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Community Relations Plan

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Los Alamos National Laboratory
**HAZARDOUS WASTE FACILITY PERMIT
COMMUNITY RELATIONS PLAN**



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Hazardous Waste Facility Permit Community Relations Plan

1.0 INTRODUCTION

The mission of Los Alamos National Laboratory (the Laboratory) is to solve national security challenges through scientific excellence. Our vision is delivering science and technology to protect our nation and promote world stability.

In 2014, the Laboratory Strategic Plan confirmed this vision and mission, articulated values, and set forth goals. Particularly pertinent to our commitment to the community are our six values.

- Service: serving our country, our partners, our community and each other
- Excellence: ensuring timely mission execution through scientific, operational, and business excellence
- Integrity: building trust through intellectual honesty, ethical conduct and individual responsibility
- Teamwork: collaborating with colleagues and partners, respecting diverse opinions and backgrounds, vigorously debating alternatives, and coming together to achieve the best solutions
- Stewardship: being good stewards of the taxpayers' dollars, the Laboratory, our community and the environment.
- Safety & Security: Ensuring that safety and security are integral to everything we do

The requirements of the Hazardous Waste Facility Permit are fulfilled through execution of the fourth strategic goal: "Enabling mission delivery through next-generation facility, infrastructure, and operational excellence." With input from our stakeholders, we will continue to fulfill those requirements and to improve our waste operations.

In pursuing our national security mission, Los Alamos National Laboratory generates some hazardous and mixed waste. Hazardous waste is solid waste that can be 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 as the byproducts of operations. Title 40 Code of Federal Regulations (CFR), Part 261: [40 CFR Part 261 includes a complete description.](#)

ENVIRONMENTAL MANAGEMENT SYSTEM

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

We are committed to act as stewards of our environment to achieve our mission in accordance with all applicable environmental requirements. We set continual improvement objectives and targets, measure and document our progress, and share our results with our workforce, sponsors, and public. We reduce our environmental risk through legacy cleanup, pollution prevention, and long-term sustainability programs.

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) that established



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standards for the Laboratory 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 Los Alamos National Laboratory Permit page: <https://cloud.env.nm.gov/waste/?c=185&k=14aade0874>. The Permit expires on December 30, 2020.

The Laboratory 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 co-permittees (the Permittees) on the Los Alamos National Laboratory Hazardous Waste Facility Permit.

The Permit covers treatment and storage of hazardous waste in 27 facilities; 1 storage tank system at Technical Area 55 (TA-55), 1 cementation treatment unit at TA-55, 1 storage/treatment unit at TA-50, and 24 container storage units at TA-03, TA-50, TA-54, TA-55 and TA-63. Additionally, the Laboratory manages some units under interim status at TA-14, TA-16, TA-36, TA-39, and TA-54.

The Hazardous Waste Facility Permit 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 relation activities concerning the Laboratory's Hazardous Waste Facility Permit and coordinates with but does not include public involvement for other Laboratory programs or environmental activities.

2.0 PURPOSE OF THE COMMUNITY RELATIONS PLAN

The Laboratory is committed to communication with the public and to robust community involvement. Further, Section 1.12 of the Hazardous Waste Facility Permit requires that the Laboratory 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 post-closure activities, and corrective actions.

DEFINITIONS

Waste management is the generation, staging, storage, treatment, and handling of solid waste. This includes moving, repackaging, adding, and removing waste. Waste management activities and requirements are found in the Laboratory Hazardous Waste Facility Permit.

Closure procedures are implemented for hazardous waste management units when operations at permitted units 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.

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

The Laboratory 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 the Laboratory'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 limit or wholly eliminate the generation of hazardous waste.

3.0 WHO IS CONSULTED?

The Laboratory interacts with diverse sectors of the public and the community

- the tribal and pueblo governments contiguous with the Laboratory and their members,
- citizen and civic groups,
- federal, state, and local elected officials,
- surrounding communities,
- Laboratory workers and their families,
- the Northern New Mexico Citizens' Advisory Board (<http://energy.gov/em/nmccab/northern-new-mexico-citizens-advisory-board>),
- the Regional Coalition of LANL Communities (<https://regionalcoalition.org/>) and
- the interested public.

To prepare the CRP, the Laboratory solicited comments from communities, organizations, and interested members of the public. We collect comments continuously on our website at <http://www.lanl.gov/environment/protection/community-relations-plan.php>.

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 the Laboratory 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;
- (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.

5.0 COMMUNITY RELATIONS PLAN

Each section responds to one of the six elements required in the Permit as listed in Section 4.0. While the CRP is meant to be comprehensive, it 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

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

Every year, the Laboratory's Community Programs Office conducts a survey of local Community Leaders to gather information on Leaders' perspective of the Laboratory. The surveys can be found on www.lanl.gov/community/community-leaders-survey.php.

This year, one of the most significant improvements was in the Leaders' perspective of LANL's environmental stewardship. Seventy-three percent of Leaders surveyed express satisfaction with LANL's efforts to **provide effective environmental stewardship, monitoring and remediation**, with 29% noting they were *very satisfied*, compared to the 18 % of very satisfied Leaders' last year. Only 18% or leaders surveyed this year expressed dissatisfaction with LANL's environmental stewardship.

In August 2017, the Laboratory's Environmental Management System was recertified to an ISO 14001 Environmental Management System 2015 standard, which emphasizes the importance of public outreach and communication. The Laboratory's recertification to the new standard is a third-party affirmation of its commitment to public outreach and communication.

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.

- The Laboratory requests comments through periodic (but at least annual) letters to the NMED-maintained Facility Mailing List.

WHERE TO FIND OUT ABOUT LANL'S ENVIRONMENTAL ACTIVITIES

- Electronic Public Reading Room
EPRR.lanl.gov
- Physical [Public Reading Room](#)
- Website www.lanl.gov/environment
- News stories
- Northern New Mexico Citizens' Advisory Board
- [E-mail notifications](#)
- Contact the Environmental Outreach Office:
 - 505-667-0216
 - envoutreach@lanl.gov

- Almost 10,000 e-mail subscribers have requested e-mail notification on information about the Laboratory environmental activities at www.lanl.gov/environment.
- The Laboratory publishes notices of upcoming opportunities in publications including the Santa Fe New Mexican, the Albuquerque Journal North, the Rio Grande Sun, Los Alamos Monitor, and Los Alamos Daily Post.
- On the [CRP website](#), users can provide feedback using a fillable form.
- The Laboratory uses dialog at public meetings and with community groups to inform decisions.

The Laboratory also requests specific feedback for consideration in the CRP update published by September 1 each year. Requests for feedback are sent annually to e-mail subscribers that have requested environmental information. Comments and suggestions are compiled and posted to the CRP website by September 1 annually.

5.1.2 Los Alamos National Laboratory 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 Laboratory 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, and
4. provide contact information to receive future information.

5.1.3 Public Meetings and Briefings

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

5.1.4 Tours

Tours help acquaint the public with specific compliance and corrective actions sites, particularly during investigation and cleanup activities. Written information supplements the discussions during the tours. By experiencing the Laboratory facilities and operations for themselves, citizens are better able to provide informed suggestions for improvements to environmental practices.



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Programs provide tours periodically to acquaint the public with activities involving hazardous waste. Since there is not a regulatory requirement for tours and because much work at the Laboratory 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. Virtual tours of environmental sites at the Laboratory are available at <http://www.lanl.gov/projects/long-term-environmental-strategy/index.php>.

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 post-closure activities, and corrective actions. Pursuant to this goal, the Laboratory 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.

DEFINITIONS OF CLASS 1, 2, AND 3 PERMIT MODIFICATIONS

Permit modifications are written to make changes to the 2010 Los Alamos National Laboratory 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. 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 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 significant 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.

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

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

5.3.1 Public Meetings and Briefings

The Laboratory 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, the Laboratory conducts many other outreach activities. For Permit modification meetings, the Laboratory 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 whom have submitted comments related to the Hazardous Waste Facility Permit in the past. To be placed on the Facility Mailing List, contact

Neelam Dhawan
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Email: neelam.dhawan@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, "SUBSCRIBE," 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 a selection of many methods including 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; email notifications; and on the Laboratory's website at www.lanl.gov/environment.

5.3.4 Los Alamos National Laboratory Environmental Website

To provide educational materials and inform the public, the 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

The Laboratory 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 hardcopy Public Reading Room is located at the offices of the Northern New Mexico Citizens Advisory Board at 94 Cities of Gold Road in Pojoaque, New Mexico. This public reading room contains the subset of printed hard-copy documents specified by the Permit. The print Public Reading Room is open to the public from 8:00 a.m. - 4:00 p.m., Monday through Friday.

In compliance with the requirements in Section 1.12 of the Permit, the following documents are in both the electronic and the hardcopy 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 hardcopy Public Reading Rooms within 7 days of submitting the information to NMED. Within 5 days, an e-mail, with a link to new documents, is sent to individuals who have subscribed to for any of the notifications under "SUBSCRIBE" on the environmental website at www.lanl.gov/environment.

The Laboratory conducts training annually to teach the public how to access and search the documents in the electronic and print Public Reading Rooms. Trainings are conducted at a computer lab near the Laboratory so interested parties can get hands-on training on how to use the Electronic Public Reading Room and directions to the print Public Reading Room.

5.3.6 Public Notices and Meetings

In addition to advertisements in local newspapers, including Albuquerque Journal North, Santa Fe New Mexican, Rio Grande Sun, Los Alamos Monitor, and Los Alamos Daily Post.



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notices are also sent by mail and to email subscribers about meetings and events pertaining to the Permit. The link for e-mail sign-up, "SUBSCRIBE," can be found at www.lanl.gov/environment.

5.3.7 Intellus: Publicly Accessible Cloud-based Environmental Data Management System

IntellusNM (www.intellusnm.com) serves as the public interface for environmental data collected in and around Los Alamos National Laboratory by the Laboratory and the New Mexico Environment Department (NMED). With over 14 million records, the database provides a direct view into the data used by the Laboratory and NMED to make environmental decisions. Validated data is consistently formatted and automatically updated every night providing timely data availability and accuracy to the public.

Periodic computer-based trainings are conducted in northern New Mexico to train interested users on how to access the data, maps, tables, processes and graphs available in the system. Trainings are announced to subscribers via the email list and in newspaper advertisements.

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

The Laboratory'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 the Laboratory'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 the Laboratory'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 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

Los Alamos National Laboratory 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 for 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.

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 the Laboratory's Hazardous Waste Facility Permit.

The Laboratory 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/community-environment/environmental-stewardship/protection/community-relations-plan.php>. We also solicit comments throughout the year at various public meetings conducted by the Laboratory, the NNM CAB, and by other organizations.

The Laboratory 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

Call the Environmental Outreach Office: 505-667-0216

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

Send mail to the Environmental Outreach Office:

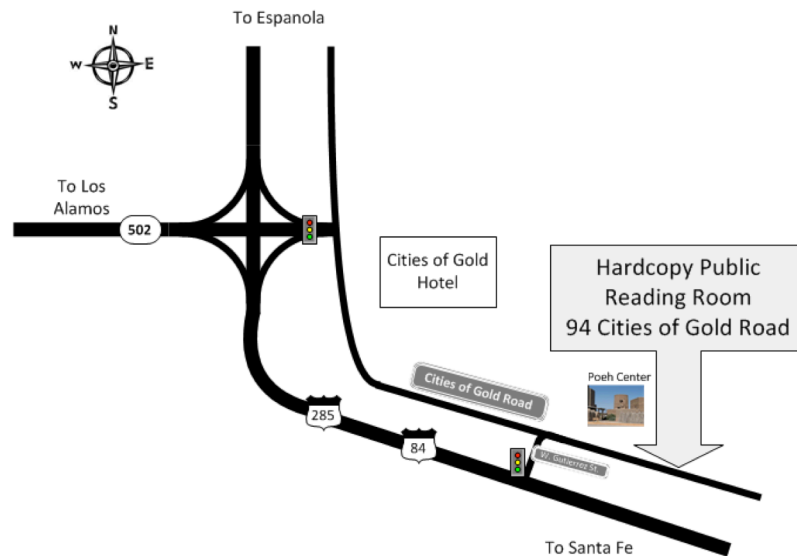
Environmental Outreach
Los Alamos National Laboratory
P.O. Box 1663, MS K491
Los Alamos, NM 87545

Visit our 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: Monday through Friday, 9:00 a.m. – 4:00 p.m.
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