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Community Relations Plan 2021

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Updated August 2021

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 (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.

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 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://www.env.nm.gov/hazardous-waste/lanl-permit/>. The Permit expired on December 30, 2020. A permit renewal application submitted in June 2020 is currently with NMED for their review and approval.

Permit Section 1.12 specifically requires that the Laboratory establish and implement a community relations plan. The purpose of the Community Relations Plan is to keep surrounding communities and interested members of the public informed about permit-related activities and to provide feedback mechanisms to gather comments and suggestions. Permit-related activities include, but are not limited to, waste minimization and pollution prevention, ongoing waste management operations, closure and post-closure activities, and corrective actions.

In 2021, the Laboratory Agenda provided a structured framework that identifies the critical outcomes, strategic initiatives and near-term R&D, and production and mission-support activities needed to accomplish our mission. One of the critical outcomes of the agenda includes sustaining and enhancing LANL's partnership with the community across the Northern New Mexico region through strategic initiatives including:

- Continue commitment to the community with educational, economic, and philanthropic investments of time and resources.
- Strengthen pipelines and partnerships to build the workforce of the future.

### DEFINITIONS

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

**Closure procedures** are conducted for every hazardous waste management unit when operations at 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.

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

**Legacy waste** is the waste generated by the Laboratory before 1999.

- Enhance small business participation in executing LANL's scope across all directorates.
- Demonstrate agility and flexibility in our partnerships, effectively balancing benefit and risk.

Triad's 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.

The Laboratory is owned by the U. S. Department of Energy's (DOE) National Nuclear Security Administration (NNSA) and operated under contract by Triad. Additionally, Newport News Nuclear BWXT-Los Alamos, LLC (N3B) performs legacy waste cleanup at the Laboratory under contract for DOE's Environmental Management Los Alamos Field Office (EM-LA). DOE, Triad, and N3B 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 24 facilities; 1 storage tank system at Technical Area 55 (TA-55), 1 cementation treatment unit at TA-55, 18 storage/treatment units at TA-3, TA-50, TA-54, TA-55, and TA-63. There are 7 container storage units at TA-54 and TA-55.

Additionally, there are units at the Laboratory under interim status at TA-14, TA-16, TA-36, TA-39, and TA-54. Triad has operational responsibility for units at TA-03, TA-14, TA-16, TA-36, TA-39, TA-50, TA-55, TA-63, and TA-54 West. N3B has operational responsibility for units at TA-54, Areas G, H, and L. In the process of pursuing our national security mission, the Laboratory generates some 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 and can be discarded commercial chemical products, such as cleaning fluids or pesticides, or as the byproducts of operations. Specific substances are listed in 40 Code of Federal Regulations (CFR), Part 261: [40 CFR Part 261](#). Mixed waste is a hazardous waste with a radiological component.

### Environmental Management System

The Triad National Security, LLC (Triad) Environmental Management System is a continuing cycle of planning, implementing, evaluating, and improving processes and actions undertaken to achieve environmental goals at Los Alamos National Laboratory.

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 the public. We reduce our environmental risk through pollution prevention, and long-term sustainability programs.

### 2.0 PURPOSE OF THE COMMUNITY RELATIONS PLAN

The Laboratory is committed to open, transparent, and bidirectional communication with the public and to robust community involvement.

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 management decisions. The Community Relations Plan identifies the scope of public involvement in the activities of the Permit. The Community Relations Plan is designed to cover only the community relations activities directly concerning the Permit and coordinates with, but does not include, public involvement for other Laboratory programs or environmental activities.

### 3.0 WHO IS CONSULTED?

The Laboratory interacts with diverse sectors throughout the surrounding region:

- the tribal and pueblo governments and their members contiguous with the Laboratory;
- 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/nmncab/northern-new-mexico-citizens-advisory-board>);  
and
- the interested public.

The Community Relations Plan is a living document. Therefore, to prepare and update the Community Relations Plan, the Laboratory solicits and encourages 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 Community Relations Plan provides for six elements of community relations. The plan describes how the Laboratory will:

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

#### WHERE TO FIND OUT ABOUT ENVIRONMENTAL ACTIVITIES AT LOS ALAMOS NATIONAL LABORATORY

##### Websites:

- Triad/NNSA information: [www.lanl.gov/environment](http://www.lanl.gov/environment)
- EM-LA/N3B information: [www.energy.gov/em-la](http://www.energy.gov/em-la)

##### Reading Rooms

- [The Laboratory's Electronic Public Reading Room](#)
- [Los Alamos Legacy Waste Cleanup Electronic Public Reading Room](#)
- Hard copy [Public Reading Room](#)

##### [E-mail notifications](#)

##### [News stories](#)

##### [Northern New Mexico Citizens' Advisory Board](#)

##### Phone contacts:

Triad Environmental Outreach Office: 505-551-4514  
EM-LA: 505-665-5658  
N3B: 505-257-7625

##### E-mail addresses for questions and comments:

- Triad/NNSA information: [envoutreach@lanl.gov](mailto:envoutreach@lanl.gov)
- EM-LA information: [publicaffairs.emla@em.doe.gov](mailto:publicaffairs.emla@em.doe.gov)



### 5.0 COMMUNITY RELATIONS PLAN

The following elements constitute the Community Relations Plan. Each section responds to one of the six elements required by the Permit and as listed in Section 4.0 (Elements of the Plan). While the Community Relations Plan is meant to be comprehensive, it is a living document, informed by our public and updated annually by September 1 each year to include the input we receive.

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

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

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

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

- The Laboratory requests comments through periodic letters to the NMED-maintained Facility Mailing List.
- Approximately 10,000 e-mail subscribers have requested e-mail notification on information about the Laboratory environmental activities at [www.lanl.gov/environment](http://www.lanl.gov/environment).
- The Laboratory publishes notices of upcoming Permit-related public events and community engagement opportunities in the Santa Fe New Mexican, the Albuquerque Journal North, the Rio Grande Sun, and the Los Alamos Daily Post.
- On the Community Relations Plan [website](#), users can provide feedback to this plan using a fillable form.
- The Laboratory uses comments and dialog with the public and community groups to inform decisions.

#### Ways to Participate:

- ↘ Follow the Laboratory in the news
- ↘ Visit environmental websites
- ↘ Sign up for e-mail notifications
- ↘ Call with questions
- ↘ Attend public briefings
- ↘ Attend formal meetings
  - Class 2 permit modifications
  - Class 3 permit modifications
  - Permit renewal
- ↘ Sign up with NMED to be on the Facility Mailing List

The Laboratory also requests specific feedback for consideration in the Community Relations Plan update published by September 1 each year. Comments and suggestions are compiled and posted to the Community Relations Plan website by September 1, annually.

### 5.1.2 Los Alamos National Laboratory Environmental Websites

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

- Triad/NNSA information: [www.lanl.gov/environment](http://www.lanl.gov/environment)
- EM-LA/N3B information: [www.energy.gov/em-la/](http://www.energy.gov/em-la/)

Using the Laboratory environmental websites, members of the public may:

1. read the Community Relations Plan at [www.lanl.gov/environment/protection/community-relations-plan.php](http://www.lanl.gov/environment/protection/community-relations-plan.php);
2. submit comments and suggestions;
3. provide consent to allow the Permittees to post their suggested improvements to the Community Relations Plan web page; and
4. provide contact information to receive future information.

### 5.1.3 Public Meetings and Briefings

The Laboratory strives to continually improve relationships and dialogue with the community, by hosting in person and virtual 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 U.S. Environmental Protection Agency, the Northern New Mexico Citizens' Advisory Board, and the New Mexico Environment Department.

### 5.1.4 Tours

Tours, in-person and virtual, can help to acquaint the public with specific regulatory compliance initiatives and corrective action sites, particularly during investigation and cleanup activities. Written information often supplements the discussions conducted during the tours. By experiencing the Laboratory facilities and operations for themselves, citizens are usually better able to provide informed suggestions for improvements to environmental policies, procedures, and practices.

Tours are provided periodically by various LANL programs to acquaint the public with activities involving hazardous waste. Since there is not a specific regulatory requirement for tours and because much work at the Laboratory is conducted in areas not accessible to the public due to safety and security concerns, 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](mailto:envoutreach@lanl.gov) and to [publicaffairs.emla@em.doe.gov](mailto:publicaffairs.emla@em.doe.gov) for legacy waste tours.

### 5.1.5 Public Notice, Meetings and Events Calendar

On the LANL Calendar at <https://www.lanl.gov/calendar/>, the public will find events and meetings pertaining to Laboratory operations. Notices are also sent by mail and to email subscribers about meetings and events pertaining to the Permit.

## **Definitions of Class 1, 2, and 3 Permit Modifications**

Permit modifications are submitted by the Permittees to the NMED to make changes to the 2010 Los Alamos National Laboratory Hazardous Waste Facility Permit and are designed to reflect adjustments and proposed improvements in administrative, informational and technical operations; these are systematically classified by the degree of complexity.

**Class 1 permit modifications** can be self-implementing or require approval prior to implementation. Class 1 permit modifications that are self-implementing are generally administrative or informational or replacing equipment with equivalent equipment. 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. Recent examples include the addition of a treatment processes at existing storage units. These are the most common changes to a permit.

**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 that involve reconfiguration of a unit that does not require an increase in the capacity of the unit, the addition of a unit that increases the facility capacity *less than 25%*, 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.

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

The pueblos of northern New Mexico have well-established relationships with the Laboratory as delineated in formal cooperative agreements, and government-to-government relationships 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



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field responsibilities in relationships with sovereign American Indian and Alaskan Native tribal governments.

Provisions in the Community Relations Plan are 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.

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

The major objective of the Community Relations Plan 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. Specifically timed public meetings are required before and after the submittal of modifications to the Permit, in addition, 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 who have submitted comments related to the Permit in the past. To be placed on the Facility Mailing List, contact:

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

Email: [neelam.dhawan@state.nm.us](mailto: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](http://www.lanl.gov/environment) or [epr.lanl.gov](http://epr.lanl.gov).

### 5.3.3 Public Notification

In addition to the mailing and emails discussed in Section 5.3.2, the public is also notified through a variety of 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; and on the environmental websites at [www.lanl.gov/environment](http://www.lanl.gov/environment) and at [www.energy.gov/em-la](http://www.energy.gov/em-la). Newspapers in which the Laboratory publishes notices and advertisements of Laboratory-related environmental meeting and events are the daily Albuquerque Journal North, the Santa Fe New Mexican, the Los Alamos Daily Post and the Rio Grande Sun published weekly on Thursdays.

### 5.3.4 Los Alamos National Laboratory Environmental Websites

To provide educational materials and inform the public, the Laboratory environmental website, [www.lanl.gov/environment](http://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. Information related to legacy cleanup and legacy waste management can be found at [www.energy.gov/em-la](http://www.energy.gov/em-la).

### 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 Rooms at <http://epr.lanl.gov>.

The hard copy 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 hard copy Public Reading Room is normally open to the public from 9:00 a.m. - 4:00 p.m., Monday through Friday. Currently, it is open by appointment only due to the COVID-19 pandemic. You can make an appointment by contacting 505-989-1662.

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

- permit applications
- permit modification requests and NMED responses
- waste minimization reports
- biennial reports
- permit-related 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 hard copy 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 any of the notifications under “SUBSCRIBE” on the environmental website at [www.lanl.gov/environment](http://www.lanl.gov/environment).

The Laboratory conducts training annually to teach the public how to access and search the documents in the electronic and hard copy Public Reading Rooms. Trainings are announced to subscribers via the email list and in newspaper advertisements.

### **5.3.6 Public Notice, Meetings and Events Calendar**

In addition to advertisements in local newspapers, the public will find an events calendar for meetings pertaining to Laboratory operations on the LANL Calendar at <https://www.lanl.gov/calendar/>. Notices are also sent by mail and to email subscribers about meetings and events pertaining to the Permit.

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

IntellusNM ([www.intellusnm.com](http://www.intellusnm.com)) serves as the public interface for environmental data collected in and around Los Alamos National Laboratory by the Laboratory, N3B 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, N3B, 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 meticulously comply 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 can grow in the medium of misunderstanding. Even with any potential differences of perspective, LANL is committed to addressing issues collaboratively. Our proactive communications process can minimize, prevent, and resolve conflict by first providing information in an understandable manner to a broad spectrum of community members as presented in Sections 5.1, 5.2, and 5.3 above.

Secondly, it is the Laboratory’s practice to employ professional and experienced facilitators to provide a safe space for listening and dialogue; to conduct public meetings and to accept public comments and suggestions through the mechanisms described above.



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Finally, the Permittees give careful consideration to public comments and suggestions and work in consultation with communities and interested members of the public to address any questions, clarifications, and/or resolve any potential 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 Community Relations Plan 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**

The Laboratory is committed to being responsive to reasonable public requests. The policy of all Permittees is to provide any member of the public access to information required by the Permit. In order to ensure prompt response to information requests, we use: e-mail, telephone, and mail as described in Section 5.1. Additionally, for the quickest access, we provide web links to information in the electronic Public Reading Room whenever possible.



Visit the electronic Public Reading Rooms: [epr.lanl.gov](http://epr.lanl.gov)

Call the Triad Environmental Outreach Office: 505-551-4514 or the EM-LA/N3B Office: 505-665-5658

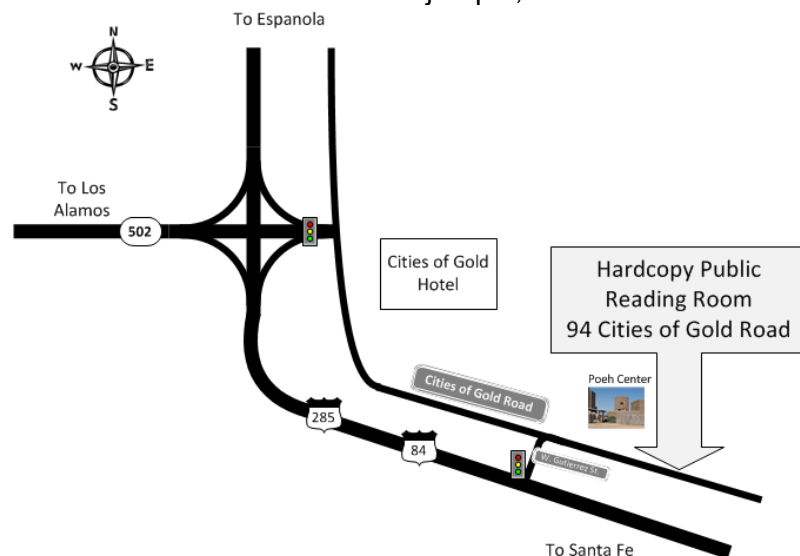
E-mail Triad/NNSA: [envoutreach@lanl.gov](mailto:envoutreach@lanl.gov)

EM-LA: [publicaffairs.emla@em.doe.gov](mailto:publicaffairs.emla@em.doe.gov)

Currently, open by appointment only due to the COVID-19 pandemic.

You can make an appointment by contacting 505-989-1662 and visit the print Public Reading Room at:

Monday through Friday, 9:00 a.m. – 4:00 p.m.  
Northern New Mexico Citizens' Advisory Board  
94 Cities of Gold Road  
Pojoaque, NM



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

The Community Relations Plan provides the public with a variety of opportunities to personally get information, 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 Permit.

The Laboratory also provides opportunities for public engagement at any time via our websites at [www.lanl.gov/environment](http://www.lanl.gov/environment) and [www.energy.gov/em-la](http://www.energy.gov/em-la), and via e-mail at [envoutreach@lanl.gov](mailto:envoutreach@lanl.gov) and [publicaffairs.emla@em.doe.gov](mailto:publicaffairs.emla@em.doe.gov), in addition to the public





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input collected during Permit modification public meetings and project-specific presentations. With permission, public comments are posted to our website.

The Community Relations Plan is updated annually by September 1. The public can submit comments throughout the year on the Community Relations Plan website Comment Page at <https://www.lanl.gov/environment/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.