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Author(s): Lopez, Lorrie Bonds

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Los Alamos National Laboratory
Hazardous Waste Facility Permit

COMMUNITY RELATIONS PLAN



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1.0 INTRODUCTION

The mission of Los Alamos National Laboratory (LANL) is to develop and apply science and technology to

- ensure the safety, security, and reliability of the U.S. nuclear deterrent;
- reduce global threats; and
- solve other emerging national security challenges.

To accomplish our mission, LANL generates hazardous and mixed waste. Hazardous Waste is solid waste that is dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, gases, or sludges. They can be discarded as commercial products, such as cleaning fluids or pesticides, or the byproducts of operations. Specific substances are listed in 40 Code of Federal Regulations (CFR), Part 261: [40 CFR Part 261](#).

Hazardous waste management activities are regulated by the New Mexico Environment Department (NMED) pursuant to New Mexico Hazardous Waste Act (HWA; Chapter 74, Article 4 NMSA 1978) and regulations under the Act. In 1989, NMED issued the Hazardous Waste Facility Permit (EPA ID Number NM0890010515-1) that established standards for LANL to manage, store, and treat hazardous wastes on-site and to undertake the closure and post closure care of permitted waste management units.

On November 30, 2010, NMED renewed the Hazardous Waste Facility Permit (the Permit). More information can be found on the NMED Hazardous Waste Bureau LANL Permit page: <http://www.nmenv.state.nm.us/hwb/lanlperm.html#FinalPermit>. The Permit expires in December 30, 2020.

LANL is owned by the U. S. Department of Energy (DOE) and operated under contract by Los Alamos National Security, LLC. DOE and Los Alamos National Security, LLC, are copermittees (the Permittees) on the LANL Hazardous Waste Facility Permit.

The Permit covers treatment and storage of hazardous waste in 24 facilities; 1 storage tank system at Technical Area 55 (TA-55), 1 cementation treatment unit, also at TA-55, and 22 container storage units at TA-03, TA-50, TA-54, and TA-55. Additionally, LANL manages some units under interim status at TA-14, TA-16, TA-36, TA-39, and TA-54.

The Community Relations Plan (CRP) describes the scope of public involvement in the activities of the Permit. The CRP is designed to cover only the community relations activities concerning the LANL Hazardous Waste Facility Permit and coordinates with but does not include public involvement for other LANL programs or environmental activities.

2.0 PURPOSE OF THE COMMUNITY RELATIONS PLAN

Section 1.12 of the Hazardous Waste Facility Permit requires that LANL establish and implement a community relations plan. The purpose of the CRP is to keep surrounding communities and interested members of the public informed about permit-related activities and to provide mechanisms to gather comments and suggestions. Permit-related activities include, but are not limited to, waste management, closure and postclosure activities, and corrective actions.

Waste management is the generation, staging, storage, treatment, and handling of solid waste, including moving, repackaging, adding, and removing waste. In the LANL Hazardous Waste Facility Permit, waste management activities apply only to hazardous waste. Limits to LANL waste may be found in Attachment J of the [Permit](#).

Closure procedures are conducted for every hazardous waste management unit when operations as a permitted unit cease. Each unit within the Permit has an approved closure plan that describes the process for removal or decontamination of hazardous waste residues to protect human health and the environment.

Postclosure activities manage landfills that require monitoring and maintenance after closure activities have been completed.

LANL works to increase public knowledge of remediation methodology and environmental stewardship practices, to inform the public of the status of Permit compliance, and to use stakeholder input to influence environmental stewardship decisions. Environmental stewardship practices extend outside the Permit through the implementation of LANL's internationally certified Environmental Management System (EMS). To minimize effects to human health and the environment, the EMS dictates that projects be planned and implemented to reduce or wholly eliminate the generation of hazardous waste.

3.0 WHO IS CONSULTED?

LANL interacts with diverse sectors of the public: the tribal and pueblo governments contiguous with LANL and their members, nearby communities, citizen and civic groups, federal, state, and local elected officials, surrounding communities, LANL workers and

LANL ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

The EMS is a continuing cycle of planning, implementing, evaluating, and improving processes and actions undertaken to achieve environmental goals.

It is the policy of LANL that we will

- Approach our work as responsible stewards of our environment to achieve our mission.
- Comply with legal and regulatory requirements.
- Prevent pollution by identifying and minimizing environmental risk.
- Set quantifiable objectives, monitor progress and compliance, and minimize consequences to the environment stemming from our past, present and future operations.
- Not compromise the environment for personal, programmatic, or operational reasons.

their families, and the interested public. To prepare the CRP, LANL solicited comments from communities, organizations, and interested members of the public.

4.0 ELEMENTS OF THE PLAN

Consistent with the terms of the Permit, the CRP provides for six elements of community relations. The plan describes how LANL will

- (1) establish an open working relationship with communities and interested members of the public;
- (2) establish a productive government-to-government relationship with local tribes and pueblos (though the Plan will describe establishing relationships with local tribes, government-to-government relationships are conducted between the DOE and the pueblos);
- (3) keep communities and interested members of the public informed of Permit actions of interest;
- (4) minimize disputes and resolve differences with communities and interested members of the public;
- (5) provide a mechanism for the timely dissemination of information in response to individual requests; and
- (6) provide a mechanism for communities and interested members of the public to provide feedback and input to the Permittees.

Where to find out about for LANL's environmental activities:

- Website www.lanl.gov/environment
- Electronic Public Reading Room www.EPRR.lanl.gov
- [E-mail notifications](#)
- Physical [Public Reading Room](#)
- News stories
- Northern New Mexico Citizens' Advisory Board
- New Mexico Community Foundation
- Information telephone line 505-670-5359
- E-mail address for questions and comments: envoutreach@lanl.gov

5.0 COMMUNITY RELATIONS PLAN

The following elements constitute the CRP. Each section responds to one of the six elements required in the Permit as listed in Section 4.0. The CRP is meant to be comprehensive but will also be a living document, informed by our public and updated annually by September 1 to include the input we receive.

5.1 ESTABLISH AN OPEN WORKING RELATIONSHIP WITH COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC

LANL environmental stewardship and hazardous waste management activities have become increasingly transparent and responsive to public requests.

Results from our annual Community Leaders Survey showed a steady increase in community members satisfied that LANL's conducts environmental stewardship, monitoring, and remediation effectively. The satisfaction rate increased from 63% in 2008 to 70% in 2009 and to 73% in 2010. Through the CRP, we will use community input to continue the trend.

In 2010, LANL environmental organizations conducted over 300 public outreach activities.

5.1.1 Public Notification and Requests for Feedback: Face to Face, On-line, via E-mail, and through News Media

Solicitation for comments and suggestions is conducted throughout the year by several methods.

- LANL requests comments through periodic (but at least annual) letters to the NMED-maintained Facility Mailing List.
- Over 8000 e-mail subscribers have requested e-mail notification on information about LANL environmental activities at www.lanl.gov/environment.
- LANL publishes notices of upcoming opportunities in the Santa Fe New Mexican, the Albuquerque Journal North, the Rio Grande Sun, and the Los Alamos Monitor
- On the CRP website, users can provide feedback using a fillable form.
- LANL uses dialog at public meetings and with community groups to inform decisions.

LANL also requests specific feedback for consideration in the CRP update published by September 1 each year. Requests for feedback are sent annually to NMED-maintained Facility Mailing List and the e-mail subscribers to LANL environmental information. Comments and suggestions are compiled and posted to the CRP website by September 1 annually.

5.1.2 LANL Environmental Website www.lanl.gov/environment

The extensive website provides educational and informational content as well as e-mail and telephone contacts for submitting questions and comments throughout the year.

Using the LANL environmental website, members of the public may

1. read the CRP at www.lanl.gov/environment/waste/CRP.shtml,
2. submit comments and suggestions,
3. provide consent to allow the Permittees to post their suggested improvements to the CRP web page,
4. provide contact information to receive future information, and
5. consult the Community Calendar for information on upcoming events hosted by LANL, the DOE, and other organizations concerning LANL environmental activities.

5.1.3 Public Meetings and Briefings

To continually improve relationships and dialogue with the community, LANL hosts community meetings, formal public informational meetings for Class 2 and 3 permit modifications, and informal meetings with interested groups and citizens. LANL requests invitations from community groups to attend their meetings for the purpose of sharing information, discussing environmental actions, and encouraging public participation. LANL also participates in regularly scheduled public meetings held by the DOE, the New Mexico Community Foundation, local pueblos, the Northern New Mexico Citizens Advisory Board, and the New Mexico Environment Department.

Ways to Participate:

- Follow LANL in the news
- Visit www.lanl.gov/environment
- Sign up for e-mail notification at www.lanl.gov/environment
- Call 505-667-0216 with questions
- Attend public briefings
- Attend formal meetings
 - Class 2 permit modifications
 - Class 3 permit modifications
- Sign up with NMED to be on the Facility Mailing List

Definitions of Class 1, 2, and 3 Permit Modifications

Permit modifications are written to make changes to the LANL Hazardous Waste Facility Permit and are classified by degree of complexity.

Class 1 permit modifications can be self-implementing or requested. Class 1 permit modifications that are self-implementing are generally administrative or informational; clarifying a requirement, or correcting typographical errors within a permit. Self-implementing changes do not require approval. Class 1 permit modifications that require approval before implementation are requested changes that are still minor but are not strictly administrative or informational in nature.

Class 2 or class 3 permit modification requests are more complex and require a 60-day public comment period. Class 2 permit modification requests are substantial changes but are still minor enough that only small portions of the permit are changed. Class 2 permit modifications include making changes to the units within the permit that do not require an increase in the capacity of the unit, adding minor treatment processes to an existing unit, or making changes to monitoring requirements.

Class 3 permit modifications are generally major changes to a hazardous waste facility permit. They include extensions of final compliance dates, additions of container storage units that increase storage capacity by more than 25% for a facility, and the creation of a unit as part of corrective actions.

Specific requirements for all permit modifications can be found in 40 CFR §270.42.

5.1.4 Tours

Tours help acquaint the public with specific compliance and corrective action sites, particularly during investigation and cleanup activities. Written information supplements the discussions during the tours. By witnessing LANL facilities and operations for

themselves, citizens are better able to provide informed suggestions for improvements to environmental practices.

Tours are provided periodically by programs to acquaint the public with activities involving hazardous waste. Since there is not a regulatory requirement for tours and because much work at LANL is conducted in areas not accessible to the public, tour requests are considered on a case-by-case basis to minimize disruption of programmatic work. Tour requests may be made through email to envoutreach@lanl.gov.

5.1.5 Northern New Mexico Citizens Advisory Board

The Northern New Mexico Citizens Advisory Board (NNMCAB) is a DOE-chartered site-specific advisory board composed of volunteers whose purpose is to provide independent recommendations to DOE regarding corrective action and waste management activities. The NNMCAB is composed of citizens representing the communities and pueblos of northern New Mexico. The NNMCAB holds monthly public meetings and has chartered a number of subcommittees to address waste management, environmental surveillance, monitoring, and remediation. LANL provides information and tours to the NNMCAB and has staff participation in its board and committee meetings. www.nnmcab.energy.gov

5.1.6 Public Notice, Meetings and Events Calendar

On the Community Relations Plan website, www.lanl.gov/environment/waste/crp.shtml, the public will find notifications of upcoming events in a meetings and events calendar pertaining to LANL environmental operations. The LANL environmental web home page, www.lanl.gov/environment, lists public notices in the top of the right-hand column.

5.2 ESTABLISH A PRODUCTIVE GOVERNMENT-TO-GOVERNMENT RELATIONSHIP WITH LOCAL TRIBES AND PUEBLOS

The pueblos of northern New Mexico have well-established government-to-government relationships with Los Alamos National Laboratory as delineated in formal cooperative agreements and with the DOE as dictated in the Accord agreements.

DOE Policy 144.1, *Department of Energy American Indian Tribal Government Interactions and Policy*, communicates U.S. Department of Energy programmatic and field responsibilities in relationships with sovereign American Indian and Alaskan Native tribal governments.

Provisions in the CRP will be applied to augment these already robust agreements for the activities covered by the Permit, including waste management, closure and postclosure activities, and corrective actions. Pursuant to this goal, LANL meets regularly with the environment departments of pueblos and schedules periodic meetings with the governance of the pueblos and their citizenry to discuss specific topics.

5.3 KEEP COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC INFORMED OF PERMIT ACTIONS OF INTEREST

The major objective of the CRP is to keep communities and interested members of the public informed of Permit actions of interest, including cleanup activities, implementation of the contingency plan, and Permit modification requests.

5.3.1 Public Meetings and Briefings

LANL hosts community meetings and visits community groups to provide information. Groups include local and tribal governments, civic organizations, local and regional governments, schools and universities, and nonprofit organizations. The primary goals of these meetings are informational briefings, individual engagement, dialogue, and solicitation of feedback. Though only a few specifically timed public meetings are required before and after the submittal of modifications to the Hazardous Waste Facility Permit, LANL conducts many other outreach activities. For Permit modification meetings, LANL complies with the regulatory requirements for notification. Additional events help to familiarize the public with environmental stewardship, waste management, and remediation practices so the public may provide suggested improvements.

5.3.2 Mailing and Email Lists

The public is notified of events through mailings to the NMED-maintained Facility Mailing List. The Facility Mailing List consists of individuals, organizations, and government and tribal officials in northern New Mexico who have requested to be placed on the list or who have submitted comments on the LANL Hazardous Waste Facility Permit in the past. To be placed on the Facility Mailing List, contact

Mr. John E. Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Email: john.kieling@state.nm.us

Additionally, the public may sign up to receive the required notifications by e-mail when new actions or documents are generated relating to the Permit. The link for e-mail sign-up, "Get Updates," can be found at www.lanl.gov/environment.

5.3.3 Public Notification

In addition to the provisions in Section 5.3.2, the public is also notified through public service announcements on local radio stations; notices and advertisements in local newspapers; news releases and responses to queries from state, trade, and national media; and on LANL's website at www.lanl.gov/environment. Newspapers publishing notices and advertisements of LANL-related environmental meeting and events are the daily Albuquerque Journal North and Santa Fe New Mexican, the Rio Grande Sun

published weekly on Thursdays, and the Los Alamos Monitor published Tuesday through Friday and Sunday.

5.3.4 LANL Environmental Website

To provide educational materials and inform the public, the LANL environmental website, www.lanl.gov/environment, shares information organized by subject: air quality, biological resources, cleanup actions, compliance and monitoring, cultural resource management, risk reduction, waste management, and water resources.

5.3.5 Information Repository

LANL maintains two information repositories for environmental documents. Reports published pursuant to the requirements of the Permit and other pertinent information are posted to the electronic Public Reading Room at <http://epr.lanl.gov>.

The print Public Reading Room, currently located at the J. Robert Oppenheimer Study Center at corner of West Jemez and Casa Grande Roads in Los Alamos, contains the subset of printed hard-copy documents specified by the Permit. The print Public Reading Room is open to the public from 9:00 a.m. - 4:00 p.m., Monday through Friday. Please note that the Permittees are currently evaluating options for relocating the print Public Reading Room to another location in Pojoaque or Española at some time later in calendar year 2011.

In compliance with the requirements in Section 1.12 of the Permit, the following documents are in both the electronic and the print Public Reading Rooms:

- permit applications
- permit modification requests and NMED responses
- waste minimization reports
- biennial reports
- corrective action documents
- notices of disapproval (NODs), NOD responses, final approval letters, and NMED directions associated with the documents
- notices of violation (NOV), administrative compliance orders, responses required by NMED, and NMED directions associated with the Permit.

As new documents are issued, these are placed in both the electronic and print Public Reading Rooms within 10 days of submitting the information to NMED. Within 7 days, an e-mail, with a link to new documents, is sent to individuals who have subscribed to for any of the notifications under “Get Updates” on the environmental website at www.lanl.gov/environment.

LANL will conduct training annually to teach the public how to access and search the documents in the electronic and print Public Reading Rooms. Trainings will be conducted at the print Public Reading Room location.

5.3.6 Public Notice, Meetings and Events Calendar

On the Community Relations Plan website www.lanl.gov/environment/crp.shtml, the public will find an events calendar for meetings pertaining to LANL environmental operations. Public notices of other meetings and events are on the front page of the LANL environmental website at www.lanl.gov/environment.

5.3.7 RACER: Connecting Community, Science, and Environment

RACER is a tool that provides transparency and accessibility to the public regarding the environmental monitoring data collected in and around LANL. At the RACER website, <http://racernm.com/>, members of the public can access LANL environmental sampling data for their own analyses. As a public service, the RACER project also hosts a monthly meeting, the Forum for Environmental Education and Dialogue (FEED).

5.4 MINIMIZE DISPUTES AND RESOLVE DIFFERENCES WITH COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC

LANL's principal strategy for minimizing disputes is to comply meticulously with applicable permits, regulations, and laws, and then accurately document our compliance so that our regulator can approve LANL's hazardous waste management practices.

Conflict grows in the medium of misunderstanding. Even with differences of perspective, addressing issues can be collaborative. Our proactive process can minimize, prevent, and resolve conflict by first providing information in an understandable manner to a broad spectrum of community members as specified in Sections 5.1, 5.2, and 5.3 above.

Secondly, it is LANL's practice to employ facilitators to conduct public meetings and to accept public comments and suggestions through the mechanisms described above.

Finally, the Permittees give careful consideration to public comments and suggestions and work in consultation with communities and interested members of the public to resolve differences.

The Permittees will address comments that allow for a response and provide the response to the community or individual with whom it originated. Questions, suggestions, inquiries, and responses specific to the CRP will be posted to the LANL environmental web page, with the consent of the contributor.

5.5 PROVIDE A MECHANISM FOR THE TIMELY DISSEMINATION OF INFORMATION IN RESPONSE TO INDIVIDUAL REQUESTS

LANL is committed to being responsive to reasonable public requests. Our policy is to provide any member of the public access to information required by the Permit. In order to speed the process of responding, we use the provisions described in Section 5.1:

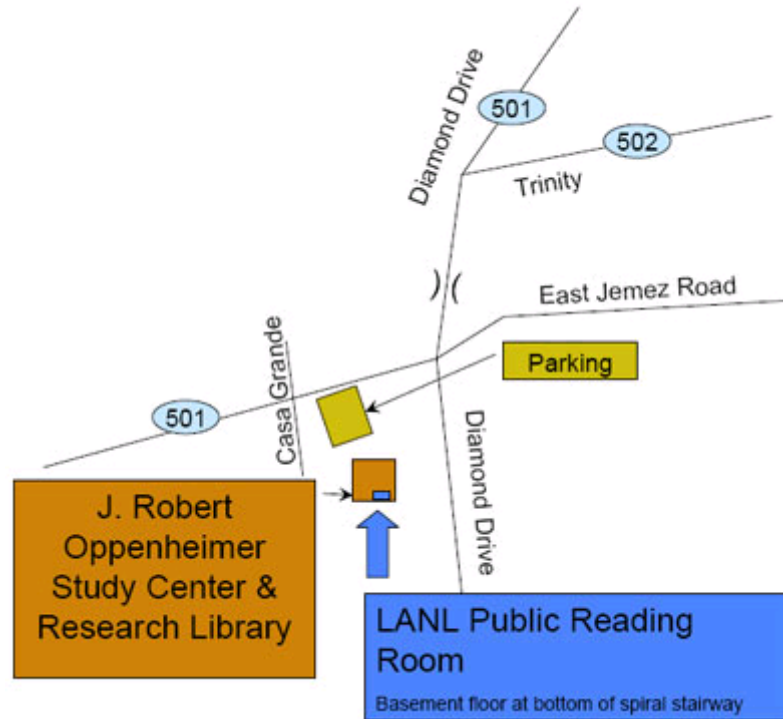
e-mail, telephone, and mail. For the quickest access, we provide web links to information in the electronic Public Reading Room whenever possible.

Visit the electronic Public Reading Room: eprr.lanl.gov

Call the Environmental Outreach Office: 505-667-0216

E-mail the Environmental Outreach Office: envoutreach@lanl.gov

Visit the print Public Reading Room: Monday through Friday, 9:00 a.m. – 4:00 p.m.
J. Robert Oppenheimer Study Center
West Jemez Road at Casa Grande
Los Alamos, NM [\(map\)](#)



5.6 PROVIDE A MECHANISM FOR COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC TO PROVIDE FEEDBACK AND INPUT TO THE PERMITTEES

The CRP provides the public with a variety of opportunities to get information personally, observe activities, discuss issues, and provide feedback. As required by regulation, meetings are held for the purpose of obtaining public comments and recommendations on certain proposed actions that involve Class 2 and 3 modifications of LANL's Hazardous Waste Facility Permit.



LANL provides opportunities for public involvement at any time via our website at www.lanl.gov/environment, and via e-mail, envoutreach@lanl.gov, as well as during Permit modification public meetings and project-specific presentations. With permission, public comments are posted to our website.

The CRP is updated annually by September 1. The public can submit comments throughout the year on the CRP website Comment Page at <http://www.lanl.gov/environment/waste/crp-comments.shtml>. We also solicit comments throughout the year at various public meetings conducted by LANL, the NNM CAB, the New Mexico Community Foundation and by other organizations.

LANL and DOE are required to document consultations, communications, agreements and disagreements between the Permittees and the public in developing the Community Relations Plan. Each year the Permittees compile and post public comments, statements, agreements, and disagreements on the Community Relations Plan web page. Comments are posted only with the permission of the contributor.

FOR FURTHER INFORMATION

Visit LANL's environmental website: www.lanl.gov/environment

Sign up for e-mail notification: [What is LANL doing?](#)

Visit the electronic Public Reading Room: <http://epr.lanl.gov>

Visit the print Public Reading Room: West Jemez Road at Casa Grande
Los Alamos, NM [\(map\)](#)

Call the Environmental Outreach Office: 505-667-0216

E-mail the Environmental Outreach Office: envoutreach@lanl.gov

Mailing address: Lorrie Bonds Lopez
Los Alamos National Laboratory
P.O. Box 1663, MS M996
Los Alamos, NM 87545