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Date: NOV 27 2019
Refer To: N3B-19-0362

Esteban Herrera, Chief
 Water Enforcement Branch (6EN-WS)
 Compliance Assurance and Enforcement Division
 U.S. Environmental Protection Agency, Region 6
 1201 Elm Street, Suite 500
 Dallas, Texas 75270-2102

Subject: NPDES Permit No. NM0030759 – Completion of Corrective Action for Three Sites in 2M-SMA-3 Following Analytical Results Below Target Action Levels

Dear Mr. Herrera:

This letter and the enclosure are 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 (Permit) 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. 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.2(a), Completion of Corrective Action under the Permit includes the following:

Analytical results from confirmation sampling show pollutant concentrations for all pollutants of concern at the Site to be at or below applicable target action levels.

Enclosure 1 is the certification that corrective action is complete following analytical results below target action levels (TALs) from two confirmation samples collected from two measurable storm events occurring at least 15 days apart for Sites 07-001(a), 07-001(b), and 07-001(d) within 2M-SMA-3. Table 1 identifies the sites, site monitoring area (SMA), and corrective action sample collection dates applicable to the certification. The certification that corrective action is complete was prepared in accordance with 40 Code of Federal Regulations 122.22(b).

The enclosed certified document will also be posted to the Individual Permit public website (<https://ext.em-la.doe.gov/IPS/Home>).

Table 1
Confirmation Samples Collected with Results below TALs

Table with 4 columns: Site Numbers, SMA Number, Permitted Feature, Sample Collection Dates. Rows include site numbers 07-001(a), (b), (d) and SMA Number 2M-SMA-3.

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veen@em-la.doe.gov) or David Nickless at (505) 257-7933 (david.nickless@em.doe.gov).

Sincerely,

Handwritten signature of Elizabeth Lowes for, followed by typed name and title: Elizabeth Lowes, Program Manager, Environment, Safety and Health, N3B-Los Alamos.

Sincerely,

Handwritten signature of David Nickless, followed by typed name and title: David Nickless, Acting Director, Office of Quality and Regulatory Compliance, Environmental Management, Los Alamos Field Office.

Enclosure(s): One hard copy with electronic files:

- 1. Completion of Corrective Action at Sites 07-001(a), 07-001(b), and 07-001(d) Following Analytical Results Below Target Action Levels at 2M-SMA-3 (EM2019-0395)

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

cc (letter and enclosure[s] emailed): Carol Johnson, EPA Region 6; Curry Jones, EPA Region 6; Laurie King, EPA Region 6; Brent Larsen, EPA Region 6; Steve Yanicak, NMED-DOE-OB; Arturo Duran, EM-LA; David Nickless, EM-LA; Cheryl Rodriguez, EM-LA; William Alexander, N3B; Don Carlson, N3B; Emily Day, N3B; Mary Erwin, N3B; Erich Evered, N3B; Debby Holgerson, N3B; Kim Lebak, N3B; Joseph Legare, N3B; Dana Lindsay, N3B

Vertical barcode numbers: 7019 0700 0001 6963 8298

U.S. Postal Service CERTIFIED MAIL RECEIPT form with fields for Certified Mail Fee, Extra Services & Fees, Postage, and recipient address: Esteban Herrera, Chief, Water Enforcement Branch, (6.E.N.-WS), 1201 Elm St., Suite 500, Dallas TX 75270-2102. Includes a red circular postmark from Los Alamos, NM dated 07/27/2019.

Frazer Lockhart, N3B
Elizabeth Lowes, N3B
Pamela Maestas, N3B
Jason Moore, N3B
Glenn Morgan, N3B
Lester Patten, N3B
Gary Pool, N3B
Bruce Robinson, N3B
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Public Reading Room (EPRR)
PRS Website

**Completion of Corrective Action
at Sites 07-001(a), 07-001(b), and 07-001(d) in
2M-SMA-3 Following Analytical Results Below
Target Action Levels at 2M-SMA-3**

November 26, 2019

NPDES PERMIT NO. NM0030759

EM2019-0395

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

PF: E014


2M-SMA-3

Sites: 07-001(a)
07-001(b)
07-001(d)

The following certification was performed in accordance with NPDES Permit No. NM0030759, Part I.E.2, which requires the Permittees (U.S. Department of Energy and Newport News Nuclear BWXT-Los Alamos, LLC) 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."



Elizabeth Lowes, Program Manager *for*
Environment, Safety and Health
Newport News Nuclear BWXT-Los Alamos, LLC

11/25/19
Date



David Nickless, Acting Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

11/26/19
Date

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

PF: E014

2M-SMA-3

Sites: 07-001(a)
07-001(b)
07-001(d)

Tables 1 and 2 present the analytical results received from the confirmation samples collected from two measurable storm events occurring at least 15 days apart following the installation of enhanced controls at site monitoring area (SMA) 2M-SMA-3. Table 3 presents each applicable target action level (TAL) for the analytes monitored.

**Table 1
Radiochemical Analytical Results from
Two Measurable Storm Events Following Installation of Enhanced Controls, 2M-SMA-3**

Sample ID	Analyte	Field Preparation	Detect Status	Result (pCi/L)	Minimum Detectable Activity (pCi/L)	Lab Uncertainty	Qualifier ^a	Data Receipt Date
WT_IPC-17-135506	Radium-226 and radium-228	Unfiltered	Detect	1.11	0.672	n/a ^b	NQ	8/25/2017
WT_IPC-17-135506	Gross alpha	Unfiltered	Detect	1.83	1.38	0.641	NQ	8/25/2017
WT_IPC-17-135513	Radium-226 and radium-228	Unfiltered	Nondetect	1.26	1.402	n/a	U	11/7/2017
WT_IPC-17-135513	Gross alpha	Unfiltered	Detect	16.2	2.89	1.48	NQ	11/7/2017

^a Qualifier: NQ = result is not qualified, U = result is not detected.

^b n/a = Not applicable.

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

PF: E014

2M-SMA-3

Sites: 07-001(a)
07-001(b)
07-001(d)

**Table 2
Metals and Organic Analytical Results from
Two Measurable Storm Events Following Installation of Enhanced Controls, 2M-SMA-3**

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	Method Detection Limit (µg/L)	Report Detection Limit (µg/L)	Qualifier ^a	Data Receipt Date
WT_IPC-17-135394	Aluminum	Filtered	Detect	105	19.3	50.0	NQ	8/25/2017
WT_IPC-17-135394	Antimony	Filtered	Nondetect	1.00	1.00	3.00	U	8/25/2017
WT_IPC-17-135394	Arsenic	Filtered	Nondetect	2.00	2.00	5.00	U	8/25/2017
WT_IPC-17-135394	Boron	Filtered	Nondetect	15.0	15.0	50.0	U	8/25/2017
WT_IPC-17-135394	Cadmium	Filtered	Nondetect	0.300	0.300	1.00	U	8/25/2017
WT_IPC-17-135394	Chromium	Filtered	Nondetect	3.00	3.00	10.0	U	8/25/2017
WT_IPC-17-135394	Cobalt	Filtered	Nondetect	1.00	1.00	5.00	U	8/25/2017
WT_IPC-17-135394	Copper	Filtered	Detect	1.56	0.300	1.00	NQ	8/25/2017
WT_IPC-17-135506	Cyanide, weak acid dissociable	Unfiltered	Nondetect	0.00167	1.67	0.005	U	8/25/2017
WT_IPC-17-135394	Lead	Filtered	Nondetect	0.500	0.500	2.00	U	8/25/2017
WT_IPC-17-135506	Mercury	Unfiltered	Nondetect	0.067	0.067	0.200	U	8/25/2017
WT_IPC-17-135394	Nickel	Filtered	Detect	0.673	0.600	2.00	J	8/25/2017
WT_IPC-17-135506	RDX ^b	Unfiltered	Nondetect	0.0952	0.0952	0.298	U	8/25/2017
WT_IPC-17-135506	Selenium	Unfiltered	Nondetect	2.00	2.00	5.00	U	8/25/2017
WT_IPC-17-135394	Silver	Filtered	Nondetect	0.300	0.300	1.00	U	8/25/2017
WT_IPC-17-135394	Thallium	Filtered	Nondetect	0.600	0.600	2.00	U	8/25/2017
WT_IPC-17-135506	Trinitrotoluene[2,4,6-]	Unfiltered	Nondetect	0.0952	0.0952	0.298	U	8/25/2017
WT_IPC-17-135394	Vanadium	Filtered	Nondetect	1.00	1.00	5.00	U	8/25/2017
WT_IPC-17-135394	Zinc	Filtered	Nondetect	3.30	3.30	10.0	U	8/25/2017
WT_IPC-17-135424	Aluminum	Filtered	Detect	539	19.3	50.0	NQ	11/7/2017
WT_IPC-17-135424	Antimony	Filtered	Nondetect	1.00	1.00	3.00	U	11/7/2017
WT_IPC-17-135424	Arsenic	Filtered	Nondetect	2.00	2.00	5.00	U	11/7/2017

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

PF: E014

2M-SMA-3

Sites: 07-001(a)
07-001(b)
07-001(d)

Table 2 (continued)

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	Method Detection Limit (µg/L)	Report Detection Limit (µg/L)	Qualifier ^a	Data Receipt Date
WT_IPC-17-135424	Boron	Filtered	Nondetect	15.0	15.0	50.0	U	11/7/2017
WT_IPC-17-135424	Cadmium	Filtered	Nondetect	0.300	0.300	1.00	U	11/7/2017
WT_IPC-17-135424	Chromium	Filtered	Nondetect	3.00	3.00	10.0	U	11/7/2017
WT_IPC-17-135424	Cobalt	Filtered	Nondetect	1.00	1.00	5.00	U	11/7/2017
WT_IPC-17-135424	Copper	Filtered	Detect	1.36	0.300	1.00	NQ	11/7/2017
WT_IPC-17-135513	Cyanide, weak acid dissociable	Unfiltered	Detect	0.00424	1.67	0.005	J	11/7/2017
WT_IPC-17-135424	Lead	Filtered	Nondetect	0.500	0.500	2.00	U	11/7/2017
WT_IPC-17-135513	Mercury	Unfiltered	Nondetect	0.067	0.067	0.200	U	11/7/2017
WT_IPC-17-135424	Nickel	Filtered	Detect	0.623	0.600	2.00	J	11/7/2017
WT_IPC-17-135513	RDX	Unfiltered	Detect	0.11	0.0964	0.301	J	11/7/2017
WT_IPC-17-135513	Selenium	Unfiltered	Nondetect	2.00	2.00	5.00	U	11/7/2017
WT_IPC-17-135424	Silver	Filtered	Nondetect	0.300	0.300	1.00	U	11/7/2017
WT_IPC-17-135424	Thallium	Filtered	Nondetect	0.600	0.600	2.00	U	11/7/2017
WT_IPC-17-135513	Trinitrotoluene[2,4,6-]	Unfiltered	Nondetect	0.0964	0.0964	0.301	U	11/7/2017
WT_IPC-17-135424	Vanadium	Filtered	Nondetect	1.00	1.00	5.00	U	11/7/2017
WT_IPC-17-135424	Zinc	Filtered	Nondetect	3.30	3.30	10.0	U	11/7/2017

^a Qualifier: NQ = result is not qualified, U = result is not detected, J = result is estimated.

^b RDX = Royal Demolition Explosive.

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

PF: E014

2M-SMA-3

Sites: 07-001(a)
07-001(b)
07-001(d)

**Table 3
Results Compared with Applicable TALs**

Analyte	Unit	CAS No.	Result ^a	MQL	ATAL	MTAL
Aluminum	µg/L	7429-90-5	539	2.5	n/a ^b	750
Antimony	µg/L	7440-36-0	1	60	640	n/a
Arsenic	µg/L	7440-38-2	2	0.5	9	340
Boron	µg/L	7440-42-8	15	100	5000	n/a
Cadmium	µg/L	7440-43-9	0.3	1	n/a	0.6
Chromium	µg/L	7440-47-3	3	10	n/a	210
Cobalt	µg/L	7440-48-4	1	50	1000	n/a
Copper	µg/L	7440-50-8	1.56	0.5	n/a	4.3
Cyanide, weak acid dissociable	µg/L	57-12-5	0.0027	10	5.2	22
Gross alpha	pCi/L	n/a	5.4	n/a	15	n/a
Lead	µg/L	7439-92-1	0.5	0.5	n/a	17
Mercury	µg/L	7439-97-6	0.067	0.005	0.77	1.4
Nickel	µg/L	7440-02-0	0.673	0.5	n/a	170
Radium-226 and radium-228	pCi/L	n/a	1.2	n/a	30	n/a
RDX ^c	µg/L	121-82-4	0.10	n/a	200	n/a
Selenium	µg/L	7782-49-2	0.1	5	5	20
Silver	µg/L	7440-22-4	0.3	0.5	n/a	0.4
Thallium	µg/L	7440-28-0	0.6	0.5	6.3	n/a
Trinitrotoluene[2,4,6-]	µg/L	118-96-7	0.096	n/a	20	n/a
Vanadium	µg/L	7440-62-2	1	50	100	n/a
Zinc	µg/L	7440-66-6	3.3	20	n/a	42

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level; ATAL = average TAL; MTAL = maximum TAL. As allowed by Part I.D. of the Individual Permit, analytical results are compared with either the corresponding MTAL/ATAL (as applicable) or the MQL, whichever value is greater, for the purpose of determining the effectiveness of storm water control measures.

^a Result = Reported ATAL result is the geomean of the two collected corrective action samples. Reported MTAL is the greater result of the two collected corrective action samples.

^b n/a = Not applicable.

^c RDX = Royal Demolition Explosive.