Department of Energy
National Nuclear Security Administration
Sandia Site Office
P.O. Box 5400
Albuquerque, New Mexico 87185-5400

FEB 27 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William P. Moats, FFCO Project Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Subject: Proposed Revision No. 7 for the Site Treatment Plan (STP) for Mixed Waste, Compliance Plan Volume (CPV) of the Federal Facility Compliance Order (FFCO) for Sandia National Laboratories, New Mexico (SNL/NM)

Dear Mr. Moats:

The purpose of this letter is to submit our request for a revision to the covered waste inventories and treatability groups listed in the STP CPV for SNL/NM. The revision request has been prepared for the New Mexico Environment Department (NMED) by the Department of Energy (DOE) and Sandia Corporation (Sandia), in accordance with the requirements of Sections X. B. 2, X.B.4, and X. B. 5 (Revisions), of the FFCO, as revised and amended. This is proposed Revision No. 7.

The purpose of the revision is to incorporate the changes in covered waste inventories that have been reported in the SNL/NM STP Fiscal Year (FY) 2001 Update report, to add or modify compliance dates as applicable, and to increase the volume of a specific treatability group by greater than 10% of its current volume. The requested changes to waste inventory volumes and compliance dates for FY 2003 will have a negligible impact on the total volumes of waste treated or disposed of in FY 2003, will not cause an impact to the environment or public health, and will allow the DOE and Sandia to realize significant positive impacts on both the overall cost and the operational effectiveness of mixed waste treatment and disposal.

The proposed revision, with information required by the FFCO, Section X. C (Revisions) and Section VIII (Addition of New Covered Waste), is provided in Enclosure A to this letter. Proposed changes to the CPV text are provided as Enclosure B for the NMED's review, comment, and approval. A clean copy of

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FEB 27 2003

the proposed Revision 7.0, reflecting the requested changes, is included as Enclosure C. An electronic copy of the proposed CPV text is also provided in both redline/strikeout and clean versions.

As required by the Order, Part XX, "Documents, Information, and Reporting Requirements," Section D, "Certification Statements," the appropriate certification is also provided. If you have any questions regarding this submittal please feel free to contact John Gould at 845-6089.

Sincerely,

John Gould
Interim STP Project Manager
Sandia Site Office

Sincerely,

James J. Thompson
STP Project Manager
Sandia National Laboratories, New Mexico

Enclosures

cc w/enclosure:
J. Bearzi, NMED HWB
W. P. Moats, NMED HWB, MS 1087
R. Kilbury, NMED HWB
R. Kennett, NMED DOE OB, MS 1396
E. Krauss, SNL, MS 0141, 11300
A. Reiser, SNL, MS 1151, 3125
H. Seeley, SNL, MS 1151, 3125
J. Thompson, SNL, MS 1151, 3125
D. Blanton, SNL, MS 0186, 3000

CERTIFICATION STATEMENT FOR APPROVAL AND FINAL RELEASE OF DOCUMENTS

Document title: Proposed Revision No. 7 for the Site Treatment Plan (STP) for Mixed Waste, Compliance Plan Volume (CPV) of the Federal Facility Compliance Order (FFCO) for Sandia National Laboratories, New Mexico (SNL/NM)

Document author: Howard Seeley, 3125

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure 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 or imprisonment for knowing violations.

1/31/03

Donald H. Blanton Date
Vice President
Human Resources and Protection Services Division, 3000
Sandia Corporation
Albuquerque, New Mexico
Co-Operator

and

Karen L Boardman 2-24-03

Karen L. Boardman Date
Manager
U.S. Department of Energy
National Nuclear Security Administration
Office of Kirtland Site Operations
Owner and Co-Operator

ENCLOSURE A

Proposed Revision No. 7 for the Site Treatment Plan for Mixed Waste Compliance Plan Volume of the Federal Facility Compliance Order, October 4, 1995, as Revised and Amended

ENCLOSURE A

Proposed Revision No. 7 for the Site Treatment Plan (STP) for Mixed Waste Compliance Plan Volume (CPV) of the Federal Facility Compliance Order (FFCO), October 4, 1995, as Revised and Amended

The Department of Energy (DOE) and Sandia Corporation (Sandia) seek to revise the covered waste inventories and treatability group compliance activities for low-level mixed waste (LLMW) listed in the STP CPV for Sandia National Laboratories/New Mexico (SNL/NM). The proposed revision request has been prepared for the New Mexico Environment Department (NMED) in accordance with the requirements of Sections X. B. 2, X. B. 4, and X. B. 5, "Revisions", of the FFCO, as revised and amended. Information required by Section X. C, "Revisions", and Section VIII, "Addition of New Covered Waste", supporting the proposed revision request is provided.

The request for Revision No. 7 is comprised of the following proposed changes:

- Addition of new covered waste to treatability groups (TGs) 8, 9, and 18, in excess of one cubic meter and greater than 10% of the current volume, proposed Revision No. 7.a (Section X. B. 5)

- Modification of certain compliance dates associated with deactivation, thermal desorption, deactivation followed by stabilization, stabilization, hydrothermal processing, heterogeneous debris, evaporative oxidation, neutralization followed by stabilization, and amalgamation, proposed Revision No. 7.b (Section X. B. 2)

- Increase in volume of TG 25 in excess of one cubic meter and greater than 10% of the current volume, proposed Revision 7.c (Section X.B.4)

Table 4 presents a summary of the treatability groups and the associated volumes reported in the previously approved Revision 6.0 and in this proposed Revision No. 7.0. The volumes reported in this proposed Revision are incorporated in the CPV. The volumes reflect those additions made to the STP through both the Amendment No. 3 process and requested in proposed Revision No. 7.

For the NMED's information and convenience, the proposed revision text for the CPV is provided as Enclosure B (redline/strikeout) and Enclosure C (clean copy). An electronic copy of Enclosure B and Enclosure C is also provided.

ENCLOSURE A

DOE and Sandia STP Proposed Revision
for Addition of New Covered Waste (Section X. B. 5)
Proposed Revision No. 7.a

The following portions of this enclosure follow the requirements of Section VIII (Addition of New Covered Waste) and Section X (Revisions), of the FFCO, as revised and amended.

Detailed description of the proposed revision (X. C. 2. a)
The DOE and Sandia request a Revision to the CPV for the addition of covered waste, in accordance with Section VIII.A, Amendment No. 3, of the FFCO. The proposed Revision requests that a volume of 2.0 cubic meters (m^3) of covered waste be added to TG 8 (Organic Debris with Organic Contaminants), 9.9 m^3 of new covered waste be added to TG 9 (Inorganic Debris with TCLP Metals), and a volume of 1.7 m^3 of new covered waste be added to TG 18 (Particulates with Organic Contaminants). In accordance with Section VIII.B of the FFCO, information required for covered waste addition is provided in Table 1.

Rationale for the proposed revision (X. C. 2. b)
The Proposed Site Treatment Plan (March 30, 1995) presented the volumes of mixed waste in storage as of September 30, 1994, regardless of its time of generation or state of compliance with the Resource Conservation and Recovery Act (RCRA) 3004[j]. The subsequent additions of new covered waste to the inventory were reported in the annual SNL/NM STP Updates. In accordance with Section X.B.5 of the FFCO (Amendment No. 3), a Revision to the CPV is required to include the addition of new covered waste to the reported CPV waste inventory if the increase is in excess of 1 cubic meter or 10% of the treatability group volume (X.B.4), whichever is greater. The proposed additions of covered waste to the TG 8, 9, and TG 18, inventories are greater than 1 m^3 and in excess of 10% of the volumes reported in the FY01 STP Update.

The majority of the waste proposed for addition to TGs 8, 9, and TG 18 is newly discovered covered waste found during low-level legacy waste sorting activities. The waste volume proposed for TG 8 consists of compactable waste such as personal protective equipment (PPE), plastic bags, and wipes. The waste volume proposed for TG 9 consists primarily of experimental hardware and filters. The waste volume proposed for TG 18 consists of charcoal from reactor ventilation systems. Upon approval, the waste volumes will be incorporated into the STP and will be subject to the existing CPV activity milestones, pending approval of proposed Revision 7.b.

Waste volume additions that do not meet the definition of a revision to the FFCO, per Section X.B.5, will be reflected in the annual STP Update, in accordance with Section VIII.A.

Anticipated length of delay resulting from the proposed revision including affected compliance dates (X. C. 2. c)
No delays are anticipated.

If delay occurs, implementation of new schedule (X. C. 2. d)
No delays are anticipated.

Description of applicable waste code, waste form, volumes, technology and capacity needs (VIII. B)
Table 1 presents the information required by Section VIII of the FFCO for the addition of new covered waste for each applicable treatability group.

Schedule for treatment (VIII. B)
All new covered waste declared in the proposed Revision request will continue to follow the current treatment schedules in accordance with the CPV.

Table 1
Addition of New Covered Waste

Treatability Group (TG)	Increase in Volume (m^3)	TG Title and Waste Form	Waste Code	Technology and Capacity Needs	Schedules for Treatment
TG 8	2.0	Organic Debris with Organic Contaminants	D018, D021, D023, D024, D025, D027, D029, D035, D036, D038, D039, D040, D043	Per CPV	Per CPV
TG 9	9.9	Inorganic Debris with TCLP Metals	D004, D005, D006, D007, D008, D009, D010, D011	Per CPV	Per CPV
TG 18	1.7	Particulates with Organic Contaminants	D001, D003	Per CPV	Per CPV

ENCLOSURE A

DOE and Sandia STP Proposed Revision
of Compliance Dates in CPV (Section X. B. 2)
Proposed Revision No. 7.b

The following portions of this enclosure follow the requirements of Section X. C. 2 Revisions of the FFCO, as revised and amended.

Detailed description of the proposed revision (X. C. 2. a)
The purpose of proposed Revision No. 7.b is to request the modification of specific milestones within the compliance schedules for the following treatment technologies:

Deactivation: The treatment technology of Deactivation applies to TG 1 (Inorganic Debris with Explosive), TG 2 (Inorganic Debris with Water Reactive), and TG 3 (Reactive Metals). Deactivation is discussed in Section 3.1.1.1 of the CPV. Examples of mixed waste items that may be found include explosive switches, aerosol cans containing various products, and small volumes of various chemicals requiring deactivation.

The following proposed compliance schedule for Deactivation reflects the intent of the DOE and Sandia to complete treatment of existing TG 2 waste (defined as TG 2 waste identified in the STP inventory as of September 30, 2002) in accordance with the compliance date of December 31, 2003, established in Revision No. 6.

Deactivation Schedule

Activity	Compliance Date
A. Submit permit application, amendment, or modification to NMED	Completed
B. Initiate set-up of laboratory operation.	Completed
C. Complete systems testing and commence operation and begin treating mixed waste.	Completed
D.1 Complete recycling/treatment of existing TG 2 (Inorganic Debris with a Water Reactive Component) volume identified as of September 30, 2002, to applicable regulatory standards and,	December 31, 2003
D.2 Complete recycling/treatment of existing mixed waste to applicable regulatory standards or,	~~December 31, 2003~~December 31, 2004
E. Complete shipping of existing wastes to an off-site treatment/recycling facility	~~December 31, 2003~~December 31, 2004
F. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

With the exception of the existing TG 2 waste volume, as defined above, these milestone extensions will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

Thermal Desorption: The treatment technology of Thermal Desorption applies to TG 8 (Organic Debris with Organic Contaminants) and is discussed in Section 3.1.1.6 of the CPV. Soft compactable waste is a primary example of TG 8 mixed waste items that may be found or generated, including personal protective equipment (PPE), paper towels, rags, and cloth. These types of wastes are currently treated by off-site shipment for thermal desorption or solvent washing. Because additional volumes of soft compactable waste will be generated during the sorting operations, the DOE and Sandia are requesting that the compliance dates be extended.

The following proposed compliance schedule for Thermal Desorption reflects the intent of the DOE and Sandia to complete shipment of existing TG 8 waste (defined as TG 8 waste identified in the STP inventory as of September 30, 2002) in accordance with the compliance date of July 27, 2003, established in Revision No. 6.

Thermal Desorption Schedule

Activity	Compliance Date
A. Submit permit application, amendment, or modification to NMED	~~December 16, 1996~~Completed
B.1 Complete shipping of existing TG 8 (Organic Debris with Organic Contaminants) volume identified as of September 30, 2002, to an off-site treatment/recycling facility, and	July 27, 2003
B.2 Complete shipping of existing wastes to an off-site treatment/recycling facility	~~July 27, 2003~~December 31, 2004
C. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

With the exception of the existing TG 8 waste volume, as defined above, this milestone extension will apply to covered waste added in accordance with the Order (Amendment No. 3 or Revision process).

Deactivation followed by Stabilization: The treatment technology of Deactivation followed by Stabilization applies to TG 13 (Oxidizers) and TG 20 (Propellant with TCLP Metals). Deactivation followed by Stabilization is discussed in Section 3.1.1.7 of the CPV.

Small quantities of chemicals, determined to be oxidizers, have been found during sorting operations and will be treated on-site by deactivation followed by stabilization. Because it is likely that additional quantities of such chemicals will be identified during further sorting operations, the DOE and Sandia are requesting that the compliance dates be extended.

The following proposed compliance schedule for Deactivation reflects the intent of the DOE and Sandia to complete treatment of existing TG 13 waste (defined as TG 13 waste identified in the STP inventory as of September 30, 2002) in accordance with the compliance date of December 31, 2003, established in

Deactivation followed by Stabilization Schedule

Activity	Compliance Date
A. Submit permit application, amendment, or modification to NMED	Completed
B. Initiate set-up of laboratory operation.	Completed
C. Complete systems testing and commence operation and begin treating mixed waste.	Completed
D.1 Complete recycling/treatment of existing TG 13 (Oxidizer) volume identified as of September 30, 2002, to applicable regulatory standards, and	December 31, 2003
D.2 Complete recycling/treatment of existing mixed waste to applicable regulatory standards or,	~~December 31, 2003~~December 31, 2004
E. Complete shipping of existing wastes to an off-site treatment/recycling facility	~~December 31, 2003~~December 31, 2004
F. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

With the exception of the existing TG 13 waste volume, as defined above, these milestone extensions will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

Stabilization: The treatment technology of Stabilization applies to TG 15 (Soils <50% Debris & Particulates with TCLP Metals) and TG 19 (Liquids with Metals). Stabilization is discussed in Section 3.1.1.9 of the CPV. Examples of mixed waste items requiring stabilization that may be found include powders, soils, vacuum cleaner contents, oils, and liquids. Extension of the compliance dates is requested to treat new covered and newly discovered covered waste. The requested extension dates to the Stabilization compliance schedule are reflected in the following proposed schedule:

Stabilization Schedule

Activity	Compliance Date
A. Initiate set-up of laboratory operation.	Obtain new permit or modify or amend existing NMED permit if required
B. Complete systems testing and commence operation and begin treating mixed waste.	Completed
C. Complete recycling/treatment of existing mixed wastes to applicable regulatory standards or,	~~September 1, 2003~~December 31, 2004
D. Complete shipping of existing wastes to an off-site	~~September 1, 2003~~December 31, 2004

treatment/recycling facility	
E. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

These milestone extensions will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

Hydrothermal Processing: The treatment technology of Hydrothermal Processing applies to TG 11 (Organic Liquids II) and is discussed in Section 3.2.1 of the CPV. Examples of TG 11 mixed waste items that may be found include organic liquids drained from aerosol cans, oils, and solvents. These types of wastes are currently treated by off-site shipment for hydrothermal processing or incineration. Section 3.2.1 of the CPV currently requires that "Off-site shipments must be completed by June 30, 2003". The requested extension date to the Hydrothermal Processing compliance schedule would require that "Off-site shipments must be completed by December 31, 2004". This milestone extension will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

Sorting of Heterogeneous Debris: The treatment technology of Sorting of Heterogeneous Debris applies to TG 10 (Heterogeneous Debris) and is discussed in Section 3.3.1 of the CPV. Examples of TG 10 mixed waste items that may be found include experimental hardware and electronics. Through disassembly and further sorting, the mixed waste actually present in the items can be reduced and segregated into other appropriate treatability groups for treatment and/or disposal. Section 3.3.1 of the CPV currently requires that "Off-site shipments must be completed by November 30, 2003". The requested extension date to the Sorting of Heterogeneous Debris compliance schedule would require that "Off-site shipments must be completed by December 31, 2004". This milestone extension will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

New compliance activity schedules are requested for the following treatment technologies:

Neutralization followed by Stabilization: The treatment technology of Neutralization followed by Stabilization applies to TG 5 (Aqueous Liquids (Corrosive)), as discussed in Section 3.1.1.3 of the CPV. Examples of mixed waste items that may be found include radiological standards and various corrosive liquids. The existing compliance schedule for Neutralization followed by Stabilization is modified as follows:

Neutralization followed by Stabilization Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	Completed
B. Initiate set-up of laboratory operation.	Completed
C. Complete system testing and commence operation and begin treating mixed waste.	Completed
D. Complete recycling/treatment of existing mixed wastes to applicable regulatory standards or,	~~Completed~~ December 31, 2004
E. Complete shipping of existing wastes to an off-site treatment/recycling facility	~~Completed~~ December 31, 2004
F. Provide documentation to NMED that waste was	Within 45 working days of receipt of waste at

received at off-site treatment/recycling facility	treatment/recycling facility

This milestone modification will apply to covered waste currently in inventory or added in accordance with the Order (Amendment No. 3 or Revision process).

Amalgamation: The treatment technology of Amalgamation applies to TG 6 (Elemental Mercury) and is discussed in Section 3.1.1.4 of the CPV. Examples of mixed waste items that may be found include elemental mercury from manometers and thermometers. The existing compliance schedule for Amalgamation is modified as follows:

Amalgamation Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	~~December 16, 1996~~Completed
B. Complete recycling/treatment of existing mixed wastes to applicable regulatory standards or,	~~Completed~~ December 31, 2004
C. Complete shipping of existing wastes to an off-site treatment/recycling facility	~~Completed~~ December 31, 2004
D. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

This milestone modification will apply to covered waste added in accordance with the Order (Amendment No. 3 or Revision process).

Evaporative Oxidation: The treatment technology of Evaporative Oxidation applies to TG 14 (Aqueous Liquids with Organic Contaminants) and is discussed in Section 3.1.1.8 of the CPV. Examples of mixed waste items that may be found include rinse water from decontamination activities or experimental processes. The existing compliance schedule for Evaporative Oxidation is modified as follows:

Evaporative Oxidation Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	~~December 16, 1996~~Completed
B. Complete recycling/treatment of existing mixed wastes to applicable regulatory standards or,	December 31, 2004
C. Complete shipping of existing wastes to an off-site treatment/recycling facility	~~Completed~~ December 31, 2004
D. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	Within 45 working days of receipt of waste at treatment/recycling facility

This milestone modification will apply to covered waste added in accordance with the Order (Amendment No. 3 or Revision process).

Rationale for the proposed revision (X. C. 2. b)

Sandia began extensive sorting activities associated with legacy low-level radioactive waste (LLW) in the first quarter of FY02. The initial inventory process is expected to be completed during the third quarter of FY03. Concurrently, a detailed sorting and characterization of potential mixed waste items separated during the initial sorting of LLW legacy waste is planned for completion during the first quarter of FY04. All of the mixed waste volumes found during LLW sorting activities are newly discovered covered wastes (Section V.A), immediately subject to, and protected by, the Order. The waste volumes are added to the STP through the Amendment No. 3 process or through the Revision process.

While the final volume and types of newly discovered covered waste sorted from the legacy LLW will not be known until detailed sorting is complete, to date over 10 cubic meters (m^3) have been identified as potentially mixed waste. Mixed waste items such as aerosol cans, corrosive liquids, and oxidizers, are intended for on-site treatment at SNL/NM, following characterization. Organic and inorganic debris, as well as organic liquids, may require characterization and shipment to an off-site facility for treatment and disposal. Items such as large pieces of experimental hardware will likely require further sorting or disassembly to reduce and segregate the mixed waste volumes for proper characterization, treatment, and disposal. Because these are significant waste management activities that will require sufficient time to complete, the DOE and Sandia are requesting that specific compliance activity dates be extended.

The DOE and Sandia intend to meet the compliance activity dates approved in Revision No. 6 for existing covered waste in TGs 2, 8, and 13, as defined in the FY02 STP Annual Update, and the proposed changes to the compliance activities for these TGs reflect that commitment. For other TGs, combining existing and newly discovered covered waste volumes, and applying an extended compliance date, will better serve the interests of the Order by

- Streamlining management of mixed waste treatability groups,
- Allowing the DOE and Sandia to more effectively utilize personnel and resources to characterize, treat, and/or dispose of the wastes, and
- Reducing the overall cost of treatment and disposal with a negligible increase in the total volume of the mixed waste inventory (4% or 1.4 m^3) above the current inventory.

Some of the mixed waste items being segregated during the LLW sorting activities include corrosive liquids (TG 5). It is anticipated that other items likely to be found may include aqueous liquids with organic contaminants (TG 14) and elemental mercury (TG 6). These three TGs do not currently have specified compliance activity schedules, as required by Section 3.1.1 of the CPV. The DOE and Sandia had met the previous applicable milestones and, through previous Revisions, requested that such milestones be deleted from the STP as completed. The NMED concurred through approval of these previous Revision requests. Now that waste volumes are being identified that are immediately subject to the Order, these compliance schedules should be reinstated. Therefore DOE and Sandia are requesting that specific milestones be added for these waste items.

Anticipated length of delay resulting from the proposed revision including affected compliance dates (X. C. 2. c)

See the Tables and information provided above.

If delay occurs, implementation of new schedule (X. C. 2. d)

New schedules have been specified for Section 3.1.1.1, 3.1.1.3, 3.1.1.4, 3.1.1.6, 3.1.1.7, 3.1.1.8, 3.1.1.9, 3.2.1, and 3.3.1, and will be implemented upon approval of Revision No. 7. Otherwise, no delays are anticipated.

ENCLOSURE A

DOE and Sandia STP Proposed Revision
for the Increase in Volume of Treatability Group (TG) 25,
Classified Items with TCLP Metals (Section X. B. 4)
Proposed Revision No. 7.c

The following portions of this enclosure follow the requirements of Section X. C. 2 Revisions, of the FFCO, as revised and amended.

Detailed description of the proposed revision (X. C. 2. a)
The DOE and Sandia are submitting Proposed Revision No. 7.c, as required by Section X.B.4 (Revisions) of the FFCO, to increase the volume of covered waste in TG 25 in excess of 10% of the current volume. The DOE and Sandia are requesting approval to transfer a volume of 1.4 m^3 of waste from TG 10 (Heterogeneous Debris) and 1.4 m^3 of waste from TG 9 (Inorganic Debris with TCLP Metals) to TG 25 (Classified Items with TCLP Metals).

Rationale for the proposed revision (X. C. 2. b)
With the approval of Revision No. 5, a volume of 1.4 m^3 of soil and debris was added as new covered waste to the TG 10 inventory, requiring sorting and re-classification into other TGs. Just after the submission of Revision No. 6, it was determined that this waste is considered classified (Secret Restricted Data) and more appropriately belongs in TG 25.

In Revision No. 6, TG 25 was established with the transfer of 4.5 m^3 of classified waste being transferred from TG-9. Sorting and re-packaging operations, along with characterization, of waste within TG 9 have identified an additional volume of 1.4 m^3 classified waste items that should be transferred to TG 25.

Anticipated length of delay resulting from the proposed revision including affected compliance dates (X. C. 2. c)

No delays are anticipated.

If delay occurs, implementation of new schedule (X. C. 2. d)

No delays are anticipated.

ENCLOSURE A

Table 4 Summary of Treatability Groups and Associated Volumes

TG and Description	Revision No. 6.0 Volume	Proposed Revision No. 7.0 Volume[a]
TG 1 Inorganic Debris with Explosive Component	0.01 m^3	0.2 m^3
TG 2 Inorganic Debris with a Water Reactive Component	0 m^3	0.04 m^3
TG 3 Reactive Metals	0 m^3	0.01 m^3
TG 4 Elemental Lead	1.3 m^3	0.01 m^3
TG 5 Aqueous Liquids (Corrosive)	0 m^3	0.004 m^3
TG 6 Elemental Mercury	0 m^3	0 m^3
TG 7 Organic Liquids I	0 m^3	0 m^3
TG 8 Organic Debris with Organic Contaminants	4.1 m^3	2.0 m^3
TG 9 Inorganic Debris with TCLP Metals	10.5 m^3	12.2 m^3
TG 10 Heterogeneous Debris	2.5 m^3	0.5 m^3
TG 11 Organic Liquids II	0.002 m^3	0.15 m^3
TG 12 Organic Debris with TCLP Metals	12.8 m^3	0.3 m^3
TG 13 Oxidizers	0 m^3	0.09 m^3

Continued next page

Table 4 Summary of Treatability Groups and Associated Volumes (concluded)

TG and Description	Revision No. 6.0 Volume	Proposed Revision No. 7.0 Volume[a]
TG 14 Aqueous Liquids with Organic Contaminants	0 m^3	0 m^3
TG 15 Soils <50% Debris & Particulates with TCLP Metals	0 m^3	0.17 m^3
TG 16 Cyanide Waste	0 m^3	0 m^3
TG 17 Liquid/Solid with Organic and/or Metal Contaminants	6.9 m^3	6.35 m^3
TG 18 Soils <50% Debris & Particulates with Organic Contaminants	1.3 m^3	1.7 m^3
TG 19 Liquids with Metals	0.09 m^3	0 m^3
TG 20 Propellant with TCLP Metals	0.3 m^3	0.4 m^3
TG 21 Sealed Sources with TCLP Metals	1.0 m^3	1.0 m^3
TG 22 Reserved	Not Applicable	Not Applicable
TG 23 Thermal Batteries	6.3 m^3	0 m^3
TG 24 Spark Gap Tubes with TCLP Metals	2.2 m^3	2.2 m^3
TG 25 Classified Items with TCLP Metals	4.5 m^3	7.4 m^3
TG 26 Debris Items with Reactive Compounds and TCLP Metals	0.3 m^3	0.4 m^3
TG 27 High Mercury Solids and Liquids	0.15 m^3	0.13 m^3
MTRU Mixed Transuranic Waste	0.7 m^3	0.8 m^3

[a] Volumes indicated may reflect waste volumes that have been treated or shipped off-site for treatment and disposal but have not yet received NMED approval of the deletion request.