

Mr. Steve Calanog
Federal On-Scene Coordinator
United States Environmental Protection Agency
Region IX
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Date: January 17, 2023
Our Ref: 30123419
Subject: Temporary Consolidation Waste Pile Regrading Completion Report 2022
Location: Haystack Mines Site; McKinley County, New Mexico

Dear Mr. Calanog,

On behalf of BNSF Railway Company (BNSF), Arcadis U.S., Inc. (Arcadis) prepared this Temporary Consolidation Waste Pile (Waste Pile) Regrading Completion Report 2022 to document the cover repair work completed at the former Haystack Mines Site in McKinley County, New Mexico (the site). In accordance with the Haystack Mines Administrative Settlement Agreement and Order on Consent for Removal Action (USEPA 2017), an annual inspection confirming fence integrity and erosion control integrity are required. On June 30, 2022, BNSF performed an initial inspection of the Waste Pile in Section 19. The inspection indicated that some erosion of the cover material had occurred since construction was completed in 2021. BNSF determined that the waste pile required regrading and re-seeding in some areas, and construction activities would be performed to mitigate erosion, improve cover stability, and reduce the long-term site management costs.

The field work was conducted at the site on November 15 and 16, 2022, by Arcadis, Pacific West LLC, and Horizon Environmental Services, Inc. All work performed was on Section 19, which is owned by BNSF, and no work was performed on the Navajo Nation. The scope of work performed included the following:

- Regrading of the cover soil within specific areas where erosion had occurred to eliminate erosion rills and restore a uniformly sloped ground surface on the Waste Pile.
- Installation of a broad, shallow drainage swale around the perimeter of the Waste Pile soil cover to promote surface water drainage toward a sediment detention basin constructed at the downstream limit of the perimeter swale, whereby stormwater collected in the basin will discharge to the adjacent undisturbed vegetated area to the northwest of the basin; and,
- Application of a seed/wood hydro-mulch over the top and lower sloped sides of the Waste Pile, the perimeter swale, and the sediment detention basin.


Annual monitoring of the Waste Pile will continue, with the above-stated long-term goal of establishing the Waste Pile as a stable landform.

Photographs showing the Waste Pile before and after field work are provided in Attachment 1.

Mr. Steve Calanog
United States Environmental Protection Agency
January 17, 2023

Please contact me if you have any questions or comments related to this letter.

Sincerely,
Arcadis U.S., Inc.

A handwritten signature in blue ink, appearing to read "Ali Harmon".

Ali Harmon, P.E.
Project Manager

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CC.

Tom Jones, BNSF
Ryan Russ, Arcadis

Enclosures:

Attachment 1 – Photograph Log

References

USEPA. 2017. Administrative Settlement Agreement and Order on Consent for Removal Action. CERCLA Docket No. 09-2017-02 and CERCLA Docket No. 06-02-17. May 15.

Attachment 1

Photograph Log



Photograph: 1

Description:
Pre-repair work

Location:
Temporary Consolidated
Waste Pile

Photograph taken by:
Audrey Yorke

Date: 11/15/2022



Photograph: 2

Description:
Pre-repair work

Location:
Temporary Consolidated
Waste Pile

Photograph taken by:
Audrey Yorke

Date: 11/15/2022



Photograph: 3

Description:
Pre-repair work

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/15/2022



Photograph: 4

Description:
Erosional rills repaired

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/15/2022

Attachment 1 – Photograph Log
Temporary Consolidation Waste Pile Regrading Completion Report 2022
Haystack Mines Site
Baca/Prewitt Chapter, Navajo Nation
McKinley County, New Mexico



Photograph: 5

Description:
Perimeter drainage
swale

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/15/2022



Photograph: 6

Description:
Perimeter drainage
swale

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 7

Description:

Drainage swale from
Temporary
Consolidated Waste
Pile to sediment basin

Location:

Temporary
Consolidated Waste
Pile

Photograph taken by:

Audrey Yorke

Date: 11/16/2022



Photograph: 8

Description:

Hydro-mulch
application

Location:

Temporary
Consolidated Waste
Pile

Photograph taken by:

Audrey Yorke

Date: 11/16/2022



Photograph: 9

Description:
Hydro-mulch
application

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 10

Description:
Hydro-mulch
application

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 11

Description:
Hydro-mulch
application at sediment
basin

Location:
Sediment basin

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 12

Description:
Hydro-mulch
application at sediment
basin

Location:
Sediment basin

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 13

Description:
Hydro-mulch
application at perimeter
drainage swale

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 14

Description:
Hydro-mulch
application at perimeter
drainage swale

Location:
Temporary
Consolidated Waste
Pile

Photograph taken by:
Audrey Yorke

Date: 11/16/2022



Photograph: 15

Description:

Leftover clean fill soil
staged west of
Temporary
Consolidated Waste
Pile

Location:

Temporary
Consolidated Waste
Pile

Photograph taken by:

Audrey Yorke

Date: 11/16/2022