

Ms. Evelyn Rosborough  
U. S. Environmental Protection Agency Region 6  
NPDES/Wetland Review Section (6WD-PN)  
1201 Elm Street, Suite 500  
Dallas, TX 75270

By email: [rosborough.evelyn@epa.gov](mailto:rosborough.evelyn@epa.gov)

**Re: Comment on Clean Water Act Permit No. NM0028355 for LANL Industrial Wastewater Discharge**

Dear Ms. Rosborough:

Los Alamos National Laboratory (LANL) is asking the Environmental Protection Agency (EPA) to issue another Clean Water Act permit. Yet this permit includes facilities that have not discharged wastewater into the environment for years or sometimes, decades.

LANL facilities that have no discharge from an outfall should no longer be included in a Clean Water Act permit.

I object to EPA issuing a permit for facilities that handle, treat and store hazardous waste, but do not discharge. This is just a way for LANL to get around the more stringent RCRA hazardous waste laws and regulations which should be regulating these facilities. It is against the regulations and totally illegitimate to exempt such LANL facilities from RCRA. That LANL continues to apply for Clean Water Act permits for these facilities only shows that the Lab is **not** a good neighbor to the surrounding communities, as it is seeking to weasel out – yet again – from its environmental responsibilities.

LANL has a long history of just this kind of irresponsible, illegal and reckless behavior as year after year they do everything possible to avoid their responsibilities toward the communities that surround them – whether it is to limit their EJSCREEN radii essentially to Los Alamos County – possibly the richest county in the country – while ignoring the majority/minority makeup of poorer, local pueblos and the Espanola Valley and beyond – an area that LANL has already contaminated with their past discharges; or venting tritium gas with no care or even study of effects on the same local population because it's the cheapest way for the Lab to check off one of the boxes on their contract; or shipping waste to WIPP that, through total incompetence and greed, has become explosive, with no care at all for safety.

LANL has not improved their safety culture at all despite numerous demands from affected communities, government oversight entities, and state and local agencies. If EPA is truly in the business of protecting the environment, letting LANL continue to avoid proper regulation is not the way to go. EPA should require proper permit applications that meet the regulations instead of rubber stamping these illegal permits.

Therefore I object to EPA issuing a permit for those LANL facilities that have not discharged, such as the

- 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 those facilities that are in the business of handling, treating, and storing hazardous waste but do not discharge, from the Clean Water Act permit so that they can be properly regulated by the more stringent RCRA regulations ,and LANL can show that they actually understand what safety means and that they are willing to operate the Lab in a safe manner.

Thank you for your careful consideration of my comments.

Sincerely,  
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