



**Environmental Protection Division**  
**Environmental Compliance Programs (ENV-CP)**  
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*Symbol:* ENV-DO-15-0340  
*LA-UR:* N/A  
*Locates Action No.:* N/A

Mr. John E. Kieling  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
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's 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. Based on this, the waste will be characterized 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.

The film is currently being safely and securely stored in a refrigerator in a classified vault at the Media Records Center at TA-03-39, Room 26 until permission from NMED-HWB is received to conduct emergency treatment. On Thursday, December 3, 2015, the film canister will safely be removed and transported to TA-49. Staging for the treatment will start about 8:30am, and the treatment is anticipated to

occur about 9:00am, subject to your approval. 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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