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Date: AUG 13 2018
Refer To: N3B-18-0183

Isaac Chen, Permit Writer
 U.S. Environmental Protection Agency, Region 6
 Permitting Division (6WQ-NP)
 1445 Ross Avenue, Suite 1200
 Dallas, Texas 75202-2733

Subject: Intent to Revise March 2014 Renewal Application for the Individual Permit for Discharges from Solid Waste Management Units and Areas of Concern (National Pollutant Discharge Elimination System Permit No. NM00030759)

Dear Mr. Chen:

Thank you for arranging the meeting with U.S. Environmental Protection Agency (EPA) staff, U.S. Department of Energy staff, and Newport News Nuclear BWXT – Los Alamos, LLC (N3B) staff to discuss the status of the Individual Permit for Discharges from Solid Waste Management Units and Areas of Concern (National Pollutant Discharge Elimination System Permit No. NM00030759) on June 27, 2018, in Dallas, Texas. We have made substantial progress on implementation of the existing administratively continued permit and appreciate the discussion and exchange of ideas on how to move forward with the issuance of the new permit. Based on these discussions, we want to inform you of our intent to revise our renewal application originally submitted in March 2014 for the following reasons:

- We have implemented aspects of the 2015 draft permit related to the sampling implementation plan as a condition set forth in the New Mexico Environment Department (NMED) 401 Certification. We have worked closely with NMED to assess representative sampling locations at all 250 Individual Permit (IP) site monitoring areas. The assessment is complete, and agreement has been made on all future sampling locations, which will be modified in Appendix A.
- Since the submittal of the 2014 renewal application, new information has been collected at IP Sites, including storm water samples and investigation soil samples collected under the Compliance Order on Consent. This information is important for us to identify Site-related constituents at IP Sites.
- The original supporting materials section submitted in the 2014 application must be updated to reflect recently completed data quality objectives for storm water and soil, storm water studies related to natural and developed background, and to modify sections of the draft permit to improve clarity and consistency.

We request that issuance of the pending EPA permit based on the March 17, 2015, draft be stayed until the revised application can be acted upon. We are currently reviewing the 2014 application and developing a schedule for submitting the revised application to EPA. We will concurrently begin discussions with NMED to communicate the details of our efforts and will send an update of our proposed revision schedule.

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,



Frazer Lockhart
Program Manager
Regulatory and Stakeholder Interface
N3B – Los Alamos

Sincerely,



David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

FL/DR/SV

Cy: (date-stamped letter emailed)
Brent Larsen, EPA Region 6
Renea Ryland, EPA Region 6
Bruce Yurdin, NMED
Shelly Lemon, NMED-SWQB
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Extra Services & Fees (check box, add fee as appropriate) <input checked="" type="checkbox"/> Return Receipt (hardcopy) \$2.75 <input type="checkbox"/> Return Receipt (electronic) \$0.00 <input type="checkbox"/> Certified Mail Restricted Delivery \$0.00 <input type="checkbox"/> Adult Signature Required \$0.00 <input type="checkbox"/> Adult Signature Restricted Delivery \$0.00	
Sent To Isaac Chen US EPA Region 6 Street and Apt. No., or PO Box No. 1445 Rose Avenue, Suite 1200 City, State, ZIP+4® Dallas, Tx 75202-2733	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	