Subject: Emergency Treatment Permit

Attachments: EP 17-002 March 2 2017.pdf

From: Kraemer, Janine, NMENV [mailto:Janine.Kraemer@state.nm.us]
Sent: Thursday, March 02, 2017 11:00 AM
To: Edwards, Angela Martinez; Haagenstad, Mark P; Armijo, Karen; Grieggs, Tony
Cc: Kieling, John, NMENV; Connolly, Stephen, NMENV; Dhawan, Neelam, NMENV
Subject: RE: Emergency Treatment Permit

Please see attached for approval for emergency treatment of unstable chemicals.

Janine

From: Edwards, Angela Martinez [mailto:angmtz@lanl.gov]
Sent: Thursday, March 02, 2017 9:27 AM
To: Kraemer, Janine, NMENV <Janine.Kraemer@state.nm.us>; Kieling, John, NMENV <john.kieling@state.nm.us>
Cc: Haagenstad, Mark P <mph@lanl.gov>; Brandt, Michael Thomas <mtbrandt@lanl.gov>; Sharp-Geiger, Raeanna Racine <raeanna@lanl.gov>; Bretzke, John Clifford <jbretzke@lanl.gov>; Grieggs, Tony <grieggst@lanl.gov>; Armijo, Karen <Karen.Armijo@nnsa.doe.gov>; Hyde, Peter Alden <pahyde@lanl.gov>
Subject: Emergency Treatment Permit

Dear Ms. Kraemer:

Per our conversation with Janine Kraemer of the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) on March 2, 2017, the Los Alamos National Laboratory (LANL) Environmental Protection and Compliance Division (EPC-DO) personnel were notified on March 1, 2017 by Emergency Management and Response (EM&R) personnel that three unstable chemicals/containers were identified in a flammable cabinet at Technical Area (TA) 43 Building 1. The following information was provided by EM&R personnel regarding the unstable chemicals:

- The unstable chemical Diethyl ether (100 ml container)
- The unstable chemical Hydrazine (50 gm container)
- The unstable chemical Hydrazine acetate (10 ml container)
- The unstable chemicals/containers are currently being safely and securely stored in a flammable cabinet within a lab in TA-43 Building 1 until emergency treatment can occur.

LANL EM&R personnel have determined the unstable chemicals/containers are shock sensitive and pose an imminent and substantial endangerment to human health and the environment and is requesting permission from the NMED-HWB to conduct emergency treatment in accordance with 40 CFR 270.1(c)(3). EM&R personnel determined the safest path forward for treatment to be on-site (TA-43) through contained vessel detonation. Upon completion of emergency treatment, all remaining residual material, if any, will be collected and properly managed.

Your immediate response regarding this matter is greatly appreciated. Please contact me if additional information would be helpful.

Angela Martinez Edwards
Environmental Professional
EPC-CP
Phone: 505-667-4006
Schedule B

NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary
JC BORREGO
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 2, 2017

Mr. Anthony R. Grieggs
Environmental Protection Division
Environmental Compliance Programs
ENV-CP
PO Box 1663, K490
Los Alamos, New Mexico 87545

Emergency Permit #17-002

SUBJECT: EMERGENCY AUTHORIZATION TO DESTROY UNSTABLE HAZARDOUS WASTE
LOS ALAMOS NATIONAL LABORATORY, EPA ID# NM0890010515

Dear Mr. Grieggs,

The New Mexico Environment Department (NMED) hereby authorizes Los Alamos National Laboratory (LANL) Emergency Response team to destroy unstable hazardous waste that LANL has determined poses an imminent and substantial health and safety risk. The hazardous waste covered by this authorization is identified in correspondence from LANL dated March 2, 2017 and consists of the following:

- Diethyl ether (100 ml container)
- Hydrazine (50 gm container)
- Hydrazine acetate (10 ml container)

LANL's Emergency Management and Response (EM & R) personnel are authorized to detonate the unstable hazardous materials at a safe onsite location at TA-43 through contained vessel detonation in accordance with 20.4.1.900 NMAC.

Emergency destruction of waste materials is allowed when performed in accordance with 20.4.1.900 NMAC, incorporating 40 CFR § 270.1(c)(3), under an emergency permit issued by NMED in accordance with 20.4.1.900 NMAC incorporating 40 CFR § 270.61. While operating

under this authorization, LANL must take all necessary safety precautions and comply with all applicable requirements of 40 CFR § 264, subparts C and D in accordance with 20.4.1.500 NMAC incorporating 40 CFR § 264.1(g)(8)(ii). This authorization is valid only through 5:00 p.m., March 6, 2017.

LANL must properly dispose of any hazardous residues that remain after the destruction. LANL must also submit a report to NMED detailing the activities conducted under this emergency permit within seven days after the emergency activity was completed, or no later than March 13, 2017.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

JEK:jk

cc: Neelam Dhawan, NMED HWB
Janine Kraemer, NMED HWB
Mark Haagenstad, LANL, mph@lanl.gov

file: Library #2390