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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: March 30, 2021 Refer To: N3B-2021-0047

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 PJ-SMA-11

Dear Mr. Herrera:

This letter with enclosure 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 document for certification of enhanced control measures completed at PJ-SMA-11 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 was 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
SMA Included in this Submittal of Certification of Installation of Enhanced Control Measures

Permitted Feature	SMA	Site
J013	PJ-SMA-11	40-003(a)

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,

Kimbuly D Zelak Kim Lebak

Program Manager

Environmental Remediation

N3B-Los Alamos

Sincerely,

M Lee Bishop for Digitally signed by M Lee Bishop for Date: 2021.03.26 09:03:12 -06'00'

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 PJ-SMA-11 (EM2021-0085)

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

Peter Maggiore, NA-LA

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

Jennifer Payne, LANL

Felicia Aguilar, N3B

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Sharon Brady, N3B

Don Carlson, N3B

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Audrey Krehlik, N3B

Kim Lebak, N3B

Joseph Legare, N3B

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Pamela Maestas, N3B

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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: Tuesday, March 30, 2021 12:54 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 3/30/2021 of Certification of Install of Enhanced Ctrl Msrs for

PJ-SMA-11

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: Tuesday, March 30, 2021 1:42 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 3/30/2021 of Certification of Install of Enhanced Ctrl Msrs for PJ-SMA-11

Mr. Herrera,

Attached for submittal is a pdf of the following:

• NPDES Permit No. NM0030759 – Certification of Installation of Enhanced Control Measures for PJ-SMA-11 (N3B-2021-0047, 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 PJ-SMA-11

March 30, 2021

NPDES PERMIT NO. NM0030759 EM2021-0085

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

PJ-SMA-11 PF: J013 Site: 40-003(a)

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."

Lebak, Program Manager

Environmental Remediation

Newport News Nuclear BWXT-Los Alamos, LLC

M Lee Bishop

for

Digitally signed by M Lee

Bishop for

Date: 2021.03.26 09:02:41 -06'00'

M. Lee Bishop, Director

Office of Quality and Regulatory Compliance

Environmental Management

Los Alamos Field Office

March 16, 2021

Date

Date

PF: J013 PJ-SMA-11 Site: 40-003(a)

In September 2018 and August 2019, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) PJ-SMA-11 exceeded target action levels (TALs) for copper and gross alpha 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 TALs 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
J01303120030	Berm	Rock Berm	1.JPG
J01303140031	Berm	Coir Log	2.JPG
J01303140032	Berm	Coir Log	3.JPG

^{*}BMP = Best management practice.

PF: J013 PJ-SMA-11 Site: 40-003(a)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	J01303120030	Berm	Rock Berm	Looking east

PF: J013 PJ-SMA-11 Site: 40-003(a)



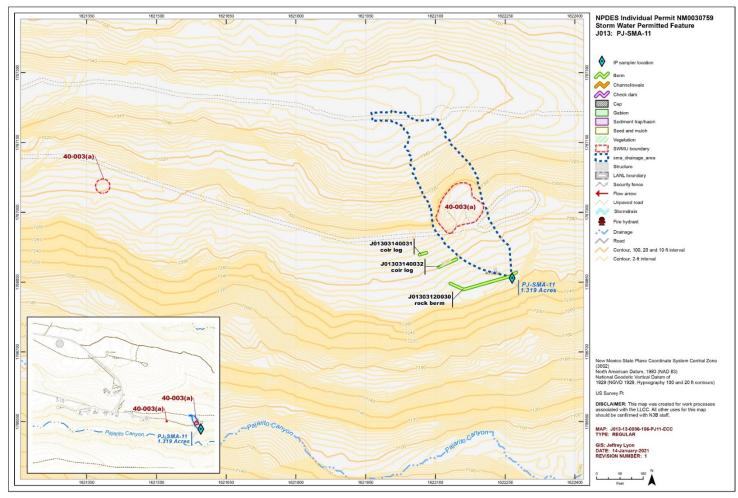
Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	J01303140031	Berm	Coir Log	Looking northeast

PF: J013 PJ-SMA-11 Site: 40-003(a)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	J01303140032	Berm	Coir Log	Looking east

PF: J013 PJ-SMA-11 Site: 40-003(a)



Note: The two coir logs serve as run-on controls because of historical scrap fill. After detonations, rock rubble and crushed tuff that sloughed from the amphitheater wall were pushed to the south, creating an area of fill that extended nearly to the edge of Pajarito Canyon. The rock berm also contributes to controlling runoff from this area; however, its primary purpose is to detain sediment within the SMA.

Figure 1 PJ-SMA-11 enhanced control measures