



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: November 25, 2020
Refer To: N3B-2020-0386

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 at Site 00-011(c) in R-SMA-2.05 following Certification of Completion by the New Mexico Environment Department

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. On April 30, 2018, responsibilities, coverage, and liability transferred from LANS to Newport News Nuclear BWXT-Los Alamos, LLC (N3B).

Completion of corrective action is being certified to EPA as specified in Part 1, Section E.2(d) of the Permit:

The Site has achieved RCRA "corrective action complete without controls/corrective action complete with controls" status or a Certificate of Completion under NMED's Consent Order.

Enclosure 1 is a documentation package supporting completion of corrective action for Solid Waste Management Unit (SWMU) 00-011(c). The package includes the document certifying that corrective action is complete and the corresponding certificate of completion issued under the New Mexico Environment Department's (NMED's) Compliance Order on Consent (Consent Order). This submittal can also be accessed at the following website:
<https://ext.em-la.doe.gov/ips>.

Table 1 includes information about the site and site monitoring area (SMA) included in this certification package.

Table 1
Certificate of Completion for One Site in One Site Monitoring Area

Site Number	Associated SMA Number	Permitted Feature	Watershed	Site Priority
00-011(c)	R-SMA-2.05	R004	Los Alamos/Pueblo	Moderate

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,



Kim Lebak
Program Manager
Environmental Remediation
N3B-Los Alamos

Sincerely,

M Lee
Bishop

Digitally signed by M Lee
Bishop
Date: 2020.11.16
12:42:24 -07'00'

M. Lee Bishop, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

Enclosure(s):

1. Completion of Corrective Action at Site 00-011(c) in R-SMA-2.05 (EM2020-0528)

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

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
M. Lee Bishop, EM-LA
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
Felicia Aguilar, N3B
William Alexander, N3B
Don Carlson III, N3B
Emily Day, N3B
Mary Erwin, N3B

Thomas Harrison, N3B
Debby Holgerson, N3B
Jeff Holland, N3B
Audrey Krehlik, N3B
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
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: Wednesday, November 25, 2020 12:34 PM
To: Pamela T. Maestas
Cc: Johnson, Carol; Jones, Curry; Larsen, Brent; Emily M. Day; Regulatory Documentation; cheryl.rodriguez@em.doe.gov; Audrey Krehlik; Amanda B. White
Subject: RE: Submittal to EPA on 11/25/2020 of Completion of Corrective Act at 00-011(c)

Thank you. I received it

U.S. Environmental Protection Agency
Compliance Assurance & Enforcement
Section Chief – Analysis and Assessment 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: Wednesday, November 25, 2020 1:18 PM
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-LA.DOE.GOV>; cheryl.rodriguez@em.doe.gov; Audrey Krehlik <Audrey.Krehlik@EM-LA.DOE.GOV>; Amanda B. White <Amanda.White@em-la.doe.gov>
Subject: Submittal to EPA on 11/25/2020 of Completion of Corrective Act at 00-011(c)

Mr. Herrera,

Attached for submittal is a pdf of the following:

- NPDES Permit No. NM0030759 – Completion of Corrective Action at Site 00-011(c) in R-SMA-2.05 following Certification of Completion by the New Mexico Environment Department (N3B-2020-0386, 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



1200 Trinity Drive, Suite 150
Los Alamos, NM 87544

**Completion of Corrective Action
at Site 00-011(c)
in R-SMA-2.05**

November 25, 2020

NPDES PERMIT NO. NM0030759

EM2020-0528

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

PF: R004

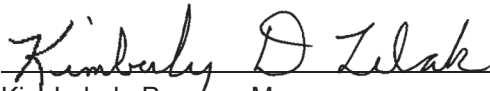
R-SMA-2.05

Site: 00-011(c)

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."



Kim Lebak, Program Manager
Environmental Remediation
Newport News Nuclear BWXT-Los Alamos, LLC

November 12, 2020
Date

M Lee Bishop Digitally signed by M Lee Bishop
Date: 2020.11.16 12:42:52 -07'00'

M. Lee Bishop, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

Date

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

PF: R004

R-SMA-2.05

Site: 00-011(c)

This document certifies completion of corrective action for Site 00-011(c) pursuant to Part 1, E.2(d) of the Individual Permit NM0030759. Accompanying this certification is a copy of the New Mexico Environment Department- (NMED-) issued certificate of completion (COC) for Site 00-011(c), which is designated as Solid Waste Management Unit 00-011(c) for the purposes of the 2016 Compliance Order on Consent (Consent Order). This site, listed in Table 1, has achieved Resource Conservation and Recovery Act “corrective action complete without controls” status under the Consent Order. This certification that corrective action is complete was prepared in accordance with 40 Code of Federal Regulations 122.22(b).

In August 2020, a baseline confirmation monitoring sample collected at Site Monitoring Area (SMA) R-SMA-2.05 exceeded the target action level for gross alpha activity, causing the Permittees to initiate corrective action. The Permittees are certifying completion of corrective action at Site 00-011(c) through a demonstration that the site has achieved a COC, included with this submission, under Section XXI of the Consent Order. A copy of the COC from NMED is included in Attachment 1.

**Table 1
Completion of Corrective Action for One Site in R-SMA-2.05**

Site	Associated SMA Number	Watershed	Site Priority
00-011(c)	R-SMA-2.05	Los Alamos/Pueblo	Moderate

Attachment 1

*New Mexico Environment Department
Certificate of Completion for Site 00-011(c)*



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

**2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us**



DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

EP2012-5112

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 16, 2012

Pete Maggiore
Assistant Manager
Environmental Projects Office
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Michael J. Graham
Associate Director
Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: CERTIFICATES OF COMPLETION
ONE SOLID WASTE MANAGEMENT UNIT AND ONE AREA OF CONCERN
IN THE GUAJE/BARRANCAS/RENDIJA CANYONS AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-12-008**

Dear Messrs. Maggiore and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Request for Certificates of Completion for One Solid Waste Management Unit and One Area of Concern in the Guaje/Barrancas/Rendija Canyons Aggregate Area*, dated February 02, 2012 and referenced by EP2012-0026.

One solid waste management unit (SWMU) 00-011(c) and one area of concern (AOC) C-00-020 were recommended for corrective action complete without controls in the *2011 Biennial Ordnance Survey Report* (Report), dated December 2011 (LA-UR-11-6766/EP2011-0383). NMED reviewed the Report and concurred with the conclusion that there is no need to conduct further ordnance surveys at these two sites (December 28, 2011). The Permittees have satisfied

U1201076

Messrs. Maggiore and Graham
May 16, 2012
Page 2

the requirements of the March 1, 2005 Consent Order for completion of corrective action at these sites.

Based on the results of investigations, the following sites within the Guaje/Barrancas/Rendija canyons Aggregate Area qualify for Corrective Action Complete Without Controls status.

SWMU 00-011(c) is a suspected mortar impact area located on U. S. Forest Service land in a tributary of Rendija canyon north of the Sportman's club small-arms firing range. The area is approximately 10 acres and may have been used as a mortar impact area in the 1940s. A RCRA facility investigation (RFI) conducted in 1993 included an ordnance survey that did not find any munitions debris (MD) at the site and the Permittees concluded that the site was never used as an ordnance impact area. In October 2006, another munitions debris survey was conducted at the site and no MD or munitions of explosive concern (MEC) were found at SWMU 00-011(c). At NMED's direction, additional ordnance surveys were conducted in 2009 and 2011 and no MD or MEC was found at the site during either survey. The Permittees have demonstrated that the SWMU 00-011(c) is eligible for corrective action complete without controls.

AOC C-00-020 is a 30-acre suspected mortar impact area located along the north valley wall of Rendija Canyon on U. S. Forest Service land. The site was thought to be a former impact area because of the presence of "U.S. Property-No trespassing" signs posted along the southern edge of the area. In 1991, an ordnance team inspected the site and concluded that the site was not a former impact area. A RFI was conducted in 1993 that included an ordnance survey. No MD or MEC was observed at the site. In October 2006, another munitions debris survey was conducted at the site and no MD or MEC were found at AOC C-00-020. At NMED's direction, additional ordnance surveys were conducted in 2009 and 2011 and no MD or MEC was found during the surveys. The Permittees have demonstrated that the AOC C-00-020 is eligible for corrective action complete without controls.

If new information becomes available that indicates that any of these sites may pose a risk to human health or the environment, NMED may require the Permittees to conduct additional investigation or remediation. NMED hereby issues this Certificate of Completion for 2 sites discussed above pursuant to section VII.E.6.b of the Consent Order.

U1201076

Messrs. Maggiore and Graham
May 16, 2012
Page 3

Please contact Neelam Dhawan at (505) 476-6042, if you have any questions.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
C. Rodriguez, DOE LASO, MS A316
T. Haagenstad, EP-CAP, MS M992

File: 2012 LANL, Certificates of Completion for Guaje/barrancas/Rendija Canyons AA Sites
(LANL 12-008)

U1201076