By email: rosborough.evelyn@epa.gov

Ms. Evelyn Rosborough

U. S. Environmental Protection Agency Region 6
NPDES/Wetland Review Section (6WD-PN)

1201 Elm Street, Suite 500

Dallas, TX 75270

Re: Public Comment about the draft LANL Industrial Wastewater Discharge

 Clean Water Act Permit No. NM0028355

Dear Ms. Rosborough:

I support the New Mexico Environment Department recommendation that all Los Alamos National Laboratory (LANL) discharge sites covered by the permit are sampled for PFASs and PCBs at the most protective standards possible.

I object to LANL asking the Environmental Protection Agency (EPA) to issue a Clean Water Act permit for industrial facilities that have not discharged treated wastewater to the environment for years, even decades. Clean Water Act permits may be granted only for “the discharge of any pollutant, or combination of pollutants.” These facilities should no longer be covered by the permit.

I object to EPA issuing a permit for facilities that handle, treat and store hazardous waste, but do not discharge. Such permitting confers an exemption from more protective hazardous waste laws and regulations. The only reason to issue a Clean Water Act permit is to illegitimately exempt LANL facilities from hazardous waste laws and regulations and to deny the public the opportunity for a public hearing for the newly constructed low-level radioactive liquid waste treatment facility.

I object to EPA issuing a permit for those LANL facilities that do not discharge at present, including:

* Radioactive Liquid Waste Treatment Facility (RLWTF),
* Strategic Computing Complex;
* Los Alamos Neutron Science Complex, or LANSCE, facility;
* National High Magnetic Field Laboratory; and
* High Explosive Wastewater Treatment Facility.

Please delete these facilities from the Clean Water Act permit that are in the business of handling, treating, and storing hazardous waste, but do not discharge. Open the door to their proper and more stringent regulation under RCRA and the opportunity for a public hearing about the newly constructed low-level radioactive liquid waste treatment facility.

Thank you for your careful consideration of my comments.

Sincerely,