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

Date: August 27, 2021
Refer To: N3B-2021-0268

Carol Johnson
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500 (6 ECD-WR)
Dallas, Texas 75270-2102

Subject: NPDES Permit No. NM0030759 – Analytical Results for Site Monitoring Area PJ-SMA-11 from the First Measurable Storm Event Following Certification of Enhanced Control Measures

Dear Ms. Johnson:

This letter and enclosure are being submitted in accordance with the requirements of the U.S. Environmental Protection Agency (EPA) 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, and 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.l(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 and, where applicable shall provide sampling results within 30 days of receipt of analytical results from the first measurable storm event after completion of such measures….

Accordingly, the analytical results from the sample collected during the first measurable storm event received at site monitoring area (SMA) PJ-SMA-11 in the last 30 days are enclosed. The report provides references to the certificate of completion of the installation of the control measures. Table 1 includes information about the confirmation sample collected at the SMA. The enclosed certified document can also be accessed at the following website: https://ext.em-la.doe.gov/ips.

Table 1
Confirmation Sample Collected at PJ-SMA-11 from the
First Measurable Storm Event after Certification of Installation of Enhanced Controls

Watershed	Priority	Site Number	SMA Number	Permitted Feature	Sample Collection Date	Data Receipt Date
Pajarito	Moderate	40-003(a)	PJ-SMA-11	J013	6/27/2021	07/28/2021

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,

For

Troy Thomson
Acting Program Manager
Environmental Remediation
N3B-Los Alamos

Sincerely,

M Lee Bishop Digitally signed by M Lee Bishop Date: 2021.08.23 14:36:43 -06'00'

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

Enclosure(s): One hard copy with electronic files:
1. Analytical Results from the First Measurable Storm Event Following Certification of Enhanced Control Measures at PJ-SMA-11 (EM2021-0475)

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

cc (letter and enclosure[s] emailed):
Esteban Herrera, 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
Peter Maggiore, NA-LA
M. Lee Bishop, EM-LA
Arturo Duran, EM-LA
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Cheryl Rodriguez, EM-LA


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City, State, ZIP+4®
Dallas Texas 75270-2102
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Jennifer Payne, LANL
Felicia Aguilar, N3B
William Alexander, N3B
Sharon Brady, N3B
Don Carlson, N3B
Emily Day, N3B
Thomas Harrison, N3B
Debby Holgerson, N3B
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emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
Public Reading Room (EPRR)
PRS website

Analytical Results from the First Measurable Storm Event Following Certification of Enhanced Control Measures at PJ-SMA-11

August 27, 2021

NPDES PERMIT NO. NM0030759

EM2021-0475

NPDES PERMIT NO. NM0030759 **EM2021-0475**

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ANALYTICAL RESULTS

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

The following certification of analytical results received from the confirmation monitoring sample collected after the completion of the installation of enhanced controls was performed in accordance with NPDES Permit No. NM0030759, Part I.E.1.

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."

Steve Veenis, Water Program Director
Environmental Remediation
Newport News Nuclear BWXT-Los Alamos, LLC

8/13/21
Date

M Lee Bishop Digitally signed by M Lee Bishop Date: 2021.08.23 14:37:00 -06'00'

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

Date

NPDES PERMIT NO. NM0030759 **EM2021-0475**

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ANALYTICAL RESULTS

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

Tables 1 and 2 present the analytical results received from the confirmation monitoring sample collected from the first measurable storm event following the installation and subsequent certification of enhanced controls at site monitoring area (SMA) PJ-SMA-11. Final analytical results were received on July 28, 2021. The descriptions and photographs of each enhanced control installed at PJ-SMA-11 were provided to the U.S. Environmental Protection Agency on March 30, 2021 (N3B-2021-0047, EM2021-0085). Table 3 presents each applicable target action level (TAL) for the analytes monitored.

Table 1
Radiochemical Analytical Results from the First Measurable Storm Event
Collected on June 27, 2021, Following Installation of Enhanced Controls at PJ-SMA-11

Sample ID	Analyte	Field Preparation	Detect Status	Result (pCi/L)	TAL Exceedance Ratio	Minimum Detectable Activity (pCi/L)	Uncertainty (pCi/L)	Qualifier*	Data Receipt Date
WT_IPC-21-221597	Gross alpha	Unfiltered	Detect	18.8	1.25	2.95	2.66	NQ	7/28/2021

Note: TAL exceedance ratio is the analytical result divided by the applicable average TAL (ATAL).

*Qualifier: NQ = Result is not qualified.

Table 2
Metals and Organic Analytical Results from the First Measurable Storm Event
Collected on June 27, 2021, Following Installation of Enhanced Controls at PJ-SMA-11

Sample ID	Analyte	Field Prep	Detect Status	Result (µg/L)	TAL Exceedance Ratio	Method Detection Limit	Quantitation Limit	Qualifier*	Data Receipt Date
WT_IPC-21-221599	Copper	Filtered	Detect	35.3	8.21	0.3	2	NQ	7/28/2021

Notes: TAL exceedance ratio is the result divided by the smallest applicable TAL. Applicable TALs are the larger of the maximum TAL and minimum quantification level (MQL) or the larger of the average TAL or MQL.

*Qualifier: NQ = result is not qualified.

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ANALYTICAL RESULTS

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

Table 3
Applicable TALs

Analyte	Units	CAS No.	MQL	ATAL	MTAL
Gross alpha	pCi/L	n/a*	n/a	15	n/a
Copper	µg/L	7440-50-8	0.5	n/a	4.3

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level; ATAL = average TAL; MTAL = maximum TAL. As allowed by Part I.D. of the Individual Permit, analytical results are compared with either the corresponding MTAL/ATAL (as applicable) or the MQL, whichever value is greater, for the purpose of determining the effectiveness of storm water control measures.

*n/a = Value is not applicable.