



Northern New Mexico Citizens' Advisory Board  
A U.S. Department of Energy Site-Specific Advisory Board  
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TA-54

13 October 2005

Mr. Carl Edlund, Director, Multimedia and Planning Division  
U. S. Environmental Protection Agency  
1445 Ross Avenue  
Dallas, TX 75202



Re: Request for Stay of TSCA Permit and Opportunity for Public Hearing  
Pending Renewal of TSCA Permit for Disposal of PCB Waste in Unlined Pits  
Area G, Los Alamos National Laboratory, New Mexico

Dear Mr. Edlund:

The Northern New Mexico Citizens Advisory Board (NNMCAB) requests that EPA not issue the renewal permit for disposal of PCB wastes by burial in unlined pits at Area G of Los Alamos National Laboratory (LANL). On behalf of the citizens of New Mexico, the NNMCAB requests an opportunity for the NNMCAB and the citizens of New Mexico to comment on this draft permit and the conditions proposed for burial in the unlined pits at Area G. We have not had such an opportunity for the past 4 years this permit has been under review by USEPA.

In May of this year, the NNMCAB held a public forum regarding Area G with participants from LANL, DOE, USEPA, NMED and members of the public providing input about Area G to a large audience of the public. See the enclosed CD. Considerable public comments and input to the NNMCAB have resulted in the NNMCAB's formal recommendation to DOE for no further disposal or expansion of pits at Area G. This proposed TSCA permit would be contrary to the interests expressed by the citizens of New Mexico.

The NNMCAB requests an opportunity to present information and requests to the USEPA regarding this proposed permit including provisions for the existing permit to be rewritten to provide for safe closure for the existing PCB wastes disposed in the unlined pits of Area G in a Closure Plan subject to public comment. Further, that the rewritten permit require that DOE and



LANL prepare a Post Closure Plan and a Monitoring Plan for these pits which will be subject to public comment prior to approval by USEPA.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. D. Campbell". The signature is written in a cursive, flowing style.

J. D. Campbell, Ph.D., P. E.  
Chair, NNM CAB

Enclosure: CD and DVD presentations and video of Area G Forum

Cc w/enclosures:

Mr. Troy Hill, Associate Director of RCRA Programs Division

Cc w/o enclosures:

Christina Houston, DDFO

John Ordaz, LASO

Mat Johansen, LASO

Ken Hargis, ENV

Rich Mayer, EPA

James Bearzi, Director, Hazardous Waste Bureau, NMED