



February 23, 2022

Arturo Duran
Compliance and Permitting Manager
Environmental Management
Los Alamos Field Office
1200 Trinity Drive Suite 400
Los Alamos, NM 87544

RE: REVIEW
2021 BIENNIAL ASPHALT MONITORING AND REMOVAL REPORT FOR AREA OF CONCERN C-00-041, GUAJE/BARRANCAS/RENDIJA CANYONS AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-22-004

Dear Arturo Duran

The New Mexico Department (NMED) has received the United States Department of Energy (DOE) *2021 Biennial Asphalt Monitoring and Removal Report for Area of Concern C-00-041, Guaje/Barrancas/Rendija Canyons Aggregate Area* (Report) dated and received December 16, 2021 and referenced by EM2021-0492.

As required by NMED's July 2, 2008 *Notice of Approval Asphalt Monitoring and Removal Plan for Area of Concern C-00-041, Guaje/Barrancas/Rendija Canyons Aggregate Area* (Plan) a biennial asphalt monitoring and removal inspection was conducted October 5, 2021. The DOE inspected the site to determine if asphalt and tar had been exposed by runoff or erosion since the 2019 inspection and remove exposed asphalt and tar debris. The DOE reports that in 2021 a total of three-quarters of a 55-gallon drum of primarily asphalt debris was removed from within AOC C-00-041 and was transferred to the Los Alamos County Eco Station for recycling.

Previously, in 2013, one-half 55-gallon drum filled with asphalt debris was removed. In 2015, an equivalent of two to three 55-gallon drums filled with asphalt debris was removed from AOC C-00-041. In 2017, an equivalent of two 55-gallon drums filled with asphalt debris was removed, and in 2019, an equivalent of one-and-a-half 55-gallon drums filled with asphalt debris were removed from AOC C-00-041. The DOE Environmental Management Los Alamos Field Office (EM-LA) has recommended changing from a biennial inspection and removal to a triennial inspection and removal.

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The 2008 Plan stated that, *"the need to continue inspection and asphalt removal activities will be reevaluated with the USFS and NMED after every third inspection (i.e., every 6 yr)"*. NMED has reviewed the Report, the 2008 Plan, and the history of previous inspections and removal campaigns and noticed that every inspection resulted in continued removal of asphalt and tar debris. Based on the persistence of debris at this site, NMED will not support a reduced inspection schedule at this time. NMED has determined that DOE must continue with the biennial inspection and removal due to continuing discovery of asphalt and tar debris. Timely removal of asphalt debris and tar is important for the protection of the environment.

The DOE must continue to comply with the Plan which requires that the next inspection be completed in the early fall and the next monitoring report be submitted by **December 31, 2023**.

If you have any questions regarding this letter, please contact Mitchell Schatz (505) 690-5910.

Sincerely,

Rick Shean

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Rick Shean
Bureau Chief
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File: 2022 LANL: 2021 Biennial Asphalt Monitoring Report for AOC C-00-041
Guaje/Barracas/Rendija Canyons Aggregate Area
LANL-22-004