

Lindsay A. Lovejoy, Jr.
attorney-at-law

June 17, 2016

Ms. Lorena Vaughn, Paralegal/Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Re: Request by Concerned Citizens for Nuclear Safety to Terminate NPDES
Permit No. NM0028355 for Los Alamos National Laboratory Radioactive
Liquid Waste Treatment Facility due to Lack of Discharges

Dear Ms. Vaughan:

Enclosed are the original and one copy of a Request on behalf of Applicant (“Petitioner”) Concerned Citizens for Nuclear Safety (“CCNS”), to terminate NPDES Permit No. NM0028355 with respect to Outfall 051, which serves the Los Alamos National Laboratory Radioactive Liquid Waste Treatment Facility. Also enclosed are Exhibits to that Request.

The Request is filed pursuant to 40 C.F.R. § 124.5, which authorizes the filing of a request for permit termination by any interested person. CCNS is clearly an “interested person,” and certain members of CCNS are named in the Request who demonstrate that they are interested as well. A copy of the Request and the Exhibits thereto are served simultaneously upon the U.S. Department of Energy, NNSA Los Alamos Field Office and Los Alamos National Security, LLC, which are co-operators of Los Alamos National Laboratory and hold the NPDES permit at issue here. A courtesy copy has also been send to the Secretary of the New Mexico Environment Department.

CCNS requests that you, as the Regional Hearing Clerk, refer this matter to the Regional Judicial Officer, who is designated under 40 C.F.R. § 22.51 to act as Presiding Officer in this matter.

Please do not hesitate to bring any issues that arise to my attention or to that of co-counsel, Jonathan Block Esq., of New Mexico Environmental Law Center, 1405 Luisa Street, Santa Fe, NM 87505, tel. (505) 989-9022, Ext. 22

Thank you for your assistance.

Very truly yours,

Lindsay A. Lovejoy, Jr.

Enc./ As described above

cc: Mr. Thomas Rucki
Regional Judicial Officer
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202
(w/o Exhibits)

Mr. Ben Harrison
Acting Regional Counsel
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202
(w/o Exhibits)

Mr. Charles F. McMillan, Director
Los Alamos National Laboratory
P.O. Box 1663 (MS K499)
Los Alamos, New Mexico 87545

Ms. Kimberly D. Lebak, Manager
U.S. DOE Los Alamos Field Office,
3747 West Jemez Road (MS A316)
Los Alamos, New Mexico 87544

Mr. Ryan Flynn, Secretary
New Mexico Environment Department
P.O. Box 5469
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