

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



Environmental Management
Los Alamos Field Office
1200 Trinity Drive, Suite 400
Los Alamos, New Mexico 87544
(505) 257-7950/FAX (505) 606-2132

Date: July 15, 2021 Refer To: N3B-2021-0196

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 3M-SMA-0.2, CDV-SMA-2.42, LA-SMA-5.2, PT-SMA-2, and

STRM-SMA-1.5

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 3M-SMA-0.2, CDV-SMA-2.42, LA-SMA-5.2, PT-SMA-2, and STRM-SMA-1.5 within the last 30 days are included as Enclosures 1–5, 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/).

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

Permitted Feature	SMA	Site
H001	3M-SMA-0.2	15-010(b)
V008A	CDV-SMA-2.42	16-010(b)
L013	LA-SMA-5.2	01-003(d)
I004	PT-SMA-2	15-008(f)
		36-003(b)
		36-004(e)
J029	STRM-SMA-1.5	08-009(d)

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,

Troy Thomson

Acting Program Manager Environmental Remediation

N3B-Los Alamos

Sincerely,

M Lee Bishop for for

Digitally signed by M Lee Bishop

Date: 2021.07.14 09:46:08 -06'00'

M. Lee Bishop, Director

Office of Quality and Regulatory Compliance

Environmental Management Los Alamos Field Office

Enclosure(s): One hard copy with electronic files:

- 1. Certification of Installation of Enhanced Control Measures at 3M-SMA-0.2 (EM2021-0373)
- 2. Certification of Installation of Enhanced Control Measures at CDV-SMA-2.42 (EM2021-0374)
- 3. Certification of Installation of Enhanced Control Measures at LA-SMA-5.2 (EM2021-0375)
- 4. Certification of Installation of Enhanced Control Measures at PT-SMA-2 (EM2021-0376)
- 5. Certification of Installation of Enhanced Control Measures at STRM-SMA-1.5 (EM2021-0377)

cc (letter with hard-copy enclosure[s]): Susan Lucas Kamat, 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/-RPD

Steve Yanicak, NMED-DOE-OB

Jennifer Payne, LANL

Peter Maggiore, NA-LA

M. Lee Bishop, EM-LA

Arturo Duran, EM-LA

John Evans, EM-LA

Stephen Hoffman, EM-LA

David Nickless, EM-LA

Cheryl Rodriguez, EM-LA

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

Joseph Murdock, N3B

Joseph Noll, N3B

Gerald O'Leary III, N3B

Karly Rodriguez, N3B

Troy Thomson, 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: Johnson, Carol <johnson.carol@epa.gov>

Sent: Friday, July 16, 2021 8:01 AM **To:** William Alexander; Herrera, Esteban

Cc: Emily M. Day; Regulatory Documentation; cheryl.rodriguez@em.doe.gov; Karly B.

Rodriguez; Audrey Krehlik; Jones, Curry; Larsen, Brent; Amanda B. White

Subject: RE: Submittal to EPA on 7/15/21 Cert Install 5 SMAs

Thank you Mr. Alexander; your submittal was received. Going forward you may send any future stormwater related correspondence directly to me.

Sincerely,

Carol Johnson

Enforcement and Compliance Assurance Division US Environmental Protection Agency 1201 Elm St., Suite 500 (6 ECD-WR) Dallas, TX 75270 johnson.carol@epa.gov

From: William Alexander < William. Alexander@em-la.doe.gov>

Sent: Thursday, July 15, 2021 1:52 PM

To: Herrera, Esteban < Herrera. Esteban@epa.gov>

Cc: 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>; Audrey Krehlik

<Audrey.Krehlik@EM-LA.DOE.GOV>; Johnson, Carol <johnson.carol@epa.gov>; Jones, Curry <jones.curry@epa.gov>;

Larsen, Brent < Larsen. Brent@epa.gov>; Amanda B. White < Amanda. White@em-la.doe.gov>

Subject: Submittal to EPA on 7/15/21 Cert Install 5 SMAs

Mr. Herrera,

Attached for submittal is a PDF of the following:

Certification of Installation of Enhanced Control Measures for 3M-SMA-0.2, CDV-SMA-2.42, LA-SMA-5.2, PT-SMA-2, and

STRM-SMA-1.5 (N3B-2021-0196)

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

Let me know if you have any questions.

Thanks,

William Alexander

Newport News Nuclear BWXT-Los Alamos "N3B" RCRA Remediation Regulatory Documentation Writer/Editor/Compositor/Database Admin

TA-00, Building 1237, Room 109 Phone: (505)551-2494 (cell)

Phone: (505)257-7449 (Desk)

E-Mail: william.alexander@em-la.doe.gov

Certification of Installation of Enhanced Control Measures at 3M-SMA-0.2

July 15, 2021

NPDES PERMIT NO. NM0030759 EM2021-0373

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

PF: H001 3M-SMA-0.2 Site: 15-010(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."

Troy homos	6/29/21
Troy Thomson, Acting Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop for Digitally signed by M Lee Bishop for Date: 2021.07.14 09:46:25 -06'00'	
M. Lee Bishop, Director	Date

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

PF: H001 3M-SMA-0.2 Site: 15-010(b)

In August 2018, analytical results received from extended baseline monitoring at Site Monitoring Area (SMA) 3M-SMA-0.2 yielded target action level (TAL) exceedances for copper, gross alpha, and mercury, 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 is a photo (listed in Table 1 and shown on page 2) and a map (Figure 1) of the enhanced control measure to be certified.

Table 1
Enhanced Control Measure Description

Photo ID	BMP* ID	Type of Control Measure	Control Measure
1. JPG	H00103010010	Berm	Earthen Berm

^{*} BMP = Best management practice.

PF: H001 3M-SMA-0.2 Site: 15-010(b)

Photo:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	H00103010010	Berm	Earthen Berm	Looking northwest

PF: H001 3M-SMA-0.2 Site: 15-010(b)

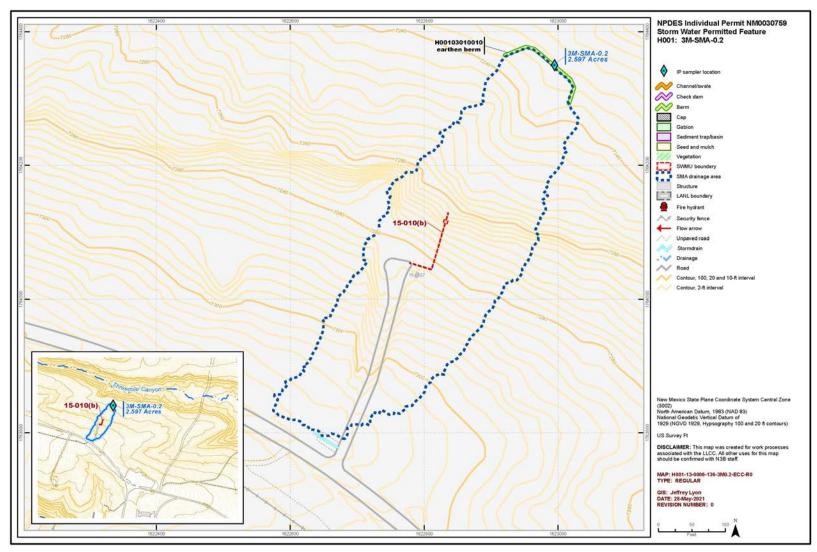


Figure 1 3M-SMA-0.2 enhanced control measure

Certification of Installation of Enhanced Control Measures at CDV-SMA-2.42

July 15, 2021

NPDES PERMIT NO. NM0030759 EM2021-0374

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

PF: V008A CDV-SMA-2.42 Site: 16-010(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."

Troy homos	6/29/21
Troy Thomson Acting Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop for Digitally signed by M Lee Bishop for Date: 2021.07.14 09:46:43 -06'00'	
M. Lee Bishop, Director	 Date

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

PF: V008A CDV-SMA-2.42 Site: 16-010(b)

In July and November 2017, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CDV-SMA-2.42 yielded target action level (TAL) exceedances for aluminum, copper, gross alpha, and total polychlorinated biphenyls (PCBs), 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 is a photo (listed in Table 1 and shown on page 2) and a map (Figure 1) of the enhanced control measure to be certified.

Table 1
Enhanced Control Measure Descriptions

Photo ID	BMP ^a ID	Type of Control Measure	Control Measure
1. JPG	V008A08050026	Сар	HDPE ^b Cap

^a BMP = Best management practice.

^b HDPE = High-density polyethylene.

PF: V008A CDV-SMA-2.42 Site: 16-010(b)

Photo:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	V008A08050026	Сар	HDPE Cap	Looking east

PF: V008A CDV-SMA-2.42 Site: 16-010(b)

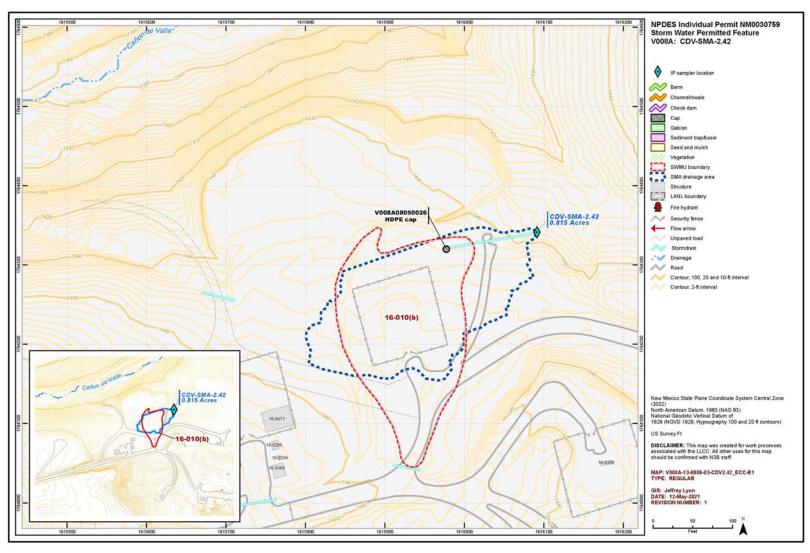


Figure 1 CDV-SMA-2.42 enhanced control measure

Certification of Installation of Enhanced Control Measures at LA-SMA-5.2

July 15, 2021

NPDES PERMIT NO. NM0030759 EM2021-0375

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

PF: L013 LA-SMA-5.2 Sites: 01-003(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."

Troy Thomas	6/29/21
Troy Thomson Acting Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop for Digitally signed by M Lee Bishop for Date: 2021.07.14 09:46:59 -06'00'	
M. Lee Bishop, Director	 Date

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

PF: L013 LA-SMA-5.2 Site: 01-003(d)

In September 2019, analytical results received from extended baseline monitoring at Site Monitoring Area (SMA) LA-SMA-5.2 yielded target action level (TAL) exceedances for arsenic, gross alpha, radium-226 and radium-228, selenium, 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 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 5) and a map (Figure 1) of the enhanced control measures to be certified.

A debris cleanup was also conducted at LA-SMA-5.2. Metal debris weighing a total of 1080 lb was removed from the hill slope above the sampler on April 21 and 22, 2021, and was taken to the Los Alamos County Eco Station for recycling. The majority of the debris were empty paint cans originating from SWMU 01-003(d), or "Can Dump Site," a surface disposal area used by the Zia Company up to the mid-to-late 1950s. This cleanup removed potential sources of contaminants from the sampler watershed and properly disposed of historical debris.

Table 1
Enhanced Control Measure Descriptions

Photo ID	BMP* ID	Type of Control Measure	Control Measure
1. JPG	L01303140008	Berm	Coir Log
2. JPG	L01306020009	Check Dam	Log Check Dam
3. JPG	L01306020010	Check Dam	Log Check Dam
4. JPG	L01304060011	Channel/Swale	Rip Rap

^{*}BMP = Best management practice.

PF: L013 LA-SMA-5.2 Site: 01-003(d)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	L01303140008	Berm	Coir Log	Looking west



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	L01306020009	Check Dam	Log Check Dam	Looking north, L01306020010 is visible in the background



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	L01306020010	Check Dam	Log Check Dam	Looking north



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	L01304060011	Channel/Swale	Rip Rap	Looking north

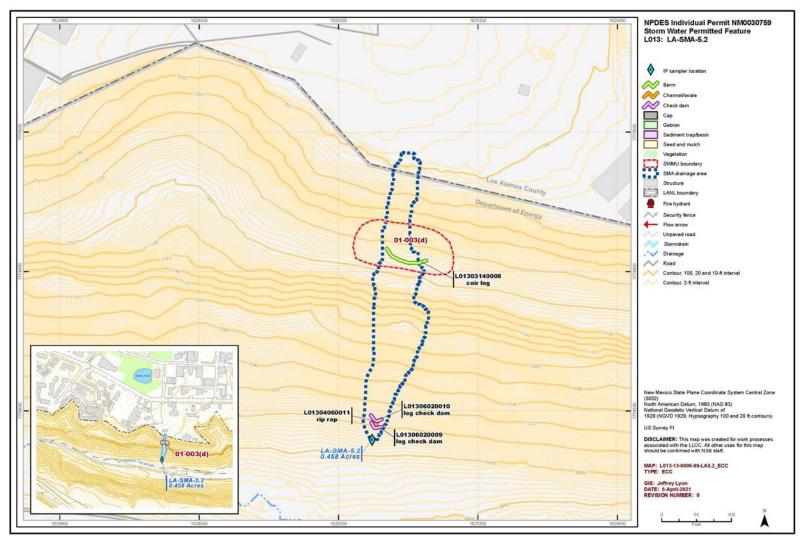


Figure 1 LA-SMA-5.2 enhanced control measures

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

July 15, 2021

NPDES PERMIT NO. NM0030759 EM2021-0376

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

PF: I004 PT-SMA-2 Sites: 15-008(f)

36-003(b) 36-004(e)

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."

Troy homos	6/29/21
Troy Thomson Acting Program Manager Environmental Remediation	Date
Newport News Nuclear BWXT-Los Alamos, LLC	
Digitally signed by M Lee Bishop for Date: 2021.07.14 09:47:17 -06'00'	
M. Lee Bishop, Director	 Date

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

PF: I004 PT-SMA-2 Sites: 15-008(f)

36-003(b) 36-004(e)

In August and November 2019, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) PT-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

Photo ID	BMP* ID	Type of Control Measure	Control Measure
1. JPG	100403140026	Berm	Coir Log
2. JPG	100403140027	Berm	Coir Log
3. JPG	100403140028	Berm	Coir Log
4. JPG	100403140029	Berm	Coir Log
5. JPG	100403200030	Berm	Compost Log

^{*} BMP = Best management practice.

PF: 1004 PT-SMA-2 Sites: 15-008(f)

36-003(b) 36-004(e)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	100403140026	Berm	Coir Log	Looking north

PF: I004 PT-SMA-2 Sites: 15-008(f)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	100403140027	Berm	Coir Log	Looking northwest

PF: 1004 PT-SMA-2 Sites: 15-008(f)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	100403140028	Berm	Coir Log	Looking north

PF: 1004 PT-SMA-2 Sites: 15-008(f)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	100403140029	Berm	•	Looking east, Coir Log l00403140028 is visible in the foreground.

PF: 1004 PT-SMA-2 Sites: 15-008(f)



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
5. JPG	100403200030	Berm		Looking south, Rock Check Dam 100406010025 is visible behind the log.

PF: 1004 PT-SMA-2 Sites: 15-008(f)

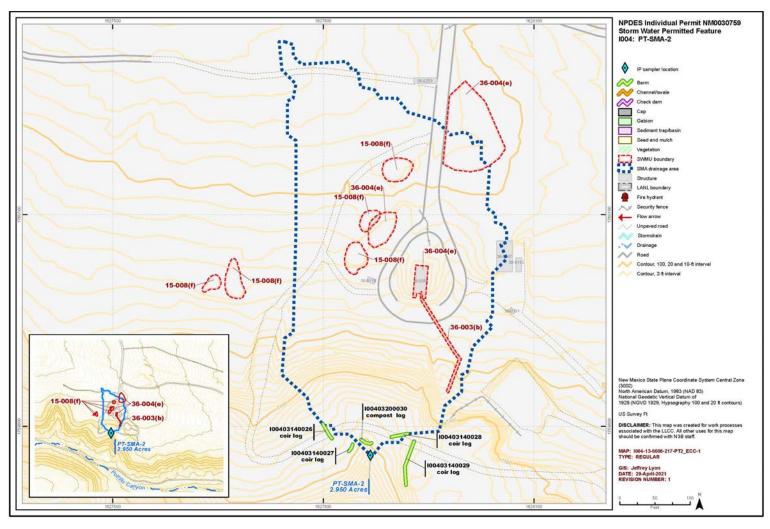


Figure 1 PT-SMA-2 enhanced control measures

Certification of Installation of Enhanced Control Measures at STRM-SMA-1.5

July 15, 2021

NPDES PERMIT NO. NM0030759 EM2021-0377

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

PF: J029 STRM-SMA-1.5 Site: 08-009(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."

Troy Thomas	6/29/21
Troy Thomson Acting Program Manager	Date
Environmental Remediation	
Newport News Nuclear BWXT-Los Alamos, LLC	
M Lee Bishop for Digitally signed by M Lee Bishop for Date: 2021.07.14 09:47:37 -06'00'	
M. Lee Bishop, Director	 Date

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

PF: J029 STRM-SMA-1.5 Site: 08-009(d)

In October 2018, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) STRM-SMA-1.5 yielded target action level (TAL) exceedances for silver and gross alpha, prompting the Permittees to initiate a third 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 is a photo (listed in Table 1 and shown on page 2) and a map (Figure 1) of the enhanced control measure to be certified.

Table 1
Enhanced Control Measure Description

Photo ID	BMP* ID	Type of Control Measure	Control Measure
1. JPG	J02903010021	Berm	Earthen Berm

^{*} BMP = Best management practice.

PF: J029 STRM-SMA-1.5 Site: 08-009(d)

Photos:



Photo ID	BMP ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	J02903010021	Berm	Earthen Berm	Looking southeast

PF: J029 STRM-SMA-1.5 Site: 08-009(d)

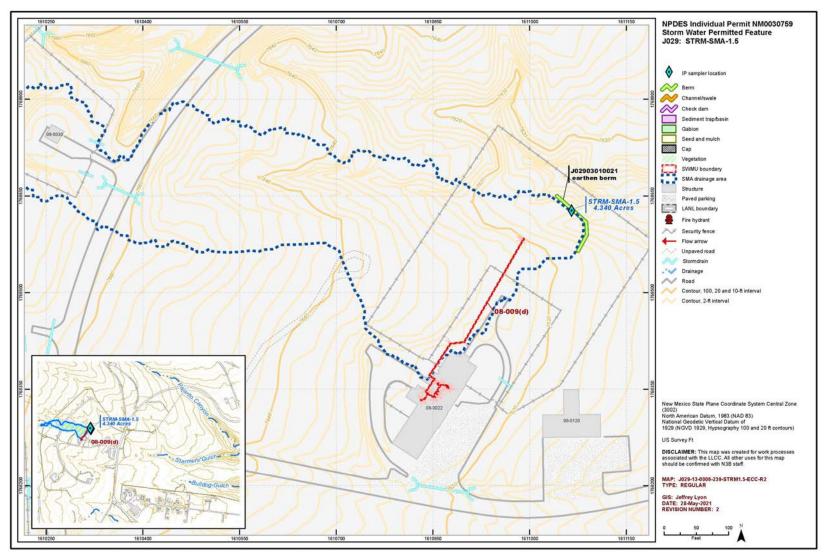


Figure 1 STRM-SMA-1.5 enhanced control measure