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Date: OCT 18 2018
Refer To: N3B-18-0278

Esteban Herrera, Chief
 Water Enforcement Branch (6EN-WS)
 Compliance Assurance and Enforcement Division
 U.S. Environmental Protection Agency, Region 6
 1445 Ross Avenue, Suite 1200
 Dallas, Texas 75202-2733

Subject: NPDES Permit No. NM0030759 - Analytical Results from the First Measurable Storm Event Following Certification of Enhanced Control Measures at Site Monitoring Area PJ-SMA-11

Dear Mr. Herrera:

This letter and enclosure are being 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 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 Nuclear News BWXT – Los Alamos, LLC (N3B). As specified in Part I, Section E.l(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 and, where applicable shall provide sampling results within 30 days of receipt of analytical results from the first measurable storm event after completion of such measures....

Accordingly, the analytical results from samples collected during the first measurable storm event received at one site monitoring area (PJ-SMA-11) in the last 30 days are enclosed. The report provides references to the certificates of completion of the installation of the control measures. Table 1 includes information about the confirmation samples collected at the site monitoring area. The enclosed certified document can also be accessed at the following website:
<https://www.epr.lanl.gov/>.

Table 1
Confirmation Samples Collected at PJ-SMA-11 from the
First Measurable Storm Event after Certification of Installation of Enhanced Controls

Watershed	Priority	Site Number	SMA Number	Permitted Feature	Sample Collection Date	Final Validation Date
Pajarito	Moderate	40-003(a)	PJ-SMA-11	J013	8/10/2018	9/25/2018

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,



Frazer Lockhart
 Program Manager
 Regulatory and Stakeholder Interface
 N3B – Los Alamos

Sincerely,



David S. Rhodes, Director
 Office of Quality and Regulatory Compliance
 Environmental Management
 Los Alamos Field Office

FL/DR/SV

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

- Analytical Results from the First Measurable Storm Event Following Certification of Enhanced Control Measures at PJ-SMA-11 (EM2018-0066)

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

Cy: (letter and enclosure[s] emailed)
 Robert Houston, EPA Region 6
 Brent Larsen, EPA Region 6
 Laurie King, EPA Region 6
 Steve Yanicak, NMED-DOE-OB
 David Rhodes, DOE-EM-LA
 David Nickless, DOE-EM-LA
 Nick Lombardo, N3B
 Joe Legare, N3B
 Frazer Lockhart, N3B
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 Don Carlson, N3B

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Sent To: Esteban Herrera, Chief USEPA Water Enforcement Branch
 Street and Apt. No., or PO Box No.: 1445 Ross Avenue, Suite 1200
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PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7017 2400 0000 3545 5935

Amanda White, N3B
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N3B Records
Public Reading Room (EPRR)
PRS Database

**Analytical Results from the First Measurable
Storm Event Following Certification
of Enhanced Control Measures
at PJ-SMA-11**

October 18, 2018

NPDES PERMIT NO. NM0030759

EM2018-0066

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

PF: J013

PJ-SMA-11

Site: 40-003(a)

The following certification of analytical results received from the confirmation monitoring samples collected after the completion of the installation of enhanced controls was performed in accordance with NPDES Permit No. NM0030759, Part I.E.1.

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."



Frazer Lockhart, Program Manager
Regulatory and Stakeholder Interface
Newport News Nuclear BWXT – Los Alamos, LLC

10/15/18
Date



David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

10-18-2018
Date

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

PF: J013

PJ-SMA-11

Site: 40-003(a)

Tables 1 and 2 present the analytical results received from confirmation monitoring samples collected from the first measurable storm event following the installation and subsequent certification of enhanced controls at site monitoring area PJ-SMA-11. Final analytical results were received and validated on September 25, 2018. The descriptions and photographs of each enhanced control installed at PJ-SMA-11 were provided to the U.S. Environmental Protection Agency on August 17, 2015 (ESHID-600776/LA-UR-15-21905). Table 3 presents each applicable target action level (TAL) for the analytes monitored.

**Table 1
Radiochemical Analytical Results from the First Measurable Storm Event
Collected on August 10, 2018, Following Installation of Enhanced Controls at PJ-SMA-11**

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-18-154593	Radium-226 and radium-228	Unfiltered	Detect	6.22	0.21	1.09	n/a ^b	NQ	9/25/2018
WT_IPC-18-154593	Gross alpha	Unfiltered	Detect	164	11	6.23	5.32	NQ	9/25/2018

Note: TAL exceedance ratio is the analytical result divided by the applicable average TAL (ATAL).

^a NQ = Result is not qualified.

^b n/a = Not applicable.

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

PF: J013

PJ-SMA-11

Site: 40-003(a)

Table 2

**Metals, Inorganic, and Organic Analytical Results from the First Measurable Storm Event
Collected on August 10, 2018, Following the Installation of Enhanced Controls at PJ-SMA-11**

Sample ID	Analyte	Field Preparation	Detect Status	Result (µg/L)	TAL Exceedance Ratio	Report Method Detection Limit (µg/L)	Report Quantitation Limit (µg/L)	Validation Qualifier*	Notification of Data Validation Date
WT_IPC-18-154520	Aluminum	Filtered	Detect	357	0.48	19.3	50	NQ	9/25/2018
WT_IPC-18-154520	Antimony	Filtered	Nondetect	1	0.0016	1	3	U	9/25/2018
WT_IPC-18-154520	Arsenic	Filtered	Nondetect	2	0.22	2	5	U	9/25/2018
WT_IPC-18-154520	Boron	Filtered	Detect	23.7	0.0047	15	50	J	9/25/2018
WT_IPC-18-154520	Cadmium	Filtered	Nondetect	0.3	0.3	0.3	1	U	9/25/2018
WT_IPC-18-154520	Chromium	Filtered	Nondetect	3	0.014	3	10	U	9/25/2018
WT_IPC-18-154520	Cobalt	Filtered	Nondetect	1	0.001	1	5	U	9/25/2018
WT_IPC-18-154520	Copper	Filtered	Detect	28	6.5	0.3	1	NQ	9/25/2018
WT_IPC-18-154520	Lead	Filtered	Detect	0.654	0.038	0.5	2	J	9/25/2018
WT_IPC-18-154593	Mercury	Unfiltered	Detect	0.12	0.16	0.067	0.2	J	9/25/2018
WT_IPC-18-154520	Nickel	Filtered	Detect	1.13	0.0066	0.6	2	J	9/25/2018
WT_IPC-18-154593	Selenium	Unfiltered	Detect	5.48	1.1	2	5	NQ	9/25/2018
WT_IPC-18-154520	Silver	Filtered	Nondetect	0.3	0.6	0.3	1	U	9/25/2018
WT_IPC-18-154520	Thallium	Filtered	Nondetect	0.6	0.095	0.6	2	U	9/25/2018
WT_IPC-18-154520	Vanadium	Filtered	Detect	1.27	0.013	1	5	J	9/25/2018
WT_IPC-18-154520	Zinc	Filtered	Nondetect	7.97	0.19	3.3	10	U	9/25/2018
WT_IPC-18-154593	Cyanide, weak acid dissociable	Unfiltered	Nondetect	1.67	0.17	1.67	5	U	9/25/2018

Note: TAL exceedance ratio is the result divided by the smallest applicable TAL. Applicable TALs are the larger of the maximum TAL (MTAL) and minimum quantification level (MQL) or the larger of the average TAL (ATAL) or MQL.

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

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

PF: J013

PJ-SMA-11

Site: 40-003(a)

**Table 3
Applicable TALs**

Analyte	Field Preparation	Unit	CAS No.	MQL	ATAL	MTAL
Radium-226 and radium-228	Unfiltered	pCi/L	n/a*	n/a	30	n/a
Gross alpha	Unfiltered	pCi/L	n/a	n/a	15	n/a
Aluminum	Filtered	µg/L	7429-90-5	2.5	n/a	750
Antimony	Filtered	µg/L	7440-36-0	60	640	n/a
Arsenic	Filtered	µg/L	7440-38-2	0.5	9	340
Boron	Filtered	µg/L	7440-42-8	100	5000	n/a
Cadmium	Filtered	µg/L	7440-43-9	1	n/a	0.6
Chromium	Filtered	µg/L	7440-47-3	10	n/a	210
Cobalt	Filtered	µg/L	7440-48-4	50	1000	n/a
Copper	Filtered	µg/L	7440-50-8	0.5	n/a	4.3
Lead	Filtered	µg/L	7439-92-1	0.5	n/a	17
Mercury	Unfiltered	µg/L	7439-97-6	0.005	0.77	1.4
Nickel	Filtered	µg/L	7440-02-0	0.5	n/a	170
Selenium	Unfiltered	µg/L	7782-49-2	5	5	20
Silver	Filtered	µg/L	7440-22-4	0.5	n/a	0.4
Thallium	Filtered	µg/L	7440-28-0	0.5	6.3	n/a
Vanadium	Filtered	µg/L	7440-62-2	50	100	n/a
Zinc	Filtered	µg/L	7440-66-6	20	n/a	42
Cyanide, weak acid dissociable	UF	µg/L	57-12-5	10	5.2	22

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level; ATAL = average TAL; MTAL = maximum TAL. As allowed by Part I.D. of the Individual Permit, analytical results are compared with either the corresponding MTAL/ATAL (as applicable) or the MQL, whichever value is greater, for the purpose of determining the effectiveness of storm water control measures.

* n/a = Not applicable.