

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: April 21, 2021 Refer To: N3B-2021-0080

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 CHQ-SMA-1.02, CHQ-SMA-2, and CHQ-SMA-7.1

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 discharge 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) of the Permit, "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 CHQ-SMA-1.02, CHQ-SMA-2, and CHQ-SMA-7.1 within the last 30 days are included as Enclosures 1, 2, and 3, respectively. Table 1 identifies the permitted features, site monitoring areas (SMAs), and Sites 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 **SMAs Included in This Submittal of Certification of Installation of Enhanced Control Measures**

Permitted Feature	SMA	Site
Q002A	CHQ-SMA-1.02	33-004(h)
		33-008(c)
		33-011(d)
		33-015
Q003	CHQ-SMA-2	33-004(d)
		33-007(c)
		C-33-003
Q010	CHQ-SMA-7.1	33-010(g)

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: 2021.04.20 14:09:46

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 CHQ-SMA-1.02 (EM2021-0202)
- 2. Certification of Installation of Enhanced Control Measures at CHQ-SMA-2 (EM2021-0160)
- 3. Certification of Installation of Enhanced Control Measures at CHQ-SMA-7.1 (EM2021-0161)

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 William Alexander, N3B Sharon Brady, N3B Don Carlson, N3B Emily Day, 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 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: Wednesday, April 21, 2021 4:12 PM

To: Pamela T. Maestas

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

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

Subject: RE: Submittal to EPA on 4/21/2021 of Certification of Install of Enhanced Ctrl Msrs for

CHQ-SMA-1.02, -2, and -7.1

Received. Thanks Pamela!!

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, April 21, 2021 5:04 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; Karly B. Rodriguez <Karly.Rodriguez@EM-LA.DOE.GOV>; Amanda B.

White <Amanda.White@em-la.doe.gov>

Subject: Submittal to EPA on 4/21/2021 of Certification of Install of Enhanced Ctrl Msrs for CHQ-SMA-1.02, -2, and -7.1

Mr. Herrera,

Attached for submittal is a pdf of the following:

 NPDES Permit No. NM0030759 – Certification of Installation of Enhanced Control Measures for CHQ-SMA-1.02, CHQ-SMA-2, and CHQ-SMA-7.1 (N3B-2021-0080, 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 CHQ-SMA-1.02

April 21, 2021

NPDES PERMIT NO. NM0030759 EM2021-0202

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

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c) 33-011(d) 33-015

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. T. Jak	April 7, 2021
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Digitally signed by M Lee Bishop Date: 2021.04.20 14:10:07	
M. Lee Bishop, Director	Date

Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c) 33-011(d) 33-015

In August and September 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CHQ-SMA-1.02 yielded a target action level (TAL) exceedance 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 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
Q002A06010015	Check Dam	Rock Check Dam	1.JPG
Q002A06010016	Check Dam	Rock Check Dam	2.JPG
Q002A06010017	Check Dam	Rock Check Dam	3.JPG

^{*}BMP = Best management practice.

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c) 33-011(d)

33-015

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	Q002A06010015	Check Dam	Rock Check Dam	Looking southwest

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c) 33-011(d) 33-015



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	Q002A06010016	Check Dam	Rock Check Dam	Looking southwest

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c) 33-011(d) 33-015



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	Q002A06010017	Check Dam	Rock Check Dam	Looking south

PF: Q002A CHQ-SMA-1.02 Sites: 33-004(h)

33-008(c)

33-011(d) 33-015

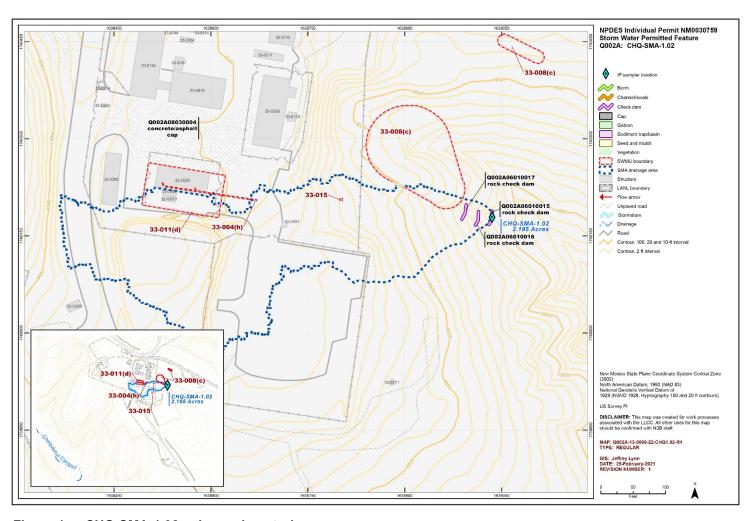


Figure 1 CHQ-SMA-1.02 enhanced control measures

Certification of Installation of Enhanced Control Measures at CHQ-SMA-2

April 21, 2021

NPDES PERMIT NO. NM0030759 EM2021-0160

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

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)

> 33-007(c) C-33-003

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."

Kimbaly D Ilak	April 7, 2021
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Date: 2021.04.21 13:19:18	
M. Lee Bishop, Director	Date
Office of Quality and Regulatory Compliance	

Environmental Management Los Alamos Field Office

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)

33-007(c) C-33-003

In August and September 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CHQ-SMA-2 yielded target action level (TAL) exceedances 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 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
Q00306010057	Check Dam	Rock Check Dam	1.JPG
Q00306010058	Check Dam	Rock Check Dam	2.JPG
Q00303140059	Berm	Coir Log	3.JPG
Q00303060060	Berm	Straw Wattle	4.JPG
Q00303060061	Berm	Straw Wattle	5.JPG

^{*}BMP = Best management practice.

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)

33-007(c) C-33-003

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	Q00306010057	Check Dam	Rock Check Dam	Looking north

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	Q00306010058	Check Dam	Rock Check Dam	Looking north

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	Q00303140059	Berm	Coir Log	Looking north

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	Q00303060060	Berm	Straw Wattle	Looking northwest

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
5. JPG	Q00303060061	Berm	Straw Wattle	Looking northwest

PF: Q003 CHQ-SMA-2 Sites: 33-004(d)

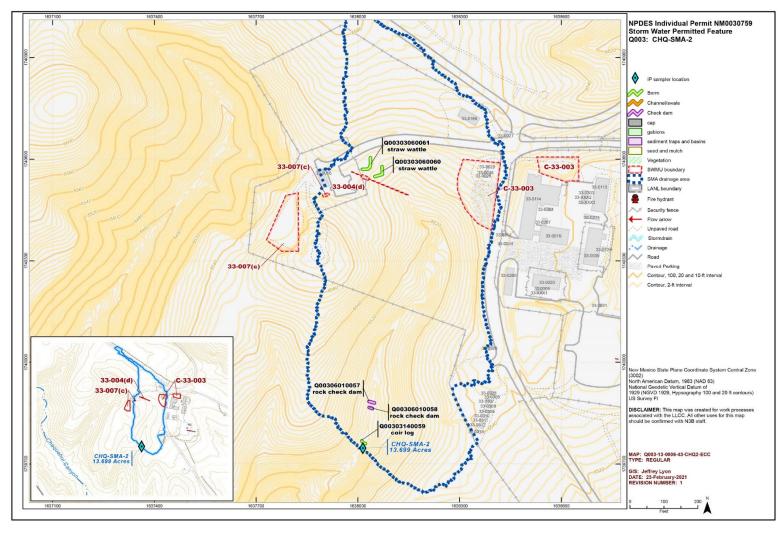


Figure 1 CHQ-SMA-2 enhanced control measures

Certification of Installation of Enhanced Control Measures at CHQ-SMA-7.1

April 21, 2021

NPDES PERMIT NO. NM0030759 EM2021-0161

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

PF: Q010 CHQ-SMA-7.1 Site: 33-010(g)

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 J. Jak	<u> April 7, 2021</u>
Kim Lebak, Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop Digitally signed by M Lee Bishop Date: 2021.04.21 13:19:42	
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: Q010 CHQ-SMA-7.1 Site: 33-010(g)

In August 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CHQ-SMA-7.1 exceeded target action levels (TALs) for aluminum, copper, and gross alpha, 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 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 2–3) 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
Q01003140013	Berm	Coir Log	1.JPG
Q01003140014	Berm	Coir Log	2.JPG

^{*}BMP = Best management practice.

PF: Q010 CHQ-SMA-7.1 Site: 33-010(g)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	Q01003140013	Berm	Coir Log	Looking north

PF: Q010 CHQ-SMA-7.1 Site: 33-010(g)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	Q01003140014	Berm	Coir Log	Looking north

PF: Q010 CHQ-SMA-7.1 Site: 33-010(g)

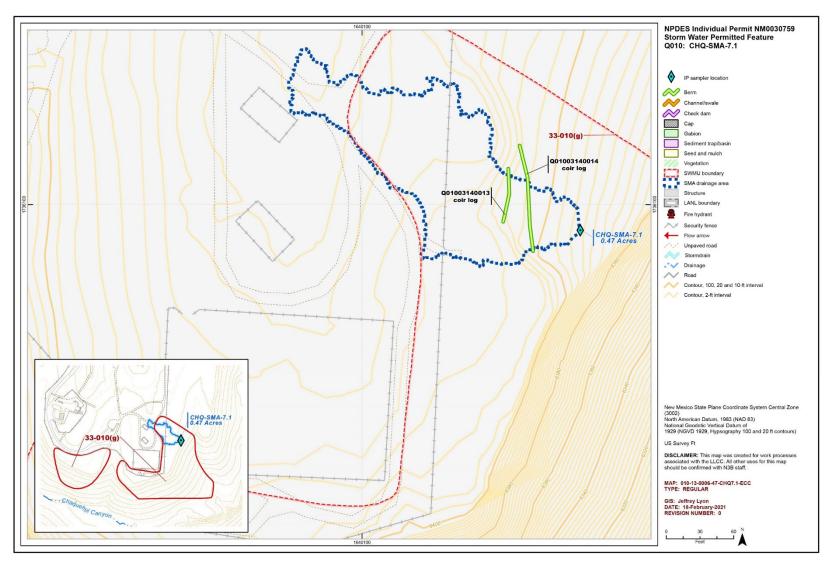


Figure 1 CHQ-SMA-7.1 enhanced control measures