



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

Version 01.12.22

Date: January 28, 2022

Applicant: U.S. Department of Energy, National Nuclear Security Administration (owner); Triad National Security, LLC (operator)

Facility Name: Los Alamos National Laboratory (LANL)

Air Quality Permit Application Number: 632-M1

Location: LANL is located in UTM Zone 13S, 380,814 m East, 3,970,796 m North, NAD83, in and adjacent to the town of 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 20.2.72 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 20.2.72 NMAC require that the application must be ruled complete or incomplete no more than 30 days after receipt, and that a public notice for this application must be published in a newspaper of general circulation where the facility is located. 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) 372-8373 to speak to Spanish speaking staff for additional information regarding this permitting action.

- b. The AQB will provide a copy of the public notice, the air quality permit application, and this PIP to the NMED field office at:

Espanola
712 La Joya Street
Espanola, NM 87532
Phone (505) 753-7256
Fax (505) 753-1840

- 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 “appropriate agency” as defined at 20.2.72 NMAC. See Section 4.e below for more information.
- e. In accordance with the evaluation of the site location and associated demographics, no additional means for disseminating information are planned at this time.
- f. 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.
- g. AQB regulations require that the permit must be issued, issued subject to conditions, or denied within ninety (90) days 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
505-629-6283
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/permitting-section-home-page/>

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.

Based on a radius of 10 miles from the facility approximate center point the results of the EJScreen ACS Summary Report (attached) are listed in the table below. [<https://ejscreen.epa.gov/mapper/>]. The 10 mile radius selected for this NSR action matches the radius used in the PIP for the renewal of LANL's Title V Operating Permit P100-R3.

Population and Income Data			
Total Population:	18,970	Per capita income of community (2014-2018):	\$42,199
People of Color Population, %:	30	US Per Capita Income*:	\$34,103
Total number of households:	7,773	Total Number (and Percent) of Linguistically Isolated Households:	233 (3.0%)

*US Per Capita Income 2015-2019; <https://www.census.gov/quickfacts/fact/table/US/INC910219>

Population by Race, %		Population by Ability to Speak English, %	
White	84	Speak Only English	85
Black	0	Non-English at Home	15
American Indian	2	Speak English "very well"	11
Asian	5	Speak English "well"	3
Pacific Islander	0	Speak English "not well"	0
Some Other Race	3	Speak English "not at all"	0
Two or More Races	5	Speak English "less than very well"	4

Linguistically Isolated Household Details, %		List other Languages (if applicable)
Speak Spanish	49	////////////////////////////////////
Speak Other Indo-European Languages	4	
Speak Asian Pacific Island Languages	46	
Speak Other Languages	0	

LANL has a fairly extensive history of public involvement in air permitting during the last 10 years and even further back in time. Various "affected programs" (defined for TV actions), "appropriate agencies" (defined for NSR actions), and "interested parties" have commented on prior LANL permit actions. Several of the parties shown below commented on LANL's current draft Title V Permit Renewal No. P100-R3 for which a public hearing will be held.

The following community or stakeholder groups are those groups that requested to be on the Department's mailing list for NSR permit actions:

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
Or PO Box 31147, Santa Fe, NM, 87594-1147
Tel (505) 986-1973, Fax (505) 986-0997
Emails: ccns@nuclearactive.org and jarends@nuclearactive.org

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

Kathy Wanpovi Sanchez and Beata Tsosie
Environmental Health and Justice Program and
Gathering for Mother Earth Tewa Women United
PO Box 397
Santa Cruz, NM 87567 (505) 747-3259
Email to: Kathy@tewawomenunited.org and Beata@tewawomenunited.org (this second email 'Beata' although listed in comments for TV renewal, bounced back as undeliverable)

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

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

The following community or stakeholder groups are ones who have commented on relatively recent prior permit actions, but are not on the Department's mailing list for NSR permit actions:

Scott Kovac and Jay Coghlan
Nuclear Watch New Mexico
903 W. Alameda, #325
Santa Fe, NM 87501
Email to: jay@nukewatch.org and scott@nukewatch.org

Kevin Martin
Peace Action
Montgomery Center
8630 Fenton St., Suite 524
PO Box 397
Silver Spring, MD 20910
Email to: kmartin@peace-action.org

Naomi Archuleta
Ohkay Owingeh
PO Box 1099
Ohkay Owingeh, NM 87566
Email to: naomi.archuleta@ohkay.org and Noah.Kaniatobe@ohkay.org

Pinu'u Stout
PO Box 4339
San Felipe Pueblo, NM 87001
Email to: at pstout@sfpueblo.com and LHopinkah@sfpueblo.com

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 other announcements (radio broadcasts, brochures, signs, postcards, etc.) and strive to make public participation efforts as inclusive as possible within AQB budget and time limitations. Although the Covid-19 pandemic continues, with many NMED staff on various teleworking schedules, NMED District Offices are open and the AQB will as best as possible make available the NMED Espanola Field Office as an access area for the AQB to leave hard copies of important documents and information about how to comment on this permit application. Please keep in mind documents for public review will be available on the NMED website: <https://www.env.nm.gov/air-quality/permitting-section-home-page/> as was also shown in 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.**
- 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.

Notifications were sent to individuals on the Department list maintained per 20.2.72.206.A.(4):

Karmen Badonie, Director, Eight Northern Indian Pueblo Council, Inc

Joni Arends, Executive Director, Concerned Citizens for Nuclear Safety

Sheri Kotowski, Embudo Valley Environmental Monitoring Group (EVEMG)

Kathy Wanpovi Sanchez and Beata Tsosie, Environmental Health and Justice Program and Gathering for Mother Earth Tewa Women United

Neil Weber, Director of Env. and Cultural Preservation for San Ildefonso

Jeremy Nichols, Climate and Energy Program Director, WildEarth Guardians

The list also includes addresses within fifty kilometers of the boundary of other states, Bernalillo County, or a Class I area.

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.

The Department does not do this notification for NSR permits. Notification to Indian Tribes, Pueblos or Nations within 10 miles is required from the applicant for the NSR. These notifications are listed in Section 9 of the permit application.

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, Elizabeth (Mary) Layton at r6airpermits@epa.gov & layton.mary@epa.gov

Two Pueblos have Treatment as State status and will be contacted:

Governor Ulysses Leon

Pueblo of Santa Ana

2 Dove Road

Santa Ana Pueblo, NM 87004

governor@santaana-nsn.gov

Email to: Alan Hatch, Director: alan.hatch@santaana-nsn.gov, 505-771-6771

Governor Jerome Lucero

Pueblo of Zia

135 Capitol Square Dr.

Zia Pueblo, NM 87053

governor@ziapueblo.org

Email to: Jesse Young, Interim Director: jyoung@ziapueblo.org, 505-867-3304

Class I Areas

Bandelier National Monument

Web: <http://www.nps.gov/band/index.htm>

Chief of Resources, Bandelier National Monument

(505) 672-3861 ext 701

Superintendent, Bandelier National Monument, 15 Entrance Road, Los Alamos NM 87544-9508

Email: BAND_Superintendent@nps.gov

National Park Service (Bandelier is part of) – Air Resources office in Colorado

Don Shepherd

Air Resources Division

National Park Service

12795 W. Alameda Pkwy.

Lakewood, CO 80228

Phone: 303-969-2075

Don_shepherd@nps.gov

San Pedro Parks Wilderness (part of Santa Fe National Forest) with the southern portion of Coyote Ranger District and the northern portion of Cuba Ranger Districts)

Forest Supervisor: Debbie Cress (Debbie.cress@usda.gov)

11 Forest Lane

Santa Fe, NM 87508

Ph (505) 438-5300 – Main SFNF Headquarters

USFS Liaison to NMED: Kerry Jones, Kerry.jones@usda.gov, (off) 505-438-5673, (cell) 505-414-4787

Alternate contact: Anita Rose, anita.rose@usda.gov

Coyote District, Mark Sando District Ranger: 575-638-5526

20 Private Drive 1707
Coyote, NM 87012
Cuba District, Patrick Petracea District Ranger: 575-289-3264
PO Box 130 Cuba, NM 87013

Land Grants and Colonias (within 4-mile radius)

No Colonias within 4 miles of LANL

One Land Grant within 4 miles of LANL

Ramon Vigil: based on NMED known contact list, there is no contact for this land grant.

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.

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.

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 and at the NMED District office (address listed in Section 1.b above).

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

For 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: LANL

Summary of ACS Estimates		2014 - 2018	
Population		18,970	
Population Density (per sq. mile)		121	
People of Color Population		5,650	
% People of Color Population		30%	
Households		7,773	
Housing Units		8,633	
Housing Units Built Before 1950		816	
Per Capita Income		42,199	
Land Area (sq. miles) (Source: SF1)		157.21	
% Land Area		100%	
Water Area (sq. miles) (Source: SF1)		0.25	
% Water Area		0%	
	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	18,970	100%	324
Population Reporting One Race	18,087	95%	872
White	15,978	84%	370
Black	41	0%	35
American Indian	436	2%	107
Asian	999	5%	154
Pacific Islander	1	0%	17
Some Other Race	633	3%	189
Population Reporting Two or More Races	883	5%	175
Total Hispanic Population	3,542	19%	246
Total Non-Hispanic Population	15,428		
White Alone	13,320	70%	319
Black Alone	40	0%	35
American Indian Alone	393	2%	106
Non-Hispanic Asian Alone	999	5%	154
Pacific Islander Alone	0	0%	17
Other Race Alone	9	0%	17
Two or More Races Alone	667	4%	138
Population by Sex			
Male	9,656	51%	255
Female	9,314	49%	259
Population by Age			
Age 0-4	981	5%	118
Age 0-17	4,306	23%	250
Age 18+	14,664	77%	385
Age 65+	3,281	17%	169

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) 2014 - 2018

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

Ring (buffer): 10-miles radius

Description: LANL

	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	13,476	100%	253
Less than 9th Grade	84	1%	51
9th - 12th Grade, No Diploma	240	2%	58
High School Graduate	1,414	10%	130
Some College, No Degree	2,965	22%	213
Associate Degree	1,133	8%	120
Bachelor's Degree or more	8,773	65%	309
Population Age 5+ Years by Ability to Speak English			
Total	17,989	100%	332
Speak only English	15,306	85%	423
Non-English at Home ¹⁺²⁺³⁺⁴	2,683	15%	228
¹ Speak English "very well"	2,034	11%	199
² Speak English "well"	525	3%	102
³ Speak English "not well"	87	0%	47
⁴ Speak English "not at all"	38	0%	51
³⁺⁴ Speak English "less than well"	124	1%	67
²⁺³⁺⁴ Speak English "less than very well"	649	4%	121
Linguistically Isolated Households*			
Total	233	100%	62
Speak Spanish	115	49%	50
Speak Other Indo-European Languages	10	4%	17
Speak Asian-Pacific Island Languages	107	46%	46
Speak Other Languages	1	0%	17
Households by Household Income			
Household Income Base	7,773	100%	179
< \$15,000	478	6%	88
\$15,000 - \$25,000	223	3%	70
\$25,000 - \$50,000	759	10%	88
\$50,000 - \$75,000	842	11%	110
\$75,000 +	5,471	70%	247
Occupied Housing Units by Tenure			
Total	7,773	100%	179
Owner Occupied	5,782	74%	153
Renter Occupied	1,991	26%	170
Employed Population Age 16+ Years			
Total	15,140	100%	276
In Labor Force	10,160	67%	294
Civilian Unemployed in Labor Force	349	2%	99
Not In Labor Force	4,981	33%	216

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)

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

EJSCREEN ACS Summary Report



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

Ring (buffer): 10-miles radius

Description: LANL

	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	17,989	100%	332
English	15,306	85%	444
Spanish	1,291	7%	157
French	29	0%	66
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	102	1%	66
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	174	1%	98
Chinese	387	2%	147
Japanese	N/A	N/A	N/A
Korean	11	0%	18
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	57	0%	46
Other Asian	261	1%	111
Tagalog	38	0%	40
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	195	1%	74
Total Non-English	2,683	15%	554

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) 2014 - 2018.

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

LANL PIP Map



