



MICHELLE LUJAN GRISHAM
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Certified Mail - Return Receipt Requested

April 15, 2025

Daryl Hauck, Ph.D.
Manager
U.S. Department of Energy
NNSA/Sandia Field Office
P.O. Box 5400, MS 0184
Albuquerque, NM 87185

David Stuhan
Director
Sandia National Laboratories
P.O. Box 5800, MS-0915
Albuquerque, NM 87185

**RE: APPROVAL
CLASS 1 PERMIT MODIFICATION (WITHOUT PRIOR NMED APPROVAL)
SANDIA NATIONAL LABORATORIES/NEW MEXICO (SNL/NM)
EPA ID#NM5890110518
HWB-SNL-25-002**

Dear Dr. Hauck and Mr. Stuhan:

The New Mexico Environment Department (NMED, the Department) has completed review of the February 24, 2025 "Submittal of *Notification of Class 1 Permit Modification No. 25-029, Revisions to Resource Conservation and Recovery Act (RCRA) Facility Operating Permit, Chemical Waste Landfill Post-Closure Care Permit, and the RCRA Facility Operating Permit Renewal Request, Sandia National Laboratories, New Mexico, EPA ID No. NM5890110518*". The request for Permit Modification was submitted by the Department of Energy/National Nuclear Security Administration (DOE/NNSA) on behalf of itself and the National Technology and Engineering Solutions of Sandia, LLC (NTESS) (collectively, the Permittee). NMED received the request for permit modification on February 26, 2025.

In the submittal, the Permittee proposed modifications to the following 3 documents:

1. The SNL/NM Resource Conservation and Recovery Act (RCRA) Facility Operating Permit.
2. The Chemical Waste Landfill Post-Closure Care Permit (PCCP).
3. The RCRA Facility Operating Permit Renewal Request (RCRA Permit Renewal Request).

The Permittee seeks to revise the Contingency Plans of the above documents to reflect the changes in the names and contact information for personnel who serve as emergency coordinators at (1) the Auxiliary Hot Cell Unit (AHCU), (2) the Corrective Action Management Unit

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

(CAMU), and (3) the Chemical Waste Landfill (CWL).

Details of the proposed permit modifications are summarized in the following Table:

Document	Attachment or Appendix	Location of Revised Text
RCRA Permit	Attachment D <i>Contingency Plan</i>	Table D-11 List of Emergency Coordinators for the AHCU
		Table D-15 List of Emergency Coordinators for the CAMU
CWL PCCP	Attachment 6 <i>Contingency Plan</i>	Table 6-5 List of Emergency Coordinators for the CWL
RCRA Permit Renewal Request	Volume 3 <i>General Part B Renewal Request</i> , Appendix 3J <i>AHCU</i>	Table 3J-4 Emergency Coordinator List, AHCU
	Volume 5 <i>Post-Closure Care</i> , Appendix 5B <i>CAMU</i>	Table 5B-5 Emergency Coordinator List, CAMU
	Volume 5 <i>Post-Closure Care</i> , Appendix 5C <i>CWL</i>	Table 5C-4 Emergency Coordinator List, CWL

The proposed Permit Modifications tabulated above are clarified in the following 10 Enclosures, which the Permittee submitted with the Permit Modification request cover letter:

Enclosure 1 – Certification Statement

Enclosure 2 – Summary of Revisions to RCRA Facility Operating Permit

Enclosure 3 – Redline/Strikeout Changes to the RCRA Facility Operating Permit

Enclosure 4 – Final Revisions to the RCRA Facility Operating Permit

Enclosure 5 – Summary of Revisions to the Chemical Waste Landfill Post-Closure Care Permit

Enclosure 6 – Redline/Strikeout Changes to Chemical Waste Landfill Post-Closure Care Permit

Enclosure 7 – Final Revisions to the Chemical Waste Landfill Post-Closure Care Permit

Enclosure 8 – Summary of Revisions to RCRA Facility Operating Permit Renewal Request

Enclosure 9 – Redline/Strikeout Changes to the RCRA Facility Operating Permit Renewal Request

Enclosure 10 – Final Revisions to the RCRA Facility Operating Permit Renewal Request

Following review of the permit modification request and related documents, NMED has determined that the proposed changes to both the Operating and Chemical Waste Landfill Permits are Class 1 Permit Modifications not requiring prior approval from NMED.

Since the Permit Modifications are self-implementing changes that do not require prior approval from NMED, the Permittee must, pursuant to 40 CFR §270.42(a)(ii), send out a notice of the Permit modifications to all persons on the Facility mailing list previously received from the Department. This notification must be made within 90 calendar days after the change is put into effect.

Additionally, the Permittee must, upon receipt of this letter, incorporate the following five (5) attached Enclosures into the appropriate sections of the Permits and Permit Renewal Request:

1. **Enclosure 4:** *Final Revisions to the RCRA Facility Operating Permit (Permit Attachment D, Tables D-11 and D-15, Contingency Plans for the AHCU and CAMU, respectively).*
2. **Enclosure 7:** *Final Revisions to the Chemical Waste Landfill Post-Closure Care Permit, Permit Attachment 6, Table 6-5, Contingency Plan.*
3. **Enclosure 10a:** *Final Revisions to the RCRA Operating Permit Renewal Request for the AHCU, Volume 3, Appendix 3J, Table 3J-4, Emergency Coordinator List, AHCU .*
4. **Enclosure 10b:** *Final Revisions to RCRA Operating Permit Renewal Request for the CAMU, Volume 5, Appendix 5B, Table 5B-5, Emergency Coordinator List, CAMU.*
5. **Enclosure 10c:** *Final Revisions to RCRA Operating Permit Renewal Request for the CWL, Volume 5, Appendix 5C, Table 5C-4, , Emergency Coordinator List, CWL.*

Further, the New Mexico Hazardous Waste Management Fee Regulations 20.4.2 NMAC require assessment of fees when administrative review of a document is complete. NMED has attached an invoice to this letter. Payment of the fees is due within sixty (60) calendar days from the date that you receive the invoice.

If payment is by check, then you must provide the invoice number on the check. If payment is transmitted electronically, then you must submit a letter to Ms. Vanessa Baros, NMED Hazardous Waste Bureau, indicating the invoice number, payment amount, and the assessed activity prior to transferring the funds.

Should the Permittee need to request an extension of the sixty-day period the request must be submitted at least seven days prior to the end of the sixty-day period. Should the Permittee disagree with the fee assessed you may file an Administrative Appeal under the provisions of 20.4.2.302 NMAC.

Dr. Hauck and Mr. Stuhan
April 15, 2025
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If you have any questions regarding this correspondence, please contact Cornelius Amindyas of my staff at (505) 690-5859.

Sincerely,

JohnDavid Nance

Digitally signed by JohnDavid
Nance
Date: 2025.04.15 12:36:12 -06'00'

JohnDavid Nance
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
C. Amindyas, NMED HWB
N. Davidson, NMED HWB
L. King, EPA Region 6 (6LCRRC)
C. Valencia, SNL
SJ Zapitello, SNL
L. Tello, SNL
A. Bodour, SNL
A. Reiser, SNL
D. Jesus, SNL

Attachments:

Enclosure 4: RCRA Permit Attachment D, *Contingency Plan*.
Enclosure 7: Permit Attachment 6, CWL Post-Closure Care, *Contingency Plan*.
Enclosure 10a: Volume 3, *General Part B Renewal Request*, Appendix 3J AHCU, Table 3J-4, Emergency Coordinator List, AHCU.
Enclosure 10b: Volume 5, *General Part B, Renewal Request, Post-Closure Care*, Appendix 5B, Table 5B-5, Emergency Coordinator List, CAMU.
Enclosure 10c: Volume 5 *Renewal Request*, Post-Closure Care, Appendix 5C CWL, Table 5C-4 Emergency Coordinator List, CWL.

File: SNL 2025 and Reading.



**New Mexico
Environment Department
Hazardous Waste Bureau**

Sandia National Laboratories
Sandia Site Office, NNSA
P.O. Box 5800, MS 0184
Albuquerque, NM 87185-5400
Attn: Messrs. Harrell and Moya

4/15/2025

Invoice # - HWB-SNL-25-002

Submittal of Notification of Class 1 Permit Modification No. 25-029, Revisions to RCRA Facility Operating Permit, Chemical Waste Landfill Post-Closure Care Permit, and the RCRA Facility Operating Permit Renewal Request, Sandia National Laboratories

Quantity	Item	Item Cost	Total Cost
2	Class 1 (without prior approval)	\$1,800.00	\$3,600.00
		Total Fees	\$3,600.00
		Adjustment	\$0.00
		Pay This Amount	\$3,600.00

Make Checks Payable to: NMED/HWB

Mail Checks and Invoice to:

New Mexico Environment Department, HWB
Attn: Bureau Financial Manager
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505

When you provide a check as payment, you authorize the State of New Mexico to either use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

