



National Nuclear Security Administration

Sandia Site Office

P.O. Box 5400

Albuquerque, New Mexico 87185-5400



DEC 14 2011

Ms. Trina Gonzalez, Deputy Director for
Pollution Prevention and Green Technology
California Department of Toxic Substances Control
1001 "T" Street, P.O. Box 806
Sacramento, California 95812-0806

DEC 14 2011

Subject: Response to the California Department of Toxic Substances Control's (DTSC) Formal Request for Chemical Information and Analytical Test Methods for Specified Nanomaterials

Dear Ms. Gonzalez,

The purpose of this letter is to respond, on behalf of Sandia National Laboratories, to DTSC's letter dated January 4, 2011, *Formal Request for Chemical Information and Analytical Test Methods for Specified Nanomaterials*.

On January 11, 2011, Sandia National Laboratories ("Sandia") received a letter from DTSC that formally requested chemical and other relevant information on six specific nanomaterials from "manufacturers" as defined under California Health and Safety Code section 57018(a)(4) ("Code"). The letter stated that "manufacturers subject to the statute are required to provide the information in writing to DTSC no later than Wednesday, January 4, 2012." The letter further requested that an organization that considers itself to have received the formal request in error should notify the DTSC in writing with "your reasons for why the information call-in request does not apply to you."

Sandia is a government-owned/contractor operated (GOCO) facility. Sandia Corporation, a Lockheed Martin company, manages Sandia for the U.S. Department of Energy's National Nuclear Security Administration (NNSA). Sandia has confirmed with the Sandia Site Office (SSO) of NNSA that it does not meet the definition of "manufacturer" under Health and Safety Code section 57018(a)(4). Specifically, Sandia is not an entity "who produces a chemical [specified nanomaterials] in this state [California] or who imports a chemical into this state for sale in this state." As a result, Sandia is not considered a manufacturer under the Code and the statutory requirements of providing the information do not apply to Sandia.

Despite the lack of statutory application to Sandia for this formal request for information, Sandia strives to assist federal and state agencies where possible. At this time, however, Sandia has not developed any analytical test methods for the specified nanomaterials in environmental matrices, including water, air, soil, sediment, sludge, and chemical waste, as requested in the DTSC letter. A potential resource of information for DTSC on developments in the area of nanotechnology is the public website for the Center for Integrated Nanotechnologies (CINT), a Department of Energy/Office of Science Nanoscale Science Research Center (NSRC) located in New Mexico. CINT operates as a national user facility "devoted to establishing the scientific principles that govern the design, performance, and integration of nanoscale materials." DTSC can access information on CINT and its projects at <http://cint.lanl.gov/>.

Should you have any questions regarding this correspondence, please feel free to contact me at (505) 845-5398 or Joe Eizaguirre of my staff at (505) 845-4373.

Sincerely,

Daniel Pellegrino
Assistant Manager for
Environment, Safety and Health
Sandia Site Office

Enclosure:

DTSC Formal Request for Chemical Information and Analytical Test Methods for Specified Nanomaterials

cc:

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cc: (pdf, electronic) record COR-ESH-12.13.2011-405395

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