

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: July 5, 2023 Refer To: N3B-2023-0186

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 CDB-SMA-0.15, M-SMA-12, M-SMA-12.5, M-SMA-12.8, and

M-SMA-13

Dear Ms. Johnson:

This letter and enclosures 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 Newport News Nuclear BWXT-Los Alamos, LLC (N3B) and the U.S. Department of Energy Environmental Management Los Alamos Field Office (EM-LA), effective August 1, 2022. As specified in Part I, Section D.l(a), "Installation of Enhanced Control Measures," states "Permittees shall certify completion of installation of control measures under this subpart to EPA, with a copy to NMED, within 30 days of completion of all such measures at the Site."

Accordingly, the documents for certification of enhanced control measures completed at CDB-SMA-0.15, M-SMA-12, M-SMA-12.5, M-SMA-12.8, and M-SMA-13 within the last 30 days are included as Enclosures 1 through 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), "Signatories to permit applications and reports," 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	Sites
C001	CDB-SMA-0.15	04-003(a) 04-004
M015	M-SMA-12	35-016(p)
M016	M-SMA-12.5	05-005(b) 05-006(c)
M019	M-SMA-12.8	05-001(a) 05-002
M022	M-SMA-13	05-001(c)

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or M. Lee Bishop at (505) 257-7902 (lee.bishop@em.doe.gov).

Sincerely,

Troy Thomson Program Manager

Environmental Remediation

N3B-Los Alamos

Sincerely,

Digitally signed by BRIAN Date: 2023.06.29 09:09:15 -06'00'

For

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 CDB-SMA-0.15 (EM2023-0386)
- 2. Certification of Installation of Enhanced Control Measures at M-SMA-12 (EM2023-0387)
- 3. Certification of Installation of Enhanced Control Measures at M-SMA-12.5 (EM2023-0388)
- 4. Certification of Installation of Enhanced Control Measures at M-SMA-12.8 (EM2023-0389)
- 5. Certification of Installation of Enhanced Control Measures at M-SMA-13 (EM2023-0390)

cc (letter with hard-copy enclosure[s]): Shelly Lemon, 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 Jahan Nasim, EPA Region 6, Dallas, TX Steve Yanicak, NMED-DOE-OB Ricardo Maestas, NMED-HWB Rick Shean, NMED-HWB Levi Dean, NMED-SWQB Susan Lucas-Kamat, NMED-SWQB Stephen Hoffman, NA-LA Jennifer Payne, LANL Arturo Duran, EM-LA John Evans, EM-LA Michael Mikolanis, EM-LA Aubrey Pierce, EM-LA Cheryl Rodriguez, EM-LA William Alexander, N3B Tanner Bonham, N3B Robert Edwards, N3B Michael Erickson, N3B Audrey Krehlik, N3B Dana Lindsay, N3B Robert Macfarlane, N3B Christian Maupin, N3B Karly Rodriguez, N3B Vince Rodriguez, N3B Bradley Smith, N3B Shannon Smith, N3B Jeff Stevens, N3B Troy Thomson, N3B Grayson Vogel, N3B Jennifer von Rohr, 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 CDB-SMA-0.15

July 5, 2023

NPDES PERMIT NO. NM0030759 EM2023-0386

U.S. Department of Energy Environmental Management Los Alamos Field Office

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

PF: C001 CDB-SMA-0.15 Sites: 04-003(a)

04-004

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759, Part I.D.1(a), 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."

Modelle .	6/22/23
Amanda White, Senior Manager,	
Water Program	Date
Tech2Solutions	
Michael Erickson, Director Water Program Newport News Nuclear BWXT-Los Alamos, LLC	6/20/23 Date
Digitally signed by BRIAN HARCEK Date: 2023.06.29 09:09:36 -06'00'	
M. Lee Bishop, Director For	 Date
Office of Quality and Regulatory Compliance	

PF: C001 CDB-SMA-0.15 Sites: 04-003(a)

04-004

In August 2015, analytical results received from corrective action monitoring at Site Monitoring Area (SMA) CDB-SMA-0.15 yielded target action level (TAL) exceedances for aluminum and copper. The Permittees submitted a request for alternative compliance for the Sites per 2010 Permit Part I.E.3 in February 2016. No response was received from the U.S. Environmental Protection Agency. Upon issuance of the 2022 Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for copper. Filtered aluminum exceeded the TAL but not the background threshold value in the 2015 sample, thus corrective action is not required per the 2022 Permit Part I.C.2(b).

In accordance with NPDES Permit No. NM0030759 (the Permit) Part I.D.1(a), 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 and 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	C00103140022	Berm	Coir Log
1. JPG	C00103140023	Berm	Coir Log
2. JPG	C00103040024	Berm	Asphalt Berm

PF: C001 CDB-SMA-0.15 Sites: 04-003(a)

04-004

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	C00103140022	Berm	Coir Log	Looking northwest
1. JPG	C00103140023	Berm	Coir Log	Looking northwest

PF: C001 CDB-SMA-0.15 Sites: 04-003(a)

04-004



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	C00103040024	Berm	Asphalt Berm	Looking northeast

PF: C001 CDB-SMA-0.15 Site: 04-003(a) 04-004

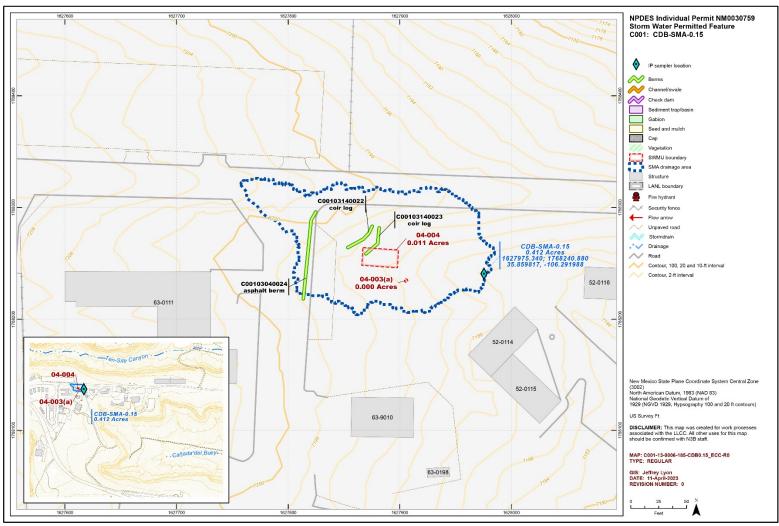


Figure 1 CDB-SMA-0.15 enhanced control measures

Certification of Installation of Enhanced Control Measures at M-SMA-12

July 5, 2023

NPDES PERMIT NO. NM0030759 EM2023-0387

PF: M015 M-SMA-12 Sites: 35-016(p)

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759, Part I.D.1(a), 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."

Pull off	
11/02500	6/22/23
Amanda White, Senior Manager,	
Water Program	Date
Tech2Solutions	
Michael Erickson, Director Water Program Newport News Nuclear BWXT-Los Alamos, LLC	6/20/23 Date
Digitally signed by BRIAN HARCEK Date: 2023.06.29 09:10:03 -06'00'	
M. Lee Bishop, Director For Office of Quality and Regulatory Compliance	Date

Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

PF: M015 M-SMA-12 Sites: 35-016(p)

In August 2015, analytical results received from baseline monitoring at Site Monitoring Area (SMA) M-SMA-12 yielded target action level (TAL) exceedances for aluminum, copper, and total polychlorinated biphenyls (PCBs). Solid Waste Management Unit (SWMU) 35-016(p) received a certificate of completion under the Compliance Order on Consent from the New Mexico Environment Department in October 2015. The Permittees submitted a certification of completion of corrective action for the Site to the U.S. Environment Protection Agency per 2010 Permit Part I.E.2(d) in October 2015. Stormwater monitoring has not occurred since 2015. Upon issuance of the 2022 Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for aluminum. Copper exceeded the TAL but not the background threshold value in the 2015 sample, thus corrective action is not required per the 2022 Permit Part I.C.2(b). The total PCB result in the 2015 sample was re-screened against the 0.014-μg/L standard included in the 2022 Permit and no longer is considered a TAL exceedance.

In accordance with NPDES Permit No. NM0030759 (the Permit) Part I.D.1(a), 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

Photo ID	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	M01503100011	Berm	Gravel Bag
2. JPG	M01503200012	Berm	Compost Log
3. JPG	M01503200013	Berm	Compost Log

PF: M015 M-SMA-12 Sites: 35-016(p)

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	M01503100011	Berm	Gravel Bag	Looking east

PF: M015 M-SMA-12 Sites: 35-016(p)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	M01503200012	Berm	Compost Log	Looking northeast

PF: M015 M-SMA-12 Sites: 35-016(p)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	M01503200013	Berm	Compost Log	Looking northeast

PF: M015 M-SMA-12 Site: 35-016(p)

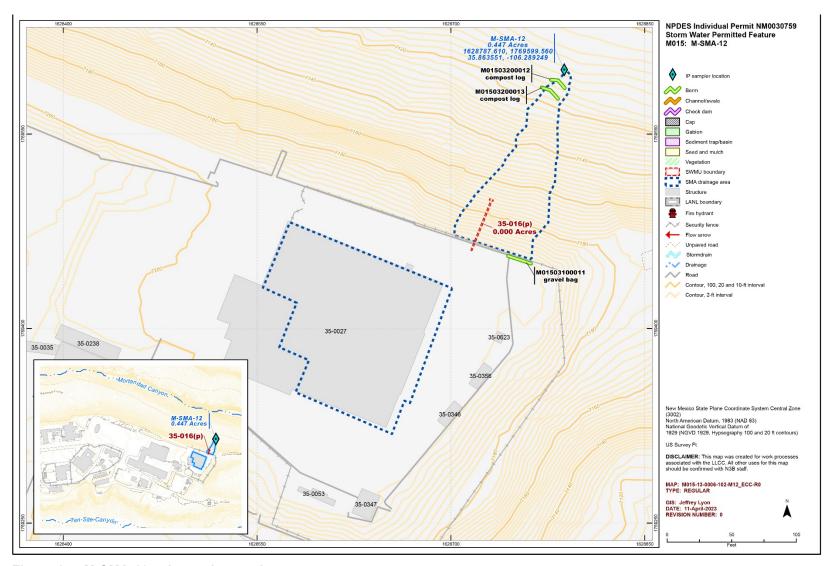


Figure 1 M-SMA-12 enhanced control measures

Certification of Installation of Enhanced Control Measures at M-SMA-12.5

July 5, 2023

NPDES PERMIT NO. NM0030759 EM2023-0388

Environmental Management Los Alamos Field Office

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

PF: M016 M-SMA-12.5 Sites: 05-005(b)

05-006(c)

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759, Part I.D.1(a), 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."

MODELLE	6/22/23
Amanda White, Senior Manager,	
Water Program	Date
Tech2Solutions	
mifor	6/20/23
Michael Erickson, Director	Dut
Water Program	Date
Newport News Nuclear BWXT-Los Alamos, LLC	
Digitally signed by BRIAN HARCEK Date: 2023.06.29 09:10:27 -06'00'	
M. Lee Bishop, Director For	Date
Office of Quality and Regulatory Compliance	
U.S. Department of Energy	

PF: M016 M-SMA-12.5 Sites: 05-005(b)

05-006(c)

In August 2019, analytical results received from baseline monitoring at Site Monitoring Area (SMA) M-SMA-12.5 yielded target action level (TAL) exceedances for aluminum, gross-alpha activity and selenium. Solid Waste Management Units (SWMUs) 05-005(b) and 05-006(c) received certificates of completion under the Compliance Order on Consent from the New Mexico Environment Department in May 2019. The Permittees submitted a certification of completion of corrective action for the Site to the U.S. Environmental Protection Agency per 2010 Permit Part I.E.2(d) in December 2019. Stormwater monitoring has not occurred since 2019. Upon issuance of the 2022 Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for selenium. Total aluminum and gross-alpha activity exceeded the TAL but not the background threshold value in the 2019 sample, thus corrective action is not required per the 2022 Permit Part 1.C.2(b).

In accordance with NPDES Permit No. NM0030759 (the Permit) Part I.D.1(a), 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	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	M01606010014	Check Dam	Rock Check Dam
2. JPG	M01606010015	Check Dam	Rock Check Dam
3. JPG	M01603120016	Berm	Rock Berm
4. JPG	M01603140017	Berm	Coir Log
5. JPG	M01603140018	Berm	Coir Log

PF: M016 M-SMA-12.5 Sites: 05-005(b)

05-006(c)

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	M01606010014	Check Dam	Rock Check Dam	Looking west

PF: M016 M-SMA-12.5 Sites: 05-005(b)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	M0160601015	Check Dam	Rock Check Dam	Looking north

PF: M016 M-SMA-12.5 Sites: 05-005(b)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	M01603120016	Berm	Rock Berm	Looking west

PF: M016 M-SMA-12.5 Sites: 05-005(b)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
4. JPG	M01603140017	Berm	Coir Log	Looking west

PF: M016 M-SMA-12.5 Sites: 05-005(b)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
5. JPG	M01603140018	Berm	Coir Log	Looking southwest

PF: M016 M-SMA-12.5 Site: 05-005(b)

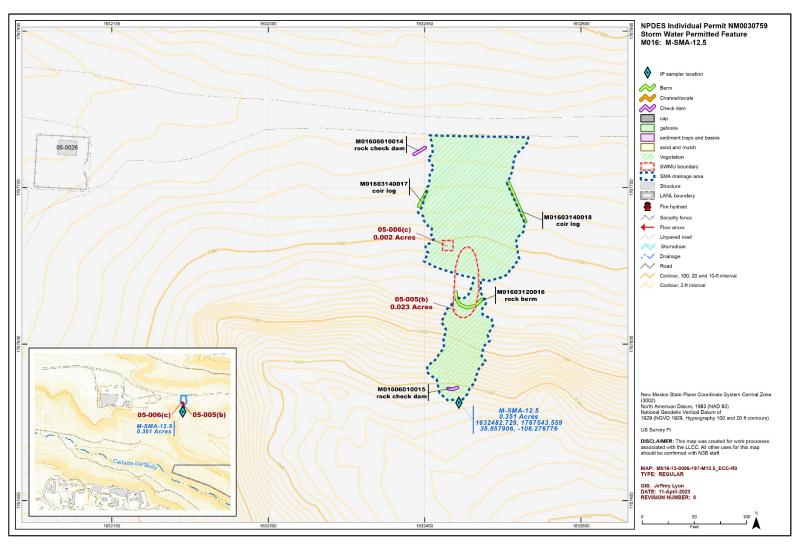


Figure 1 M-SMA-12.5 enhanced control measures

Certification of Installation of Enhanced Control Measures at M-SMA-12.8

July 5, 2023

NPDES PERMIT NO. NM0030759 EM2023-0389

PF: M019 M-SMA-12.8 Sites: 05-001(a)

05-002

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759, Part I.D.1(a), 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."

(justo)	6/22/23
Amanda White, Senior Manager, Water Program Tech2Solutions	Date
mifor	6/20/23
Michael Erickson, Director Water Program	Date
Newport News Nuclear BWXT-Los Alamos, LLC	
Digitally signed by BRIAN HARCEK	
M. Leu Dionop, Director For	Date
Office of Quality and Regulatory Compliance	

Office of Quality and Regulatory Compliance U.S. Department of Energy Environmental Management Los Alamos Field Office

PF: M019 M-SMA-12.8 Sites: 05-001(a)

05-002

In August 2019, analytical results received from baseline monitoring at Site Monitoring Area (SMA) M-SMA-12.8 yielded target action level (TAL) exceedances for aluminum, copper, gross-alpha activity, and selenium. Solid Waste Management Units (SWMUs) 05-001(a) and 05-002 received certificates of completion under the Compliance Order on Consent from the New Mexico Environment Department in September 2015. The Permittees submitted a certification of completion of corrective action for the Sites to the U.S. Environmental Protection Agenct per 2010 Permit Part I.E.2(d) in December 2019. Stormwater monitoring has not occurred since 2019. Upon issuance of the 2022 Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for copper. Total aluminum, gross-alpha activity, and selenium exceeded the TAL but not the background threshold value in the 2019 sample, thus corrective action is not required per the 2022 Permit Part I.C.2(b).

In accordance with NPDES Permit No. NM0030759 (the Permit) Part I.D.1(a), 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 page 2) 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	M01903140014	Berm	Coir Log

PF: M019 M-SMA-12.8 Sites: 05-001(a)

05-002

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	M01903140014	Berm	Coir Log	Looking east

PF: M019 M-SMA-12.8 Site: 05-001(a)

05-002

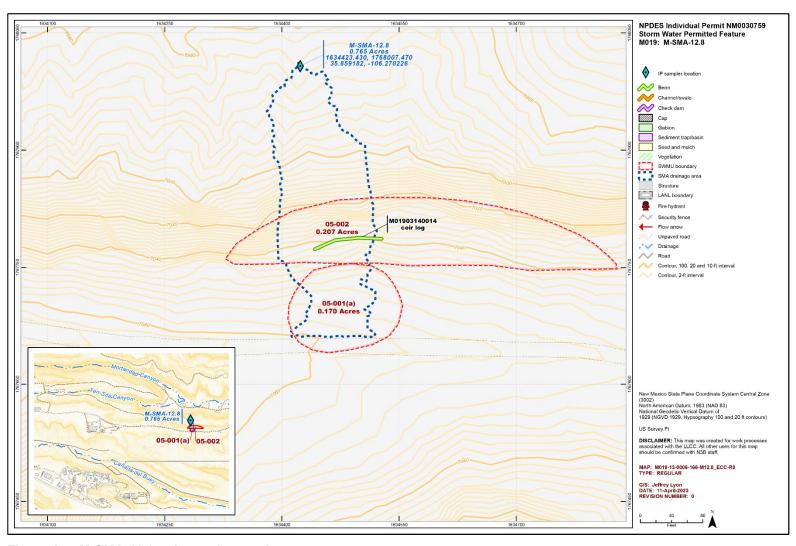


Figure 1 M-SMA-12.8 enhanced control measures

Certification of Installation of Enhanced Control Measures at M-SMA-13

July 5, 2023

NPDES PERMIT NO. NM0030759 EM2023-0390

PF: M022 M-SMA-13 Sites: 05-001(c)

The following certification was performed in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759, Part I.D.1(a), 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."

Pull off	
	6/22/23
Amanda White, Senior Manager,	
Water Program	Date
Tech2Solutions	
Michael Erickson, Director	6/20/23
Water Program	Date
Newport News Nuclear BWXT-Los Alamos, LLC	
Digitally signed by BRIAN HARCEK Date: 2023.06.29 09:11:45 -06'00'	
M. Lee Bishop, Director For Office of Quality and Regulatory Compliance	Date

Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

PF: M022 M-SMA-13 Sites: 05-001(c)

In August 2021, analytical results received from baseline monitoring at Site Monitoring Area (SMA) M-SMA-13 yielded target action level (TAL) exceedances for aluminum and copper. Area of Concern (AOC) 05-001(c) received a certificate of completion under the Compliance Order on Consent from the New Mexico Environment Department in September 2015. The Permittees submitted a certification of completion of corrective action for the Site to the U.S. Environmental Protection Agency per 2010 Permit Part I.E.2(d) in December 2021. Stormwater monitoring has not occurred since 2021. Upon issuance of the 2022 Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for copper. Total aluminum exceeded the TAL but not the background threshold value in the 2021 sample, thus corrective action is not required per the 2022 Permit Part I.C.2.(b).

In accordance with NPDES Permit No. NM0030759 (the Permit) Part I.D.1(a), 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

Photo ID	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	M02203140020	Berm	Coir Log
2. JPG	M02203200021	Berm	Compost Log
3. JPG	M02203200022	Berm	Compost Log

PF: M022 M-SMA-13 Sites: 05-001(c)

Photos:



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	M02203140020	Berm	Coir Log	Looking east

PF: M022 M-SMA-13 Sites: 05-001(c)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	M02203200021	Berm	Compost Log	Looking northwest

PF: M022 M-SMA-13 Sites: 05-001(c)



Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	M02203200022	Berm	Compost Log	Looking northwest

PF: M022 M-SMA-13 Site: 05-001(c)

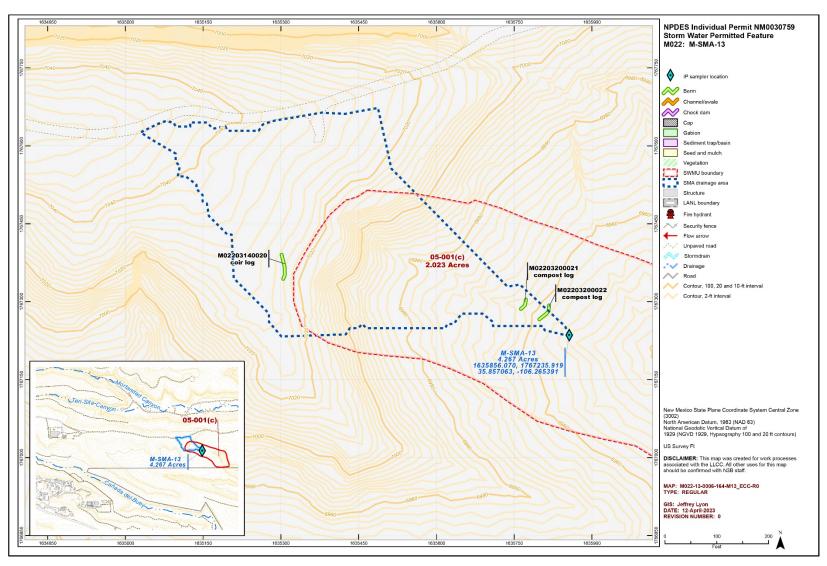


Figure 1 M-SMA-13 enhanced control measures