

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 (240) 562-1122

Date: March 16, 2022 *Refer To*: N3B-2022-0053

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 – Certification of Installation of Enhanced Control Measures for A-SMA-2

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.I(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 A-SMA-2 within the last 30 days is included as Enclosure 1. Table 1 identifies the permitted feature, site monitoring area (SMA), 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 (<u>https://ext.em-la.doe.gov/ips</u>).

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

| Permitted Feature | SMA | Sites |
|-------------------|---------|-----------|
| A002 | A-SMA-2 | 39-004(b) |
| | | 39-004(e) |

If you have any questions, please contact Emily Day at (505) 695-4243 (emily.day@em-la.doe.gov) or M. Lee Bishop at (702) 218-4460 (lee.bishop@em.doe.gov).

Sincerely,

inoy thomas

Troy Thomson Program Manager Environmental Remediation N3B-Los Alamos

Sincerely,

M Lee Bishop Digitally signed by M Lee Bishop Date: 2022.03.09 14:37:33 -07'00'

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. Certification of Installation of Enhanced Control Measures at A-SMA-2 (EM2022-0059)

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 Steve Yanicak, NMED-DOE-OB Chris Catechis, NMED-RPD Stephen Hoffman, NA-LA Jennifer Payne, LANL Arturo Duran, EM-LA John Evans, EM-LA Michael Mikolanis, EM-LA David Nickless, EM-LA Cheryl Rodriguez, EM-LA William Alexander, N3B Emily Day, N3B Audrey Krehlik, N3B Kim Lebak, N3B Joseph Legare, N3B Pamela Maestas, N3B Karly Rodriguez, N3B Joseph Sena, N3B Steve Veenis, N3B Amanda White, N3B emla.docs@em.doe.gov n3brecords@em-la.doe.gov Public Reading Room (EPRR) PRS website

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| 150 | Postage \$ \$1.56 | | | |
| 60 | Total Postage and Fees 03/15/2022 \$ \$3.36 | | | |
| 7021 | Sent To Carol Johnson ECAD U.S. ERA Region 6 Street and Apt. No., or PO Box No. | | | |
| ~ | 1201 Eln Street, Suite 500 (6 ECD-W/R) City, State, 218+4° Dallas TX 75270 - 2102 | | | |
| | PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions | | | |

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

March 16, 2022

NPDES PERMIT NO. NM0030759

EM2022-0059

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

PF: A002

A-SMA-2

Sites: 39-004(b) 39-004(e)

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (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 gualified 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

M Lee Bishop Date: 2022.03.09 14:37:48

Digitally signed by M Lee Bishop -07'00'

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

Date

3/3/22

Date

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

PF: A002

A-SMA-2

Sites: 39-004(b) 39-004(e)

In August and November 2019, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) A-SMA-2 yielded target action level (TAL) exceedances for copper and gross alpha, prompting the initiation of a second round of corrective action.

In accordance with 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 2–4) and a map (Figure 1) of the enhanced control measures to be certified.

| Photo ID | Control Measure ID | Type of Control Measure | Control Measure |
|----------|--------------------|-------------------------|-----------------|
| 1. JPG | A00203150054 | Berm | Redi-Rock Berm |
| 2. JPG | A00204080055 | Channel/Swale | TRM-Lined Swale |
| 3. JPG | A00203010056 | Berm | Earthen Berm |

 Table 1

 Enhanced Control Measure Descriptions

EM2022-0059

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

PF: A002

A-SMA-2

Sites: 39-004(b) 39-004(e)

Photos:



| Photo ID | Control Measure ID | Type of Control Measure | Control Measure | Photo Angle |
|----------|--------------------|-------------------------|-----------------|-------------------|
| 1. JPG | A00203150054 | Berm | Redi-Rock Berm | Looking southwest |

EM2022-0059

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

PF: A002

A-SMA-2

Sites: 39-004(b) 39-004(e)



| Photo ID | Control Measure ID | Type of Control Measure | Control Measure | Photo Angle |
|----------|--------------------|-------------------------|-----------------|-------------------|
| 2. JPG | A00204080055 | Channel/Swale | TRM-Lined Swale | Looking southeast |

EM2022-0059

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

PF: A002

A-SMA-2

Sites: 39-004(b) 39-004(e)



| Photo ID | Control Measure ID | Type of Control Measure | Control Measure | Photo Angle |
|----------|--------------------|-------------------------|-----------------|---------------|
| 3. JPG | A00203010056 | Berm | Earthen Berm | Looking south |

EM2022-0059

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

A-SMA-2

PF: A002

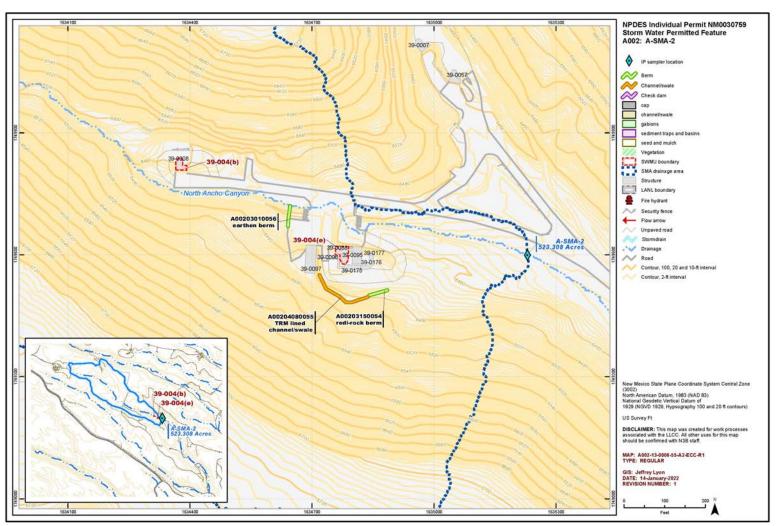


Figure 1 A-SMA-2 enhanced control measures

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Site: 39-004(b) 39-004(e)