

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: December 14, 2020 Refer To: N3B-2020-0434

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 CDV-SMA-7, CDV-SMA-9.05, PJ-SMA-5, P-SMA-2.2, and S-SMA-6

Dear Mr. Herrera:

This letter with enclosures is 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 documents for certification of enhanced control measures completed at CDV-SMA-7, CDV-SMA-9.05, PJ-SMA-5, P-SMA-2.2, and S-SMA-6 within the last 30 days are included as Enclosures 1 through 5, respectively. Table 1 identifies the permitted feature, site monitoring area (SMA), and site applicable to each certification. The certifications were signed in accordance with 40 Code of Federal Regulations 122.22(b) and will also be posted to the Individual Permit public website (https://ext.em-la.doe.gov/ips/home).

Table 1 **SMAs Included in this Submittal of Certification** of Installation of Enhanced Control Measures

Permitted Feature	SMA	Site
V013	CDV-SMA-7	15-008(d)
V016	CDV-SMA-9.05	15-007(b)
J005	PJ-SMA-5	22-015(c)
P008	P-SMA-2.2	00-019
S016	S-SMA-6	72-001

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 Bishop Date: 2020.12.09 14:51:10

Digitally signed by M Lee

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 at CDV-SMA-7 (EM2020-0631)
- 2. Certification of Installation of Enhanced Control Measures at CDV-SMA-9.05 (EM2020-0632)
- 3. Certification of Installation of Enhanced Control Measures at PJ-SMA-5 (EM2020-0633)
- 4. Certification of Installation of Enhanced Control Measures at P-SMA-2.2 (EM2020-0634)
- 5. Certification of Installation of Enhanced Control Measures at S-SMA-6 (EM2020-0635)

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 Felicia Aguilar, N3B William Alexander, N3B Don Carlson, 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: Monday, December 14, 2020 3:53 PM

To: Pamela T. Maestas

**Subject:** RE: Submittal to EPA on 12/14/2020 of Certification of Install of Enhanced Ctrl

Measures for 5 Sites

#### Thank you

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: Monday, December 14, 2020 4:15 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-</p> 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 12/14/2020 of Certification of Install of Enhanced Ctrl Measures for 5 Sites

Mr. Herrera,

Attached for submittal is a pdf of the following:

NPDES Permit No. NM0030759 - Certification of Installation of Enhanced Control Measures for CDV-SMA-7, CDV-SMA-9.05, PJ-SMA-5, P-SMA-2.2, and S-SMA-6 (N3B-2020-0434, letter and enclosures)

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 CDV-SMA-7

**December 14, 2020** 

NPDES PERMIT NO. NM0030759 EM2020-0631

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

PF: V013 CDV-SMA-7 Site: 15-008(d)

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."

Kimbuly D Zelak	12/2/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.12.09 14:50:50 -07'00'	
M. Lee Bishop, Director Office of Quality and Regulatory Compliance	Date

**Environmental Management** Los Alamos Field Office

PF: V013 CDV-SMA-7 Site: 15-008(d)

In August and September 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CDV-SMA-7 exceeded target action levels for gross alpha radioactivity, prompting the Permittees to initiate a second round of 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 6) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

BMP* ID	Type of Control Measure	Control Measure	Photo ID
V01303140022	Berm	Coir Log	1. JPG
V01303140023	Berm	Coir Log	2. JPG
V01306010024	Check Dam	Rock Check Dam	3. JPG
V01306010025	Check Dam	Rock Check Dam	4. JPG
V01306010026	Check Dam	Rock Check Dam	5. JPG

<sup>\*</sup>BMP = Best management practice.

PF: V013 CDV-SMA-7 Site: 15-008(d)

**Photos:** 



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	V01303140022	Berm	Coir Log	Looking west



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	V01303140023	Berm	Coir Log	Looking west



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	V01306010024	Check Dam	Rock Check Dam	Looking north, BMP V01303140023 is visible above



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	V01306010025	Check Dam		Looking east, BMP V01306010026 is visible to the right



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
5. JPG	V01306010026	Check Dam	Rock Check Dam	Looking east

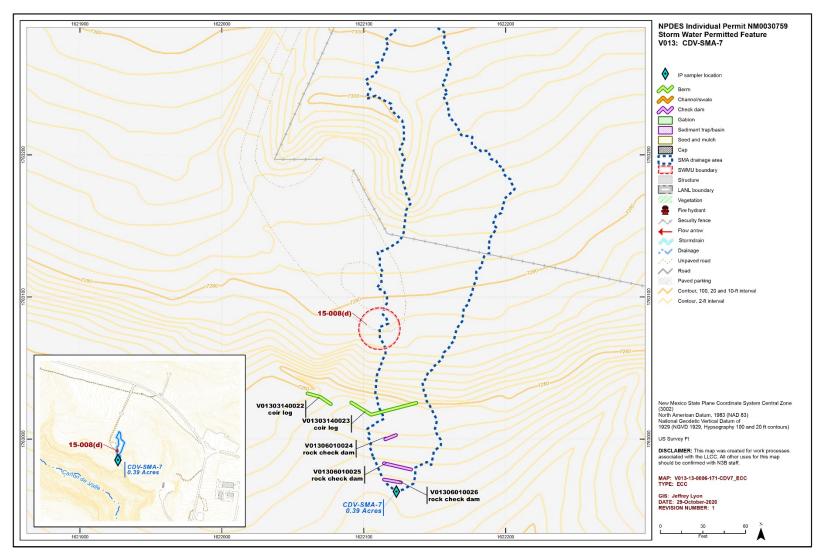


Figure 1 CDV-SMA-7 enhanced control measures

# Certification of Installation of Enhanced Control Measures at CDV-SMA-9.05

**December 14, 2020** 

NPDES PERMIT NO. NM0030759 EM2020-0632

Los Alamos Field Office

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

PF: V016 CDV-SMA-9.05 Site: 15-007(b)

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."

Kimbuly D Zelak	12/2/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.12.09 14:50:29 -07'00'	
M. Lee Bishop, Director	Date
Office of Quality and Regulatory Compliance	
Environmental Management	

PF: V016 CDV-SMA-9.05 Site: 15-007(b)

In September 2018, analytical results received from extended baseline monitoring at Site Monitoring Area (SMA) CDV-SMA-9.05 exceeded target action levels for gross-alpha radioactivity, prompting 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 4) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

BMP* ID	Type of Control Measure	Control Measure	Photo ID
V01606010007	Check Dam	Rock Check Dam	1. JPG
V01606010008	Check Dam	Rock Check Dam	2. JPG
V01606010009	Check Dam	Rock Check Dam	3. JPG

<sup>\*</sup>BMP = Best management practice.

PF: V016 CDV-SMA-9.05 Site: 15-007(b)

**Photos:** 



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	V01606010007	Check Dam	Rock Check Dam	Looking south

PF: V016 CDV-SMA-9.05 Site: 15-007(b)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	V01606010008	Check Dam	Rock Check Dam	Looking west

PF: V016 CDV-SMA-9.05 Site: 15-007(b)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	V01606010009	Check Dam	Rock Check Dam	Looking east

PF: V016 CDV-SMA-9.05 Site: 15-007(b)

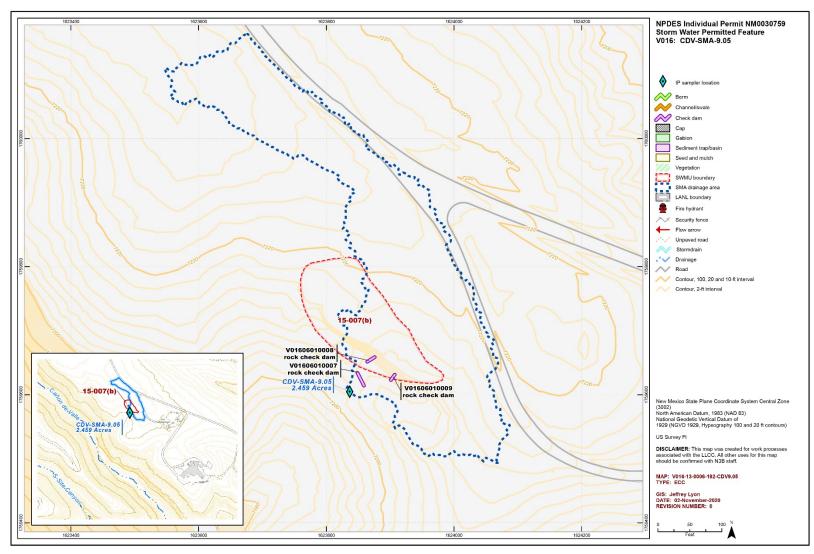


Figure 1 CDV-SMA-9.05 enhanced control measures

# Certification of Installation of Enhanced Control Measures at PJ-SMA-5

**December 14, 2020** 

NPDES PERMIT NO. NM0030759 EM2020-0633

Environmental Management Los Alamos Field Office

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

PF: J005 PJ-SMA-5 Site: 22-015(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."

Kimbuly D Zelak	12/2/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.12.09 14:49:56	
M. Lee Bishop, Director	 Date
Office of Quality and Regulatory Compliance	

PF: J005 PJ-SMA-5 Site: 22-015(c)

In October 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) PJ-SMA-5 exceeded target action levels for copper, prompting the Permittees to initiate a second round of 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 Descriptions

BMP* ID	Type of Control Measure	Control Measure	Photo ID
J00503200033	Berm	Compost Log	1. JPG
J00503200034	Berm	Compost Log	2. JPG
J00503200035	Berm	Compost Log	3. JPG
J00503200036	Berm	Compost Log	4. JPG

<sup>\*</sup>BMP = Best management practice.

PF: J005 PJ-SMA-5 Site: 22-015(c)

**Photos:** 



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	J00503200033	Berm	Compost Log	Looking west



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	J00503200034	Berm	Compost Log	Looking southeast, BMP J00503200033 is visible to the right



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	J00503200035	Berm	Compost Log	Looking southeast



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	J00503200036	Berm	Compost Log	Looking southeast

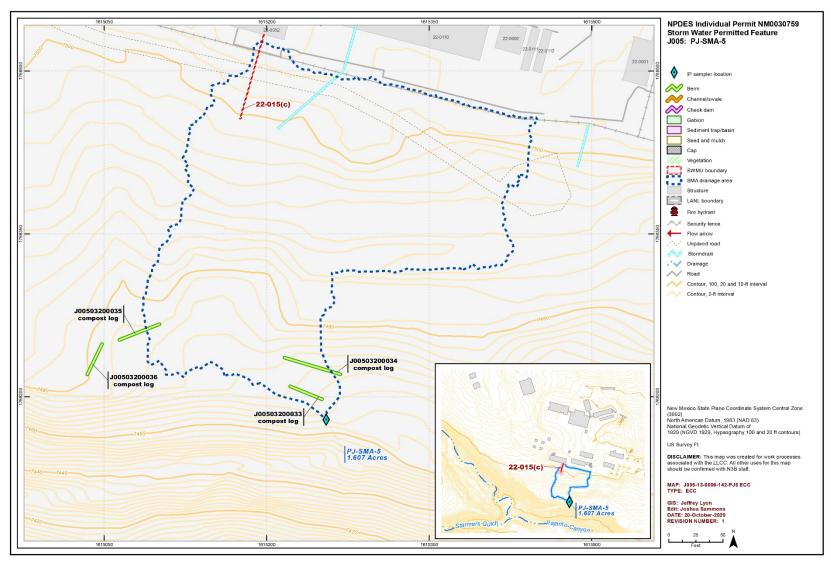


Figure 1 PJ-SMA-5 enhanced control measures

# Certification of Installation of Enhanced Control Measures at P-SMA-2.2

**December 14, 2020** 

NPDES PERMIT NO. NM0030759 EM2020-0634

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

PF: P008 P-SMA-2.2 Site: 00-019

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."

Kimbuly D Zelak	12/2/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.12.09 14:49:32 -07'00'	
M. Lee Bishop, Director	Date
Office of Quality and Regulatory Compliance	

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

PF: P008 P-SMA-2.2 Site: 00-019

In September 2019, analytical results received from extended baseline monitoring at Site Monitoring Area (SMA) P-SMA-2.2 exceeded target action levels for copper, gross-alpha radioactivity, mercury, total polychlorinated biphenyls, and zinc, prompting 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 and 3) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

BMP* ID	Type of Control Measure	Control Measure	Photo ID
P00803010031	Berm	Earthen Berm	1. JPG
P00804060032	Channel/Swale	Rip Rap	2. JPG

<sup>\*</sup>BMP = Best management practice.

PF: P008 P-SMA-2.2 Site: 00-019

**Photos:** 



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	P00803010031	Berm	Earthen Berm	Looking southwest

PF: P008 P-SMA-2.2 Site: 00-019



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	P00804060032	Channel/Swale	Rip Rap	Looking northwest

PF: P008 P-SMA-2.2 Site: 00-019

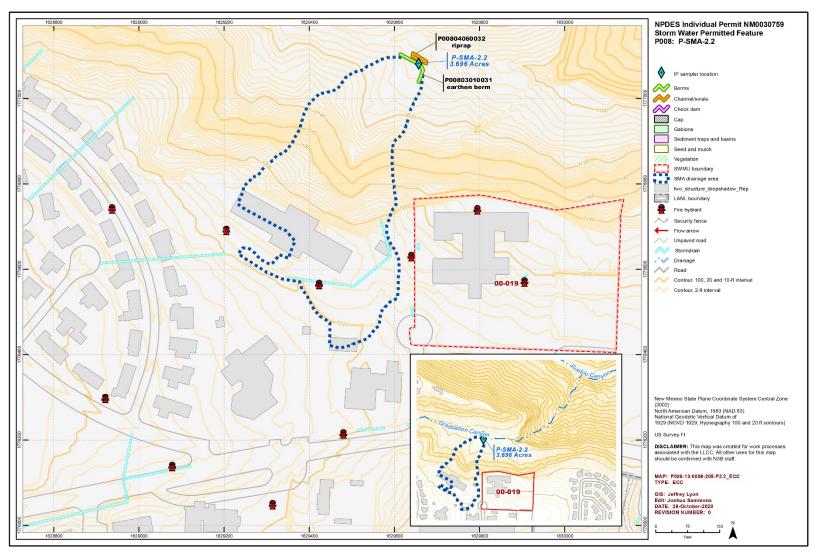


Figure 1 P-SMA-2.2 enhanced control measures

# Certification of Installation of Enhanced Control Measures at S-SMA-6

**December 14, 2020** 

NPDES PERMIT NO. NM0030759 EM2020-0635

Environmental Management Los Alamos Field Office

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

PF: S016 S-SMA-6 Site: 72-001

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."

Kimbuly D Zelak	12/2/20
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2020.12.09 14:49:05 -07'00'	
M. Lee Bishop, Director	Date
Office of Quality and Regulatory Compliance	

PF: S016 S-SMA-6 Site: 72-001

In August and November 2017, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) S-SMA-6 exceeded target action levels for aluminum, copper, lead, total polychlorinated biphenyls, and gross-alpha radioactivity, prompting the Permittees to initiate a second round of 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 and 3) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

BMP* ID	Type of Control Measure	Control Measure	Photo ID
S01603010018	Berm	Earthen Berm	1. JPG
S01603140019	Berm	Coir Log	2. JPG

<sup>\*</sup>BMP = Best management practice.

PF: S016 S-SMA-6 Site: 72-001

**Photos:** 



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	S01603010018	Berm	Earthen Berm	Looking northwest

PF: S016 S-SMA-6 Site: 72-001



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	S01603140019	Berm	Coir Log	Looking west

PF: S016 S-SMA-6 Site: 72-001

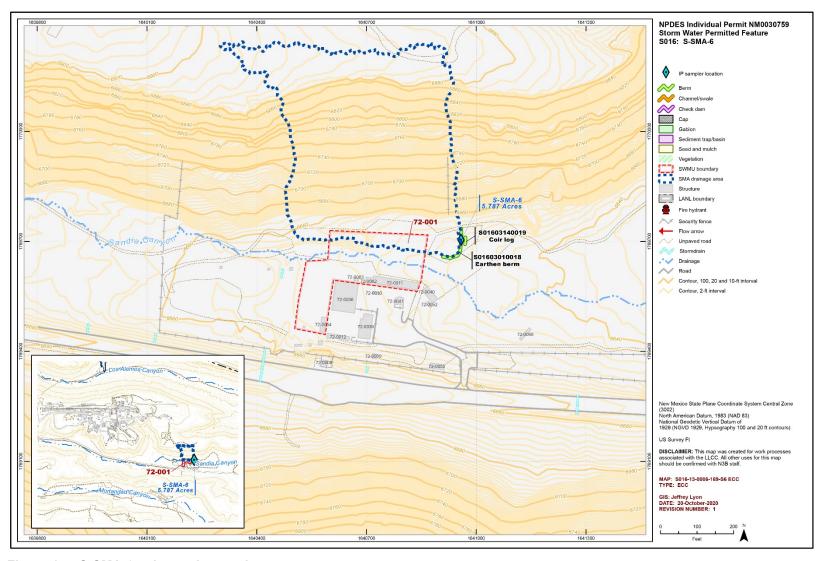


Figure 1 S-SMA-6 enhanced control measures