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NMED
Hazardous Waste
Bureau

Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

Date: January 29, 2016
Symbol: ENV-DO-16-025
LA-UR: 16-20490
Locates Action No.: Not Applicable

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
Santa Fe, NM 87505

Dear Mr. Kieling:

Subject: Request for Destruction of Unstable Hazardous Waste at TA-49, Los Alamos National Laboratory

The purpose of this letter is to request approval by the New Mexico Environment Department - Hazardous Waste Bureau (NMED-HWB) to conduct an emergency treatment (detonation) of a canister containing unstable nitrocellulose film at Technical Area (TA) 49. The destruction will be conducted in accordance with 40 CFR 270.1(c)(3) and approval is requested for an emergency permit under 40 CFR 270.61.

A film canister containing nitrocellulose film was identified at TA-03-39 inside a vault with items of historical significance. The film has deteriorated and is potentially unstable. The Emergency Response team was able to identify the film as containing nitrocellulose and determined that the flammable properties of nitrocellulose film is unsafe and poses a considerable safety risk; therefore, the waste will be characterized as reactive with a D003 EPA Hazardous Waste Number. Emergency Response personnel have deemed the situation an emergency and have determined that treatment by detonation of the film canister is a necessary response. Suitable quantities of high explosive (no more than 5 pounds net explosive weight) will be applied to all sides of the material equally. The resulting incendiary thermal effect will consume the film.

On December 2, 2015, Los Alamos Laboratory (LANL) requested approval from NMED-HWB to conduct this emergency treatment. On December 2, 2015, NMED-HWB authorized the LANL Emergency Response Team to treat the unstable hazardous waste. This authorization was only valid through 5:00 pm on December 4, 2015. The destruction had to be postponed until authorization was provided by the National Archives and Records Administration (NARA). LANL has received NARA approval to proceed

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with the emergency treatment. Thereby, the Permittees are once again requesting the approval of this emergency treatment activity.

The film is currently being safely and securely stored in a laboratory refrigerator that meets NFPA 40 requirements for the storage of nitrocellulose film. The refrigerator is located in a Satellite Accumulation Area (SAA) at TA-03-39, Room 26 until permission from NMED-HWB is received to conduct emergency treatment. Contingent on the weather, the hazardous waste will be safely removed from the storage location and transported to TA-49 for immediate treatment. Upon completion of emergency treatment, all remaining residual material (if any) will be collected and properly managed for disposal in accordance with state and federal waste management requirements. This correspondence will be included in the Electronic Public Reading Room (EPRR).

Please contact Mark P. Haagenstad of my staff at (505) 665-2014 if additional information is desired.

Sincerely,

Anthony R. Grieggs
Group Leader
Environmental Compliance Programs (ENV-CP)
Los Alamos National Security, LLC

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