



Department of Toxic Substances Control



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Secretary for
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August 2, 2018

Ms. Barbara Larsen
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EMERGENCY PERMIT FOR TREATMENT OF HAZARDOUS WASTE, SANDIA NATIONAL LABORATORIES, ALAMEDA COUNTY, EPA ID: CA2890012923

Sandia National Laboratories (SNL) has requested an emergency permit from the Department of Toxic Substances Control (DTSC) to allow NEMS High Hazardous Remediation Inc. (NEMS) to treat hazardous waste at this facility. The hazardous waste includes the following item:

Description	Quantity	Hazard Designation	Container Size
Acetylene Gas (100%)	9	Flammable/Reactive Material	9x1.3 Liter

This chemical is expired and currently being stored at the SNL facility located at 7011 East Avenue, Livermore, CA 94550. It has been determined that this chemical may be unstable and should be chemically stabilized as a safety precaution prior to transportation off site by NEMS. The treatment of the hazardous waste involves the breaking the glass globe remotely and absorbing gas with an activated carbon unit to reduce the reactive or flammable characteristics of the chemicals.

Once the chemical is treated, it will be transported offsite to a hazardous waste facility. NEMS personnel are tentatively scheduled to arrive at the facility sometime between August 2, 2018 and September 30, 2018 to conduct treatment operation, in an exclusion zone set up and maintained at the location outside the building (see the map in Permit Application).

Based on the authority in Title 22, California Code of Regulations (22 CCR), Division 4.5, section 66270.61, DTSC finds there to be imminent and substantial endangerment to human health and the environment, and by way of this letter, issues this emergency permit to SNL. The emergency permit is a temporary measure, which allows SNL to treat the chemical so it can be safely transported offsite for proper management.

This permit is not transferable to any other party and may not be used in any other capacity or for any other activity. This permit may be revoked by DTSC at any time without process if it is determined that termination is appropriate to protect human health and the environment.

The emergency permit is effective beginning August 2, 2018 and shall expire on September 30, 2018. The treatment activities will be conducted by qualified Waste Specialist from NEMS.

The following requirements are specific conditions of this permit. Failure to comply with any of the following conditions may cause an immediate revocation of this permit pursuant to 22 CCR, section 66270.61(b)(4), and could subject SNL to enforcement action.

1. The treatment of the Items mentioned above must be conducted by qualified personnel from NEMS and shall take place within the designated exclusion zone as illustrated in the workplan submitted to DTSC by SNL on 07/11/2018. Only NEMS reactive material technicians with proper health and safety equipment and attire shall be allowed within 50 feet of the items during the treatment and during the movement of the Items from the storage location to the exclusion zone.
2. SNL must have a predetermined route from the storage location to the exclusion zone that allows for unobstructed movement for NEMS reactive material technicians. Building Management and occupants must be notified of the treatment activity and any occupants must be moved as needed to meet the requirements of permit condition #1.
3. All items to be treated must be appropriately labeled and marked before NEMS personnel arrive to the facility.
4. SNL must notify the Certified Unified Public Agency (CUPA) and local Fire Department that this emergency permit has been Issued by DTSC by the effective date.
5. In the event that SNL identifies any releases of hazardous waste, SNL must notify DTSC's Permitting Division orally within 24 hours of discovery.
6. The area must be Inspected after treatment to ensure that there is no release of hazardous waste from the area; Any untreated waste must be immediately retreated or removed.
7. SNL must allow inspection of records and of the facility by any duly-authorized representative of DTSC, in order to carry out the requirements of Chapter 6.5, Division 20 of the California Health and Safety Code.
8. Only the items listed in the table above may be treated. Additional quantity or type of hazardous waste may be treated if they follow the same treatment procedures listed in the 07/11/2018 workplan submitted to DTSC by SNL. SNL must notify and request authorization from DTSC for any additional items that are discovered and that require a treatment process not described in the workplan.
9. The issuance of this Permit by DTSC does not release SNL from any liability or duty imposed by federal or state statutes or regulations, or local ordinances. SNL must obtain permits required by other governmental agencies, including but not limited to, the applicable and use planning, zoning, air quality, and water quality laws for the treatment operations.

10. Within 10 business days following the expiration of this permit or the execution of the treatment operation in whichever is shorter, SNL must submit a report signed, in accordance with Title 22 CCR, section 66270.11(d) to DTSC and the nearby Certified Unified Program Agency (CUPA). The report must contain following certification statement, "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The report must state whether the treatment area has been cleared of all residual hazardous waste generated from this emergency treatment, and if all waste has been properly managed. The report must also contain a list of all the hazardous waste that was treated by NEMS and a description of any deviations from the established guidelines of this emergency permit, or information submitted to DTSC. This emergency permit is effective beginning August 2, 2018 and shall expire on September 30, 2018.

If you have any questions, please contact me at (916) 255-6522 or hkang@dtsc.ca.gov

Sincerely,



Hai-Yong Kang
Hazardous Substance Engineer
Permitting Division

cc:

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