

Longenecker & Associates Proven Value in Successful Regulatory Strategies

VISION

Longenecker & Associates (L&A) brings proven capabilities and highly experienced experts to support design and implementation of regulatory strategies that enable and drive mission success, by ensuring and enabling fulfillment of environmental and regulatory requirements.

Using our 30 years of experience and knowledge of the DOE and NNSA sites, our team of regulatory experts (including former senior regulators, decision makers and regulatory practitioners) work within environmental, safety and compliance organizations to deliver integrated solutions

We understand DOE's and NNSA's regulator. We deliver regulatory interface strategies that enable attainment of desired end states and mission objectives on schedule. A regulatory dispute can bring the most promising project to a grinding, unexpected halt or delay start of mission critical projects. Regulatory issues can impact the project schedule and add to overall costs. An overlooked regulatory step can slow the project and threaten noncompliance. Insufficient communication can erode trust between the parties. L&A has broad experience in planning timely, transparent, regulatory strategies and reaching resolution on difficult regulatory issues. These skills are especially important with the significance of regulatory negotiation within the End States Contracting Strategy. It is possible to build a partnered regulatory interface that reaches safe, timely, cost-effective decisions that are supported by regulators and stakeholders.

APPROACH

L&A will capitalize on its best-in-class personnel and proven experience to develop and implement an integrated approach to regulatory matters that provides a suite of real-time, effective tools for the project manager and a high-functioning support organization to stand behind them. L&A will deliver a full complement of capabilities that fulfill a range of regulatory needs:

- Regulatory experts who served at the highest levels of various State regulatory agencies (e.g., New Mexico, Nevada, South Carolina and Washington) and who lead the way in developing innovative, collaborative approaches to regulatory assurance.
- Find and fix regulatory issues before they impact mission
- Coaching for culture change to team-based, collaborative, regulatory interaction
- Comprehensive planning for end state, focused, risk-informed regulatory and land use decisions

- Facilitation between all regulatory decision-makers, including DOE/NNSA, contractors, and participating regulatory agencies for healthy team interaction
- Early identification of schedule and strategy risks for regulatory team resolution
- Relationship building, communication and outreach to elected representatives, the public, Tribal Nations, and other stakeholders, including early collaboration on decisions of high significance and interest
- Comprehensive knowledge of high-level waste, transuranic, mixed waste, low-level and hazardous waste cleanup, and general state and federal environmental requirements (RCRA, CERCLA, NEPA, CWA, CAA, state regulations)
- Assistance with air, water, waste, and wetlands permitting, including multi-media integration of permit processes for complex projects
- Assessment and improvement options to ensure hazardous and mixed waste compliance
- Support for waste identification and waste management needs
- Identification and implementation of regulatory process efficiency improvements
- Support for negotiation of regulatory agreements, orders, milestones, supplemental environmental projects, and innovative approaches
- Permit strategy, development and analysis
- National Environmental Policy Act assistance

L&A's approach for regulatory success builds an effective, sustained regulatory interface by:

- Listening to the customer and understanding their priorities, as well as needs of regulators and stakeholders
- Collaborating to collectively devise a common-sense, implementable regulatory strategy that provides a win for all parties
- Regular and frequent communication with all decision makers and influencers
- Early, pro-active identification of issues for joint resolution so there are no surprises
- Recognizing ancillary issues to the process that may be game changers for early resolution
- Cultivating a regulatory climate that is willing to consider change options
- Generating innovative ideas for mutual benefit and efficiency
- Consistently integrating cost and risk management in regulatory discussions
- Coaching all parties to joint schedule commitment and optimization
- Coordinating and facilitating collaborative team-based regulatory interface

Effective regulatory frameworks rarely happen on their own. Balanced, common sense regulatory decisions stem from teams that are informed and aligned with mission to work together to achieve shared goals. L&A has the capabilities to help shift regulatory culture to highly effective, collaborative teams, resulting in faster, better decisions that are protective of

human health and the environment while being cost conscious and risk informed. L&A will ensure overall strategy development, coordination and alignment of all regulatory decision makers, and consistent outreach to stakeholders, helping to sustain a framework that is schedule grounded and adaptive to real life changes. L&A will deliver a regulatory framework that supports overall mission strategy while ensuring compliance. L&A support will lead to a collaborative, effective regulatory interface that is critical in mission success to achieve safe, protective and cost-effective end states.

EXPERIENCE

Past Performance

L&A' corporate experience includes the following:

- Regulatory support to WIPP M&O (e.g., permitting strategy)
- Support to Idaho Cleanup Project on waste disposition strategies
- Support to commercial entities on regulatory strategies for waste management and disposition
- Leadership of and support to IAEA projects in regulatory and waste disposition strategy
- Performance as a key team member for the inaugural WIPP Triennial Review
- Support to EM-HQs on Mercury disposition
- Regulatory support to Los Alamos Legacy Cleanup Contract

L&A In-House Expertise

L&A regulatory experts are leaders in their field and have accomplished many innovative successes, both in the Department of Energy complex and beyond:

- The 2016 Compliance Order on Consent for Los Alamos National Laboratory was negotiated to provide risk-informed prioritization and cleanup levels, incorporating “rolling” targets and milestones. The Order improved processes for public engagement and increased regulator and permittee accountability through streamlined, refined regulatory planning processes.
- The partnering (collaborative, team-based) regulatory approach at Savannah River Site has resulted in an extremely successful high-level waste program: implementation of a jointly created treatment plan and closure of 8 high level waste tanks, all without appeal. The regulatory strategy integrated all decision makers (DOE, contractors, State, EPA, NRC) into one streamlined process that took regulatory approvals off the critical path for tank closure and simplified the process for stakeholder engagement.
- The 2016 Dispute Resolution Agreement at Savannah River Site resulted in a \$200 million investment in supplemental tank closure innovations rather than penalty payment,

including first of a kind Tank Closure Cesium Removal (TCCR) Units, Next Generation Solvent for waste treatment, and sonar map trial testing for remaining tank residuals.

- At Hanford, a senior management regulatory streamlining team for waste management improvements enabled disposal of 8,000 backlog drums and expanded use of the Environmental Restoration Disposal Facility for mixed waste disposal.
- A sustaining deal for Lake Tahoe was negotiated between Nevada and California, resulting in a bi-state regional plan and matching legislation in both states, heralded by Governors Sandoval and Brown.
- In Nevada, a government streamlining project returned the Nevada Department of Conservation and Natural Resources to 2005 spending levels and eliminated over 20 outdated regulations.
- A South Carolina innovation for permit process clarity and timeliness, Permit Central, was recognized by EPA Headquarters in 2018 as a national best permitting practice as applied to a Boeing plant expansion. All permit decisions were issued by the jointly developed schedule with no appeals.
- Negotiated, developed and authored a Memorandum of Understanding (MOU) between the State of Nevada and the U.S. Department of Energy which acknowledged the broad shared interests regarding activities at the Nevada National Security Site (NNSS) and established a senior level NNSS working group. The MOU supported the continuation of a variety of activities between Nevada and DOE, including the review and discussion of waste streams, waste classification, waste acceptance criteria, public safety and environmental stewardship, public outreach and education, economic development, and future missions at NNSS.
- Multiple L&A senior managers held DOE leadership positions in which they guided policy development and implementation, including DOE Order 435.1 - Radioactive Waste Management, the complex-wide review on waste management, DOE Order 458.1- Radiation Protection of the Public and Environment, as well as the DOE Order on Nuclear Material Management and Packaging and Transportation Safety.

Leo Drozdoff



Leo Drozdoff is the former Natural Resource Cabinet Secretary in the State of Nevada. The Department had a \$160 million annual operating budget and over 900 employees. Major agencies within the Department are Environmental Protection, Water Resources, State Lands, State Parks, Forestry and State Historic Preservation. Mr. Drozdoff is the former Administrator of the Nevada Division of Environmental Protection. He was also the Chair of the Nevada Public Employees Benefit Board, responsible for providing health insurance benefits to all active and retired state employees. Mr. Drozdoff is a licensed professional engineer in the State of Nevada.

Kathryn Roberts

As the Resource Protection Division Director at NMED, Katie led the State of New Mexico's development and negotiations of the 2016 Compliance Order on Consent for LANL legacy cleanup. The Consent Order is based on risk-informed prioritization and cleanup levels as well as "rolling" targets and milestones. The Consent Order improved processes for public engagement and increased regulator and permittee accountability through streamlined, refined regulatory planning processes. During her time at NMED, Ms. Roberts led many initiatives which resulted in streamlined regulatory decisions and collaborative partnering between the State of NM and DOE.



Ron Skinnarland



Ron Skinnarland spent more than two decades at Hanford leading the Waste Management Section, where he provided regulatory oversight of multiple Hanford waste treatment, storage and disposal facilities, the Hanford Low Level Burial Grounds, the Plutonium Finishing Plant, PUREX and PUREX Tunnels, B Plant, T Plant, 300 Area Building decommissioning and demolition, and cocooning the N, D, DR and H Reactors. He negotiated the consent decree for interim stabilization of Hanford's single shell tanks and led Tri-Party Agreement negotiations for Hanford tank waste treatment and disposal and Transuranic waste retrieval, treatment and shipment. Ron also served as a principal interface manager between Ecology, US Department of Energy, EPA, contractors, the Hanford Advisory Board, tribes, and stakeholders.

Shelly Wilson

Shelly Wilson led the State regulatory strategy for the six most recent Savannah River Site high level waste tank closures, getting regulatory approvals off the critical path and on schedule, with no appeals. Shelly also implemented a scheduled, regulatory assurance strategy for several new or expanding industries, notably Boeing and Volvo. The Boeing regulatory process was recognized by the Environmental Protection Agency in 2018 as a best management practice for timeliness. Shelly has been reappointed by Secretary Perry as a member of the DOE Environmental Management Advisory Board.

