

N3B-Los Alamos 1200 Trinity Drive, Suite 150 Los Alamos, New Mexico 87544 (505) 257-7690



Environmental Management Los Alamos Field Office P.O. Box 1663, MS M984 Los Alamos, New Mexico 87545 (505) 257-7950/FAX (505) 606-2132

Date: September 10, 2020 *Refer To*: N3B-2020-0101

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 – Certification of Installation of Enhanced Control Measures for W-SMA-9.5

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.1(c), "Permittees shall certify completion of installation of control measures under this subsection to EPA within 30 days of completion of all such measures at the Site..."

Accordingly, the certification documentation for enhanced control measures completed at W-SMA-9.5 within the last 30 days is included as Enclosure 1. Table 1 identifies the permitted feature, site monitoring area (SMA), and site applicable to the certification. The certification of installation of enhanced controls 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
SMA included in this Submittal of Certification of Installation of Enhanced Control Measures

Permitted Feature	SMA	Site
W014	W-SMA-9.5	11-012(c)

If you have any questions, please contact Emily Day at (505) 695-4243 (emily.day@em-la.doe.gov) or M. Lee Bishop at (505) 257-7902 (lee.bishop@em.doe.gov).

Sincerely,

Program Manager

Environmental Remediation

N3B-Los Alamos

Sincerely,

M Lee Bishop Digitally signed by M Lee Bishop Date: 2020.09.08 12:20:06

M. Lee Bishop, Director

Office of Quality and Regulatory Compliance

Environmental Management Los Alamos Field Office

Enclosure(s):

1. Certification of Installation of Enhanced Control Measures for W-SMA-9.5 (EM2020-0118)

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

buly D Zelak

cc (letter and enclosure[s] emailed):

Carol Johnson, EPA Region 6, Dallas, TX

Curry Jones, EPA Region 6, Dallas, TX

Laurie King, EPA Region 6, Dallas, TX

Brent Larsen, EPA Region 6, Dallas, TX

Chris Catechis, NMED-DOE-OB

Steve Yanicak, NMED-DOE-OB

Arturo Duran, EM-LA

Stephen Hoffman, EM-LA

Kirk D. Lachman, EM-LA

David Nickless, EM-LA

Cheryl Rodriguez, EM-LA

Ben Underwood, EM-LA

William Alexander, N3B

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Emily Day, N3B

Mary Erwin, N3B

Thomas Harrison, N3B

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Kim Lebak, N3B

Joseph Legare, N3B

Dana Lindsay, N3B

Pamela Maestas, N3B

Jason Moore, N3B

Glenn Morgan, N3B

Joseph Murdock, N3B

Joseph Noll, N3B Gerald O'Leary III, N3B Bruce Robinson, N3B Karly Rodriguez, N3B Steve Veenis, N3B Tashia Vigil, N3B Amanda White, N3B emla.docs@em.doe.gov n3brecords@em-la.doe.gov Public Reading Room (EPRR) PRS website

Pamela T. Maestas

From: Herrera, Esteban < Herrera.Esteban@epa.gov>
Sent: Thursday, September 10, 2020 9:37 AM

To: Pamela T. Maestas

Cc: Johnson, Carol; Jones, Curry; Larsen, Brent; Emily M. Day; Regulatory Documentation;

cheryl.rodriguez@em.doe.gov; Karly B. Rodriguez

Subject: RE: Submittal to EPA on 9/10/2020 of W-SMA-9.5 Cert of Install Enhanced Ctrl Msrs

Thank you!!!

U.S. Environmental Protection Agency
Compliance Assurance & Enforcement
Section Chief – Surface Water Compliance Section (R6-ECDWA)
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
(214) 665-7213

From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>

Sent: Thursday, September 10, 2020 10:34 AM **To:** Herrera, Esteban Herrera.Esteban@epa.gov

Cc: Johnson, Carol <johnson.carol@epa.gov>; Jones, Curry <jones.curry@epa.gov>; Larsen, Brent

<Larsen.Brent@epa.gov>; Emily M. Day <Emily.Day@em-la.doe.gov>; Regulatory Documentation <RegDocs@EM-</p>

LA.DOE.GOV>; cheryl.rodriguez@em.doe.gov; Karly B. Rodriguez <Karly.Rodriguez@EM-LA.DOE.GOV>

Subject: Submittal to EPA on 9/10/2020 of W-SMA-9.5 Cert of Install Enhanced Ctrl Msrs

Mr. Herrera,

Attached for submittal is a pdf of the following:

• NPDES Permit No. NM0030759 – Certification of Installation of Enhanced Control Measures for W-SMA-9.5 (N3B-2020-0101, letter and enclosure)

Please acknowledge receipt of this submittal by responding to this email.

Let me know if you have any questions.

Thank you.

Pamela T. Maestas Regulatory Documentation Manager Newport News Nuclear BWXT-Los Alamos, LLC c. 505-927-7882 regdocs@em-la.doe.gov



Certification of Installation of Enhanced Control Measures at W-SMA-9.5

September 10, 2020

NPDES PERMIT NO. NM0030759 EM2020-0118

Los Alamos Field Office

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC CERTIFICATION OF ENHANCED CONTROL MEASURES

PF: W014 W-SMA-9.5 Site: 11-012(c)

The following certification was performed in accordance with NPDES Permit No.NM0030759, Part I.E.1(c), which requires the Permittees (U.S. Department of Energy and Newport News Nuclear BWXT-Los Alamos, LLC) to certify the completion of the installation of control measures within 30 days of completion of the installation of all such measures at the site.

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."

Kindrala D. Telak	8/26/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.09.08 12:19:27	
M. Lee Bishop, Director	Date
Office of Quality and Regulatory Compliance	
Environmental Management	

PF: W014 W-SMA-9.5 Site: 11-012(c)

In June 2017, analytical results received from extended baseline monitoring at Site Monioring Area (SMA) W-SMA-9.5 exceeded target action levels for gross alpha radioactivity and mercury, causing the Permittees to initiate corrective action.

In accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No.NM0030759 (the Permit) Part I.E.1(c), the design, installation, and documentation of enhanced control measures reasonably expected to achieve compliance with target action levels identified in the Permit for all sites within the identified SMA drainage area have been completed. Included in this document are photos (listed in Table 1 and shown on pages 2 through 5) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Description

BMP* ID	Type of Control Measure	Control Measure	Photo ID
W01403010010	Berm	Earthen Berm	1.JPG, 2.JPG, 3.JPG,
W01404060011	Channel/Swale	Rip Rap	4.JPG

^{*}BMP = Best management practice.

PF: W014 W-SMA-9.5 Site: 11-012(c)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1.JPG	W01403010010	Berm	Earthen Berm	Northern portion of berm looking north



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2.JPG	W01403010010	Berm	Earthen Berm	Southern portion of berm looking southeast



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3.JPG	W01403010010	Berm	Earthen Berm	Western portion of berm looking east



Photo ID	BMP ID	Type of Control Measure	Control Measure
4.JPG	W01404060011	Channel/Swale	Rip Rap

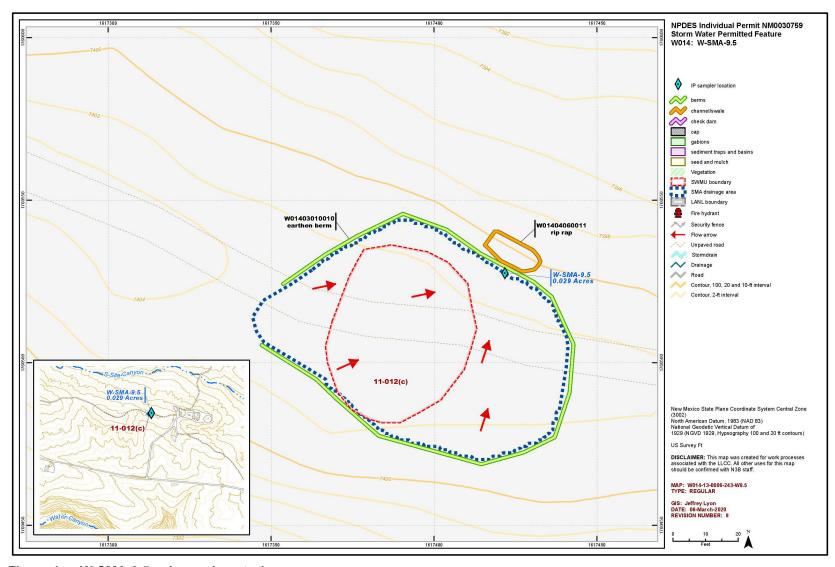


Figure 1 W-SMA-9.5 enhanced control measures