

**CONCERNED CITIZENS FOR NUCLEAR SAFETY
HONOR OUR PUEBLO EXISTENCE
NEW MEXICO ACEQUIA ASSOCIATION**

February 23, 2021

Ms. Evelyn Rosborough
U.S. Environmental Protection Agency
NPDES/Wetland Review Section (6WD-PN)
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

By email to: rosborough.evelyn@epa.gov

Re: Reopened Public Comment Period for Draft Permit for Los Alamos National Laboratory- NPDES Industrial Wastewater Permit No. NM0028355

Dear Ms. Rosborough:

These comments are submitted by Concerned Citizens for Nuclear Safety (“CCNS”), Honor Our Pueblo Existence (“H.O.P.E.”) and the New Mexico Acequia Association (“NMAA”), all New Mexico based non-governmental organizations with members who live, work and recreate downwind and downstream of Los Alamos National Laboratory (“LANL”) about the reopened public comment period for the draft National Pollutant Discharge Elimination System (“NPDES”) permit for LANL.

The Environmental Protection Agency (“EPA”) public notice reopening the comment period states:

On November 12, 2020, Triad, which is the operator of the LANL facility, and was only privy to the content of public comments after the comment period closed, requested that EPA reopen the comment period to allow submittal of additional information on the Record to address information provided in the comments believed by Triad to be incomplete, misleading, or technical[ly] inaccurate that would help EPA in responding to those comments and make a final permit decision.

CCNS, H.O.P.E. and NMAA note that the “new” information referenced in our October 15, 2020 *Comments of Concerned Citizens for Nuclear Safety, Honor Our Pueblo Existence, and New Mexico Acequia Association on Proposed Renewal of NPDES Permit # NM0028355* is not “incomplete, misleading, or technical[ly] inaccurate.” Our new information is based on Department of Energy and Triad National Security, LLC (and its predecessor) documents.

EPA appears to have adopted an approach that authorizes interested parties to address submissions by other such parties. To permit such responses to be submitted equitably, we respectfully request EPA grant the public a three (3) week period of time to respond to the materials to be submitted by Triad. We request that the three (3) week comment period commencing when a public notice is released to the mailing list and when the Triad comments, and all comments submitted by others, are posted to the “Review associated documents” webpage at <https://www.epa.gov/nm/los-alamos-national-laboratory-lanl-limited-reopening-public-comment-period-npdes-permit-no-0>

We note that the current comment period ends on Sunday, February 28, 2021. Generally, when comment periods end on a Sunday, the comments are due the next day, or on Monday, March 1, 2021. Does EPA concur?

Thank you for your careful consideration of our comments. We look forward to a prompt response to our requests.

Sincerely,

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