

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: June 27, 2022 Refer To: N3B-2022-0360

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 CHQ-SMA-6, PJ-SMA-3.05, and PJ-SMA-11

Dear Ms. Johnson:

This letter and enclosures are submitted in accordance with 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 documents for certification of enhanced control measures completed at CHQ-SMA-6, PJ-SMA-3.05, PJ-SMA-11 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 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	Sites
Q009	CHQ-SMA-6	33-004(j)
		33-006(a)
		33-007(b)
		33-010(c)
		33-010(g)
		33-010(h)
		33-014
J003	PJ-SMA-3.05	09-004(o)
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 (702) 218-4460 (lee.bishop@em.doe.gov).

Sincerely, Troy Thomas

Trov Thomson Program Manager

Environmental Remediation

N3B-Los Alamos

Sincerely,

Digitally signed by M Lee M Lee Bishop Bishop Date: 2022.06.16 14:21:55

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 CHQ-SMA-6 (EM2022-0361)
- 2. Certification of Installation of Enhanced Control Measures at PJ-SMA-3.05 (EM2022-0362)
- 3. Certification of Installation of Enhanced Control Measures at PJ-SMA-11 (EM2022-0363)

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

Certification of Installation of Enhanced Control Measures at CHQ-SMA-6

June 24, 2022

NPDES PERMIT NO. NM0030759 EM2022-0361

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 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

M Lee
Bishop

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Date: 2022.06.16 14:22:10-06'00'

M. Lee Bishop, Director

Date

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

PF: Q009 CHQ-SMA-6 Sites: 33-004(j)

33-006(a)

33-007(b) 33-010(c)

33-010(g)

33-010(h)

33-014

In July and August 2021, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CHQ-SMA-6 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 2-5) and a map (Figure 1) of the enhanced control measures to be certified.

A debris cleanup was also conducted at CHQ-SMA-6 during installation of enhanced controls. Approximately five gallons of metal debris and cables were removed from within the SMA.

Table 1
Enhanced Control Measure Descriptions

Photo ID	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	Q00906010047	Check Dam	Rock Check Dam
2. JPG	Q00906010048	Check Dam	Rock Check Dam
3. JPG	Q00903140049	Berm	Coir Log
4. JPG	Q00903140050	Berm	Coir Log

PF: Q009 CHQ-SMA-6 Sites: 33-004(j)

33-006(a)

33-007(b)

33-010(c)

33-010(g)

33-010(h) 33-014

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	Q00906010047	Check Dam	Rock Check Dam	Looking west

PF: Q009 CHQ-SMA-6 Sites: 33-004(j)

33-006(a)

33-007(b)

33-010(c)

33-010(g)

33-010(h) 33-014



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	Q00906010048	Check Dam	Rock Check Dam	Looking north

PF: Q009 CHQ-SMA-6 Sites: 33-004(j)

33-006(a)

33-007(b)

33-010(c)

33-010(g)

33-010(h) 33-014



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	Q00903140049	Berm	Coir Log	Looking north

PF: Q009 CHQ-SMA-6 Sites: 33-004(j)

33-006(a)

33-007(b)

33-010(c)

33-010(g)

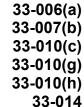
33-010(h) 33-014



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	Q00903140050	Berm	Coir Log	Looking north

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: Q009 CHQ-SMA-6 Site: 33-004(j)



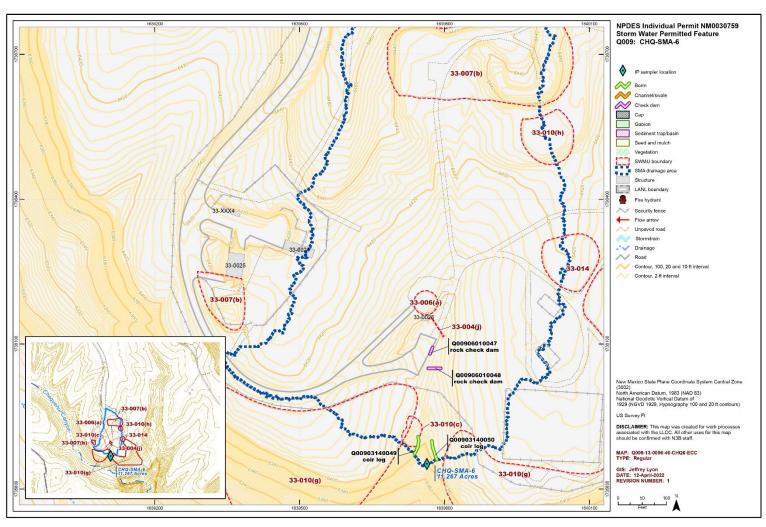


Figure 1 CHQ-SMA-6 enhanced control measures

Certification of Installation of Enhanced Control Measures at PJ-SMA-3.05

June 24, 2022

NPDES PERMIT NO. NM0030759 EM2022-0362

Date

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

PF: J003 PJ-SMA-3.05 Sites: 09-004(o)

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 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

June 16, 2022

Date

Environmental Remediation

Newport News Nuclear BWXT-Los Alamos, LLC

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Lee Bishop

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

Los Alamos Field Office

PF: J003 PJ-SMA-3.05 Sites: 09-004(o)

In October 2018 and August 2021, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) PJ-SMA-3.05 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 2-3) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

Photo ID	Photo ID Control Measure ID Type of Control Measure		Control Measure
1. JPG	J00303140013	Berm	Coir Log
2. JPG	J00303200014	Berm	Compost Log

PF: J003 PJ-SMA-3.05 Sites: 09-004(o)

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	J00303140013	Berm	Coir Log	Looking southeast

PF: J003 PJ-SMA-3.05 Sites: 09-004(o)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	J00303200014	Berm	Compost Log	Looking northwest

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: J003 PJ-SMA-3.05 Site: 09-004(o)

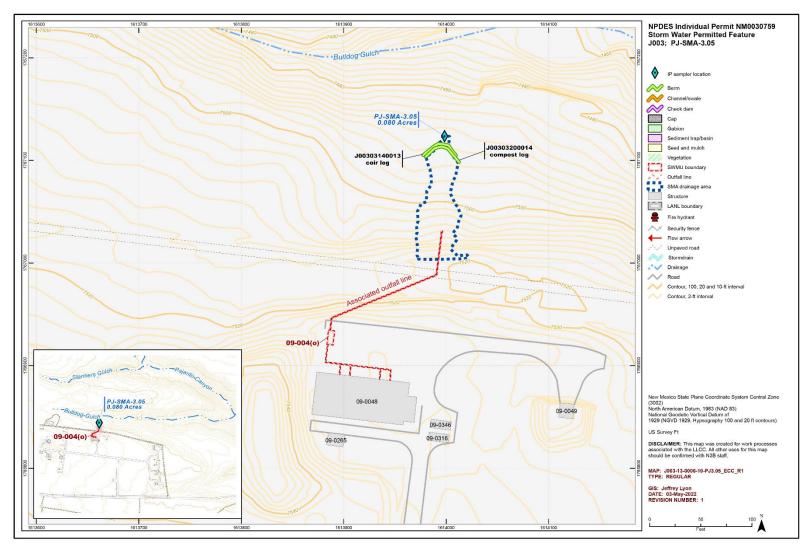


Figure 1 PJ-SMA-3.05 enhanced control measures

Certification of Installation of Enhanced Control Measures at PJ-SMA-11

June 24, 2022

NPDES PERMIT NO. NM0030759 EM2022-0363

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

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 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

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M. Lee Bishop, Director

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Lee Bishop
Date: 2022.06.16
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Date

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

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

In July and October 2021, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) PJ-SMA-11 yielded target action level (TAL) exceedances for copper and gross alpha, prompting the initiation of a third 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 2-3) and a map (Figure 1) of the enhanced control measures to be certified.

Table 1
Enhanced Control Measure Descriptions

Photo ID	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	J01303200033	Berm	Compost Log
2. JPG	J01304030034	Channel/Swale	Rock Channel/Swale

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

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	J01303200033	Berm	Compost Log	Looking west

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



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	J01304030034	Channel/Swale	Rock Channel/Swale	Looking south

NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

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

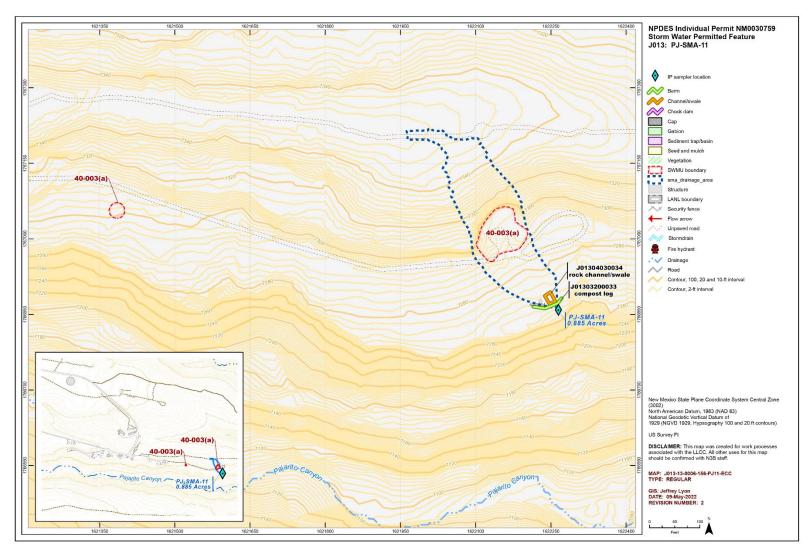


Figure 1 PJ-SMA-11 enhanced control measures