



**Sandia
National
Laboratories**

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

SANDIA NATIONAL LABORATORIES, NEW MEXICO

AUGUST 2018



**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 National Technology & Engineering Solutions of Sandia, LLC, a wholly owned subsidiary of Honeywell International Inc. for the U.S. Department of Energy's National Nuclear Security Administration under contract DE-NA0003525. SAND2018-8701 O

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ACRONYMS AND ABBREVIATIONS

AOC	area of concern
CRP	Community Relations Plan
DOD	U.S. Department of Defense
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
IR	Information Repository
KAFB	Kirtland Air Force Base
NMED	New Mexico Environment Department
NNSA	National Nuclear Security Administration
No.	number
NTESS	National Technology & Engineering Solutions of Sandia, LLC
RCRA	Resource Conservation and Recovery Act
SNL	Sandia National Laboratories
SNL/NM	Sandia National Laboratories, New Mexico
SWMU	solid waste management unit
U.S.	United States

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1.0 INTRODUCTION AND BACKGROUND

Sandia National Laboratories (SNL) is a multi-mission laboratory managed and operated by National Technology & Engineering Solutions of Sandia, LLC, (NTESS), a wholly-owned subsidiary of Honeywell International Inc. for the United States (U.S.) 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 we leverage capabilities to solve complex national security problems. As a multidisciplinary national laboratory and federally funded research and development center, we accomplish 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

SNL personnel generate hazardous and mixed wastes during ongoing operations in support of the objectives listed above. Operations at the SNL facility in Albuquerque, New Mexico 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 in New Mexico 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 of 1954, as amended and updated apply to the radioactive component of mixed wastes.

SNL is owned by the DOE/NNSA and is managed and operated by NTESS. Hazardous and mixed waste management activities at Sandia National Laboratories, New Mexico (SNL/NM) are subject to the Resource Conservation and Recovery Act (RCRA) Facility Operating Permit Number (No.) NM5890110518 (the Permit), issued 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 NTESS 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 the SNL management and operating contractor.

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 Units and Activities Subject to the
 RCRA Facility Operating Permit at
 Sandia National Laboratories, 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

Notes:

RCRA = Resource Conservation and Recovery Act.

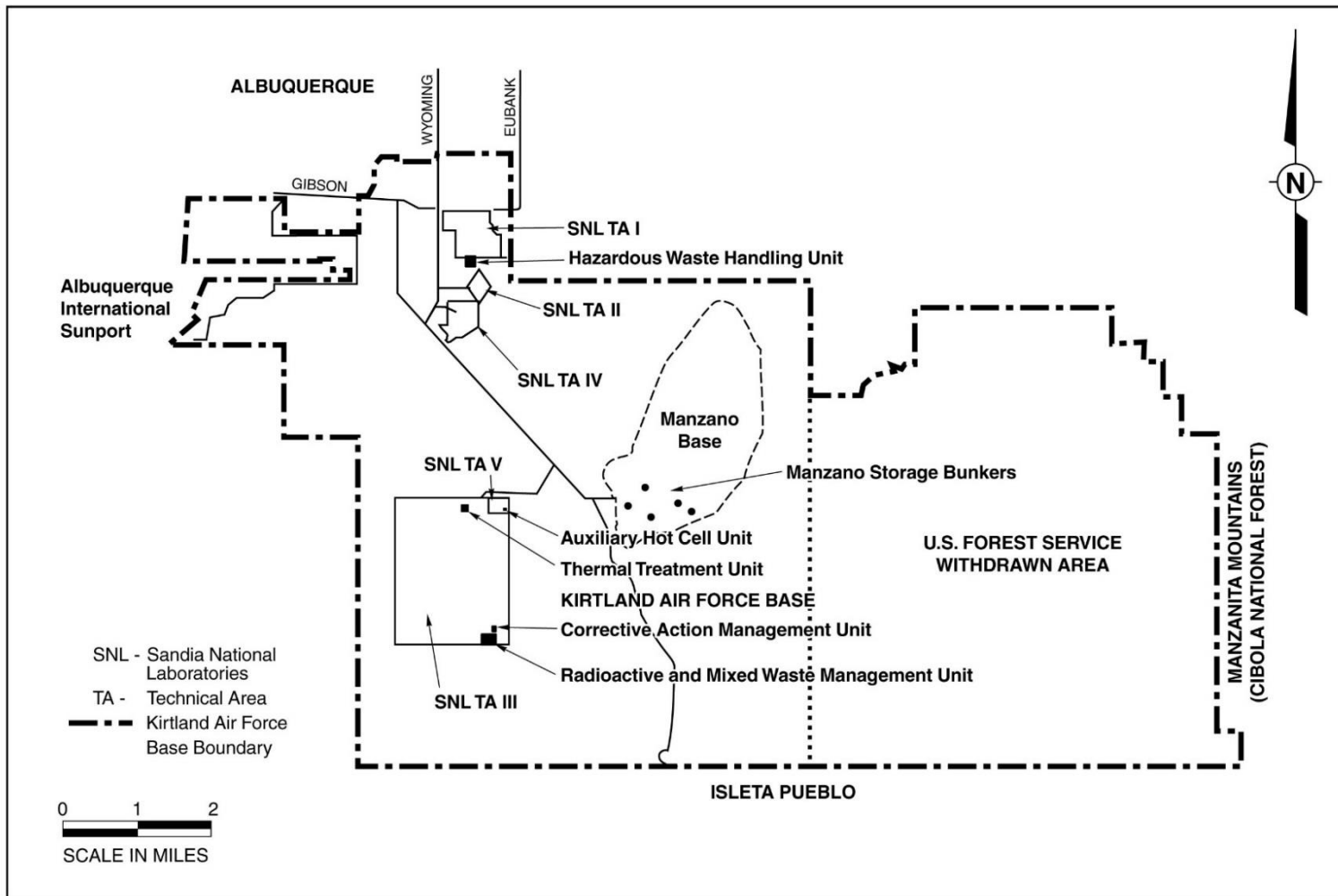


Figure 1
Location of Permitted Hazardous and Mixed Waste Units, August 2018
Sandia National Laboratories, New Mexico

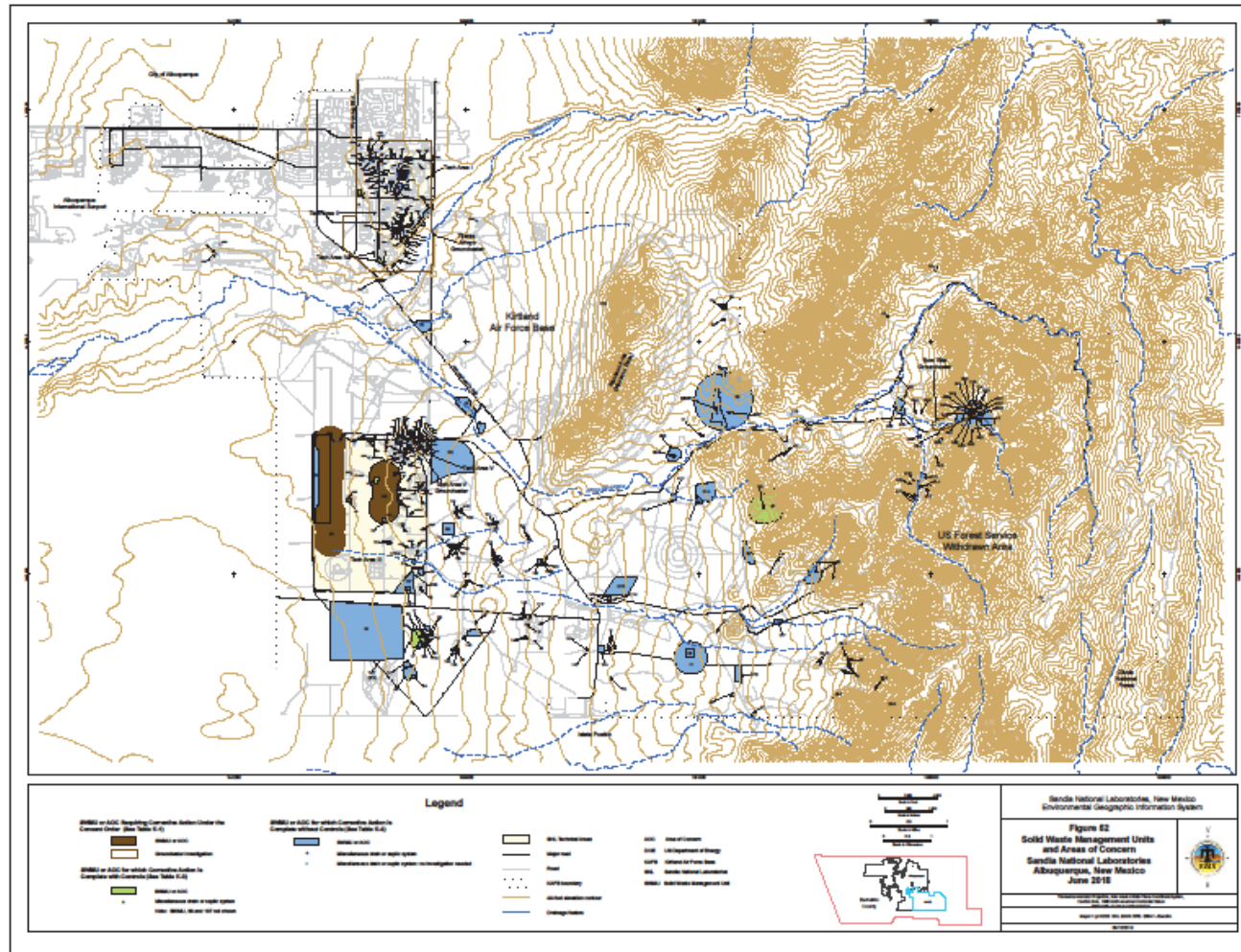


Figure 2
Location of Solid Waste Management Units and Areas of Concern, August 2018
Sandia National Laboratories, New Mexico

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2.0 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY OPERATING PERMIT REQUIREMENTS

The DOE/NNSA and NTESS 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, we 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 Section 3.0:

- Waste management activities 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 NTESS "...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)." Specifically, the CRP describes how we 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. In December 2015, the NMED made the draft CRP available to the public and received one comment during the 30-day public comment period. The NMED approved the CRP in January 2016 without modification (Kielling January 2016). In March 2016, the approved CRP was posted online. The most recent CRP was posted in October 2017 following NMED approval (Kielling November 2017). It is available at http://www.sandia.gov/news/publications/environmental_reports/index.html.

2.3 Revisions to the Community Relations Plan

Each year, we solicit comments regarding the CRP during a public meeting or poster session in April. Annually, during the month of June, we review the CRP and update it as necessary during August. When the CRP is updated, it is submitted to NMED by September 15.

We provided copies of the CRP to interested attendees at poster sessions on October 26, 2017 and April 24, 2018. No comments were received during or after either poster session. No comments have been received at envinfo@sandia.gov as of August 1, 2018.

The CRP has been updated to reflect the following:

- NMED approval of modification to the Permit granting Corrective Action Complete Status to six SWMUs and AOCs (Borrego, June 2018). The current status of each SWMU and AOC is reflected in Figure 2 in this CRP.
- Administrative updates and clarifications to information presented in the CRP.

In the future, review of the CRP will continue on an annual basis by June 30 and the CRP will be updated, 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 NTESS 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 our environmental stewardship.

We 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:

- We have an open working relationship through 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.
- We disseminate information in response to questions as discussed in Section 3.4.
- Mechanisms for providing feedback to us 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 the SNL 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://digitalrepository.unm.edu/snl/>.

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 with presentations or posters; DOE and NTESS personnel are available to provide information and answer questions. These are typically joint meetings with the U.S. 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 Kirtland Air Force Base (KAFB). Future meetings or poster sessions may be held in community centers or other locations. To receive agendas for these meetings and poster sessions, interested persons can subscribe to the list for semi-annual public meetings as described in Section 3.3.2.

New Mexico regulations specify the public notice steps that we 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.

We 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 KAFB. 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

We 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 be notified by email of updates to the IR and its index after new documents are added. To subscribe, an interested person can:

- 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

We 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

We send notices to people on this list every time we request a modification to the Permit.

3.4 Questions and Requests for Information

We 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://digitalrepository.unm.edu/snl/> 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/aboutus/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 the SNL environmental website at <http://www.sandia.gov/about/environment/index.html>,
- Attend semi-annual public meetings/poster sessions and permit-related public meetings/poster sessions, and
- Subscribe to mailing lists.

3.6 **Providing Feedback**

There are several ways for people or organizations to provide feedback to the DOE/NNSA and NTESS.

We provide opportunities for public involvement at any time via the SNL 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 at meetings and presentations, including:

- Semi-annual public meetings that may be in a poster session format are held in April and October. Comment cards are available. DOE and SNL personnel are available for questions and feedback, as time allows.
- Public meetings for Class 2 and 3 modifications to the Permit. At each of these meetings, comments will be solicited and comment submittal instructions will be provided.

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. We also solicit comments during the semi-annual public meeting/poster session each April.

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

3.7 **Minimizing Disputes**

We give careful consideration to feedback, comments, and suggestions received during semi-annual meetings/poster sessions and other permit-specific public meetings.

We 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

Borrego, J. C. (New Mexico Environment Department [NMED]), June 2018. Letter to J.P. Harrell (U.S. Department of Energy NNSA/Sandia Field Office) and J. L. Moya (National Technology & Engineering Solutions of Sandia, LLC) "Approval for Corrective Action Status for Six Solid Waste Management Units, May 2016, Sandia National Laboratories, EPA ID# NM5890110518, HWB-SNL-16-009" NMED Hazardous Waste Bureau, Santa Fe, New Mexico, June 15, 2018.

Kieling, J. E. (NMED), 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.

Kieling, J. E. (NMED), November 2017. Letter to J. W. Todd (U.S. Department of Energy NNSA/Sandia Field Office) and T. Cooper (National Technology & Engineering Solutions of Sandia LLC), "Approval, Updated Resource Conservation and Recovery Act Facility Operating Permit Community Relations Plan August 2017, Sandia National Laboratories, EPA ID# NM5890110518, HWB-SNL-17-MISC," November 8, 2017.

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," NMED Hazardous Waste Bureau, Santa Fe, New Mexico, January 26, 2015.

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