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Environmental Protection Division
Water Quality & RCRA Group (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: August 22, 2011
Refer To: ENV-RCRA-11-165

Mr. John Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313



Dear Mr. Kieling:

SUBJECT: DESTRUCTION OF UNSTABLE CHEMICAL AT TECHNICAL AREA (TA) 21 MATERIAL DISPOSAL AREA (MDA) B, LOS ALAMOS NATIONAL LABORATORY

During remediation activities at TA-21 MDA-B the week of August 8, 2011, thirteen (13) containers of waste were unearthed. These waste containers were safely staged in a controlled area at TA-21, awaiting further evaluation for waste disposition. During further evaluation by TA-21 remediation personnel on August 16, 2011, it was discovered that one of the thirteen containers (500 mL glass bottle) contained approximately 375 mL of peroxide waste. On August 17, 2011, LANL EOC and HAZ-MAT personnel conducted a thorough assessment of the peroxide waste and determined that crystals had formed on the inside and outside of the container. LANL EOC and HAZ-MAT personnel determined that the waste was unstable and that the safest, most appropriate option for managing the chemical waste was to treat it with detonation on-site in a Total Containment Vessel (TCV). On August 17, 2011, the waste was safely and effectively treated through contained detonation in a TCV at TA-21.

On August 17, 2011, Los Alamos National Laboratory (LANL) Environmental Stewardship Division Water Quality and RCRA Group (ENV-RCRA) representative Mark Haagenstad contacted New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) representatives Brady Christensen, Steven Pullen, and yourself regarding the need to conduct emergency treatment (detonation) on an unstable chemical discovered during remediation activities at Technical Area (TA) 21 Material Disposal Area (MDA) B. As captured in a phone conversation with you on August 17, 2011 and as stated in a letter from NMED-HWB dated August 19, 2011, NMED-HWB granted Emergency Authorization for detonation treatment of the unstable chemical. Destruction was safely conducted in a TCV and in accordance with 20.4.1.900 NMAC, incorporating 40 CFR 270.1(c)(3) and 20.4.1.500 NMAC incorporating 40 CFR 264.1(g)(8)(ii). All residual material remaining was collected and is being properly managed in accordance with state and federal waste management requirements.



Please contact Mark Haagenstad of my staff at (505) 665-2014 if additional information would be helpful.

Sincerely,



Dennis Hjeresen, Division Leader

Anthony R. Grieggs
Group Leader
Water Quality & RCRA Group (ENV-RCRA)

ARG:MH/lm

Enclosure: a/s

Cy: Steven Pullen, NMED/HWB, Santa Fe, NM
Brady Christensen, NMED/HWB, Santa Fe, NM.
Gene Turner, LASO-EO, A316
Carl A. Beard, PADOPS, A102
J. Chris Cantwell, ADESHQ, K491
Denny Hjeresen, ENV-DO, K404
Bruce Schappell, ADEPHQ, M991
Allan Chaloupka, TA-21, MDA-B, C348
Mark Haagenstad, ENV-RCRA, K490 (E-File)
ENV-RCRA File, K490
IRM-RMMSO, A150