



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: August 24, 2023
Refer To: N3B-2023-0258

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-1.02 and M-SMA-12.9

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 stormwater 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.1(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."

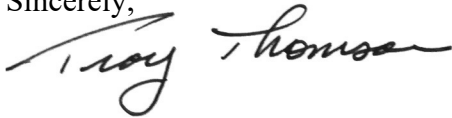
Accordingly, the documents for certification of enhanced control measures completed at CHQ-SMA-1.02 and M-SMA-12.9 within the last 30 days are included as Enclosures 1 and 2, respectively. Table 1 identifies the permitted features, site monitoring areas (SMAs), and Sites applicable to the certification. 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
SMA's Included in This Submittal
of Certification of Installation of Enhanced Control Measures

Permitted Feature	SMA	Sites
Q002A	CHQ-SMA-1.02	33-004(h) 33-008(c) 33-011(d) 33-015
M020	M-SMA-12.9	05-001(b) 05-002

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or Brian Harcek at (505) 692-4261 (brian.harcek@em.doe.gov).

Sincerely,



Troy Thomson
Program Manager
Environmental Remediation
N3B-Los Alamos

Sincerely,



Brian Harcek, Acting Co-Director
Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

Digitally signed by BRIAN HARCEK
Date: 2023.08.23 06:18:59 -06'00'

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

1. Certification of Installation of Enhanced Control Measures at CHQ-SMA-1.02 (EM2023-0485)
2. Certification of Installation of Enhanced Control Measures at M-SMA-12.9 (EM2023-0486)

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-RPD
Levi Dean, NMED-SWQB

Susan Lucas-Kamat, NMED-SWQB
 Stephen Hoffman, NA-LA
 Jeannette Hyatt, LANL
 Arturo Duran, EM-LA
 John Evans, EM-LA
 Michael Mikolanis, EM-LA
 Kent Rich, EM-LA
 Cheryl Rodriguez, EM-LA
 Susan Wacaster, EM-LA
 William Alexander, N3B
 Tanner Bonham, N3B
 Robert Edwards III, N3B
 Michael Erickson, N3B
 Audrey Krehlik, N3B
 Dana Lindsay, N3B
 Christian Maupin, N3B
 Aubrey Pierce, N3B
 Karly Rodriguez, N3B
 Vince Rodriguez, N3B
 Bradley Smith, N3B
 Shannon Smith, N3B
 Jeffrey Stevens, 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

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PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

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**Certification of Installation of
Enhanced Control Measures at CHQ-SMA-1.02**

August 24, 2023

NPDES PERMIT NO. NM0030759

EM2023-0485

**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ENHANCED CONTROL MEASURES****PF: Q002A****CHQ-SMA-1.02****Sites: 33-004(h)
33-008(c)
33-011(d)
33-015**

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.

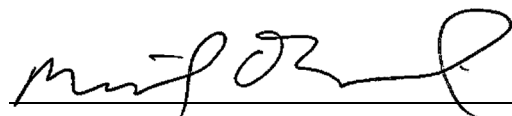
CERTIFICATION STATEMENT OF AUTHORIZATION

"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."



Amanda White, Senior Manager
Water Program
Tech2Solutions

8/14/23

Date

Michael Erickson, Director
Water Program
Newport News Nuclear BWXT-Los Alamos, LLC

8/9/23

Date

Digitally signed by BRIAN
HARCEK
Date: 2023.08.23 06:19:25 -06'00'

Brian Harcek, Acting Co-Director
Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

Date

**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ENHANCED CONTROL MEASURES****PF: Q002A****CHQ-SMA-1.02****Sites: 33-004(h)
33-008(c)
33-011(d)
33-015**

In June and October 2021, analytical results received from corrective-action monitoring at Site Monitoring Area (SMA) CHQ-SMA-1.02 yielded target action level (TAL) exceedances for aluminum, copper, gross-alpha activity, and total polychlorinated biphenyls (PCBs), initiating corrective action for copper and total PCBs. Aluminum exceeded the TAL but not the background threshold value in the 2021 samples, so corrective action for aluminum is not required per the NPDES Permit No. NM0030759 (the Permit) Part I.C.2(b). Gross alpha no longer has a TAL under the 2022 version of the Permit.

In accordance with the Permit, Part I.D.1(a), the design, installation, and documentation of enhanced control measures that are 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 p. 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	Q002A03010019	Berm	Earthen Berm

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

PF: Q002A

CHQ-SMA-1.02

**Sites: 33-004(h)
33-008(c)
33-011(d)
33-015****Photos:**

Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	Q002A03010019	Berm	Earthen Berm	Looking south

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

PF: M020

M-SMA-12.9

Site: 05-001(b)
05-002

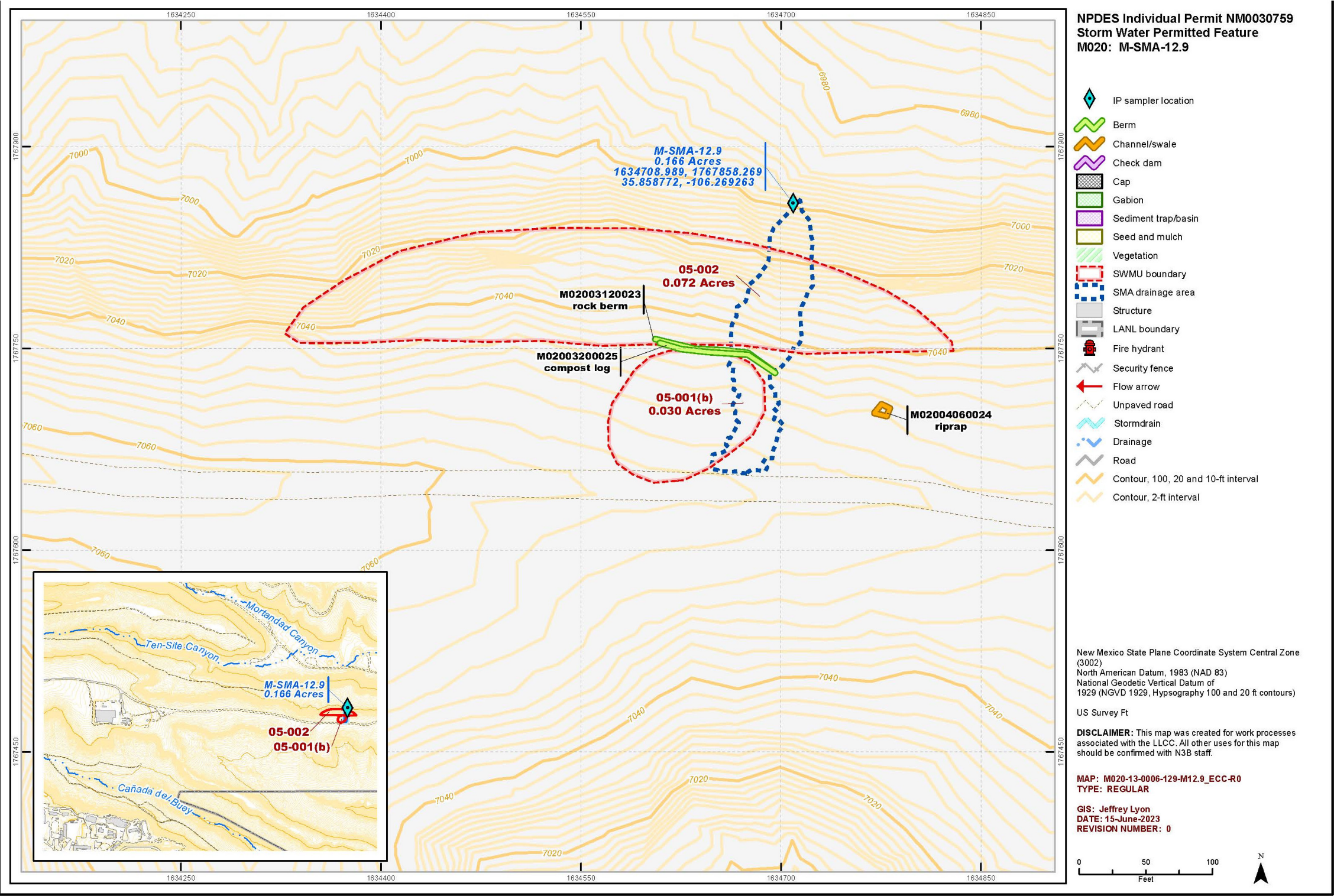


Figure 1 M-SMA-12.9 enhanced control measures

**Certification of Installation of
Enhanced Control Measures at M-SMA-12.9**

August 24, 2023

NPDES PERMIT NO. NM0030759

EM2023-0486

NPDES PERMIT NO. NM0030759

EM2023-0486

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

PF: M020

M-SMA-12.9

**Sites: 05-001(b)
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

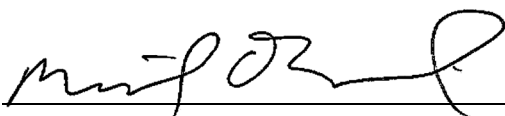
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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."



Amanda White, Senior Manager
Water Program
Tech2Solutions

8/14/23

Date



Water Program
Newport News Nuclear BWXT-Los Alamos, LLC

8/9/23

Date



Digitally signed by BRIAN
HARCEK
Date: 2023.08.23 06:19:49
-06'00'

Brian Harcek, Acting Co-Director
Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

Date

**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ENHANCED CONTROL MEASURES****PF: M020****M-SMA-12.9****Sites: 05-001(b)
05-002**

In August 2015, analytical results received from baseline monitoring at Site Monitoring Area (SMA) M-SMA-12.9 yielded that target action level (TAL) exceedances for copper and gross-alpha activity. Solid Waste Management Units (SWMUs) 05-001(b) 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 Agency, per the 2010 version of NPDES Permit No. NM0030759 (the Permit) Part I.E.2(d), in October 2015. Stormwater monitoring has not occurred since 2015. Upon issuance of the 2022 version of the Permit, the SMA was reviewed as part of the 2022 Sampling Implementation Plan and screened into corrective action for copper. Gross alpha no longer has a TAL under the 2022 version of the Permit.

In accordance with the Permit Part I.D.1(a), the design, installation, and documentation of enhanced control measures that are 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.

Table 1
Enhanced Control Measure Descriptions

Photo ID	Control Measure ID	Type of Control Measure	Control Measure
1. JPG	M02003120023	Berm	Rock Berm
2. JPG	M02004060024	Channel/Swale	Rip Rap
3. JPG	M02003200025	Berm	Compost Log

**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC
CERTIFICATION OF ENHANCED CONTROL MEASURES****PF: M020****M-SMA-12.9****Sites: 05-001(b)
05-002****Photos:**

Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
1. JPG	M02003120023	Berm	Rock Berm	Looking south

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

PF: M020

M-SMA-12.9

Sites: 05-001(b)
05-002

Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
2. JPG	M02004060024	Channel/Swale	Rip Rap	Looking west

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

PF: M020

M-SMA-12.9

Sites: 05-001(b)
05-002

Photo ID	Control Measure ID	Type of Control Measure	Control Measure	Photo Angle
3. JPG	M02003200025	Berm	Compost Log	Looking north

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

PF: M020

M-SMA-12.9

Site: 05-001(b)
05-002

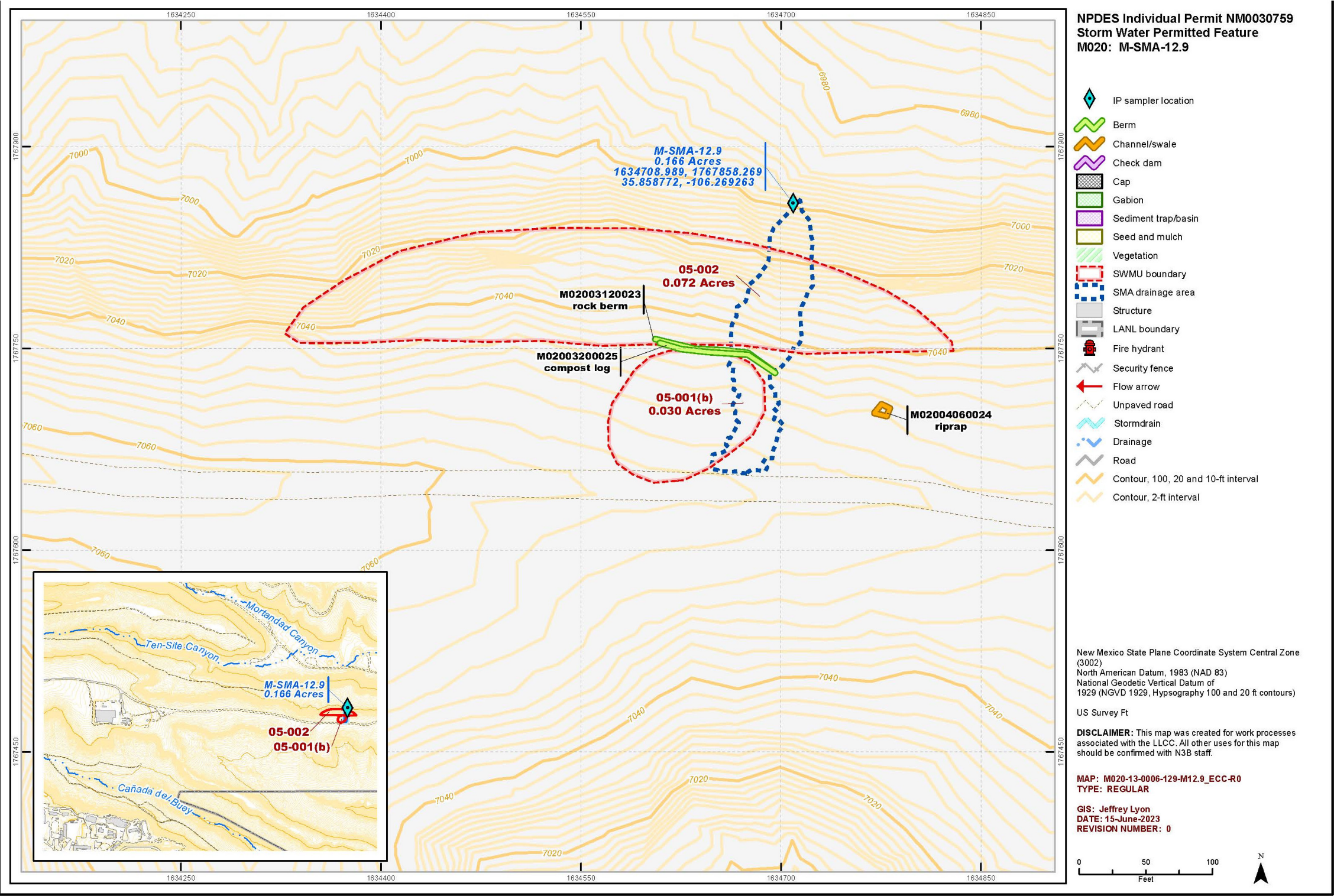


Figure 1 M-SMA-12.9 enhanced control measures