



April 19, 2023

Arturo Duran, Designated Agency Manager
U.S. Department of Energy
Environmental Management
Los Alamos Field Office
1200 Trinity Drive Suite 400
Los Alamos, NM 87544

RE: REVIEW
2022 TRIENNIAL ORDNANCE SURVEY REPORT, SOLID WASTE MANAGEMENT UNITS 00-011 (A, D, AND E), GUAJE/BARRANCAS/RENDIJA CANYONS AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-22-087

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) *2022 Triennial Ordnance Survey Report, Solid Waste Management Units 00-011(a, d, and e) Guaje/Barrancas/Rendija Canyons Aggregate Area* (Report) dated and received November 30, 2022, and referenced by EM2022-0523/EMLA-23-BF64-2-1.

The Department of Energy-Environmental Management (DOE-EM) recommended that the UXO survey be conducted on a 5-year basis. This recommendation comes from the lack of UXO, MD and 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), and 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 2022 survey, no unexploded ordnance (UXO) or munitions and explosives of concern (MEC) were discovered or recovered at Solid Waste Manage Units (SWMU) 00-011(a, d, e). The results of the 2019 Survey also show no discovered or recovered UXO and MEC at the sites. However, the 2019 Survey did show discovered and recovered munitions debris (MD) from SWMU 00-011(e). The 2022 ordnance survey also recovered and removed several MD fragments in the form of rounds, as well as a fuse adapter from SWMUs 00-011(a). It is also noted, 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 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*

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Investigation Report, and the NMED's May 7, 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 required 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 would reconsider the request from DOE to move from a triennial to a quinquennial survey.

Based on the results of the 2022 survey and 2016 and 2019 surveys, along with the 2015 USACE's recommendations to reduce the frequency from a triennial to a quinquennial survey, NMED approves the request that SWMUs 00-011(a, d, e) ordnance survey be done every five years. The next survey is required to be submitted no later than **December 31, 2027**.

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

Sincerely,

Rick Shean

Rick Shean
Acting Chief
Hazardous Waste Bureau

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