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PUBLIC INVOLVEMENT PLAN (PIP)
Air Quality Bureau Air Permit Application

Version P8.20.19

Date: August 25, 2020

Applicant: U.S. Department of Energy, National Nuclear Security Administration (owner); Triad National Security, LLC, Newport News Nuclear BWXT – Los Alamos, LLC (operator)

Facility Name: Los Alamos National Laboratory (LANL)

Air Quality Permit Application Number: P100-R3

Location: LANL is located in UTM Zone 13, UTMH 380.790 km, UTMV 3970.800 km, in and adjacent to Los Alamos, New Mexico in Los Alamos County

Latitude: 35.874167°

Longitude: -106.320278°

1. Overview of Air Quality Bureau's plan of action for addressing the community's needs and concerns for processing Air Quality Permit Applications:

The New Mexico Environment Department (Department), Air Quality Bureau (AQB) developed this Public Involvement Plan (PIP) for the processing of air quality permit applications in accordance with the requirements at 20.2.70 NMAC for this facility. This air quality regulation does require public participation outreach throughout different stages of the permitting process. The AQB will meet the public participation requirements by following this PIP, which includes all applicable policy, regulatory and statutory public participation requirements.

In developing this PIP, community participation needs for this permitting action were assessed to ensure appropriate promotion of public outreach by identifying whether there is a combination of environmental and demographic factors (i.e., low income community, minority community, limited English proficiency individuals, Linguistically Isolated Households, etc.) that may impact public participation. This assessment identifies community outreach needs and provides for public access opportunities above and beyond statutorily mandated requirements, and underscores the provision of adequate public access to information about this permit application.

As much as possible, public participation and informational activities related to this permit application will be held within the regulatory timelines outlined below.

- a. AQB regulations at 20.2.70 NMAC require that the application must be ruled complete or incomplete no more than 60 days after receipt. The AQB will publish a public notice for this application in a newspaper of general circulation in the area closest to the location of the facility, when the draft permit is issued for comment. See section 4.c below for more information.

The public notice contains a paragraph in Spanish directing Spanish speaking interested parties to call the AQB at (505) 476-5557 to speak to Spanish speaking staff for additional information regarding this permitting action.

- b. Normally the AQB would provide a copy of the public notice, the air quality permit application, and this PIP to the nearest NMED field office in Espanola, but due to current Covid-19 access restrictions for protection of both public employees and the protection of the general public these materials are instead available on the NMED website (see section 2.a).
- c. AQB regulations require that the public notice be sent to interested parties maintained on a mailing list. See Section 4.b below for more information.
- d. AQB regulations require that the public notice be sent to the “affected programs” as defined at 20.2.70 NMAC. See Section 4.e below for more information.
- e. Public notice shall be followed by a 30-day public comment period that starts on the day that the notice is published in the newspaper. See Section 4.g below for details.
- f. AQB regulations require that the permit must be issued or issued subject to conditions within eighteen (18) months after the department deems the application administratively complete.

2. Contact list of AQB staff with phone numbers and email addresses:

- a. **AQB contact for questions about this application or PIP (included in public notices and outreach materials):**

James E. Nellessen
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico, 87505
505-476-4315 (voicemail)
james.nellessen@state.nm.us.

Electronic copies will be available at the following link, which will be included in public notices and outreach materials as appropriate: <https://www.env.nm.gov/air-quality/permit-applications-with-public-interest-public-meeting-or-public-hearing/>

- b. **Non-English Language Speaker Assistance and Accommodations**

The AQB may hold public meetings, open houses, stakeholder meetings, and/or a formal hearing depending on the interest in the application. Language assistance services may be arranged for translation of documents for meetings, for translators during meetings and for

obtaining services for persons with disabilities. A phone-based interpretation service may be available for languages other than English.

3. Description of the community/stakeholder groups:

To provide for adequate public participation opportunities and meaningful involvement of persons regarding this permit application and to address potential or existing environmental justice areas, the affected communities must first be identified, informed about proposed environmental actions affecting the community, and invited to share their comments and concerns. The EJSCREEN tool developed by the U.S. Environmental Protection Agency (EPA) helps identify communities that are low income and minority populations that may benefit from a variety of approaches for notification and outreach communication.

The Title V permit has historically generated interest from a large area around LANL. Therefore, a radius of 10 miles from the facility approximate center point was used to provide the results of the EJScreen ACS Summary Report (attached) listed in the table below. This slightly larger radius captured an additional estimated 714 people and 118 households over the previous PIP issued for an NSR permit modification in 2018. This PIP also uses an updated EJScreen dataset that includes more recent data.

Population and Income Data			
Total Population:	18,659	Per capita income of community:	\$39,096
Minority Population, %:	29	US Per Capita Income*:	\$29,829
Total number of households:	7,738	Total Number (and Percent) of Linguistically Isolated Households:	201 (2.6%)

*US Per Capita Income 2012-2016; <https://www.census.gov/quickfacts/fact/table/US/HSG030210>

Population by Race, %		Population by Ability to Speak English, %	
White	85	Speak Only English	83
Black	0	Non-English at Home	17
American Indian	2	Speak English "very well"	13
Asian	6	Speak English "well"	3
Pacific Islander	0	Speak English "not well"	1
Other Race	3	Speak English "not at all"	0
Two or More Races	3	Speak English "less than very well"	4

Linguistically Isolated Household Details, %		List other Languages (if applicable)
Speak Spanish	49	////////////////////////////////////
Speak Other Indo-European Languages	7	
Speak Asian Pacific Island Languages	42	
Speak Other Languages	1	

In addition, the following community or stakeholder groups have been identified:

Karmen Badonie, Director
Eight Northern Indian Pueblo Council, Inc
Office of Environmental Technical Assistance
Mobile: 505-692-7073, Fax: 505.884.0846
Email: Karmen@enipc.org

Joni Arends, Executive Director
Concerned Citizens for Nuclear Safety
107 Cienega Street
Santa Fe, New Mexico 87501
Tel (505) 986-1973, Fax (505) 986-0997
Emails: ccns@nuclearactive.org and jarends@nuclearactive.org

Neil Weber
Director of Env. and Cultural Preservation for San Ildefonso
Email: nweber@sanipueblo.org

Sheri Kotowski
Embudo Valley Environmental Monitoring Group (EVEMG)
Email: serit@cybermesa.com

Kathy Sanchez, Environmental Health and Justice Program Manager and Gathering
for Mother Earth Tewa Women United
P. O. Box 397
Santa Cruz, NM 87567 (505) 747-3259
sent by electronic mail to: Kathy@tewawomenunited.org

Jeremy Nichols
Climate and Energy Program Director
WildEarth Guardians
1536 Wynkoop, Suite 302
Denver, CO 80202
Email: jnichols@wildearthguardians.org

LANL has a fairly extensive history of public involvement in air permitting during the last 10 years and even further back in time. Affected programs and interested parties listed in this PIP have commented on prior LANL permit actions.

It is important for the AQB to incorporate the linguistic and communication needs of this community when conducting public outreach and participation activities. To help accomplish this, the AQB will provide information in English, in public comment notices, public meeting notices (if applicable), and provide contact information for those with special needs and strive to make public participation efforts as inclusive as possible within AQB budget and time limitations. Under normal circumstances the NMED Espanola Field Office would serve as an access area for the AQB to leave hard copies of important documents and information about how to comment on this permit application, but due to Covid-19 restrictions to protect both the general public and public employees, materials will not be available in hard copy, but can be found on the AQB webpage (see Section 2.a above).

4. Detailed actions and outreach activities the AQB Permitting Section will take to reach the affected public:

a. Overview

Based on the demographics report discussed in the PIP, the history of public involvement at the facility and the facility background, basic information about public involvement opportunities will be in English. This information will include how to request materials in Spanish or to speak with AQB staff through an interpreter. Further details about public participation for this activity are outlined below.

The AQB maintains information regarding this air quality permit application at the following locations:

- i. On the Air Quality Bureau website, see Section 2.a above.**

[Due to Covid-19 restrictions materials will not be available at ii and iii below but will be available on the website]:

- ii. At the District Office listed in Section 1.b above.**
- iii. At the main office location:**

New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico, 87505

b. Postal Mailing or E-Mailing of Notices to Persons on the Facility-Specific Mailing List

AQB regulations require notification to persons who have expressed interest in applications. The AQB maintains a mailing list that includes individuals interested in permit applications from particular facilities or geographic areas. Notifications may be sent through physical mail and/or an email.

The list also includes addresses of states, local air pollution control programs, and Indian tribes and pueblos, that are within 50 miles of the source (see Section 4.d below).

c. Notices in the State Newspaper and Local Newspapers

The public notice for this permit application will be published in English in the Legal Section of the Santa Fe New Mexican newspaper.

Website for this publication is listed below:

Santa Fe New Mexican:

English: <http://www.santafenewmexican.com/>

d. Mailing to the Governor or President of Indian Tribes, Pueblos or Nations

AQB regulations and the evaluation of the facility location and associated demographics, require notification to Tribes, Pueblos or Nations about this permit application for facilities located within a specified distance.

Email notification will be sent to the contacts at the Tribes, Pueblos and/or Nations listed below:

Table List:

Affected Program	Distance	Units
Municipality - Jicarilla Apache Tribe	67.6	km
Municipality - Pueblo of Cochiti	12.9	km
Municipality - Pueblo of Jemez	19	km
Municipality - Pueblo of Laguna	77	km
Municipality - Pueblo of Nambe	24	km
Municipality - Pueblo of Ohkay Owingeh	19.3	km
Municipality - Pueblo of Picuris	56.3	km
Municipality - Pueblo of Pojoaque	12.9	km
Municipality - Pueblo of San Felipe	38.6	km
Municipality - Pueblo of San Ildefonso	4.8	km
Municipality - Pueblo of Sandia	61	km
Municipality - Pueblo of Santa Clara	25.8	km
Municipality - Pueblo of Santo Domingo	27.3	km
Municipality - Pueblo of Taos	69.2	km
Municipality - Pueblo of Tesuque	19	km
State - Pueblo of Santa Ana	40	km
State - Pueblo of Zia	49.2	km

Contact Name List:

Adam Duran Pojoaque Pueblo of 39 Camino del Rincon Pueblo of Pojoaque Santa Fe, NM 87506 ADuran@Pojoaque.org

<p>Cherylin Atcitty Taos Pueblo of P.O. Box 1846 Taos Pueblo of Taos, NM 87571 Catcitty@taospueblo.com</p>
<p>Cynthia Naha Santo Domingo (Kewa) Tribe PO Box 99 Pueblo of Santo Domingo, NM 87052 KLovato@kewa-nsn.us; CHana@kewa-nsn.us</p>
<p>Dino Chavarria Santa Clara Pueblo of PO Box 580 Santa Clara Pueblo Espanola, NM 87532 DinoC@santaclarapueblo.org</p>
<p>Greg Jojola Laguna Pueblo of PO Box 194 Pueblo of Laguna, NM 87026 gjojola@lagunapueblo-nsn.gov</p>
<p>Jacob Pecos Cochiti Pueblo of PO Box 70 Pueblo of Cochiti, NM 87072 Jacob_Pecos@pueblodecochiti.org</p>
<p>Jesse Young Zia Pueblo of (State of) 135 Capitol Square Drive Pueblo of Zia, NM 870536013 danyaibe@ziapueblo.org</p>
<p>Karena Castillo Jicarilla Apache Nation - Environmental Protection Office Environmental Protection Office PO Box 507 Jicarilla Apache Nation Dulce, NM 87528 karena_cstll@yahoo.com</p>
<p>Kenny (Kenneth) Lovato Santo Domingo (Kewa) Tribe PO Box 99 Pueblo of Santo Domingo, NM 87052 KLovato@kewa-nsn.us; CHana@kewa-nsn.us</p>

Levi Lementino Picuris Pueblo of PO Box 158 Pueblo View State Rd. 75 Penasco, NM 87553 Environment@picurispueblo.org
Maxine Paul Santa Ana Pueblo of (State of) 2 Dove Road Santa Ana Pueblo Bernalillo, NM 87004 Maxine.Paul@santaana-nsn.gov
Naomi Archuleta Ohkay Owingeh Pueblo of PO Box 1099 San Juan, NM 87566 naomi.archuleta@ohkay.org
Pinu'u Stout San Felipe Pueblo of PO Box 4219 San Felipe Pueblo, NM 87001 pstout@sfpueblo.com
Ramon Martinez San Ildefonso Pueblo of 02 Tunyo Po San Ildefonso Pueblo Santa Fe, NM 87506 RMartinez@SanIPueblo.org
Ryan Swazo-Hinds Tesuque Pueblo of Route 42, Box 360T Pueblo of Tesuque Santa Fe, NM 87506 rswazohinds@pueblooftesuque.org
Sage Mountainflower Sandia Pueblo of 481 Sandia Loop Pueblo of Sandia Bernalillo, NM 87004 smountainflower@sandiapueblo.nsn.us
Steve Rydeen Nambe Pueblo of 15A NP102 West Pueblo of Nambe Nambe Pueblo, NM 87506 SRydeen@nambepueblo.org

Tammy Belone
 Jemez Pueblo of
 PO Box 100
 Pueblo of Jemez, NM 87024
 Tammy.Belone@jemezpuablo.org

e. Affected Local, State, or Federal Government Agencies, and Active Land Grants

AQB regulations require identifying and notifying local, state or federal government agencies about this permit application.

The following affected Local, State, or Federal Government Agencies will be notified by email:

US EPA Region VI, Erica LeDoux

Affected Program	Distance	Units
County - Bernalillo	56	km

Isreal Tavarez
 Albuquerque-Bernalillo County AQCB
 PO Box 1293
 Air Quality Control Board
 Albuquerque, NM 87103
 ITavarez@cabq.gov

f. Public Meeting Notices, Public Comment Notices, and Other Notices

AQB may hold public meetings, open houses, stakeholder meetings, and/or a formal hearing depending on the interest in the application. Based on historical information and the results of the initial screening, there is no public meeting planned at this time for this permit application. If it is determined that a public meeting will be required, notice will be provided to the community as follows:

- 1) Via a newspaper of general circulation in the area closest to the location of the facility.
- 2) Locations commonly frequented by the general public, such as a nearby post office, public library, or city hall.
- 3) All persons and organizations that have expressed interest and are on a list maintained by AQB.
- 4) Via a public service announcement to at least one radio or television station which serves the municipality or county in which the source is or is proposed to be located.
- 5) The notices will be translated for non-English speaking participants, if required.
- 6) The notices will include information for requesting accommodations for those with disabilities as listed in item 2b above.

AQB will locate an appropriate venue based on the availability to the community to access the meeting, and the specific needs of the affected community (e.g. size of community, community locations, impacts, etc.).

AQB may reschedule the meeting due to inclement weather. If rescheduled, AQB will provide as much advance notice as possible and reschedule for an appropriate time and date.

Meetings will be scheduled to make them as accessible and user-friendly as practical, considering work schedules, dinner hours and other community commitments. To the extent possible, the meeting will be held at a location that is local and convenient, and meet American with Disabilities Act (ADA) standards. In addition, whenever practical and appropriate, translators for limited-English speaking communities, or assistance for hearing-impaired individuals may be available. Information in public notices for a public meeting will adhere to AQB regulations, statutes and policies.

g. Public Comment Periods

AQB regulations require that all interested persons have thirty (30) days from the date the public notice is published to express an interest in writing in the permit application. If AQB receives written public comment before the end of the thirty (30) day public comment period, the analysis of the application will be made available for review for thirty (30) days on the Air Quality Bureau Website.

The PIP has been reviewed and approved by the AQB Bureau Chief.

Liz Bisbey-Kuehn
Bureau Chief
Air Quality Bureau

Date approved

Attachments: EJSCREEN Printout

Location: User-specified point center at 35.874167, -106.320278
 Ring (buffer): 10-miles radius
 Description: Los Alamos

Summary of ACS Estimates		2013 - 2017
Population		18,659
Population Density (per sq. mile)		119
Minority Population		5,433
% Minority		29%
Households		7,738
Housing Units		8,628
Housing Units Built Before 1950		784
Per Capita Income		39,096
Land Area (sq. miles) (Source: SF1)		157.21
% Land Area		100%
Water Area (sq. miles) (Source: SF1)		0.26
% Water Area		0%

	2013 - 2017 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	18,659	100%	332
Population Reporting One Race	18,044	97%	832
White	15,929	85%	361
Black	58	0%	37
American Indian	447	2%	103
Asian	1,074	6%	190
Pacific Islander	0	0%	17
Some Other Race	536	3%	124
Population Reporting Two or More Races	615	3%	117
Total Hispanic Population	3,433	18%	256
Total Non-Hispanic Population	15,226		
White Alone	13,227	71%	329
Black Alone	58	0%	37
American Indian Alone	401	2%	102
Non-Hispanic Asian Alone	1,074	6%	190
Pacific Islander Alone	0	0%	17
Other Race Alone	8	0%	17
Two or More Races Alone	458	2%	107
Population by Sex			
Male	9,446	51%	237
Female	9,213	49%	272
Population by Age			
Age 0-4	1,005	5%	108
Age 0-17	4,314	23%	239
Age 18+	14,345	77%	385
Age 65+	3,204	17%	182

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2013 - 2017

Location: User-specified point center at 35.874167, -106.320278

Ring (buffer): 10-miles radius

Description: Los Alamos

	2013 - 2017 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	13,123	100%	225
Less than 9th Grade	94	1%	49
9th - 12th Grade, No Diploma	213	2%	54
High School Graduate	1,408	11%	118
Some College, No Degree	2,995	23%	225
Associate Degree	1,254	10%	149
Bachelor's Degree or more	8,414	64%	309
Population Age 5+ Years by Ability to Speak English			
Total	17,655	100%	324
Speak only English	14,662	83%	354
Non-English at Home ¹⁺²⁺³⁺⁴	2,993	17%	275
¹ Speak English "very well"	2,346	13%	269
² Speak English "well"	505	3%	124
³ Speak English "not well"	107	1%	46
⁴ Speak English "not at all"	35	0%	32
³⁺⁴ Speak English "less than well"	142	1%	55
²⁺³⁺⁴ Speak English "less than very well"	647	4%	126
Linguistically Isolated Households*			
Total	201	100%	53
Speak Spanish	99	49%	46
Speak Other Indo-European Languages	15	7%	23
Speak Asian-Pacific Island Languages	85	42%	45
Speak Other Languages	1	1%	17
Households by Household Income			
Household Income Base	7,738	100%	151
< \$15,000	494	6%	82
\$15,000 - \$25,000	238	3%	79
\$25,000 - \$50,000	842	11%	118
\$50,000 - \$75,000	903	12%	117
\$75,000 +	5,261	68%	249
Occupied Housing Units by Tenure			
Total	7,738	100%	151
Owner Occupied	5,715	74%	137
Renter Occupied	2,023	26%	133
Employed Population Age 16+ Years			
Total	14,938	100%	278
In Labor Force	9,780	65%	274
Civilian Unemployed in Labor Force	369	2%	93
Not In Labor Force	5,158	35%	237

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of anyrace.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS)

*Households in which no one 14 and over speaks English "very well" or speaks English only.

Location: User-specified point center at 35.874167, -106.320278

Ring (buffer): 10-miles radius

Description: Los Alamos

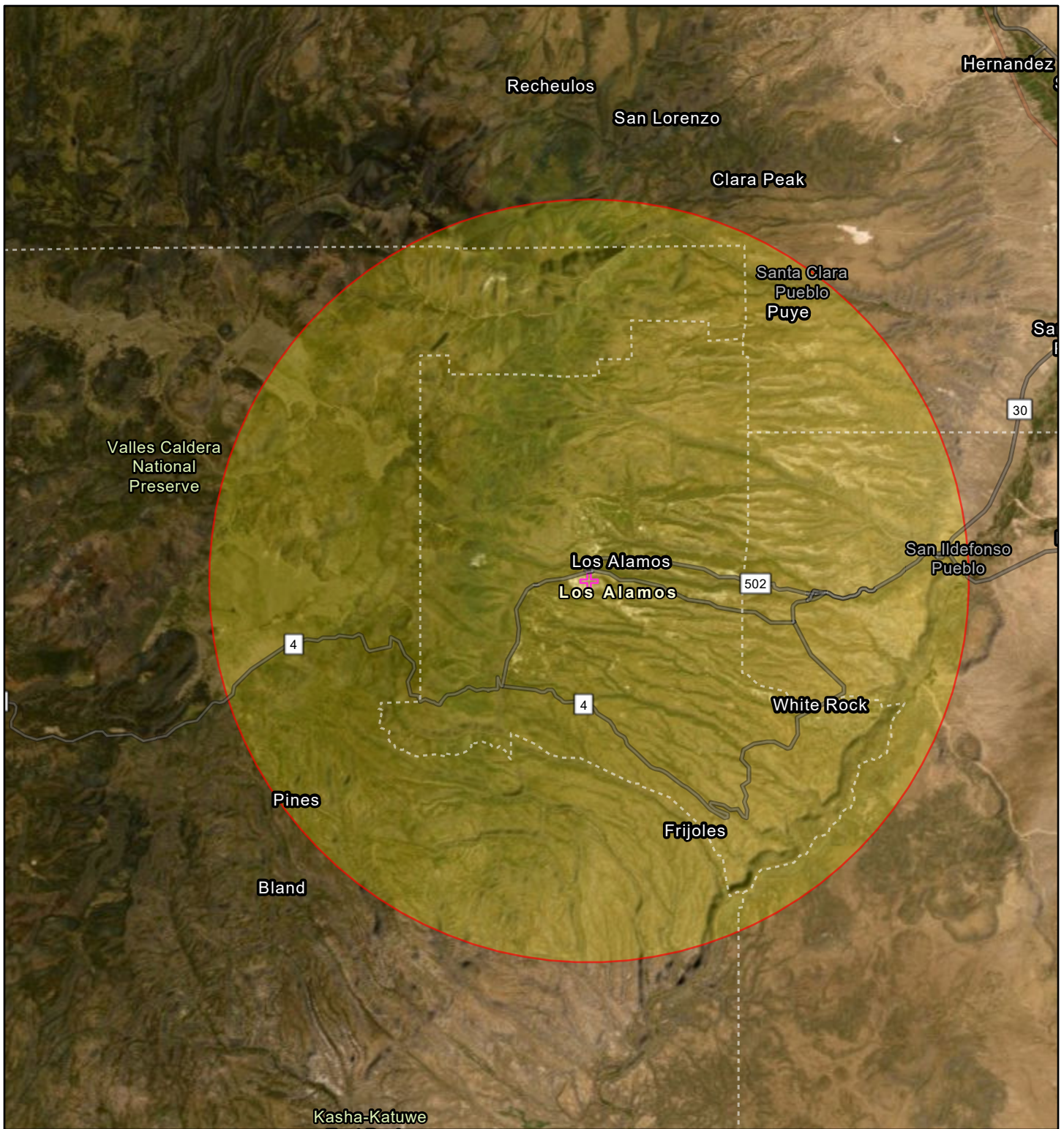
	2013 - 2017 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	17,655	100%	324
English	14,662	83%	395
Spanish	1,473	8%	221
French	31	0%	68
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	144	1%	67
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	240	1%	84
Chinese	331	2%	163
Japanese	N/A	N/A	N/A
Korean	70	0%	72
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	135	1%	125
Other Asian	211	1%	92
Tagalog	13	0%	23
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	0	0%	17
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	178	1%	62
Total Non-English	2,993	17%	511

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2013 - 2017.


*Population by Language Spoken at Home is available at the census tract summary level and up.

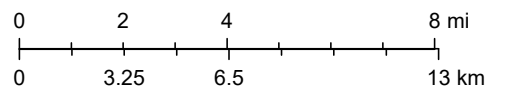
LANL PIP Map



August 25, 2020

1:288,895

 Los Alamos



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community