

From: rwhake@aol.com <rwhake@aol.com>
Sent: Friday, February 19, 2021 11:38 AM
To: Rosborough, Evelyn <rosborough.evelyn@epa.gov>
Subject: Los Alamos release of new POISONS

Hello Evelyn, thank you for the opportunity to comment on the proposed release of poison from Los Alamos Labs. Please register my objections to any release or discharge of any ionic waste from the Los Alamos Labs for any reason whatsoever.

It would be more appropriate to take that stuff to Washington D.C. and bury it under the White House and the Pentagon. Those monuments are being made into lies by such tactics as the legal ploys being used to get rid of the risk and bad karma it represents. The government and official paid lackeys do not have the right to ruin the lands and lives of citizens of the world, that includes all life. We the People remember that document?

STOP THE POISONING OF THE ENVIRONMENT AND THE BEINGS OF THIS WORLD. Science does not have to equal death, enough of that has already come from Los Alamos Labs.

PLEASE STOP IT!!. Robert Hake, Innocent victim of nuclear technology, Santa Fe, New Mexico.

From: Basia Miller <basia.miller5@gmail.com>
Sent: Saturday, February 27, 2021 12:23 PM
To: Rosborough, Evelyn <rosborough.evelyn@epa.gov>
Subject: Concerns around CWA Permit No. NM0028355

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 be sampled for PFASs.

I object to LANL asking the Environmental Protection Agency (EPA) to issue a Clean Water Act permit for industrial facilities that have not discharged wastewater to the environment for years, if not decades. Clean Water Act permits may be granted only for “the discharge of any pollutant, or combination of pollutants.”

Some LANL facilities have no discharge from a “point source,” also known as an outfall. These facilities should no longer be on the permit.

I also 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 stringent Resource Conservation and Recovery Act (RCRA) hazardous waste laws and regulations.

I fear that the only reason to issue a Clean Water Act permit is to illegitimately exempt LANL facilities from RCRA.

In other words, 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 from the Clean Water Act permit those facilities 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.

Thank you for your careful consideration of my comments.

Sincerely,
Basia Miller, Ph.D
2848 Vereda de Pueblo
Santa Fe, NM 87507

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 be sampled for PFASs. I object to LANL asking the Environmental Protection Agency (EPA) to issue a Clean Water Act permit for industrial facilities that have not discharged wastewater to the environment for years, if not decades.

Clean Water Act permits may be granted only for “the discharge of any pollutant, or combination of pollutants.” Some LANL facilities have no discharge from a “point source,” also known as an outfall. These facilities should no longer be on 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 stringent Resource Conservation and Recovery Act (RCRA) hazardous waste laws and regulations. The only reason to issue a Clean Water Act permit is to illegitimately exempt LANL facilities from RCRA.

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 from the Clean Water Act permit those facilities 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. Thank you for your careful consideration of my comments.

Sincerely,

Jean Stevens, Ranchos de Taos, NM 87557

From: Castille Aguilar <castille@earthcarenm.org>

Sent: Monday, March 1, 2021 9:04 PM

To: Rosborough, Evelyn <rosborough.evelyn@epa.gov>

Subject: Public Comment about the draft LANL Industrial Wastewater Discharge Clean Water Act Permit No. NM0028355

Dear Ms. Rosborough:

My name is Castille Aguilar, and I am a leader from YUCCA (Youth United for Climate Crisis Action); we are a youth led and primarily BIPOC organization that focuses on social and climate justice here in Northern NM. We support the New Mexico Environment Department's recommendation that all Los Alamos National Laboratory (LANL) discharge sites covered by the permit be sampled for PFASs. We object to LANL asking the Environmental Protection Agency (EPA) to issue a Clean Water Act permit for industrial facilities that have not discharged wastewater to the environment for years, if not decades.

Clean Water Act permits may be granted only for "the discharge of any pollutant, or combination of pollutants." Some LANL facilities have no discharge from a "point source," also known as an outfall. These facilities should no longer be on the permit.

We 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 stringent Resource Conservation and Recovery Act (RCRA) hazardous waste laws and regulations. The only reason to issue a Clean Water Act permit is to illegitimately exempt LANL facilities from RCRA.

We 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 from the Clean Water Act permit those facilities 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. We need to make sure that our communities that bare the brunt of environmental racism and toxic dumping are not being further harmed by these issues; we need to stop turning a blind eye when industries and facilities are polluting our air, water, and land.

Thank you for your careful consideration of my comments.

Sincerely,

Castille Aguilar
YUCCA Leadership



VETERANS FOR PEACE
The Donald & Sally-Alice Thompson Chapter 63
Albuquerque, NM 87106

Please respond to:
John E. Wilks, III
Chair, Environmental Committee
Veterans For Peace, Chapter #63 (ABQ)
1115 Republic Road
Winston, NM 87943

March 2, 2021

SUBMITTED BY EMAIL
"rosborough.evelyn@epa.gov"

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

Re: Public Comment to LANL Industrial Wastewater Discharge Clean Water Act Application for Permit NM0028355

Dear Ms. Rosborough:

This public comment is timely electronically filed prior to the March 3rd deadline to file under the reopened Comment Period. Our organization filed a comment November 1, 2020, prior to the discovery of new information surfaced by the non-governmental entities Honor Our Pueblo Existence and the New Mexico Acequia Association.

The Environmental Committee of Veterans For Peace, Chapter #63 (Albuquerque), urges your office to reject the application for a water discharge permit filed by Triad National Security, LLC, (Triad) on behalf of the Los Alamos National Laboratory (LANL), as five or more entities listed on the application are not eligible permittees.

The application under consideration lists five of six ineligible entities:

- ~ Radioactive Liquid Waste Treatment Facility (RLWTF) aka Outfall 051,
- ~ Strategic Computing Complex,
- ~ Los Alamos Neutron Science Complex, or LANSCE, facility,
- ~ National High Magnetic Field Laboratory, and
- ~ High Explosive Wastewater Treatment Facility.

The Clean Water Act provides for permits to be issued *only* for “the discharge of any pollutant, or combination of pollutants.” The five entities listed above do not discharge, rather they handle, treat, and store hazardous waste. Issuing a permit to these ineligible entities would create an exemption from the more stringent requirements found in the Resource Conservation and Recovery Act (RCRA). By filing the pending application, the applicant is attempting to skirt the DOE’s more stringent regulations concerning hazardous waste.

The Los Alamos National Laboratory is subject to multi-jurisdictional, dual oversight. For matter of wastes generated at the site, the Departments of Interior and Energy have joint responsibility. Also, for non-radioactive wastes, the New Mexico Environmental Department has a licensing role in the oversight at LANL. We believe that Triad hopes to persuade the EPA to provide an expedient avenue for Triad to avoid the more stringent regulations and statutes that address certain radioactive wastes. In our view, Triad is attempting to avoid DOE guidelines and requirements.

We urge your office to reject the permit, require a new permit application to be filed prior LANL’s discharge of any additional waste water, and to investigate and identify the point source of the elevated levels of PFAS recently detected by New Mexico’s Environment Department in the canyons below the Pajarito Plateau.

Respectfully,

(signed)

John E. Wilks, III
Chair, Environmental Committee
VFP Chapter #63 (Albuquerque)

Copy furnished: NMED (Hazardous Waste Bureau)

From: Bernice J. Gutierrez <gutierbj1748@comcast.net>
Sent: Saturday, March 27, 2021 8:29 PM
To: Rosborough, Evelyn <rosborough.evelyn@epa.gov>
Subject: Industrial Wastewater Discharge

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,
Bernice J. Gutierrez