Associate Director for ESH Environment, Safety, and Health P.O. Box 1663, MS K491 Los Alamos, New Mexico 87545 505-667-4218/Fax 505-665-3811 

Environmental Management Los Alamos Field Office, MS A316 3747 West Jemez Road Los Alamos, New Mexico 87544 (505) 665-5658/FAX (505) 606-2132

Date: MAR 0 4 2016 Refer To: ADESH-16-014

LAUR: 16-20865
Locates Action No.: n/a

Paulette Johnsey, Chief Water Enforcement Branch (6EN) 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 - Submittal of Certification of Completion of Corrective Action for One Site [53-008] Following Analytical Results below Target Action Levels at LA-SMA-10.12

Dear Ms. Johnsey:

This document is being submitted in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 for Los Alamos National Laboratory, issued to Los Alamos National Security, LLC, and the U.S. Department of Energy, effective November 1, 2010. As specified in Part I, Section E.2.(a):

Analytical results from confirmation sampling show pollutant concentrations for all pollutants of concern at the Site to be at or below applicable target action levels [TALs].

Enclosed is the certification that corrective action is complete following analytical results below TALs from two confirmation samples collected from two measurable storm events occurring at least 15 days apart for Site 53-008 within LA-SMA-10.12. Table 1 below identifies the Site, site monitoring area, baseline sample collection date, and corrective action sample collection dates applicable to the certification. The certification that corrective action is complete was prepared in accordance with 40 Code of Federal Regulations 122.22(b). This letter and certification can be accessed at the following website: http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/index.php.



Table 1 Confirmation Samples Collected at One Site from Two Measurable Storm Events with Results below TALs

| Site Number | SMA Number | Permitted Feature | Sample Collection Dates |
|-------------|--------------|-------------------|--|
| | | | September 1, 2011 (Baseline) |
| 53-008 | LA-SMA-10.12 | L030A | September 12, 2013 (Corrective Action) |
| | | | July 20, 2015 (Corrective Action) |

If you have any questions, please contact Terrill Lemke at (505) 665-2397 (tlemke@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,

John P. McCann, Acting Division Leader

Environmental Protection & Compliance Division

Los Alamos National Laboratory

Sincerely,

David S. Rhodes, Supervisor Environmental Management

Los Alamos Field Office

JM/DH/BR/SV:sm

Attachment: One hard copy with electronic files – Certification of Completion of Corrective Action

for One Site [53-008] Following Analytical Results below Target Action Levels at

LA-SMA-10.12 (EP2016-0011)

Cy: (w/att.)

Bruce Yurdin, NMED-SWQB, P. O. Box 5469, Santa Fe, NM 87502

emla.docs@em.doe.gov, MS A316 Public Reading Room (EPRR)

ADESH Records

Cy: (w/electronic att.)

Laurie King, EPA Region 6, Dallas, TX

Sarah Holcomb, NMED-SWQB

Steve Yanicak, NMED-DOE-OB, MS M894

PRS Database

Cy: (w/o att./date-stamped letter emailed)

Everett Spencer, EPA Region 6

Brent Larsen, EPA Region 6

lasomailbox@nnsa.doe.gov

Kimberly Davis Lebak, DOE-NA-LA

Peter Maggiore, DOE-NA-LA

Karen Armijo, DOE-EM-LA

David Rhodes, DOE-EM-LA

Tadz Kostrubala, ADEM ER Program

Steve Veenis, ADEM ER Program

Bruce Robinson, ADEM ER Program

Terrill Lemke, ADESH-EPC-CP

John McCann, ADESH-EPC-DO

Michael Brandt, ADESH

Amy De Palma, PADOPS

Craig Leasure, PADOPS

Submittal of Certification of Completion of Corrective Action for One Site [53-008] Following Analytical Results below Target Action Levels at LA-SMA-10.12

March 4, 2016

NPDES PERMIT NO. NM0030759

LA-UR-16-20865 EP2016-0011

PF: L030A LA-SMA-10.12 Site: 53-008

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 (i.e., DOE and LANS) 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."

Associate Directorate of Environmental Management

Environmental Remediation Program Los Alamos National Laboratory

Environmental Management

U.S. Department of Energy

Date

Date

PF: L030A LA-SMA-10.12 Site: 53-008

Tables 1 and 2 present the analytical results received from the confirmation samples collected from two measurable storm events occurring at least 15 days apart following the installation of enhanced controls at site monitoring area (SMA) LA-SMA-10.12. Tables 3 and 4 present analytical results received from the sample collected following installation of baseline controls. Table 5 presents each applicable target action level (TAL) for the analytes monitored.

Comparson of the baseline monitoring analytical results (Tables 3 and 4) with the TALs indicates that only gross alpha exceeded its TAL during this stage. The holding time for cyanide was exceeded; therefore, monitoring requirements for cyanide were not fulfilled. Following certification of the installation of enhanced controls on November 30, 2012 (EP2012-0296/LA-UR-12-26392), monitoring for gross alpha and cyanide was continued. Analytical results from confirmation samples (Tables 1 and 2) indicate no TALs were exceeded, and therefore, corrective action at Site 53-008 at LA-SMA-10.12 is complete per Part I, Section E.2.(a) of the Individual Permit.

Table 1
Radiochemical Analytical Results from
Two Measurable Storm Events at LA-SMA-10.12

| Sample ID | Analyte | Field Prep | Detect Status | Result (pCi/L) | Minimum Detectable Activity | Uncertainty | Qualifier* | Sample Collection Date |
|------------------|-------------|------------|---------------|----------------|-----------------------------|-------------|------------|------------------------|
| WT_IPC-15-101964 | Gross alpha | Unfiltered | Detect | 4.36 | 2.9 | 1.0 | NQ | 07/20/2015 |
| WT_IPC-13-32140 | Gross alpha | Unfiltered | Detect | 4.07 | 2.74 | 0.951 | NQ | 09/12/2013 |

Note: Results, minimum detectable activity, and uncertainty are in pCi/L.

^{*} Qualifier: NQ = Result is not qualified.

PF: L030A LA-SMA-10.12 Site: 53-008

Table 2
Metals and Organic Analytical Results from
Two Measurable Storm Events at LA-SMA-10.12

| Sample ID | Analyte | Field Prep | Detect Status | Result (µg/L) | Method Detection Limit | Quantitation Limit | Qualifier* | Sample Collection Date |
|------------------|--------------------------------|------------|---------------|---------------|------------------------|--------------------|------------|------------------------|
| WT_IPC-15-101964 | Cyanide, weak acid dissociable | Unfiltered | Nondetect | 2.14 | 2.14 | 5 | U | 07/20/2015 |
| WT_IPC-13-32140 | Cyanide, weak acid dissociable | Unfiltered | Nondetect | 5 | 1.67 | 5 | U | 09/12/2013 |

Note: Results, method detection limit, and quantitation limit are in $\mu g/L$.

Table 3
Radiochemical Analytical Results from the Sample Collected after
Installation of Baseline Controls at LA-SMA-10.12

| Sample ID | Analyte | Field Prep | Detect Status | Result (pCi/L) | Uncertainty | Minimum Detectable Activity | Qualifier* | Sample Collection Date |
|-------------------|------------------------------|------------|---------------|----------------|-------------|-----------------------------|------------|------------------------|
| WT_IPLAP-11-10512 | Gross alpha | Unfiltered | Detect | 23 | 3.5 | 3.0 | NQ | 9/1/2011 |
| WT_IPLAP-11-10512 | Radium-226 and Radium-228 | Unfiltered | Detect | 2.05 | 0.58 | 1.42 | NQ | 9/1/2011 |

Note: Results, minimum detectable activity, and uncertainty are in pCi/L.

^{*} Qualifier: U = Result is not detected.

^{*} Qualifier: NQ = Result is not qualified.

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Table 4

Metals and Organic Analytical Results from the

Sample Collected after Installation of Baseline Controls at LA-SMA-10.12

| Sample ID | Analyte | Field Prep | Detect Status | Result (µg/L) | Method Detection Limit | Quantitation Limit | Qualifier | Data Receipt Date |
|-------------------|--------------------------------|------------|---------------|---------------|------------------------|--------------------|-----------------|-------------------|
| WT_IPLAP-11-10510 | Silver | Filtered | Nondetect | 0.2 | 0.2 | 1 | U ^a | 9/1/2011 |
| WT_IPLAP-11-10510 | Aluminum | Filtered | Detect | 211 | 15 | 50 | NQb | 9/1/2011 |
| WT_IPLAP-11-10510 | Arsenic | Filtered | Nondetect | 1.7 | 1.7 | 5 | U | 9/1/2011 |
| WT_IPLAP-11-10510 | Boron | Filtered | Detect | 32 | 15 | 50 | J ^c | 9/1/2011 |
| WT_IPLAP-11-10510 | Cadmium | Filtered | Nondetect | 0.11 | 0.11 | 1 | U | 9/1/2011 |
| WT_IPLAP-11-10510 | Cobalt | Filtered | Detect | 4.7 | 1 | 5 | J | 9/1/2011 |
| WT_IPLAP-11-10510 | Chromium | Filtered | Nondetect | 2 | 2 | 10 | U | 9/1/2011 |
| WT_IPLAP-11-10510 | Copper | Filtered | Detect | 2.2 | 0.35 | 1 | NQ | 9/1/2011 |
| WT_IPLAP-11-10510 | Hardness | Filtered | Detect | 22.9 | 0.15 | 0.5 | NQ | 9/1/2011 |
| WT_IPLAP-11-10510 | Nickel | Filtered | Detect | 1.3 | 0.5 | 2 | J | 9/1/2011 |
| WT_IPLAP-11-10510 | Lead | Filtered | Detect | 1.6 | 0.5 | 2 | J | 9/1/2011 |
| WT_IPLAP-11-10510 | Antimony | Filtered | Nondetect | 1 | 1 | 3 | UJ ^d | 9/1/2011 |
| WT_IPLAP-11-10510 | Thallium | Filtered | Nondetect | 0.45 | 0.45 | 2 | U | 9/1/2011 |
| WT_IPLAP-11-10510 | Vanadium | Filtered | Detect | 2.3 | 1 | 5 | J | 9/1/2011 |
| WT_IPLAP-11-10510 | Zinc | Filtered | Detect | 3.5 | 3.3 | 10 | J | 9/1/2011 |
| WT_IPLAP-11-10512 | Cyanide, weak acid dissociable | Unfiltered | Nondetect | 1.5 | 1.5 | 5 | UJ | 9/1/2011 |
| WT_IPLAP-11-10512 | Mercury | Unfiltered | Nondetect | 0.066 | 0.066 | 0.2 | U | 9/1/2011 |
| WT_IPLAP-11-10512 | Selenium | Unfiltered | Nondetect | 1.5 | 1.5 | 5 | U | 9/1/2011 |

Note: Results, method detection limit, and quantitation limit are in $\mu g/L$.

^a Qualifier: U = Result is not detected.

^b Qualifier: NQ = Result is not qualified.

^c Qualifier: J = The associated numerical value is an estimated quantity.

^d Qualifier: UJ = Material was analyzed for, but not detected. Value is an estimate.

PF: L030A LA-SMA-10.12 Site: 53-008

Table 5
Applicable TALs

| Analyte | Units | CAS No. | MQL | ATAL | MTAL |
|--------------------------------|-------|-----------|-------|------|------|
| Aluminum, dissolved | μg/L | 7429-90-5 | 2.5 | n/a* | 750 |
| Antimony, dissolved | μg/L | 7440-36-0 | 60 | 640 | n/a |
| Arsenic, dissolved | μg/L | 7440-38-2 | 0.5 | 9 | 340 |
| Boron, dissolved | μg/L | 7440-42-8 | 100 | 5000 | n/a |
| Cadmium, dissolved | μg/L | 7440-43-9 | 1 | n/a | 0.6 |
| Chromium, dissolved | μg/L | 7440-47-3 | 10 | n/a | 210 |
| Cobalt, dissolved | μg/L | 7440-48-4 | 50 | 1000 | n/a |
| Copper, dissolved | μg/L | 7440-40-8 | 0.5 | n/a | 4.3 |
| Cyanide, weak acid dissociable | μg/L | 57-12-5 | 10 | 5.2 | 22 |
| Lead, dissolved | μg/L | 7439-92-1 | 0.5 | n/a | 17 |
| Mercury | μg/L | 7439-97-6 | 0.005 | 0.77 | 1.4 |
| Nickel, dissolved | μg/L | 7440-02-0 | 0.5 | n/a | 170 |
| Selenium | μg/L | 7782-49-2 | 5 | 5 | 20 |
| Silver, dissolved | μg/L | 7440-22-4 | 0.5 | n/a | 0.4 |
| Thallium, dissolved | μg/L | 7440-28-0 | 0.5 | 6.3 | n/a |
| Vanadium, dissolved | μg/L | 7440-62-2 | 50 | 100 | n/a |
| Zinc, dissolved | μg/L | 7440-66-6 | 20 | n/a | 42 |
| Gross alpha | pCi/L | n/a | n/a | 15 | n/a |
| Radium-226 and Radium-228 | pCi/L | n/a | n/a | 30 | n/a |

Notes: CAS = Chemical Abstracts Service; MQL = minimum quantification level; MTAL = maximum TAL; ATAL = average TAL.

^{*}n/a = Value is not applicable.