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Date: **JAN 14 2020**
Refer To: N3B-19-0386

Esteban Herrera, Chief
 Water Enforcement Branch (6EN-WS)
 Compliance Assurance and Enforcement Division
 U.S. Environmental Protection Agency, Region 6
 1201 Elm Street, Suite 500
 Dallas, Texas 75270-2102

Subject: NPDES Permit No. NM0030759 – Analytical Results Following Completion of Corrective Action by Certification of a No Exposure Condition at Site 16-017(j)-99 in Site Monitoring Area W-SMA-1

Dear Mr. Herrera:

This letter and the enclosure are submitted in accordance with the requirements of the U.S. Environmental Protection Agency's (EPA's) National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 (Permit) 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. 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.1(b):

“If the Permittees decide to achieve corrective action under this section through installation of measures to totally eliminate exposure of pollutants to storm water at a Site, Permittees will be in compliance with this Permit at the Site once they have certified and demonstrated to EPA, through submission of certified as-built drawings, that such measures have been properly installed to perform their function to totally eliminate exposure of pollutants to stormwater, and no further confirmation sampling is required, unless required by Section E.5(c). Thereafter, Permittees shall collect one sample and make the analytical results available via email notification and on the public website pursuant to Section I.7 of the Permit.”

Enclosure 1 includes the analytical results from the samples collected following the completion of corrective action by certification of a no exposure condition at site 16-017(j)-99 in site monitoring area W-SMA-1. Table 1 includes information about the confirmation sample collected at the site monitoring area.

The enclosed certified document will also be posted to the Individual Permit public website (<https://ext.em-la.doe.gov/IPS/Home>).

Table 1
Confirmation Samples Collected with Results Below Target Action Levels

Watershed	Site Numbers	SMA Number	Permitted Feature	Sample Collection Date
Water/ Cañon de Valle	16-017(j)-99	W-SMA-1	W001	10/24/2018

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or David Nickless at (505) 257-7933 (david.nickless@em.doe.gov).

Sincerely,

Elizabeth Lowes
 Elizabeth Lowes
 Program Manager
 Environment, Safety and Health
 N3B-Los Alamos

Sincerely,

David Nickless
 David Nickless, Acting Director
 Office of Quality and Regulatory Compliance
 Environmental Management
 Los Alamos Field Office

- Enclosure: One hard copy with electronic files:
1. Analytical Results Following Completion of Corrective Action by Certification of a no Exposure Condition at 16-017(j)-99 at W-SMA-1 (EM2019-0454)

cc (letter with enclosure[s]):
Sarah Holcomb, NMED-SWQB

cc (letter and enclosure[s] emailed):
 Carol Johnson, EPA Region 6
 Curry Jones, EPA Region 6
 Laurie King, EPA Region 6
 Brent Larsen, EPA Region 6
 Steve Yanicak, NMED-DOE-OB
 Arturo Duran, EM-LA
 David Nickless, EM-LA
 Cheryl Rodriguez, EM-LA
 William Alexander, N3B
 Don Carlson, N3B
 Emily Day, N3B
 Mary Erwin, N3B
 Erich Evered, N3B
 Debby Holgerson, N3B
 Kim Lebak, N3B

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

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emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
Public Reading Room (EPRR)
PRS Website

**Analytical Results Following Completion of
Corrective Action by Certification of a
No Exposure Condition at 16-017(j)-99 at
W-SMA-1**

January 14, 2020

NPDES PERMIT NO. NM0030759

EM2019-0454

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

PF: W001

W-SMA-1

Site: 16-017(j)-99

The following certification of completion of corrective action was performed in accordance with NPDES Permit No. NM0030759, Part I.E.2, which requires the Permittees to certify the completion of corrective action.

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."



Elizabeth Lowes, Program Manager
Environment, Safety and Health
Newport News Nuclear BWXT-Los Alamos, LLC

1-2-2020

Date



David Nickless, Acting Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

1/10/20

Date

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

PF: W001

W-SMA-1

Site: 16-017(j)-99

Tables 1 and 2 present the analytical results received from a confirmation monitoring sample collected following the completion of corrective action by certification of a no exposure condition at site 16-017(j)-99 in site monitoring area W-SMA-1. The certification of a no exposure condition with as-built drawings was submitted to the U.S. Environmental Protection Agency on September 29, 2015 (ADESH-15-128/LA-UR-15-26035). Table 3 presents each applicable target action level (TAL) for the analytes monitored.

**Table 1
Radiochemical Analytical Results Collected on October 24, 2018,
Following Completion of Corrective Action at Site 16-017(j)-99 in W-SMA-1**

Sample ID	Analyte	Field Preparation	Detect Status	Result (pCi/L)	TAL Exceedance Ratio	Minimum Detectable Activity (pCi/L)	Uncertainty (pCi/L)	Qualifier ^a	Data Validation Date
WT_IPC-18-153393	Radium-226 and radium-228	Unfiltered	Detect	0.8	0.03	0.295	n/a ^b	NQ	11/26/2018
WT_IPC-18-153394	Gross alpha	Unfiltered	Detect	6.34	0.42	2.17	0.885	NQ	11/26/2018

Note: TAL exceedance ratio is the result divided by the applicable TAL.

^a Qualifier: NQ = Result is not qualified.

^b n/a = Not applicable.

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

PF: W001

W-SMA-1

Site: 16-017(j)-99

**Table 2
Metals, Inorganic, and Organic Analytical Results Collected on October 24, 2018,
Following Completion of Corrective Action at 16-017(j)-99 in W-SMA-1**

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	TAL Exceedance Ratio	Report Method Detection Limit (µg/L)	Report Detection Limit (µg/L)	Validation Qualifier*	Data Validation Date
WT_IPC-18-153395	Aluminum	Filtered	Detect	762	1.02	19.3	50.0	NQ	11/26/2018
WT_IPC-18-153395	Antimony	Filtered	Nondetect	1.0	0.002	1.00	3.00	U	11/26/2018
WT_IPC-18-153395	Arsenic	Filtered	Nondetect	2.0	0.22	2.00	5.00	U	11/26/2018
WT_IPC-18-153395	Boron	Filtered	Detect	25.2	0.01	15.0	50.0	J	11/26/2018
WT_IPC-18-153395	Cadmium	Filtered	Detect	0.56	0.56	0.30	1.00	J	11/26/2018
WT_IPC-18-153395	Chromium	Filtered	Nondetect	3.0	0.01	3.00	10.0	U	11/26/2018
WT_IPC-18-153395	Cobalt	Filtered	Nondetect	1.0	0.00	1.00	5.00	U	11/26/2018
WT_IPC-18-153395	Copper	Filtered	Detect	6.63	1.54	0.300	1.00	NQ	11/26/2018
WT_IPC-18-153397	Cyanide, weak acid dissociable	Unfiltered	Nondetect	0.002	0.0002	0.002	0.005	U	11/26/2018
WT_IPC-18-153395	Lead	Filtered	Detect	0.79	0.05	0.500	2.00	J	11/26/2018
WT_IPC-18-153396	Mercury	Unfiltered	Detect	0.10	0.13	0.067	0.20	J	11/26/2018
WT_IPC-18-153395	Nickel	Filtered	Detect	1.06	0.01	0.600	2.00	J	11/26/2018
WT_IPC-18-153396	Selenium	Unfiltered	Nondetect	2.0	0.40	2.00	5.00	U	11/26/2018
WT_IPC-18-153395	Silver	Filtered	Nondetect	0.30	0.60	0.300	1.00	U	11/26/2018
WT_IPC-18-153395	Thallium	Filtered	Nondetect	0.60	0.10	0.600	2.00	U	11/26/2018
WT_IPC-18-153395	Vanadium	Filtered	Detect	2.57	0.03	1.00	5.00	J	11/26/2018
WT_IPC-18-153395	Zinc	Filtered	Detect	18.1	0.43	3.30	10.0	NQ	11/26/2018

Note: TAL exceedance ratio is the result divided by the applicable TAL.

*Qualifier: NQ = Result is not qualified; U = result is not detected; J = result is estimated.

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

PF: W001

W-SMA-1

Site: 16-017(j)-99

**Table 3
Applicable TALs**

Analyte	Unit	CAS No.	MQL	ATAL	MTAL
Radium-226 and radium-228	pCi/L	n/a*	n/a	30	n/a
Gross alpha	pCi/L	n/a	n/a	15	n/a
Aluminum	µg/L	7429-90-5	2.5		750
Antimony	µg/L	7440-36-0	60	640	n/a
Arsenic	µg/L	7440-38-2	0.5	9	340
Boron	µg/L	7440-42-8	100	5000	n/a
Cadmium	µg/L	7440-43-9	1	n/a	0.6
Chromium	µg/L	7440-47-3	10	n/a	210
Cobalt	µg/L	7440-48-4	50	1000	n/a
Copper	µg/L	7440-50-8	0.5	n/a	4.2
Lead	µg/L	7439-92-1	0.5	n/a	17
Mercury	µg/L	7439-97-6	0.005	0.77	1.4
Nickel	µg/L	7440-02-0	0.5	n/a	170
Selenium	µg/L	7782-49-2	5	5	20
Silver	µg/L	7440-22-4	0.5	n/a	0.4
Thallium	µg/L	7440-28-0	0.5	6.3	n/a
Vanadium	µg/L	7440-62-2	50	100	n/a
Zinc	µg/L	7440-66-6	20	n/a	42
Cyanide, weak acid dissociable	µg/L	57-12-5	10	5.2	22

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level;

ATAL = average TAL; MTAL = maximum TAL.

*n/a = Value is not applicable.