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Community Relations Plan

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Los Alamos National Laboratory

Hazardous Waste Facility Permit Community Relations Plan



Contents

1	Introduction	1
2	Purpose of the Hazardous Waste Facility Permit Community Relations Plan.....	3
3	Who Is Consulted?	3
4	Elements of the Plan.....	4
5	Hazardous Waste Facility Permit Community Relations Plan.....	5
5.1	Establish and Cultivate an Open Working Relationship with Communities and Interested Members of the Public	5
5.1.1	Public Notification and Requests for Feedback: Face to Face, Online, via Email, and through News Media.....	5
5.1.2	Los Alamos National Laboratory Environmental Websites	5
5.1.3	Public Meetings and Briefings.....	6
5.1.4	Tours	7
5.1.5	Public Notice, Meetings, and Events Calendar.....	7
5.2	Establish and Cultivate a Productive Government-to-Government Relationship with Local Tribes and Pueblos.....	7
5.3	Keep Communities and Interested Members of the Public Informed of Permit Actions.....	7
5.3.1	Public Meetings and Briefings.....	7
5.3.2	Mailing and Email Lists.....	8
5.3.3	Public Notification.....	8
5.3.4	Los Alamos National Laboratory Environmental Websites	8
5.3.5	Information Repository	9
5.3.6	Public Notice, Meetings and Events Calendar.....	9
5.3.7	Intellus: Publicly Accessible Cloud-Based Environmental Data Management System	9
5.4	Minimize Disputes and Resolve Differences with Communities and Interested Members of the Public	10
5.5	Provide a Mechanism for the Timely Dissemination of Information in Response to Individual Requests.....	10
5.6	Provide a Mechanism for Communities and Interested Members of the Public to Provide Feedback and Input to the Permittees	12
6	Acronyms and Abbreviations	12



1 Introduction

The mission of Los Alamos National Laboratory (LANL or 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 (Chapter 74, Article 4 NMSA¹ 1978) and regulations under the Act. In 1989, the 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, the NMED renewed the Hazardous Waste Facility Permit (the Permit). The Permit expired on December 30, 2020. A permit renewal application submitted in June 2020 is currently with the NMED for their review and approval. Pending issuance of the renewed Permit, the 2010 Permit is administratively continued. 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/>.

Permit Section 1.12 specifically requires that the Laboratory establish and implement a community relations plan. The purpose of the Permit 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 2023, the Laboratory Agenda provided a structured framework that identifies the critical outcomes, strategic initiatives and near-term research and development, and production and mission-support activities needed to accomplish our mission. One of the critical outcomes of the agenda is to be recognized as a force for good by Northern New Mexico communities and trusted by stakeholders to perform missions with minimal operational issues:

- Partner proactively with National Nuclear Security Administration (NNSA) headquarters and the NNSA Los Alamos Field Office (NA-LA) to create new opportunities to earn the trust of and directly

¹ New Mexico Statutes Annotated 1978

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 activities** 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.

engage with New Mexico leaders and the public on operational competence and contributions to national security and other missions.

- Define and pursue novel and varied communication channels and technologies to reach employees both onsite and at offsite/remote locations to ensure internal communications are accurate, transparent, timely, responsive, and agile. Reinforce desired Laboratory culture, values, and organizational learning objectives, regardless of physical location of employees.
- Protect the Laboratory from reputational risks by proactive management of legal, regulatory, environmental, counterintelligence, and financial/audit risks and by promoting integrity throughout our Laboratory culture.
- Design and implement a regional educational partnership strategy with New Mexico schools, community colleges, and universities to support near-term and decadal institutional workforce capacity needs. Define and explore potential mechanisms to reach more high school and middle school students.
- Stimulate starting new companies by leveraging LANL technological innovations through Feynman Center for Innovation and provide expertise through the Community Technical Assistance program to position LANL as a driver for regional economic development.
- Partner with county and state entities in the community to promote infrastructure investments that enable increased capacity at LANL.
- Direct procurement effort to local vendors where possible and develop a strategy to strengthen and improve pueblo alliance.
- Optimize investment of philanthropic dollars to address critical socioeconomic needs and to make a lasting, significant impact on the wellbeing of the communities.

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.

Triad National Security, LLC (Triad), 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's) NNSA and operated under contract by Triad. Additionally, Newport News Nuclear BWXT-Los Alamos (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 Permit.

The Permit covers treatment and storage of hazardous waste in 24 facilities; 1 storage tank system at Technical Area (TA)-55; 1 cementation treatment unit at TA-55; and 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 also be discarded commercial chemical 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](#). Mixed waste is a hazardous waste with a radiological component.

2 Purpose of the Hazardous Waste Facility Permit 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 the 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 Permit 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 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/nnmcab/northern-new-mexico-citizens-advisory-board>); and
- the interested public.

The Permit Community Relations Plan is a living document. Therefore, to prepare and update the Permit 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 Elements of the Plan

Consistent with the terms of the Permit, the Permit Community Relations Plan provides for six elements of community relations. The plan describes how the Laboratory will

- establish and cultivate open working relationships with communities and interested members of the public;
- establish and cultivate productive government-to-government relationships with local tribes and pueblos;²
- proactively keep communities and interested members of the public informed of Permit actions;
- minimize disputes and justly resolve any differences with communities and interested members of the public;
- provide an accessible and equitable mechanism for the timely dissemination of information in response to individual requests; and
- 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 LANL

Websites

- NNSA/Triad information: www.lanl.gov/environment
- LANL Community Calendar: <https://www.lanl.gov/calendar/>
- EM-LA/N3B information: 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](#)

[Email notifications](#)

[News stories](#)

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

[New Mexico Environment Department](#)

Phone contacts

NA-LA: 505-667-6691

Triad Environmental Outreach Office: 505-551-4514

EM-LA: 505-665-5658

N3B: 505-257-7625

Email addresses for questions and comments

- NNSA/Triad information: envoutreach@lanl.gov
- EM-LA information: publicaffairs.emla@em.doe.gov
- N3B information: N3Boutreach@em-la.doe.gov

² The Permit Community Relations Plan describes establishing relationships with local tribes; however, government-to-government relationships are conducted between the DOE and the local tribes and pueblos.

5 Hazardous Waste Facility Permit Community Relations Plan

The following elements constitute the Permit Community Relations Plan. Each section responds to one of the six elements required by the Permit and as listed in Section 4, Elements of the Plan. While the Permit 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 Email, and through News Media*

Solicitation for comments and suggestions is conducted throughout the year by the following methods:

- The Laboratory requests comments through periodic letters to the NMED-maintained Facility Mailing List.
- Approximately 10,000 email subscribers have requested email notification for information about the Laboratory's environmental activities at 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 Permit [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.

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

5.1.2 *Los Alamos National Laboratory Environmental Websites*

The following websites provide educational and informational content, as well as email and telephone contacts for submitting questions and comments throughout the year.

- NNSA/Triad information: www.lanl.gov/environment
- Environmental Management Los Alamos (EM-LA)/N3B information: www.energy.gov/em-la/

Ways to Participate

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

Using the Laboratory environmental websites, members of the public may

- read the Permit Community Relations Plan at www.lanl.gov/environment/protection/community-relations-plan.php,
- submit comments and suggestions,
- provide consent to allow the Permittees to post their suggested improvements to the Permit Community Relations Plan web page, and
- 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 NMED.

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 permit modifications 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 are 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 treatment processes at existing storage units. Class 1 permit modifications 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 that involve reconfiguration of a hazardous waste management 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 percent 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 percent 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, 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, the Laboratory considers tour requests on a case-by-case basis to minimize disruption of programmatic work. Tour requests may be made via email to envoutreach@lanl.gov and to publicaffairs.emla@em.doe.gov for legacy waste tours.

5.1.5 Public Notice, Meetings, and Events Calendar

Events and meetings pertaining to Laboratory operations can be found on the LANL Calendar at <https://www.lanl.gov/calendar/>. Notices about meetings and events pertaining to the Permit are also sent by mail and to email subscribers.

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

Provisions in the Permit 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 Permit 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, New Mexico 87505

Email: neelam.dhawan@env.nm.gov

Additionally, the public may sign up to receive the required notifications by email when new actions or documents are generated relating to the Permit. The link for email sign-up, “SUBSCRIBE,” can be found at www.lanl.gov/environment or epr.lanl.gov.

5.3.3 Public Notification

In addition to the mailings 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 and at www.energy.gov/em-la. Newspapers in which the Laboratory publishes notices and advertisements of Laboratory-related environmental meetings and events are the daily *Albuquerque Journal North*, the *Santa Fe New Mexican*, and 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’s environmental website, <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.

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. to 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 the NMED responses;
- waste minimization reports;
- biennial reports;
- permit-related corrective action documents;
- notices of disapproval (NODs), NOD responses, final approval letters, and the NMED directions associated with the documents; and
- notices of violation (NOV), administrative compliance orders, responses required by the NMED, and the 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 the NMED. Within 7 days, an email, 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.

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) serves as the public interface for environmental data collected in and around LANL by the Laboratory, N3B and the NMED. With more than 14 million records, the database provides a direct view into the data used by the Laboratory, N3B, and the NMED to make environmental

decisions. Validated data are 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.

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.

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, provide 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 from whom it originated. Questions, suggestions, inquiries, and responses specific to the Permit Community Relations Plan will be posted to the environmental web page (with 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. To ensure prompt response to information requests, we use email, telephone, and mail as described in Section 5.1. For the quickest access, we also provide web links to information in the electronic Public Reading Room whenever possible.

Access Public Information Required by the Permit

Visit the electronic Public Reading Rooms: epr.lanl.gov

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

Email NNSA/Triad: envoutreach@lanl.gov
EM-LA: publicaffairs.emla@em.doe.gov

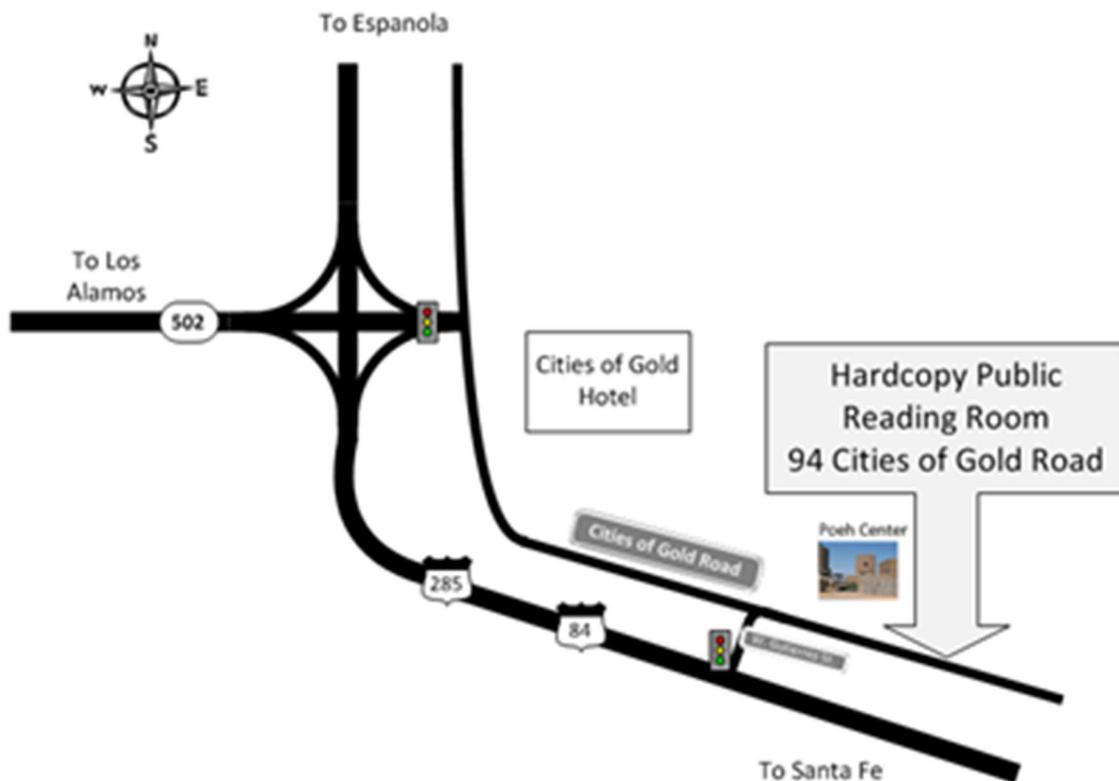
Currently open by appointment only due to the COVID-19 pandemic.

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

You can make an appointment to visit the print Public Reading room by calling 505-989-1662.

The print Public Reading Room is located at:

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 Permit 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 and www.energy.gov/em-la, and via email at envoutreach@lanl.gov and publicaffairs.emla@em.doe.gov, in addition to the public input collected during permit modification public meetings and project-specific presentations. With permission, public comments are posted to our website.

The Permit Community Relations Plan is updated annually by September 1. The public may submit comments throughout the year through the Permit Community Relations Plan website Comment Page at <https://environment.lanl.gov/community-relations-plan/>. We also solicit comments throughout the year at various public meetings conducted by the Laboratory, the Northern New Mexico Citizens' Advisory Board, and other organizations.

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

6 Acronyms and Abbreviations

Acronym	Definition
CFR	Code of Federal Regulations
DOE	(U.S.) Department of Energy
EM-LA	Environmental Management Los Alamos (Office, DOE Environmental Management)
EMS	Environmental Management System
EPA	Environmental Protection Agency
LANL	Los Alamos National Laboratory
N3B	Newport News Nuclear BWXT-Los Alamos
NMED	New Mexico Environment Department
NA-LA	NNSA Los Alamos Field Office
NNSA	National Nuclear Security Administration
NOD	Notice of Disapproval
NOV	Notice of Violation
TA	Technical Area