



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

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[www.env.nm.gov](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**ESHID-603405**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 21, 2019

Mr. Peter H. Carson  
Waste Management Programs Group  
PO Box 1663, MS M969  
Los Alamos, New Mexico 87545

Emergency Permit #19-002

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

Dear Mr. Carson,

The New Mexico Environment Department (“NMED”) authorizes Los Alamos National Laboratory (“LANL”) Emergency Response team to destroy unstable hazardous waste that LANL determined poses an imminent and substantial health and safety risk. The waste covered by this authorization was identified by e-mail from LANL on May 21, 2019. The waste consists of the following:

- The unstable chemical Phenylmagnesium bromide Solution (100 ml container)
- The unstable chemical Lithium Aluminum Deuteride (100 ml container)
- The unstable chemical Lithium tri-tert-butoxy-aluminum hydride (100 ml container)
- The unstable chemical Lithium aluminum hydride (tetrahydrofuran) (100ml container)
- The unstable chemical Methylmagnesium Iodide Solution (100ml container)
- Two unstable chemicals of Sodium Borohydride Solution (100ml container)
- Lithium 9-BBN Hydride Solution (100ml container)
- Lithium Aluminum Hydride Solution (100ml container)
- Methylmagnesium Iodide Solution (100ml container)

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The unstable chemicals were found in a laboratory in Technical Area 35 Building 85. LANL's Emergency Management and Response personnel determined the safest path forward for treatment to be on-site (TA-35) through contained vessel detonation. NMED authorizes the treatment of this unstable hazardous waste 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., May 21, 2019.

LANL must properly dispose of any hazardous residues that remain after the destruction. LANL must also submit a report to NMED detailing the specific activities conducted to render this waste inert under this emergency permit within four days after the emergency activity was completed, or no later than May 24, 2019.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

JEK:spc

cc: David Cobrain, NMED HWB  
Neelam Dhawan, NMED HWB  
Janine Kraemer, NMED HWB  
Luciana Vigil-Holterman, LANL, [luciana@lanl.gov](mailto:luciana@lanl.gov)  
Karen Armijo, LANL, [karen.armijo@nnsa.doe.gov](mailto:karen.armijo@nnsa.doe.gov)  
Patrick Padilla, [plpadilla@lanl.gov](mailto:plpadilla@lanl.gov)

file: Library #2390

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**From:** [Vigil-Holterman, Luciana R](#)  
**To:** [locatesteam](#)  
**Subject:** FW: LANL - 21 May Emergency Permit 19-002  
**Date:** Wednesday, May 22, 2019 11:58:04 AM  
**Attachments:** [LANL - 21 May Emergency Permit 19-002.pdf](#)

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Hi there! I don't think that this is coming to you by standard ways. Here is our receipt copy. –  
Luciana

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**From:** Connolly, Stephen, NMENV <[Stephen.Connolly@state.nm.us](mailto:Stephen.Connolly@state.nm.us)>  
**Sent:** Tuesday, May 21, 2019 10:53 AM  
**To:** Edwards, Angela Martinez <[angmtz@lanl.gov](mailto:angmtz@lanl.gov)>; Kieling, John, NMENV <[john.kieling@state.nm.us](mailto:john.kieling@state.nm.us)>  
**Cc:** Torres, Enrique <[etorres@lanl.gov](mailto:etorres@lanl.gov)>; Armijo, Karen <[karen.armijo@nnsa.doe.gov](mailto:karen.armijo@nnsa.doe.gov)>; Padilla, Patrick L <[plpadilla@lanl.gov](mailto:plpadilla@lanl.gov)>; Carson, Peter H <[pcarson@lanl.gov](mailto:pcarson@lanl.gov)>; Maggiore, Peter <[peter.maggiore@nnsa.doe.gov](mailto:peter.maggiore@nnsa.doe.gov)>; Kraemer, Janine, NMENV <[Janine.Kraemer@state.nm.us](mailto:Janine.Kraemer@state.nm.us)>; Cobrain, Dave, NMENV <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>; Dhawan, Neelam, NMENV <[neelam.dhawan@state.nm.us](mailto:neelam.dhawan@state.nm.us)>; Vigil-Holterman, Luciana R <[luciana@lanl.gov](mailto:luciana@lanl.gov)>  
**Subject:** LANL - 21 May Emergency Permit 19-002

Ms. Martinez-Edwards and Mr. Carson,

Attached is the subject Emergency Permit for the destruction of unstable materials at TA-35 Building 85, to be conducted today, 21 May 2019, and to be followed up with a report submitted to NMED by the end of the week.

Thank you,  
Stephen

Stephen Connolly, CHMM  
Incident Response Coordinator  
Phone: (505) 476-6025  
Fax: (505) 476-6030

Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
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TO REPORT SPILLS OR INCIDENTS OF HAZARDOUS MATERIALS CALL: 866-428-6535 FOR AFTER- HOURS EMERGENCIES CALL 505-827-9329

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**From:** Edwards, Angela Martinez <[angmtz@lanl.gov](mailto:angmtz@lanl.gov)>  
**Sent:** Tuesday, May 21, 2019 9:55 AM  
**To:** Connolly, Stephen, NMENV <[Stephen.Connolly@state.nm.us](mailto:Stephen.Connolly@state.nm.us)>; Kieling, John, NMENV

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<[john.kieling@state.nm.us](mailto:john.kieling@state.nm.us)>

**Cc:** Torres, Enrique <[etorres@lanl.gov](mailto:etorres@lanl.gov)>; Armijo, Karen <[karen.armijo@nnsa.doe.gov](mailto:karen.armijo@nnsa.doe.gov)>; Padilla, Patrick L <[plpadilla@lanl.gov](mailto:plpadilla@lanl.gov)>; Carson, Peter H <[pcarson@lanl.gov](mailto:pcarson@lanl.gov)>; Maggiore, Peter <[peter.maggiore@nnsa.doe.gov](mailto:peter.maggiore@nnsa.doe.gov)>

**Subject:** [EXT] Emergency Permit Request

Dear Mr. Connolly:

Per our conversation with Mr. Steven Connolly of the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) on May 21, 2019, the Los Alamos National Laboratory (LANL) Environmental Protection and Compliance Division (EPC-DO) personnel were notified on May 21, 2019 by Emergency Management and Response (EM&R) personnel that ten unstable chemicals/containers were identified in a flammable cabinet at Technical Area (TA) 35 Building 85. The following information was provided by EM&R personnel regarding the unstable chemicals:

- The unstable chemical Phenylmagnesium bromide Solution (100 ml container)
- The unstable chemical Lithium Aluminum Deuteride (100 ml container)
- The unstable chemical Lithium tri-tert-butoxy-aluminum hydride (100 ml container)
- The unstable chemical Lithium aluminum hydride (tetrahydrofuran) (100ml container)
- The unstable chemical Methylmagnesium Iodide Solution (100ml container)
- Two unstable chemicals of Sodium Borohydride Solution (100ml container)
- Lithium 9-BBN Hydride Solution (100ml container)
- Lithium Aluminum Hydride Solution (100ml container)
- Methylmagnesium Iodide Solution (100ml container)

The unstable chemicals/containers are currently being safely and securely stored in a flammable cabinet and a fume hood within a lab in TA-35 Building 85 until emergency treatment can occur.

LANL EM&R personnel have determined the unstable chemicals/containers are highly flammable, reactive, toxic, corrosive 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-35) 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.

Thank you in advance,  
Angela

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