EMID-700144

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(505) 665-5658/FAX (505) 606-2132

Date: DEC 0 6 2018
Refer To: N3B-18-0326

Esteban Herrera, Chief
Water Enforcement Branch (6EN-WS)
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: NPDES Permit No. NM0030759 - Analytical Results Following Completion of Corrective Action by Certification of a No Exposure Condition at Sites 54-014(d) and 54-017 in Site Monitoring Area PJ-SMA-18

Dear Mr. Herrera:

This letter and enclosure are being submitted in accordance with the requirements of the U.S. Environmental Protection Agency's (EPA's) National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 for discharges of storm water at Los Alamos National Laboratory. The permit was issued to Los Alamos National Security, LLC (LANS) and the U.S. Department of Energy, effective November 1, 2010, and on April 30, 2018, responsibilities, coverage, and liability transferred from LANS to Newport News Nuclear BWXT – Los Alamos, LLC (N3B). As specified in Part I, Section E.l(b):

> If the Permittees decide to achieve corrective action under this Section through installation of measures to totally eliminate exposure of pollutants to storm water at a Site, Permittees will be in compliance with this Permit at that Site once they have certified and demonstrated to EPA [the U.S. Environmental Protection Agency], through submission of certified as-built drawings, that such measures have been properly installed to perform their function to totally eliminate exposure of pollutants to storm water, and no further confirmation sampling is required, unless required by Section E.5(c). Thereafter, Permittees shall collect one sample and make the analytical results available via email notification and on the public website pursuant to Section I.7 of the Permit.

Accordingly, the analytical results from the samples collected following the completion of corrective action by certification of a no exposure at Sites 54-014(d) and 54-017 in site monitoring area PJ-SMA-18 are enclosed. Table 1 includes information about the confirmation sample collected at the site monitoring area. The enclosed certified document can also be accessed at the following website: https://www.eprr.lanl.gov/.

Table 1
Results from the First Measurable Storm Event
after Certification of a No Exposure Condition

Watershed	Site Numbers	SMA Number	Permitted Feature
Pajarito	54-014(d) and 54-017	PJ-SMA-18	J026

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,

Frazer Lockhart
Program Manager
Regulatory and Stakeholder Interface
N3B – Los Alamos

Sincerely,

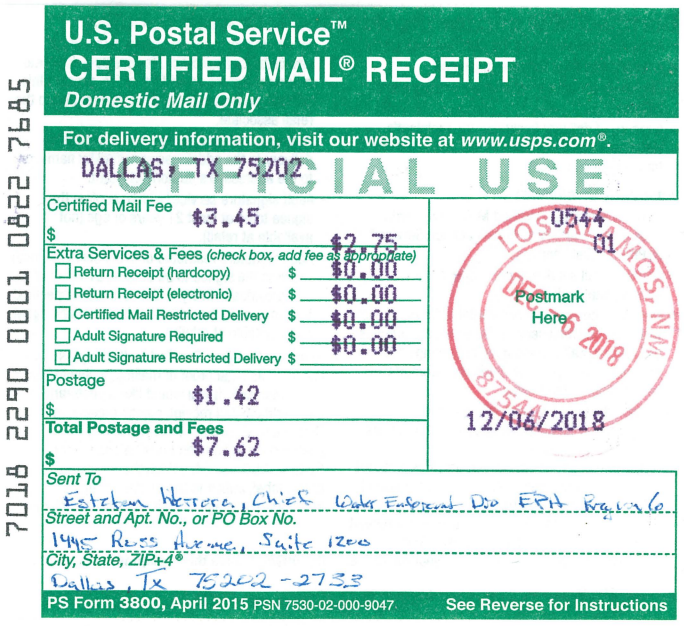
David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

FL/DR/SV

Enclosure(s): One hard copy with electronic files –
1. Analytical Results Following Completion of Corrective Action by Certification of a No Exposure Condition at Sites 54-014(d) and 54-017 in PJ-SMA-18 (EM2018-0116)

Cy: (letter with enclosure[s])
Sarah Holcomb, NMED-SWQB

Cy: (letter and enclosure[s] emailed)
Robert Houston, EPA Region 6
Brent Larsen, EPA Region 6
Laurie King, EPA Region 6
Steve Yanicak, NMED-DOE-OB
David Rhodes, DOE EM-LA
David Nickless, DOE EM-LA
Nick Lombardo, N3B
Joe Legare, N3B
Frazer Lockhart, N3B
Erich Evered, N3B
Bruce Robinson, N3B
Emily Day, N3B
Steve Veenis, N3B
Karen Velarde-Lashley, N3B
Don Carlson, N3B
Amanda White, N3B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Esteban Herrera, Chief Water Enforcement Div. EPA Region 6
Street and Apt. No., or PO Box No.
1445 Ross Avenue, Suite 1200
City, State, ZIP+4®
Dallas, TX 75202-2733
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions
7018 2290 0001 0822 7685

Mona Tates, EPA Region 6
emla.docs@em.doe.gov
N3B Records
Public Reading Room (EPRR)
PRS Website

Analytical Results Following Completion of Corrective Action by Certification of a No Exposure Condition at Sites 54-014(d) and 54-017 in PJ-SMA-18

December 6, 2018

NPDES PERMIT NO. NM0030759

EM2018-0116

NPDES PERMIT NO. NM0030759 **EM2018-0116**

NEWPORT NEWS NUCLEAR BWXT – LOS ALAMOS, LLC
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: J013 **PJ-SMA-18** **Sites: 54-014(d) and 54-017**

The following certification of completion of corrective action was performed in accordance with NPDES Permit No. NM0030759, Part I.E.2, which requires the Permittees (i.e., DOE and LANS) to certify the completion of corrective action.

CERTIFICATION STATEMENT OF AUTHORIZATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

Frazer Lockhart, Program Manager
Regulatory and Stakeholder Interface
Newport News Nuclear BWXT – Los Alamos, LLC

12/6/2018
Date

David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

12-6-2018
Date

NPDES PERMIT NO. NM0030759 **EM2018-0116**

NEWPORT NEWS NUCLEAR BWXT – LOS ALAMOS, LLC
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: J013 **PJ-SMA-18** **Sites: 54-014(d) and 54-017**

Tables 1 and 2 present the analytical results received from the confirmation monitoring sample collected following the completion of corrective action by certification of a no exposure condition at Sites 54-014(d) and 54-017 in site monitoring area PJ-SMA-18. The certification of a no exposure condition with as-built drawings was provided to the U.S. Environmental Protection Agency on August 28, 2014 (ESHID-260888/ LA-UR-14-26476). Table 3 presents each applicable target action level (TAL) for the analytes monitored.

Table 1
Radiochemical Analytical Results Collected on August 10, 2018,
Following Completion of Corrective Action at Sites 54-014(d) and 54-017 in SMA PJ-SMA-18

Sample ID	Analyte	Field Preparation	Detect Status	Result (pCi/L)	TAL Exceedance Ratio	Minimum Detectable Activity (pCi/L)	Uncertainty (pCi/L)	Qualifier[a]	Data Validation Date
WT_IPC-18-153402	Radium-226 and Radium-228	Unfiltered	Detect	2.91	0.097	1.996	n/a[b]	NQ	9/11/2018
WT_IPC-18-153405	Gross alpha	Unfiltered	Detect	33.6	2.2	3.14	2.01	NQ	9/11/2018

Note: TAL exceedance ratio is the analytical result divided by the applicable average TAL (ATAL).

[a] Qualifier: NQ = Result is not qualified.

[b] n/a = Not applicable.

Table 2
Metals and Organic Analytical Results Collected on August 10, 2018,
Following Completion of Corrective Action at Sites 54-014(d) and 54-017 in SMA PJ-SMA-18

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	TAL Exceedance Ratio	Report Method Detection Limit (µg/L)	Report Detection Limit (µg/L)	Validation Qualifier[a]	Data Validation Date
WT_IPC-18-153408	Aluminum	Filtered	Detect	159	0.21	19.3	50	NQ	9/11/2018
WT_IPC-18-153408	Antimony	Filtered	Detect	1.27	0.002	1	3	J	9/11/2018
WT_IPC-18-153408	Arsenic	Filtered	Nondetect	2	0.22	2	5	U	9/11/2018
WT_IPC-18-153408	Boron	Filtered	Nondetect	15	0.003	15	50	U	9/11/2018
WT_IPC-18-153408	Cadmium	Filtered	Nondetect	0.3	0.3	0.3	1	U	9/11/2018
WT_IPC-18-153408	Chromium	Filtered	Nondetect	3	0.014	3	10	U	9/11/2018

NEWPORT NEWS NUCLEAR BWXT – LOS ALAMOS, LLC
CERTIFICATION OF ANALYTICAL RESULTS

PF: J013 **PJ-SMA-18** **Sites: 54-014(d) and 54-017**

Table 2 (continued)

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	TAL Exceedance Ratio	Report Method Detection Limit (µg/L)	Report Detection Limit (µg/L)	Validation Qualifier[a]	Data Validation Date
WT_IPC-18-153408	Cobalt	Filtered	Nondetect	1	0.001	1	5	U	9/11/2018
WT_IPC-18-153408	Copper	Filtered	Detect	1.66	0.39	0.3	1	NQ	9/11/2018
WT_IPC-18-153408	Lead	Filtered	Nondetect	0.5	0.029	0.5	2	U	9/11/2018
WT_IPC-18-153419	Mercury	Unfiltered	Nondetect	0.067	0.087	0.067	0.2	U	9/11/2018
WT_IPC-18-153408	Nickel	Filtered	Detect	0.79	0.0046	0.6	2	J	9/11/2018
WT_IPC-18-153419	Selenium	Unfiltered	Nondetect	2	0.4	2	5	U	9/11/2018
WT_IPC-18-153408	Silver	Filtered	Nondetect	0.3	0.6	0.3	1	U	9/11/2018
WT_IPC-18-153408	Thallium	Filtered	Nondetect	0.6	0.095	0.6	2	U	9/11/2018
WT_IPC-18-153408	Vanadium	Filtered	Nondetect	1	0.01	1	5	U	9/11/2018
WT_IPC-18-153408	Zinc	Filtered	Detect	3.78	0.09	3.3	10	J	9/11/2018
WT_IPC-18-153422	Cyanide, weak acid dissociable	Unfiltered	Nondetect	1.67	0.17	1.67	5	U	9/11/2018
WT_IPC-18-153425	Total PCB[b]	Unfiltered	Detect	0.000311	0.49	n/a[c]	n/a	NQ	9/13/2018

Note: TAL exceedance ratio is the result divided by the smallest applicable TAL. Applicable TALs are the larger of the maximum TAL (MTAL) and minimum quantification level (MQL) or the larger of the average TAL (ATAL) or MQL.

[a] NQ = Result is not qualified; J = result is estimated; U = result is not detected.

[b] PCB = Polychlorinated biphenyl.

[c] n/a = Not applicable.

NEWPORT NEWS NUCLEAR BWXT – LOS ALAMOS, LLC
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: J013 **PJ-SMA-18** **Sites: 54-014(d) and 54-017**

Table 3
Applicable TALs

Analyte	Field Preparation	Units	CAS No.	MQL	ATAL	MTAL
Radium-226 and radium-228	Unfiltered	pCi/L	n/a[a]	n/a	30	n/a
Gross alpha	Unfiltered	pCi/L	n/a	n/a	15	n/a
Aluminum	Filtered	µg/L	7429-90-5	2.5	n/a	750
Antimony	Filtered	µg/L	7440-36-0	60	640	n/a
Arsenic	Filtered	µg/L	7440-38-2	0.5	9	340
Boron	Filtered	µg/L	7440-42-8	100	5000	n/a
Cadmium	Filtered	µg/L	7440-43-9	1	n/a	0.6
Chromium	Filtered	µg/L	7440-47-3	10	n/a	210
Cobalt	Filtered	µg/L	7440-48-4	50	1000	n/a
Copper	Filtered	µg/L	7440-50-8	0.5	n/a	4.3
Lead	Filtered	µg/L	7439-92-1	0.5	n/a	17
Mercury	Unfiltered	µg/L	7439-97-6	0.005	0.77	1.4
Nickel	Filtered	µg/L	7440-02-0	0.5	n/a	170
Selenium	Unfiltered	µg/L	7782-49-2	5	5	20
Silver	Filtered	µg/L	7440-22-4	0.5	n/a	0.4
Thallium	Filtered	µg/L	7440-28-0	0.5	6.3	n/a
Vanadium	Filtered	µg/L	7440-62-2	50	100	n/a
Zinc	Filtered	µg/L	7440-66-6	20	n/a	42
Cyanide, weak acid dissociable	Unfiltered	µg/L	57-12-5	10	5.2	22
Total PCB[b]	Unfiltered	µg/L	1336-36-3	n/a	0.00064	n/a

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level; ATAL = average TAL; MTAL = maximum TAL.

[a] n/a = Not applicable.

[b] PCB = Polychlorinated biphenyl.