



**Sandia
National
Laboratories**

**RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
OPERATING PERMIT
COMMUNITY RELATIONS PLAN**

SANDIA NATIONAL LABORATORIES, NEW MEXICO

AUGUST 2016



**U.S. DEPARTMENT OF
ENERGY**

**United States Department of Energy
National Nuclear Security Administration
Sandia Field Office**

Sandia National Laboratories is a multi-mission laboratory managed and operated by Sandia Corporation, a wholly owned subsidiary of Lockheed Martin Corporation, for the U.S. Department of Energy's National Nuclear Security Administration under contract DE-AC04-94AL85000. SAND2016-7767 O

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ACRONYMS AND ABBREVIATIONS

AOC	Area of concern
CRP	Community Relations Plan
DOD	(United States) Department of Defense
DOE	(United States) Department of Energy
EPA	(United States) Environmental Protection Agency
IR	Information repository
KAFB	Kirtland Air Force Base
NMED	New Mexico Environment Department
NNSA	National Nuclear Security Administration
No.	Number
RCRA	Resource Conservation and Recovery Act
Sandia	Sandia Corporation
SNL	Sandia National Laboratories
SNL/NM	Sandia National Laboratories, New Mexico
SWMU	Solid waste management unit

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1.0 INTRODUCTION AND BACKGROUND

Sandia National Laboratories (SNL) is a multi-program laboratory managed and operated by Sandia Corporation (Sandia), a wholly-owned subsidiary of Lockheed Martin Corporation, for the United States Department of Energy (DOE) National Nuclear Security Administration (NNSA). The original mission, to provide engineering design, systems engineering, and integration for the nonnuclear components of the nation's nuclear weapons, continues today. Our unique mission responsibilities create a foundation from which Sandia leverages capabilities to solve complex national security problems. As a multidisciplinary national laboratory and federally funded research and development center, Sandia accomplishes tasks that are integral to the mission and operation of our sponsoring agencies by:

- Anticipating and resolving emerging national security challenges
- Innovating and discovering new technologies to strengthen the nation's technological superiority
- Creating value through products and services that solve important national security challenges
- Informing the national debate where technology policy is critical to preserving security and freedom throughout our world

1.1 Background

Sandia generates hazardous and mixed wastes during ongoing operations in support of the objectives listed above; the operations include research and development, testing, production, maintenance, decommissioning, demolition, and waste management.

Hazardous wastes are wastes that are dangerous or potentially harmful to human health or the environment. Management of hazardous wastes is regulated by the New Mexico Environment Department (NMED) pursuant to New Mexico Hazardous Waste Act (Chapter 74, Article 4 of the New Mexico Statutes Annotated 1978) and the implementing regulations in Title 20, Chapter 4, Part 1 of the New Mexico Administrative Code. These regulations incorporate the requirements of the federal regulations found in Title 40 of the Code of Federal Regulations, Parts 260-273.

Mixed wastes are wastes that have both a radioactive and hazardous component. The regulations described above apply to the hazardous aspects of mixed waste, and regulations and policies developed by the DOE under the authority of the Atomic Energy Act (AEA) of 1954 as amended and updated apply to the radioactive component of mixed wastes.

SNL is owned by the DOE/NNSA and is operated by Sandia. Hazardous and mixed waste management activities at Sandia National Laboratories, New Mexico (SNL/NM) are subject to Resource Conservation and Recovery Act (RCRA) Facility Operating Permit Number (No.) NM5890110518 (the Permit), issued to the DOE/NNSA and Sandia by the NMED. The Permit took effect February 26, 2015 and expires on February 25, 2025. More information can be found

at <https://www.env.nm.gov/HWB/snlperm.html> under the heading “SNL Permit and Corrective Action Complete.”

1.2 Hazardous and Mixed Waste Management at Sandia National Laboratories, New Mexico

Hazardous and mixed wastes are stored and/or treated at nine waste management units at SNL/NM under the Permit, and one additional unit is undergoing post-closure care under the Permit. These ten units and waste management activities are summarized in Table 1. The locations of the ten units are shown in Figure 1.

In addition to the waste management activities listed in Table 1, the DOE/NNSA and Sandia perform corrective action as necessary to protect human health and the environment from releases of hazardous wastes and hazardous constituents from solid waste management units (SWMUs) and areas of concern (AOCs) at SNL/NM. These SWMUs and AOCs have been identified by the NMED; they include locations of past testing or waste management activities. Corrective action is conducted under the requirements in the Permit or in the Compliance Order on Consent dated April 29, 2004 between the NMED, the DOE/NNSA, and Sandia.

The SWMUs and AOCs at SNL/NM are listed in Permit Attachment K and are shown in Figure 2. Provisions for maintenance of long-term controls at the SWMUs and AOCs that need them are specified in Permit Attachment M.

1.3 Document Organization

This Community Relations Plan (CRP) describes the scope of public involvement in the hazardous and mixed waste management activities of the Permit. The CRP is designed to cover only the community relations activities concerning the Permit and coordinates with, but does not include, other SNL/NM programs or environmental activities.

Permit requirements and updates to the CRP are described in Section 2. Ongoing activities and sources of information regarding hazardous and mixed waste management at SNL/NM are described in Section 3.

Table 1
 Hazardous and Mixed Waste Management Activities and Units Subject to the RCRA Facility Operating Permit
 at Sandia National Laboratories, Albuquerque, New Mexico

Unit	Hazardous Wastes	Mixed Wastes	Operations
Hazardous Waste Handling Unit	Various	Various	<ul style="list-style-type: none"> • Storage in containers • Repackaging
Manzano Storage Bunkers (5 units)	Various	Various	<ul style="list-style-type: none"> • Storage in containers
Radioactive and Mixed Waste Management Unit	Various	Various	<ul style="list-style-type: none"> • Storage in containers • Treatment by various methods • Repackaging
Auxiliary Hot Cell Unit	Various	Various	<ul style="list-style-type: none"> • Storage in containers • Treatment by various methods • Repackaging
Thermal Treatment Unit	Specific explosive hazardous waste	None	<ul style="list-style-type: none"> • Treatment by open burning
Corrective Action Management Unit	Holds treated soil from the Chemical Waste Landfill	Holds treated soil from the Chemical Waste Landfill	<ul style="list-style-type: none"> • Post-closure care

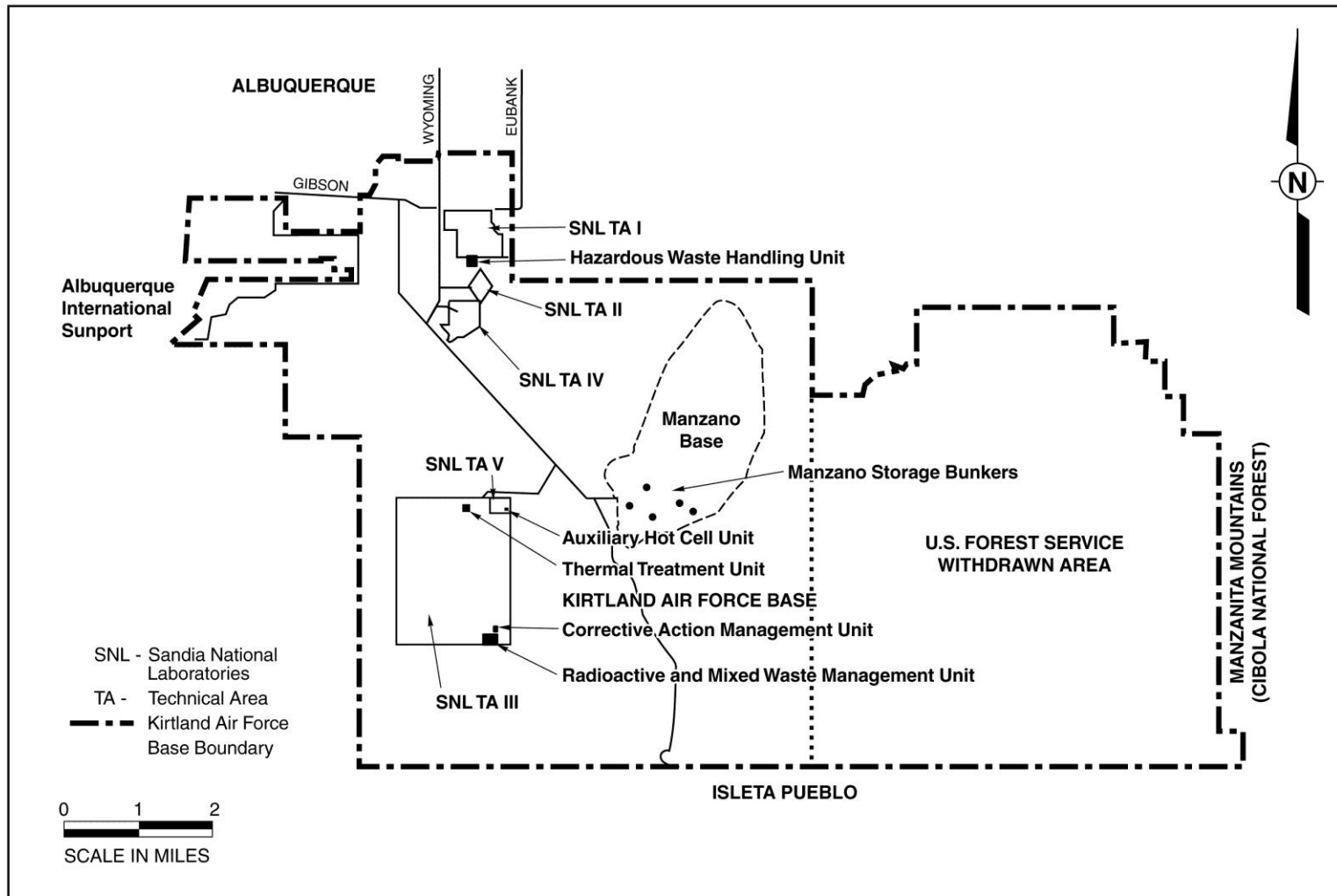


Figure 1
Location of Permitted Hazardous and Mixed Waste Units at Sandia National Laboratories
Albuquerque, New Mexico

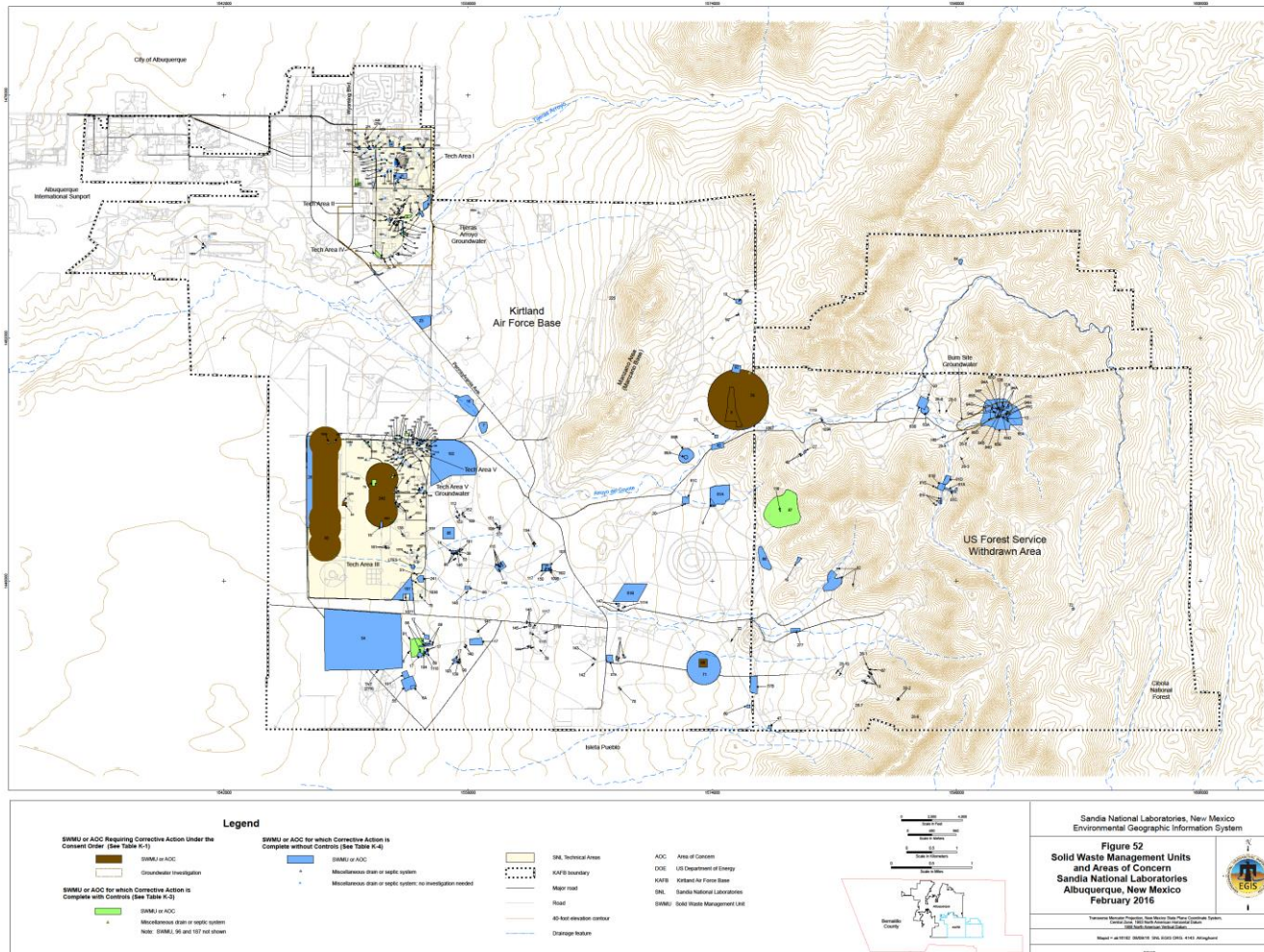


Figure 2
 Location of Solid Waste Management Units and Areas of Concern at Sandia National Laboratories
 Albuquerque, New Mexico

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2.0 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY OPERATING PERMIT REQUIREMENTS

The DOE/NNSA and Sandia work to enhance environmental stewardship practices and to inform the public of the status of Permit compliance. In accordance with Section 1.18 of the Permit, the DOE/NNSA and Sandia have developed this CRP to keep the interested members of the public informed about Permit-related activities. The following Permit-related activities are addressed in this CRP:

- Waste management at units listed in Table 1;
- Closure;
- Post-closure care;
- Corrective action; and
- Maintenance of long-term controls.

2.1 Topics Addressed in the Community Relations Plan

The CRP requirements are specified in the Part 1, Section 1.18 of the Permit. The CRP describes how the DOE/NNSA and Sandia "...will keep communities and interested members of the public informed of Permit-related activities, including waste management, closure, post-closure, and corrective action (NMED, January 2015)." The CRP describes how the DOE/NNSA and Sandia will:

- 1. Establish an open working relationship with communities and interested members of the public;*
- 2. Keep communities, the Pueblo of Isleta, and interested members of the public informed of permit actions of interest (e.g., clean-up activities, implementation of the Contingency Plan, Permit modification requests);*
- 3. Attempt to minimize disputes and resolve differences with communities, the Pueblo of Isleta and interested members of the public;*
- 4. Provide a mechanism for the timely dissemination of information in response to individual requests; and*
- 5. Provide a mechanism for communities, the Pueblo of Isleta, and interested members of the public to provide feedback and input to the Permittees semi-annually. (Excerpt from Part 1, Section 1.18 of the Permit)*

2.2 Approval of the Community Relations Plan

The draft CRP was submitted to the NMED on August 24, 2015. On December 18, 2015, the NMED made the draft CRP available to the public and announced a 30-day public comment period that concluded on January 17, 2016. The NMED received and reviewed one comment, and approved the CRP on January 29, 2016 without modification. In March 2016, the DOE/NNSA and Sandia posted the approved CRP at http://www.sandia.gov/news/publications/environmental_reports/index.html

2.3 Revisions to the Community Relations Plan

In 2016, the DOE/NNSA and Sandia reviewed the CRP and solicited comments during a public meeting on April 28. No comments were received during or after the meeting. No comments have been received at envinfo@sandia.gov as of August 1.

The CRP has been updated to reflect the following:

- Submittal and approval of the initial CRP;
- Approval of a Class 3 modification to the Permit granting Corrective Action Complete with controls status for SWMU 76 at SNL/NM; and
- Administrative updates and clarification to information presented in the CRP.

In the future the DOE/NNSA and Sandia will continue to review the CRP annually by June 30 and will update it as necessary. When the CRP is updated, it will be submitted to NMED by September 15.

3.0 COMMUNITY RELATIONS PLAN FOR SANDIA NATIONAL LABORATORIES

The DOE/NNSA and Sandia are committed to environmental stewardship. Recycling, establishing community environmental partnerships, incorporating sustainable design in new and renovated facilities, and environmental restoration are all integral parts of Sandia's environmental stewardship.

The DOE/NNSA and Sandia provide information about SNL/NM in a variety of ways, and provide numerous opportunities for interested persons to provide input. These are summarized in the seven elements of the CRP that are presented in the following sections. The CRP elements address the five topics that are specified in Section 1.18 the Permit and listed in Section 2.1 of this document. Specifically:

- The DOE/NNSA and Sandia plan to establish an open working relationship by implementing the CRP elements (e.g., information availability, meetings and tours, notices and meeting agendas, response to questions, opportunities for providing feedback, and consideration of feedback) discussed in Sections 3.1 through 3.4, 3.6, and 3.7.
- Interested persons can stay informed by using the resources listed in Section 3.5.
- Attempts to minimize disputes are addressed in Section 3.7.
- The DOE/NNSA and Sandia disseminate information in response to questions as discussed in Section 3.4.
- Mechanisms for providing feedback to the DOE/NNSA and Sandia are described in Section 3.6.

3.1 Documents and Information

Reports, other documents, and correspondence related to the Permit are available for review in the Information Repository (IR) located at Zimmerman Library, located near Roma Avenue and Yale Boulevard on the University of New Mexico main campus in Albuquerque. Information about Zimmerman Library is available at <http://library.unm.edu/about/libraries/zim.php>. Electronic copies are expected to be available at a later date.

An index of the IR is available on Sandia's environmental website at <http://www.sandia.gov/RCRA/>. A link to the index is also available at <http://www.sandia.gov/about/environment/index.html>. Interested persons can select documents of interest from the index and obtain instructions for reviewing them at Zimmerman Library.

Selected documents are available online through the University of New Mexico at <http://repository.unm.edu/handle/1928/10963>.

Hazardous waste permits and other documents related to hazardous and mixed waste management at SNL/NM are available on the NMED Hazardous Waste Bureau website at <https://www.env.nm.gov/HWB/snlperm.html>.

3.2 Meetings and Tours

The DOE/NNSA provides information about ongoing environmental activities at semi-annual public meetings. These are typically joint meetings with the United States Department of Defense (DOD), and are held in the evenings; one meeting in April, and one in October. The meetings have been held at a community center near KAFB. Future meetings may be held in community centers or other locations. To receive agendas for these meetings, subscribe to the list for semi-annual public meetings described in Section 3.3.2.

New Mexico regulations specify the public notice steps that the DOE/NNSA and Sandia are required to take when requesting a modification to the Permit for SNL/NM. There are three classes of permit modifications (i.e., Class 1, Class 2, and Class 3) and the public notice requirements differ. We hold public meetings to provide information and solicit comments when requesting Class 2 or Class 3 permit modifications. We may hold these permit-related public meetings in conjunction with the DOE/NNSA semi-annual meetings, or we may hold separate permit-related public meetings. Meetings for Class 2 and Class 3 permit modifications may include posters or presentations with question-and-answer sessions. Notices for permit-related meetings are published in the *Albuquerque Journal* and sent to people on the NMED facility list described in Section 3.3.

The DOE/NNSA and Sandia may provide tours of selected waste management units, SWMUs, and AOCs. Group size will be limited for each tour, and visitors who attend will need to comply with all requirements for access to SNL/NM and Kirtland Air Force Base. Tour requests will be considered on a case-by-case basis to minimize disruption of ongoing research and development work. Tour requests may be made through email to envinfo@sandia.gov. If tours are scheduled that are available to members of the public, information will be included with agendas for semi-annual public meetings

3.3 Mailing Lists

3.3.1 List for Information Repository

The DOE/NNSA and Sandia will update the IR and its index after submitting documents to the NMED or receiving documents from the NMED as specified in Permit Part 1, Section 1.17. Interested persons can subscribe to notified by email of updates to the IR and its index after new documents are added.

- Go to the IR index at <http://www.sandia.gov/RCRA/> or follow the link on <http://www.sandia.gov/about/environment/index.html>. Select “Information Repository Updates” on the subscription menu, or
- Send an email to envinfo@sandia.gov.

3.3.2 List for Semi-Annual Public Meetings

The DOE/NNSA and Sandia also maintain a mailing list of people and organizations who are interested in attending the semi-annual public meetings hosted by the DOE/NNSA. Each meeting agenda includes instructions for updating your contact information. To subscribe to the mailing list, people and organizations can do either of the following:

- Go to the IR index at <http://www.sandia.gov/RCRA/> or follow the link on <http://www.sandia.gov/about/environment/index.html>. Select “Public Meeting Agendas” on the subscription menu, or
- Send an email to envinfo@sandia.gov.

3.3.3 New Mexico Environment Department Facility List

The NMED maintains a mailing list of people and organizations who are interested in hazardous and mixed waste permitting activities at SNL/NM. To subscribe to this list, contact

Program Manager, Permits Program
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

The DOE/NNSA and Sandia send notices to people on this list every time we request a modification to the Permit.

3.4 Questions and Requests for Information

The DOE/NNSA and Sandia are committed to being responsive to reasonable public requests. Many documents are available in the IR, online through the University of New Mexico at <http://repository.unm.edu/handle/1928/10963>, or online through the NMED Hazardous Waste Bureau at <https://www.env.nm.gov/HWB/snlperm.html>. We recommend reviewing these sources first to avoid waiting for a response.

To ask a question about hazardous and mixed waste management, closure, post-closure care, corrective action, long-term controls, or other Permit-related activity, send an email to envinfo@sandia.gov.

To request other documents, please review the information available at the National Nuclear Security Administration Freedom of Information Act website <http://nnsa.energy.gov/about/ouoperations/generalcounsel/foia>.

3.5 Keeping Informed About Permit Actions of Interest

Interested persons may use any one or more of the following to keep informed about hazardous waste permits, hazardous and mixed waste management, and environmental cleanup activities at SNL/NM.

- Follow SNL/NM in the news,
- Visit Sandia's environmental website at <http://www.sandia.gov/about/environment/index.html>,
- Attend semi-annual public meetings and permit-related public meetings, or
- Subscribe to mailing lists.

3.6 Providing Feedback to the Department of Energy and Sandia

There are several ways for people or organizations to provide feedback.

The DOE/NNSA and Sandia provide opportunities for public involvement at any time via Sandia's environmental website at <http://www.sandia.gov/about/environment/index.html>, and via e-mail to envinfo@sandia.gov.

Interested persons are welcome to provide feedback to the DOE/NNSA and Sandia at meetings and presentations, including

- Semi-annual public meetings in April and October. Comment cards are available at the meetings, and presenters solicit questions when time allows.
- Public meetings for Class 2 and 3 modifications to the Permit. Comments will be solicited and comment submittal instructions will be available at each meeting.

This CRP is reviewed annually by June 30 and updated as necessary. Interested persons are welcome to submit comments throughout the year to envinfo@sandia.gov regarding the CRP. Please include "CRP" in the subject line of the message. The DOE/NNSA and Sandia will also solicit comments during the semi-annual public meeting each April.

If the CRP is updated, it will be submitted to NMED for review by September 15th. The updated plan will be posted on the Sandia environmental website at <http://www.sandia.gov/about/environment/index.html> following NMED review and approval.

3.7 Minimizing Disputes

The DOE/NNSA and Sandia give careful consideration to feedback, comments, and suggestions received during semi-annual meetings and other permit-specific public meetings.

The DOE/NNSA and Sandia will address comments that allow for a response and provide the response to the organization or individual with whom it originated. Questions, suggestions, and comments specific to the CRP will be forwarded to the NMED annually when the CRP is updated.

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4.0 REFERENCES

Kieling, J.E. (New Mexico Environment Department), February 2016. Letter to J.P. Harrell (U.S. Department of Energy NNSA/Sandia Field Office) and P.B. Davies (Sandia National Laboratories, New Mexico), "Approval, Final Decision on Proposal to Grant Corrective Action Complete with Controls Status for Mixed Waste Landfill, Sandia National Laboratories, EPA ID# NM5890110518, HWB-SNL-14-014," February 18, 2016.

Kieling, J.E. (New Mexico Environment Department), January 2016. Letter to J.P. Harrell (U.S. Department of Energy NNSA/Sandia Field Office) and M. W. Hazen (Sandia National Laboratories, New Mexico), "Approval, Community Relations Plan for Sandia National Laboratories Resource Conservation and Recovery Act Facility Operating Permit, Sandia National Laboratories, EPA ID# NM5890110518, HWB-SNL-15-MISC," January 29, 2016.

New Mexico Environment Department (NMED), January 2015. "Resource Conservation and Recovery Act Facility Operating Permit, EPA ID No. NM5890110518, to the U.S. Department of Energy/Sandia Corporation, for the Sandia National Laboratories Hazardous and Mixed Waste Treatment and Storage Units and Post-Closure Care of the Corrective Action Management Unit," New Mexico Environment Department Hazardous Waste Bureau, Santa Fe, New Mexico, January 26, 2015.

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