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10/30/17
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Environmental Management
 Los Alamos Field Office
 P. O. Box 1663, MS M984
 Los Alamos, New Mexico 87545
 (505) 665-5658/FAX (505) 606-2132

Date: OCT 30 2017
Refer To: ADESH-17-075
LAUR: 17-29516

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 - Compliance Activity Update for PJ-SMA-10 (SWMU 40-006(a)) and S-SMA-6 (AOC 72-001)

Dear Mr. Herrera:

This letter provides the U.S. Environmental Protection Agency (EPA) with a compliance update for PJ-SMA-10 (SWMU 40-006(a)) and S-SMA-6 (AOC 72-001) following receipt of enhanced control analytical results as part of the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 for Los Alamos National Laboratory (the Laboratory), issued to Los Alamos National Security, LLC (LANS) and the U.S. Department of Energy (DOE), effective November 1, 2010.

Enhanced control samples were collected and analytical results were received for PJ-SMA-10 and S-SMA-6 on the dates listed in Table 1.

Table 1
Enhanced Control Samples Collected at PJ-SMA-10 and S-SMA-6

Watershed	Priority	Site Number	SMA Number	Permitted Feature	Sample Collection Dates	SIP Field Visit Date
Pajarito	Moderate	40-006(a)	PJ-SMA-10	J012	7/31/2016 8/24/2016	11/30/2016
Sandia	High	72-001	S-SMA-6	S016	10/21/2015 6/23/2016	11/30/2016

As required by Part I, E.1(a) of the Individual Permit, following enhanced control installation and certification



...at least two confirmation samples shall be collected (one confirmation sample shall be collected during each of at least two (2) separate measurable storm events occurring at least fifteen (15) days apart) following installation of any enhanced control. If either validated confirmation sample result for any specific pollutant of concern exceeds applicable target action levels, the Permittees shall conduct visual inspections for all Sites within the SMA drainage area, reevaluate the existing control measures, and initiate further measures to achieve completion of corrective action under Sections E.2 or 3 as soon as practicable.

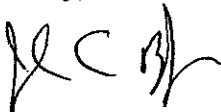
As described in the September 26, 2017 submittal to EPA (ADESH-17-064) the Permittees have been conducting sampling implementation plan (SIP) field visits to determine the most representative sampler location for each site monitoring area (SMA). These SIP evaluations have been conducted with representatives from New Mexico Environment Department (NMED) Surface Water Quality Bureau, NMED-DOE Oversight Bureau (OB), the Laboratory and DOE Environmental Management Los Alamos Field Office (EM-LA) (the Parties). Both SMAs were visited on November 30, 2016 and all parties agreed to move each sampler to a more representative location. Attachment 1 is comprised of the SIP sampler location evaluation maps showing the sampler move locations at both SMAs. The locations where the samples collected after installation of enhanced controls are labeled as IP_CA, where CA stands for "corrective action" monitoring. These locations are where the enhanced control samples referenced in Table 1 were collected (PJ-SMA-10 on 7/31/2016 and 8/24/2016 and S-SMA-6 on 10/21/2015 and 6/23/2016). The new sampler locations are denoted on each map as "Sampler Move."

In June of 2017 the Permittees re-initiated monitoring for both SMAs at the Sampler Move locations and will continue to monitor until two confirmation samples are collected. Once this occurs the Permittees will perform the requirements of the Individual Permit as described by Part I, E.1(a).

On October 25, 2013 the permittees submitted to EPA the Request for Permit Modification (EP2013-0202) for S-SMA-6, which requested the deletion of "monitoring requirements for aluminum, cyanide, polychlorinated biphenyls (PCBs), gross-alpha radioactivity, and radium-226 and -228 at Site 72-001(S-SMA-6)." To date, EPA has not responded to this request. The Permittees continue to request this Permit modification and contend that these constituents are not related to Site 72-001.

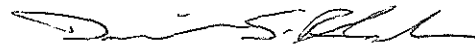
If you have any questions, please contact Terrill Lemke (505) 665-2397 (tlemke@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,



John Bretzke, Division Leader
Environmental Protection & Compliance Division
Los Alamos National Laboratory

Sincerely,



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

JB/DR/BR/SV:sm

Cy: (date-stamped letter emailed)
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John Bretzke, ADESH-EPC-DO
Michael Brandt, ADESH
William Mairson, PADOPS
Craig Leasure, PADOPS
Public Reading Room (EPRR)
ADESH Records
PRS Database

**PJ-SMA-10_Site 40-006(a) Sampling Implementation Plan
Sampler Location Evaluation Map**

Is a sampler move required? Yes No

Justification: Based in the November 30th, 2016 field visit and post-visit meeting, it was decided to move the current sampling location in order to monitor the push-pile area.

NMED SWQB Representative

Name Sarah Holcomb
Signature Sarah Holcomb
Date 3-14-17

LANS Regulatory Compliance Representative

Name Brad Schilling
Signature Brad Schilling
Date 3-23-17

DOE EMLA Representative

Name Daniel S. Rhodes
Signature Daniel S. Rhodes
Date 3-20-2017

By signing this map, I agree that the SMA sampler location shown on this map is representative of runoff from the Site(s) in this SMA. This conclusion is based upon the sampling implementation plan (SIP) document review process.

- | | | | | | |
|--|--|--|----------------|--|---------------------|
| | IP sampler location | | Major Drainage | | Sediment trap/basin |
| | FFCA and Sampler move location | | Berm | | Gabion |
| | Site soil sampling location (0 to 3 ft below ground surface) | | Channel/swale | | Seed and mulch |
| | Site boundary | | Check dam | | Cap |
| | SMA drainage area | | Flow arrow | | Stormdrain |
| | FFCA and SMA sample move drainage area | | Structure | | |

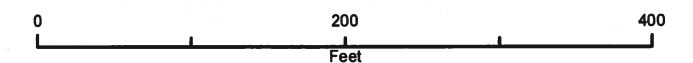
New Mexico State Plane Coordinate System Central Zone (3002)
North American Datum, 1983 (NAD 83)

US Survey Ft

GIS: Ross Casey, rcasey@lanl.gov
Created: 23-November-2016
Last Opened: Monday, February 27, 2017

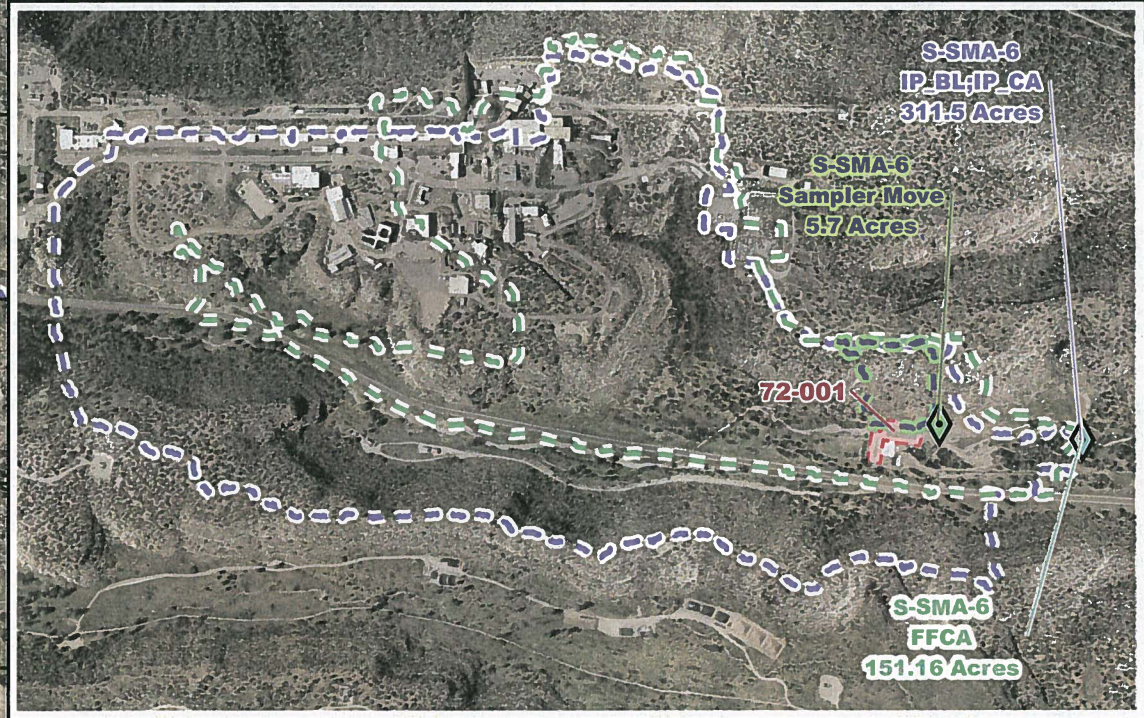
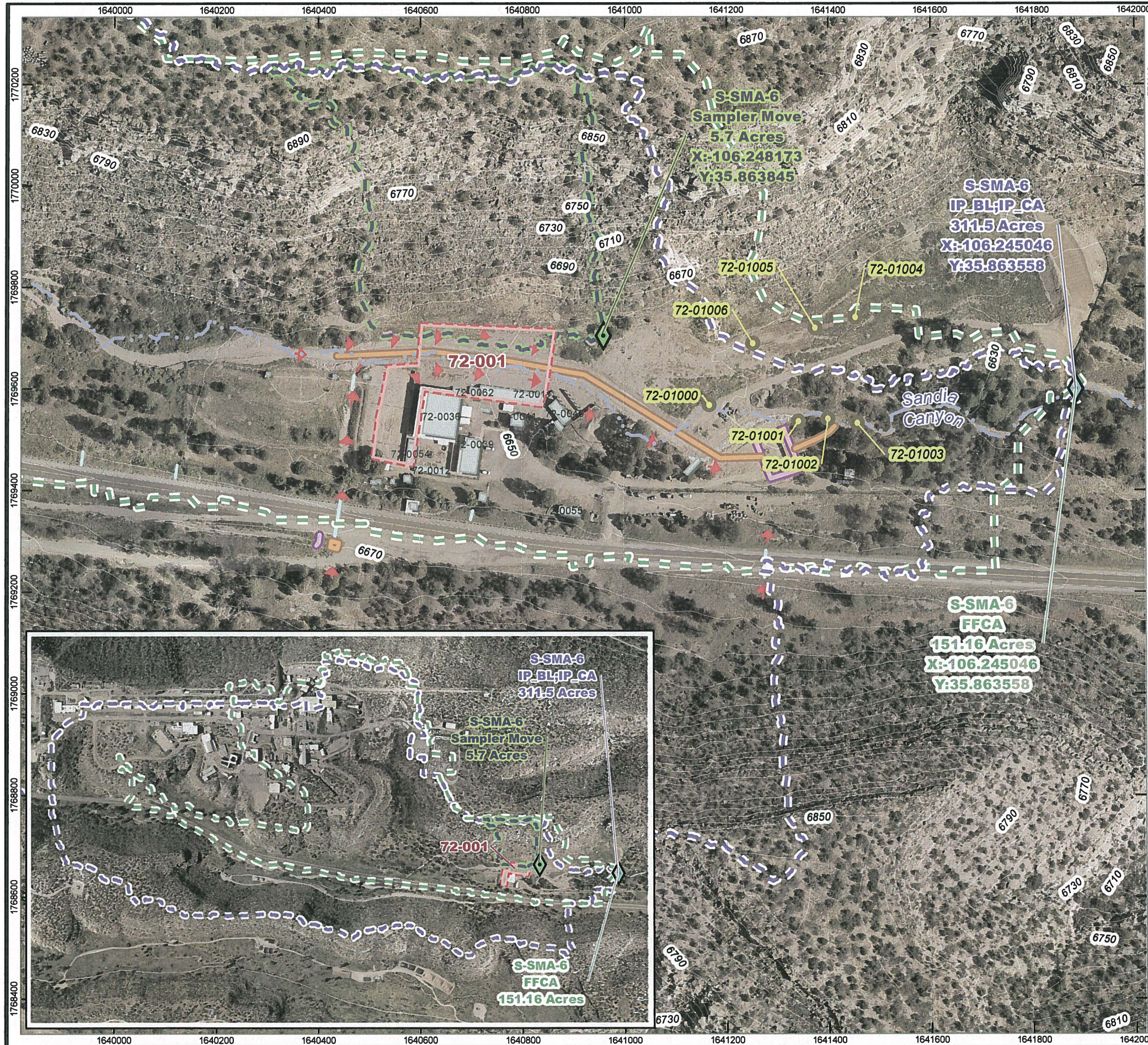
File: 13-006_SIP_sign_40-006(a)

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LA-UR-17-29055





S-SMA-6_Site 72-001 Sampling Implementation Plan

Sampler Location Evaluation Map

Is a sampler move required? Yes No

Justification: Based on the November 30, 2016 field visit, it was determined that the sampler is being impacted by up canyon sources. The current sampler will be moved in order to better represent historical SWMU activities at the Site.

NMED SWQB Representative

Name Sarah Holcomb
 Signature *Sarah Holcomb*
 Date 1-12-17

LANS Regulatory Compliance Representative

Name Sam Hoffman
 Signature *Sam Hoffman*
 Date 1/12/17

DOE EMLA Representative

Name David S. Rhodes
 Signature *David S. Rhodes*
 Date 2-27-2017

By signing this map, I agree that the SMA sampler location shown on this map is representative of runoff from the Site(s) in this SMA. This conclusion is based upon the sampling implementation plan (SIP) document review process.

- IP and FFCA sampler location
- IP Sampler move location
- Site soil sampling location (0 to 3 ft below ground surface)
- SWMU boundary
- SMA drainage area
- FFCA drainage area
- Sampler Move drainage area
- Major Drainage
- Berm
- Channel/swale
- Check dam
- Sediment trap/basin
- Gabion
- Seed and mulch
- Cap
- Flow arrow
- Stormdrain
- Structure

New Mexico State Plane Coordinate System Central Zone (3002)
 North American Datum, 1983 (NAD 83)

US Survey Ft

GIS: Ross Casey, rcasey@lanl.gov
 Created: 23-November-2016
 Last Opened: Wednesday, December 07, 2016

File: 13-006_SIP_sign_72-001

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