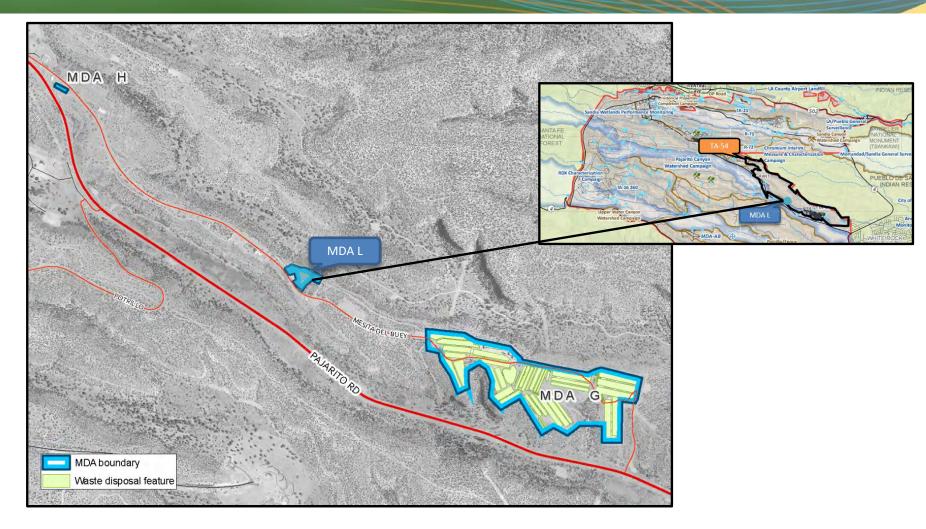








#### TA-54: MDA L

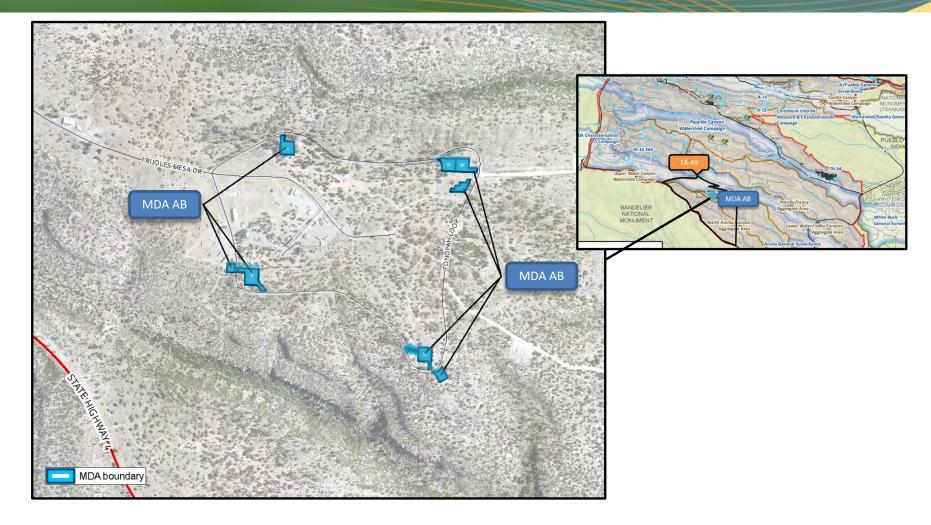








### TA-49: MDA AB

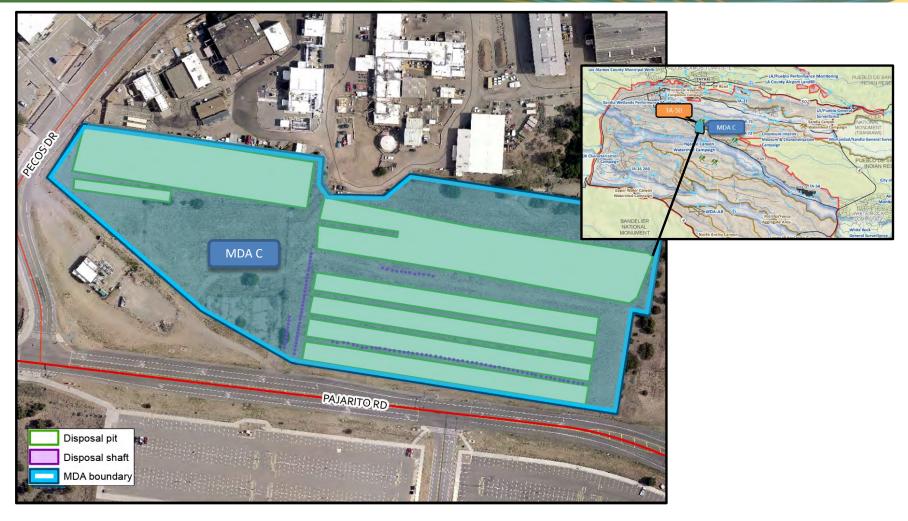








### TA-50: MDA C







### **MDA Fact Sheet**



sites: These stars ranged from septic tarks up to multi-size water bonul areas, Revises or prior complete with waite stippoal standards of the time based on known bazards. LANC, originally, the 21 material stopoal areas, mod of which have been characterized, and, where necessar, the mediated. This work usually incided digging up the bund wates and thyping it to approved size diggonal landse. Others did not require remediation:



#### MDA CAMPAIGNS UNDER THE CONSENT ORDER -----

N\*B

The Consent Order between the New Mexico Environment Department (MMED) and the United States Department of Energy (DOE) identifies server MDAs that warrant additional investigation and remedial action. The server MDAs are grouped into Consent Order campaigns MDA Chemerky (MDA AB Intered), MDAs A & T Remethy (MDA) Il Remethy and MDA G & L Remethy, All MDAs are designated Solid Waste Management Units under the Median Resource Conservation and Recovery All (RDA).

#### MDAC

MDA C, which operated from (1948-3974, is an L) & accer set within Fich-scal Area (7A) 50. ADA C contains (15) subtraffice depositiunts (server pts and 10d shat(s), Wates induse hazardous constituents that are regulated by MMC and reducides that are regulated by DOC subunifier entises can be avoide to eposite a voide regulated vapor plane in the vadois core (the area between the sufficient and underlying groundwater), MDA C is load

#### MDA AB-

+ Los Alamos

MDA AB, which lies near LANL's southern boundary in TA-40, is an underground, former explosive test site composed of three distinct areas, each with a series of deep thafts used for explosive testing. The areas is about a shaft and endological water disposal to activate distance and activate and or activate and or activate and activate for activate and activate and activate for activate and activate activate and activate activate

#### G & MDAL-

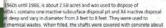
tw-level waste storage, characterization, and remediation area. The area is of White Rock and about one-eighth of a mile from the boundary between As H, G and L lie within TA-S4.

DEFINITION: SOLID WASTE

MANAGEMENT LINE

85, is a 0.3-acre site composed of t in diameter and 60 feet deep hum hydride, high-explosives, als and volatile organic compounds er as SWMU 54-004.

active waste disposal site. It enches with depths ranging from I surface. MDA G is listed under the 4-014 (b-d), 54-015 (k), 54-017, 54-

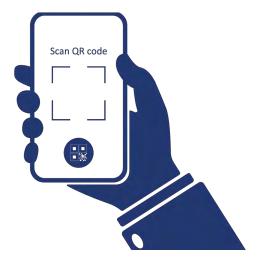


three feet thick. The disposal units are covered with asphalt. MDA L is listed under the Consent Order as SWMU 54-WC and hear of Crossent Crossent Could be a set of the consent order as SWMU 54-











#### **Consent Order Fact Sheet**



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# **ER Complexity, Risks and Challenges**

ER Projects	Complexity, Risks and Challenges <sup>1</sup>	Status
TA-21 D&D	<ul> <li>At the height of operations, TA-21 contained 125 buildings; the remaining effort at TA-21 includes demolishing Building 21-257 and DP West Slabs, removing IWLs and completing final disposition of the 38 remaining SWMUs/AOCs</li> <li>Challenge: HAZCat 2 nuclear facility and additional safety and security measures are required; for example, the safety analysis, in best case scenario, may take 18 months to fully complete and implement</li> </ul>	In process
Aggregate Areas	<ul> <li>Multiple SWMUs and AOCs are combined into Aggregate Areas, a number of which in turn are managed in Consent Order Campaigns to address area-wide contamination, human health and ecological risk</li> <li>Environmental media affected or potentially affected by releases from SWMUs or AOCs include soil, sediment and surface water and groundwater</li> <li>Challenges include depleted uranium, beryllium, proximity to cultural sites, endangered species, historical munitions and fieldwork within active facility operations areas</li> </ul>	In process
Groundwater (Hexavalent Chromium)	<ul> <li>A plume of dissolved phase hexavalent chromium has been delineated in the regional aquifer beneath Sandia and Mortandad Canyons</li> <li>The regional aquifer is the potable water source for both LANL and Los Alamos County; beneath LANL, it is approximately 5,000 feet thick with the water table approximately 1,000 feet below ground surface</li> <li>The plume is approximately 6,000 feet long by 2,500 feet wide; over most of the length, it is limited to the upper-most 100 feet of the aquifer</li> <li>The current Interim Measures is a combination of extraction, treatment and injection of water to control plume migration and hold it within the LANL boundary; it successfully prevented the plume from crossing the property line onto Pueblo de San Ildefonso land</li> <li>It has not been detected in sentinel wells, and there is no current risk to drinking water wells</li> <li>Challenges: Complex geology and hydrology of the aquifer make it difficult to fully understand contaminant movement, especially at this considerable depth</li> <li>The extreme terrain and abundance of cultural sites predict severely limited potential sites for drilling new wells</li> <li>The Chromium Interim Measures and Characterization Campaign is in progress</li> <li>EM-LA is working with NMED on a strategy to transition to final remedy</li> </ul>	In process





# **ER Complexity, Risks and Challenges**

ER Projects	Complexity, Risks and Challenges <sup>1</sup>	Status
Groundwater (RDX)	<ul> <li>Building 260 at LANL's TA-16 was the machining facility for conventional high explosives; machining water contained RDX and was discharged to the adjacent Cañon de Valle, resulting in the contamination of soils, surface water and groundwater</li> <li>The endangered species Mexican Spotted Owl has breeding sites in the area for up to six months in the calendar year, which impacts scheduling and timeline of fieldwork</li> <li>A risk assessment analyzed current and future risk, and determined there is no risk to human health and that long-term groundwater monitoring is protective</li> <li>The RDX Characterization Campaign is in progress</li> <li>The RDX Remedy Campaign has not begun</li> </ul>	In process
MDAs	<ul> <li>MDAs are Cold War-era waste disposal sites, that totaled 28 MDAS with now seven remaining</li> <li>They range from septic tanks up to multi-acre waste burial areas</li> <li>The seven remaining MDAs warrant additional investigation and remedial action: MDA A, MDA T, MDA C, MDA G, MDA L, MDA H and MDA AB</li> <li>Challenges include lack of reliable inventory documentation (all MDAs), radiological inventories (MDA T), wide range of waste types and configurations (MDAs C and G), vapor plumes (MDAs C, L and G), high explosives (MDA H), HAZCat 2 nuclear facilities (MDA AB)</li> <li>If NMED selects full excavation as the final remedy for an MDA, truckloads of waste and injuries/accidents increase significantly; for example, full excavation of MDA C (11.8 acres) would result in 41,200, 20-ton truckloads of waste and clean fill and &gt;3 traffic accidents during the project</li> </ul>	In process
<ul><li>Worker sa</li><li>Staffing ch</li><li>Inventory</li></ul>	h-level complexities, risks and challenges that apply to all projects include: fety nallenges: clearance (obtaining and maintaining), specialty certifications, SMEs shortage: SWBs, etc.	

- Equipment: maintenance, scheduling of equipment to be delivered (subcontractors bringing drills could take up to a year to schedule)
- Unknown or unforeseen events
- Natural disasters: fires, droughts, etc.
- Transportation and injuries







#### We want your feedback on the remaining scope

Remaining scope includes:

- CH-TRU: Pit 9, Trenches A–D and Shafts waste processing
- ER: TA-21 D&D, Aggregate Areas, Hexavalent chromium, RDX, MDAs

#### What should be prioritized and why?



ENVIRONMENTAL MANAGEMENT SAFETY & PERFORMANCE & CLEANUP & CLOSURE **Next Steps:** Phase 2 Session



Summary

**Purpose**: Develop a long-term strategic vision from the "ground-up" for the remaining legacy cleanup that is based on consensus of values and priorities from stakeholders, pueblos in northern New Mexico and the public

An opportunity to voice your values and priorities as they relate to the remaining cleanup scope

#### What do we mean by values and priorities?

- Values: Individual beliefs that motivate people to act one way or another
- Priorities: What's most important to you?
  - Cleanup highest risk sites to people first
  - Cleanup sites that can be transferred/used for economic development
  - Cleanup sites near residents



