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Los Alamos
NATIONAL LABORATORY
EST.1943

Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812
(505) 667-4255/FAX (505) 606-2132

National Nuclear Security Administration
Los Alamos Field Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544

Date: MAR 12 2013
Refer To: EP2013-0051

William K. Honker, Division Director
Water Quality Protection Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: NPDES Permit No. NM0030759 - Request for Extension to Submit Renewal Application

Dear Mr. Honker:

The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) respectfully request an extension to file a renewal application for National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 (the Individual Permit or IP). The Individual Permit was issued to copermittees DOE and LANS (the Permittees) on February 13, 2009, to authorize the discharge of storm water associated with industrial activity from solid waste management units and areas of concern (collectively, "Sites") located at Los Alamos National Laboratory (LANL) in Los Alamos County, New Mexico. This IP was subsequently modified effective November 1, 2010, and will expire on March 31, 2014.

Pursuant to U.S. Environmental Protection Agency (EPA) rules at 40 Code of Federal Regulations §§ 122.6 and 122.21, EPA may administratively continue the IP provided the Permittees submit a timely renewal application on or before September 30, 2013, unless a later date has been granted by the Director. At a meeting with EPA Region 6 staff in October 2012, the Permittees expressed concern about their inability to meet the September 2013 deadline. The IP contains numerous complex requirements applicable to hundreds of Sites at LANL, including compliance milestones for High Priority Sites due November 1, 2013. Considerable resources are required to maintain compliance and to manage the IP and will be required to develop a comprehensive renewal application. As discussed at our October meeting, DOE budget constraints have resulted in insufficient funding allocated to provide the necessary resources for developing the renewal application for fiscal year (FY) 2013, although funding has been requested for FY2014. In addition, it is impractical to prepare a complete renewal application during the same time period that critical data are collected and the majority of IP efforts are implemented (i.e., the 2013 summer monsoon season). Further, the renewal deadline conflicts with the November 1, 2013, 3-yr compliance milestone set by the IP. An extension, on the other hand, will allow LANL time to prepare and file a complete renewal application that incorporates critical information and data gathered during 2013.

If EPA grants this extension, the delayed renewal application will not adversely impact the environment because the existing permit conditions will continue to apply and will be in full force and effect.

For these reasons, the Permittees request a 180-day extension to file its renewal application to no later than March 29, 2014. If you have any questions, please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

JM/PM/CD/SV:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Isaac Chen, USEPA, Region 6, Dallas, TX (date-stamp emailed)
Renee Ryland, USEPA, Region 6, Dallas, TX (date-stamp emailed)
Hannah Branning, USEPA, Region 6, Dallas, TX (date-stamp emailed)
James Hogan, NMED/SWQB, Santa Fe, NM (date-stamp emailed)
Steve Yanicak, NMED-DOE-OB, MS M894
lasomailbox @nnsa.doe.gov (date-stamped letter emailed)
David Rhodes, DOE-NA-00-LA (date-stamp emailed)
Kate Lynnes, EP-REG (date-stamp emailed)
Tori George, EP-REG (date-stamp emailed)
Steve Veenis, EP-CAP (date-stamp emailed)
Dave Mclnroy, EP-CAP (date-stamp emailed)
Jeff Mousseau, ADEP (date-stamp emailed)
Wendy Staples, EP-BPS (date-stamp emailed)
Public Reading Room (hard copy)
RPF (electronic copy)