



September 26, 2022

Arturo Duran
Designated Agency Manager
Environmental Management Los Alamos Field Office
1200 Trinity Drive Suite 400
Los Alamos, NM 87544

RE: REVIEW
2019 TRIENNIAL ORDNANCE SURVEY REPORT, SOLID WASTE MANAGEMENT UNITS
00-011(a, d, and e), GUAJE/BARRANCAS/RENDIJA CANONS AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-19-076

Dear Mr. Duran

The New Mexico Department (NMED) received the United States Department of Energy (DOE) and Newport News Nuclear BXWT-Los Alamos, LLC (N3B) (Collectively, the Permittees) *2019 Triennial Ordnance Survey Report, Solid Waste Management Units 00-011(a, d, and e) Guaje/Barrancas/Rendija Canons Aggregate Area* (Report) dated and received on December 16, 2019, and referenced by EM2019-0410/EMLA-2020-1168-04-001.

The Department of Energy-Environmental Management (DOE-EM) recommended that the unexploded ordnance (UXO) survey be conducted on a 5-year basis. This recommendation comes from the lack of UXO, munition debris (MD) and munitions and explosives of concern (MEC) discovered at Solid Waste Management Units (SWMUs) 00-011(a and d) and the downward trend of MD discovered during each subsequent survey of SWMU 00-011(e), as well as a 2015 United States Army Corps of Engineers (USACE) survey conducted on the three SWMUs titled *Final, After Action Report for Military Munitions Response Program Munitions and Explosives of Concern Clearance at SWMUs 00-011(a), 00-011(d), 00-011(e), in Support of the Land Conveyance and Transfer Project Activities*.

During the 2019 survey, UXO or MEC were discovered or recovered at Solid Waste Management Units (SWMU) 00-011(a, d, e). The results of the 2016 Survey also show no discovered or recovered UXO and MEC at the sites. However, the 2019 Survey did show discovered and recovered MD from SWMU 00-011(e). The 2019 ordnance survey recovered and removed several MD fragments in the form of rotating band pieces and sidewall fragments, as well as a fuze adapter. Furthermore, the 2016 Survey showed that MD was discovered at both SWMUs 00-011(a) and 00-011(e). Due to weather related conditions; frost heaving, flash flooding, and natural movement of large objects (rocks, trees, etc.), it is a possibility that future surveys will

discover more UXO, MEC, and MD. NMED notes that the traditional magnetic flagging has been reported to have a much lower accuracy than modern remote sensing methods.

During the June 16, 2022, LANL Aggregate Area meeting, DOE was directed to continue to comply with NMED's December 2007, *Approval with Direction for Guaje/Barrancas/Rendija Canyons Aggregate Area Investigation Report*, and the May 2013, *Certificates of Completion – Three Solid Waste Management Units [00-011(A), 00-011(D), 00-011(E)] in Guaje/Barrancas/Rendija Canyons Aggregate Area*. These documents require that the next inspection be completed in the early fall and the next monitoring report be submitted by **December 31, 2022**. After the 2022 Triennial Ordnance Survey Report is submitted and reviewed, NMED will reconsider the request based on the results of the 2022 survey and 2015 USACE recommendations to reduce the frequency of triennial survey to a five-year survey and submittal for the future Ordnance Survey Reports.

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

Sincerely,

**Rick
Shean**

Rick Shean
Bureau Chief
Hazardous Waste Bureau

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