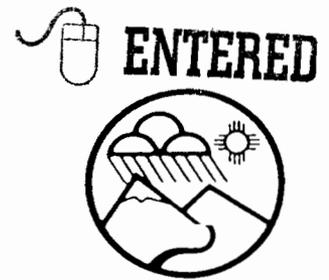




GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

May 9, 1996

James R. Hartman, Ph.D.  
Director  
Directorate of the Environment  
U.S. Army Air Defense Artillery Center and Fort Bliss  
ATZC-DOE  
Fort Bliss, Texas 79916-0058

**RE: Class III Modification for US Army Air Defense Artillery  
Center Fort Bliss Open Detonation Operational Permit  
EPA ID No. NM4213720101-01**

Dear Dr. Hartman:

The New Mexico Environment Department (**NMED**) Hazardous and Radioactive Materials Bureau (**HRMB**) has completed review of the US Army Air Defense Artillery Center Fort Bliss (hereafter Fort Bliss) Open Detonation (OD) Operational Permit request for Class III permit Modification. You indicated in your letter of September 22, 1995 that you needed to increase the amount of waste munitions to be open detonated from 1372 pounds Net Explosive Weight (**NEW**) to 10,000 pounds **NEW** per year. You explained in your letter that the need for an increase in the amount of ordnance to be detonated followed much discussion with your Safety Office, Ammunition Surveillance Office, and the 41st Explosive Ordnance Disposal Officer. In addition, in a telephone conversation between Sheri Bone of Fort Bliss and Cornelius Amindyas of HRMB (November 16, 1995), we understood that the initial amount of 1373 pounds per year was erroneously given in the original Part A Permit application from which the current operational permit was developed.

Based upon the above explanation, NMED hereby approves the Class III permit modification for the US Army Fort Bliss's Open Detonation Treatment Unit. The effective date of the approval is your date of receipt of this letter. The changes made to the OD operational permit are shown on the first four sheets of the attached pages. The next four sheets are NMED's response to comments received from the public during the 60 day public comment period that started on February 12, 1996 and ended on April 11, 1996.

Dr. Hartman, Fort Bliss  
Page 2  
May 9, 1996

The corrected portions of the permit text, with the modifications incorporated can be found on the last seven sheets. These changes have been incorporated into the Fort Bliss Open Detonation operational permit text of June 8, 1995, **EPA ID #: NM4213720101-01**. You are required to incorporate the enclosed copies of the permit modification into Fort Bliss's copy of the OD Permit originally issued by NMED.

If you have any questions on this matter you may contact either Barbara Hoditschek or Cornelius Amindyas at (505) 827-1561.

Sincerely,



Ed Kelley, Ph.D.  
Director, Water and Waste Management Division

Enclosures

cc: Benito Garcia, Chief HRMB  
Barbara Hoditschek, Program Manager, RCRA, HRMB  
David Neleigh, EPA Region VI (6PD-N)  
Files: Red and Reading 96

NEW MEXICO ENVIRONMENT DEPARTMENT (NMED)  
RESPONSE TO COMMENTS RECEIVED ON THE U.S.  
DEPARTMENT OF DEFENSE, U.S ARMY AIR DEFENSE  
ARTILLERY CENTER FORT BLISS OPEN DETONATION  
CLASS 3 DRAFT PERMIT MODIFICATION

EPA ID NUMBER: NM4213720101-01

Comment Period Ran From February 12, 1996  
to April 11, 1996.

List of Commentors                      Comment #(s)                      Page(s)

Marianne Thaeler, Chairperson, Military Issues Sierra Club, Las Cruces, New Mexico....	1-2	1-3
--	-----	-----

**NOTE:** Changes made in the draft Permit due to Public Comments are indicated as follows: **shaded areas** indicate added material, **strikeouts** indicate deleted material. This will assist the reader in rapid identification of the changes that were made.

## **PUBLIC COMMENTS:**

**COMMENTS RECEIVED FROM MARIANNE THAELE, CHAIRPERSON, MILITARY ISSUES, RIO GRANDE CHAPTER, SIERRA CLUB, LAS CRUCES, NEW MEXICO**

### **Comment # 1:**

- (a) "As we requested in our previous comments, it should be recognized that McGregor Range is not military fee land, but rather McGregor Range is temporarily withdrawn by Congress until the year 2001. McGregor Range is jointly managed with the Department of Interior, Bureau of Land Management, specifically the Caballo Resource Area of the Las Cruces district. See Public law 99-66. McGregor Range is located in Otero County, New Mexico."
- (b) Therefore, we suggest that all future meetings regarding US Army Fort Bliss be conducted in the New Mexico County where the OB/OD site is located. This is Otero County; the County seat is Alamogordo, New Mexico. And we suggest that the County Commission of Otero County and its planning units be fully informed of activities proposed to take place in their County.

### **HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU (HRMB) RESPONSE**

- (a) NMED responded to the Commentor's concern in paragraph one of Comment # 1 prior to permit issuance on June 8, 1995. A condition was added in Module II, page 6, paragraph K.1.b., that Fort Bliss "shall cease all open detonation (OD) activities" at the subject OD unit "if the US Congress decommissions McGregor Range".
- (b) The choice of the place for the informal public meeting on the proposed permit modification was the prerogative of the facility, since the Permittee requested the permit modification, as per HWMR-7<sup>1</sup>, Part IX, 40 CFR 270.2(ii). However, NMED has always held, and will continue to hold future public meetings on Fort Bliss OB/OD and other regulated units in proximity to the potentially affected communities.

**Permit Modification None**

---

<sup>1</sup>NOTE: The Subject Permit was Issued under, and Remains Governed by HWMR-7

**COMMENT # 2**

- (a) Because Fort Bliss is one of only two military installations in the United States that straddles a state border, we recommend strongly that the NMED coordinate with the state of Texas and EPA on any matters dealing with required environmental regulation of activities conducted by US Army Fort Bliss in New Mexico that have potential implications and impacts for both the State of Texas and the State of New Mexico. The OB/OD site on McGregor Range is close to the Texas/NM border and thus is in the same air and water sheds with the State of Texas.
- (b) Because the original Permit for the OB/OD unit is less than one year old, and this Permit modification request is to increase the permitted volumes of munitions to be disposed of at the site to 10,000 lbs. per year, we believe a decision on this modification request should await the final decision to the question, when are military munitions to be considered hazardous waste? This is particularly important since individuals representing Fort Bliss declared at the February 27, 1996 meeting in Las Cruces that munitions are regularly moved across the State border. We are raising the issue of potential interstate transport of hazardous materials and issues of joint jurisdiction.
- (c) We strongly support the clean up of McGregor Range in anticipation of the return of McGregor Range lands to the BLM in Otero County, New Mexico. And, we support the use of new technologies for the disposal of military munitions.

**HRMB RESPONSE**

- (a) There are currently no plans between the States of Texas and New Mexico to coordinate the regulation of facilities that treat, store, or dispose of hazardous waste in either State. New Mexico only has jurisdiction on facilities that manage or plan to manage hazardous waste in New Mexico. In addition, there is no air or water impact from the OD unit.
- (b) The answer to the question of when Fort Bliss's military munitions are declared hazardous waste can be found in the OD operational Permit on page 1, paragraph 2 of Permit Attachment A, Waste Analysis Plan as in the following sentence: "When records indicate that pyrotechnics, explosives, and propellants (PEP) materials have reduced military use due to age, the materials are segregated, designated "waste material", and they are transported to the OD treatment unit for demolition by Explosive Ordnance Disposal personnel.

In response to the second part of Comment # 2, paragraph (b) regarding hazardous materials movement from Texas to New Mexico, NMED wishes to explain that the Department regulates hazardous **waste**, not hazardous materials.

- (c) The suggestion by the commentor about the use of new technologies is plausible, and Fort Bliss is once more reminded (as previously advised in response to comments during the subject permit issuance) to explore methods of applying current experimental innovative technologies (**ITs**) for the disposal of military munitions, whenever the ITs become commercialized.

**Permit Modification: None**

**FORT BLISS PROPOSED CLASS III PERMIT MODIFICATION: OD TREATMENT  
UNIT**

**May 2, 1996**

Modifications made to the U.S Army Air Defense Artillery Center and Fort Bliss (hereafter **Fort Bliss**) Open Detonation Operational Permit issued June 8, 1995 are indicated as follows: **Shaded** areas indicate added material, while ~~strikeouts~~ indicate deleted material.

**Item # 1:**

**NOTE:** Permit Module I, Page 11 of 12, Paragraph 1, the New Hazardous and Radioactive Materials Bureau contact address has been changed as follows:

RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
~~525 Marquez Camino de los Marquez~~  
**2044 Galisteo Street**  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-~~1563~~ **4308**

Facsimile Number: (505) 827-~~1544~~ **4361**

**ITEM # 2:**

Permit Attachment A, page 1, Paragraph 3 has been revised as follows:

**PERMIT ATTACHMENT A**

**WASTE ANALYSIS PLAN**

The following information describes the measures that will be taken to assure that the wastes treated at the Open Detonation (OD) treatment unit by the U.S. Army Air Defense Artillery Center and Fort Bliss (USAADACENFB) are in accordance with the requirements of HWMR-7, Part. V, § 264.13, and the unit-specific requirements of HWMR-7, Part. V, § 264, Subpart X.

The OD unit is a thermal treatment unit owned by the United States Government and operated by USAADACENFB. The hazardous wastes to be treated at the OD unit include propellants, explosives, and pyrotechnics (PEP), in the form of pure substances and contaminated solid wastes. The waste materials subject to treatment result from demilitarization of existing stockpiles and off specification materials. When records indicate that PEP materials have reduced military use due to age, the materials are segregated, designated "waste material", and they are transported to the OD treatment unit for demolition by EOD personnel.

USAADACENFB plans to detonate up to ~~1372~~ 10,000 pounds (~~623~~ 4539 kilograms) of hazardous waste munitions per calendar year or ~~343~~ 2,500 pounds (~~156~~ 1135 kilograms) per quarter. Tables A-2 through A-7 are a list of the waste munitions that will be treated at the OD unit.

**ITEM # 3:**

Permit Attachment F, Page 2, Paragraph 4 has been revised as follows:

**Maximum Waste Inventory:**

The maximum inventory of waste expected to be in treatment at the OD unit at anytime during the life of the unit will not exceed ~~343~~ 2,500 pounds (~~156~~ 1135 kilograms) Net Explosive Weight (NEW) of munitions per quarter of explosive-contaminated material. No more than ~~1372~~ 10,000 pounds (~~623~~ 4539 kilograms) NEW of materials will be detonated in a year. Therefore, the expected waste inventory for the permitted life of the open detonation treatment unit is ~~13,720~~ 100,000 pounds (~~6230~~ 45,390 kilograms) of waste munitions.

**ITEM # 4:**

Permit Module III, Page 1, Paragraphs 3 and 4 have been revised as follows:

**B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION**

- B.1. The Permittee may open detonate only the wastes listed in Permit Attachment M (Permitted Waste Codes and Maximum Treatment Quantities) and in Tables A-2 through A-6. The Permittee is

prohibited from treating Radioactive Nuclear Waste, Mixed Waste, and Polychlorinated Biphenyls (PCBs). All treatment shall consist of explosive open detonation only.

B.2. The Permittee is prohibited from treating hazardous waste that is not identified in Permit Condition B.1. above, including shipping and storage containers for waste explosives. The amount of waste munitions to be open detonated shall not exceed ~~1372~~ 10,000 pounds (~~623~~ 4,539 kilograms) Net Explosive Weight (NEW) per calendar year or ~~13,720~~ 100,000 pounds (~~6230~~ 45,390 kilograms) (NEW) for the permitted life of the OD treatment unit.

B.3. The Permittee shall not open detonate more than ~~343~~ 2,500 pounds (~~156~~ 1135 kilograms) waste munitions per quarter, except in case of an emergency, after authorization by the Secretary.

**ITEM # 5:**

Permit Attachment I, Page 1, Paragraph 4 has been revised as follows:

**Explosive Limits:**

Explosive limits will be established for each disposal operation so that each EOD Team Leader will be charged with the responsibility of not exceeding the established limit of ~~343~~ 2,500 pounds (~~156~~ 1135 kilograms) per quarter.

**ITEM # 6:**

Permit Attachment I, Page 3, Paragraph 5, has been revised as follows:

**Quantity of Waste per Movement**

The weight of PEP per movement, including shipping containers, will not exceed the load limit of the vehicle. However, practically the loads are much less and are not expected to exceed ~~343~~ 2,500 pounds (~~156~~ 1135 kilograms) per load.

EPA I.D. Number (Enter from page 1)										Secondary ID Number (Enter from page 1)											
N	M	4	2	1	3	7	2	0	1	0	1										

**XII. Process Codes and Design Capabilities (Continued)**

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code <small>(From list above)</small>	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only
		1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>		
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	T 0 4	1372.00 10,000.00	lbs/yr		
2					
3					
4					
5					
6					
7					
8					
9					
1 0					
1 1					
1 2					
1 3					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

**XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)**

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
		1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>		
X 1	T 0 4				In-situ Vitrification
1					
2					
3					
4					

US ARMY FORT BLISS  
CLASS 3 PERMIT MODIFICATION  
PAGES FOR INCORPORATION INTO THE OPEN  
DETONATION OPERATIONAL PERMIT

requested by the Secretary, a designee, or authorized representative, shall be signed and certified in accordance with HWMR-7, Part IX, §270.11 and 270.30(k).

**G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE SECRETARY**

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Secretary or should be sent by certified mail or given to:

RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo Street  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-1561

Facsimile Number: (505) 827-1544

**H. CONFIDENTIAL INFORMATION**

In accordance with HWMR-7, Part IX, §270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

**I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

The Permittee shall maintain a written operating record of OD activities and laboratory results at the Davis Dome facility at the McGregor Range in compliance with HWMR-7, Part V, 264.73, until closure is completed and certified by an independent, New Mexico registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by HWMR-7, Part V, §264.13 and this Permit.
2. Inspection schedules, as required by HWMR-7, Part V, §264.15(b)(2) and this Permit.

**PERMIT ATTACHMENT A**

**WASTE ANALYSIS PLAN**

The following information describes the measures that will be taken to assure that the wastes treated at the Open Detonation (OD) treatment unit by the U.S. Army Air Defense Artillery Center and Fort Bliss (USAADACENFB) are in accordance with the requirements of HWMR-7, Part. V, § 264.13, and the unit-specific requirements of HWMR-7, Part. V, § 264, Subpart X.

The OD unit is a thermal treatment unit owned by the United States Government and operated by USAADACENFB. The hazardous wastes to be treated at the OD unit include propellants, explosives, and pyrotechnics (PEP), in the form of pure substances and contaminated solid wastes. The waste materials subject to treatment result from demilitarization of existing stockpiles and off specification materials. When records indicate that PEP materials have reduced military use due to age, the materials are segregated, designated "waste material", and they are transported to the OD treatment unit for demolition by EOD personnel.

USAADACENFB plans to detonate up to 10,000 pounds ( 4539 kilograms) of hazardous waste munitions per calendar year or 2,500 pounds (1135 kilograms) per quarter. Tables A-2 through A-7 are a list of the waste munitions that will be treated at the OD unit.

**WASTE CHARACTERISTICS**

The chemical and physical characteristics of waste thermally treated at the OD treatment unit are described in this section along with a waste analysis plan for sampling, testing, and evaluating the waste. Table A-1 is an example of generator supplied information that will be obtained from the explosives manufacturers and used together with the Materials Safety Data Sheet and equivalent technical information to characterize the waste munitions, since by their nature the subject waste munitions are too dangerous to characterize by chemical analysis.

**CHEMICAL AND PHYSICAL ANALYSES [HWMR-7, Part IX, §270.14 (b) (2) and 264.13(a)]**

For the vast majority of the wastes thermally treated at the OD unit, the physical and chemical characteristics required to prove

Final Closure:

Final closure activities for the OD treatment unit is scheduled for the year 2005 and will consist of (1) decontaminating and decommissioning all structures and equipment used for hazardous waste treatment; (2) decontaminating the area within the OD treatment unit; and (3) removing any hazardous waste residues to a permitted treatment, storage, or disposal facility.

Final closure of the OD treatment unit will be complete when (1) all hazardous waste and hazardous waste residues have been removed from the OD unit to a permitted TSD facility for proper management; and (2) all structures, equipment, and surrounding areas have been decontaminated.

Maximum Extent of Operations

The maximum extent of operations that will be open during the term of this permit includes the Open Detonation unit.

Maximum Waste Inventory:

The maximum inventory of waste expected to be in treatment at the OD unit at anytime during the life of the unit will not exceed 2,500 pounds (1,135 kilograms) Net Explosive Weight (NEW) of munitions per quarter of explosive-contaminated material. No more than 10,000 pounds (4,539 kilograms) NEW of materials will be detonated in a year. Therefore, the expected waste inventory for the permitted life of the open detonation treatment unit is 100,000 pounds (45,390 kilograms) of waste munitions.

Schedule for Closure

OD cleaning, sampling, and analytical activities are expected to take 180 days. Closure will proceed by the following schedule:

Closure Schedule:

<u>Activity</u>	<u>Maximum Time Required</u>
Notify NMED of intent to Close	0 Days
Process final volumes of wastes	30 Days
Completion of site characterization	60 Days
Completion of remediation	165 Days

## MODULE III-TREATMENT OF ENERGETIC WASTES

### A. MODULE HIGHLIGHTS

This module contains a general description of the permitted and prohibited waste identification, the design plan of the open detonation treatment unit, and the standard operating procedures. Also included are a description of the amount of waste munitions allowed to be treated, how the wastes are to be handled prior to OD activities, the sampling and analysis plan for the potentially contaminated soil and ash/residues following OD operations, and the procedures for limiting air emissions. Further, the climatic conditions, risk assessment, and methods of protecting the environmental media are presented.

### B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- B.1. The Permittee may open detonate only the wastes listed in Permit Attachment M (Permitted Waste Codes and Maximum Treatment Quantities) and in Tables A-2 through A-6. The Permittee is prohibited from treating Radioactive Nuclear Waste, Mixed Waste, and Polychlorinated Biphenyls (PCBs). All treatment shall consist of explosive open detonation only.
- B.2. The Permittee is prohibited from treating hazardous waste that is not identified in Permit Condition B.1. above, including shipping and storage containers for waste explosives. The amount of waste munitions to be open detonated shall not exceed 10,000 pounds (4539 kilograms) Net Explosive Weight (NEW) per calendar year or 100,000 pounds (45,390 kilograms) (NEW) for the permitted life of the OD treatment unit.
- B.3. The Permittee shall not open detonate more than 2,500 pounds (1135 kilograms) waste munitions per quarter, except in case of an emergency, after authorization by the Secretary.

### C. OPEN DETONATION ON THE GROUND:

- C.1. The Permittee shall construct, maintain and operate the OD treatment unit to minimize the possibility of a fire, explosion, or any unplanned, sudden or nonsudden release of

PERMIT ATTACHMENT I

STANDARD OPERATING PROCEDURES

**Introduction:**

The following is a description of the Standard Operating Procedures (SOP) that will be implemented by all Explosive Ordnance Disposal (EOD) personnel of the U.S. Army Air Defense Artillery Center and Fort Bliss. These procedures include the inspection of vehicles that will be used in transporting waste munitions to the OD unit, transportation of the inspected vehicles to the OD unit, and unloading of waste munitions brought by those vehicles. After unloading the waste munitions, the hazardous waste munitions will be subjected to open detonation. Safety criteria are also presented, and the meteorologic conditions under which OD operations will be allowed. Further, medical evacuation of OD personnel accidentally injured during Ordnance Demolition activities is outlined.

**Personnel and Explosives limits:**

All waste demolition/disposal operations will be analyzed with a view toward reducing personnel and quantity of explosives that could be subjected to an incident.

**Personnel limits:**

A minimum of two EOD qualified personnel will be exposed for a minimum time to the smallest quantity of explosives consistent with safety requirements and efficiency. One person will be available near the hazard area during explosive operations to give warning and assist in rescue activities in the event of an accident. The safe area will be determined by the senior EOD persons present. Trucks transporting explosive material to demolition site shall meet the U.S. department of transportation (DOT) requirements. Not more than two persons will ride in the cab.

**Explosive limits:**

Explosive limits will be established for each disposal operation so that each EOD Team Leader will be charged with the responsibility of not exceeding the established limit of 2,500 pounds (1135 kilograms) per quarter.

is used to enter the OD excavation.

East of Davis Dome during OD operations there is no reason for traffic except EOD personnel. The EOD unit establishes its base of operation on the unpaved entry road during treatment operations so as to stop any traffic approaching the treatment unit.

#### Number and Type of Vehicles

The only vehicles on the dirt roads between the viewing stands and the treatment unit during OD operations are carrier trucks appropriate for transport of the waste in its containers, and lighter trucks for personnel transport. There should not be more than four such vehicles in the area at any one time.

During range operations, (i.e., target practice) there will not be any vehicles east of the viewing stands. Any other vehicle movement in the area of the treatment unit (i.e., when there are no OD operations and no Range operations) will be Range personnel conducting maintenance operations or, potentially, reclamation of target materials.

#### Transfer and Pick-Up Stations

Pickup is at the PEP bunkers on McGregor Range. When loaded the waste materials will be transported directly to the OD unit, without being transferred to another vehicle.

#### Quantity of Waste Per Movement

The weight of PEP waste per movement, including shipping containers, will not exceed the load limit of the vehicle. However, practically the loads are much less and are not expected to exceed 2,500 pounds (1135 kg) per load.

#### Route Capacities

The road surface design loads are not known, however, the asphalt roads have supported the trucks transporting PEP, as well as missile carriers and other heavy military equipment, since 1965 with normal maintenance and resurfacing. The unpaved roads are on a very hard base (usually rock) and have previously supported the vehicles involved in treatment operations for many years.

EPA I.D. Number (Enter from page 1) Secondary Number (Enter from page 1)

N	M	4	2	1	3	7	2	0	1	0	1								
---	---	---	---	---	---	---	---	---	---	---	---	--	--	--	--	--	--	--	--

**XII. Process Codes and Design Capabilities (Continued)**

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only											
	1. Amount (Specify)					2. Unit Of Measure <small>(Enter code)</small>													
X 1	S	0	2			5 3 3 . 7 8 8	G	0	0	1									
1	T	0	4			10,000 .00	lbs/yr												
2						.													
3						.													
4						.													
5						.													
6						.													
7						.													
8						.													
9						.													
1 0						.													
1 1						.													
1 2						.													
1 3						.													

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

**XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)**

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
	1. Amount (Specify)					2. Unit Of Measure <small>(Enter code)</small>		
X 1	T	0	4					In-situ Vitrification
1								
2								
3								
4								