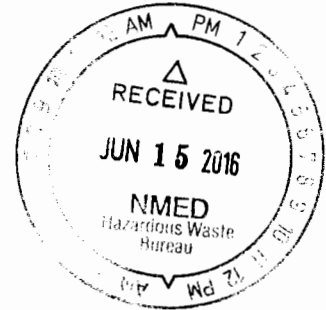




Department of Energy ENTERED
National Nuclear Security Administration
Sandia Field Office
P.O. Box 5400
Albuquerque, NM 87185



JUN 14 2016



Mr. Brian Salem
FFCO Project Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East, Bldg. 1
Santa Fe, New Mexico 87505

Subject: Proposed Revision No. 15 to the Mixed Waste Site Treatment Plan, Compliance Plan Volume, for Sandia National Laboratories/New Mexico

Dear Mr. Salem:

The Department of Energy/National Nuclear Security Administration (DOE/NNSA) and Sandia Corporation (Sandia) hereby submit proposed Revision No. 15 to the Mixed Waste Site Treatment Plan (STP), Compliance Plan Volume (CPV) for Sandia National Laboratories/New Mexico (SNL/NM). The revision request has been prepared for the New Mexico Environment Department (NMED) in accordance with the requirements of Part X *Revisions* of the Federal Facility Compliance Order (FFCO), as revised and amended.

In accordance with Section X.B of the FFCO, a revision is required to modify a compliance date by more than 90 days (Section X.B.2). Proposed Revision No. 15 would establish new December 31, 2020 compliance dates for all treatment technologies and treatability groups (TGs). Additionally, this proposed revision updates the STP to update the parallel preferred options for management of mixed transuranic (MTRU) wastes that are destined for disposal at the Waste Isolation Pilot Plant (WIPP).

Viable mixed waste treatment and disposal options are available for most mixed wastes, and the DOE/NNSA and Sandia believe that routine mixed wastes can be treated within one year. Establishing new compliance dates for all TGs would provide continuity of the STP CPV requirements, and ensure that valid compliance dates are in place for future wastes that cannot be treated within one year.

The only wastes currently subject to the FFCO at SNL/NM are MTRU wastes that are destined for disposal at WIPP. However, the WIPP facility is currently not accepting MTRU wastes. The DOE/NNSA and Sandia anticipate that the WIPP schedule for future waste shipments and disposal operations will be more certain by December 31, 2020; this updated information will be reflected in proposals for future STP revisions. The MTRU wastes at SNL/NM are and will remain subject to the FFCO during potentially lengthy storage at SNL/NM. Revision No. 15 also updates the volume of MTRU waste to include anticipated future wastes.

Mr. Brian Salem

04/14/2012

The requested changes to the STP compliance dates will not reduce the capacity of DOE/NNSA and Sandia to protect human health and the environment. Additionally, the requested changes will:

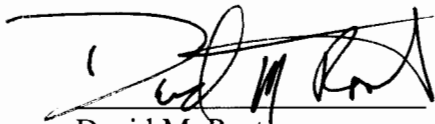
1. Have a negligible impact on the total quantity of mixed waste stored, treated, or disposed.
2. Allow DOE/NNSA and Sandia to realize significant positive impacts on both the overall cost and the operational effectiveness of mixed waste treatment and disposal.
3. Ensure continuity of the STP CPV requirements, including the process for reporting mixed waste volumes to NMED.

The proposed revision is detailed in Enclosure A to this letter, including information required by the FFCO, Section X.C. The proposed changes to the CPV are provided in Enclosure B, as redline/strikeout, for NMED's review, comment, and approval. A clean copy of the proposed changes reflecting proposed Revision No. 15 is included as Enclosure C. An electronic copy of the proposed CPV text is also provided in both redline/strikeout and clean formats.

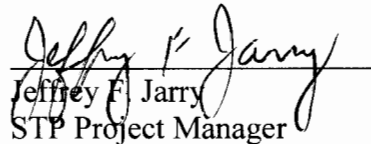
As required by the FFCO, Part XX, *Documents, Information, and Reporting Requirements*, Section D, *Certification Statements*, the appropriate certification is also provided.

The DOE/NNSA and Sandia are available to provide additional information as necessary. If you have questions, please contact David Rast at (505) 845-5349.

Sincerely,



David M. Rast
STP Project Manager
DOE/NNSA Sandia Field Office



Jeffrey F. Jarry
STP Project Manager
Sandia Corporation

Enclosures

cc w/ enclosures:

David Cobrain
Hazardous Waste Bureau
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2905 Rodeo Park Dr. E., Bldg. 1, Santa Fe, New Mexico 87505

Brian Salem
Hazardous Waste Bureau
New Mexico Environment Department
121 Tijeras Ave. NE, Albuquerque, New Mexico 87102

Mr. Brian Salem

3

Susan Lucas Kamat,
DOE Oversight Bureau
New Mexico Environment Department
121 Tijeras Ave. NE, Albuquerque, New Mexico 87102

Zimmerman Library
MSC05 3020
1 University of New Mexico, Albuquerque, New Mexico 87101-0001

SNL Customer Funded Records Center, MS-0651

cc w/o enclosure:

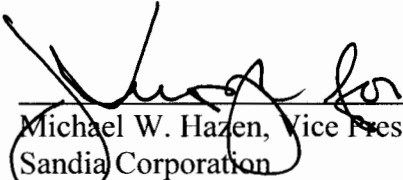
Amy Blumberg, SNL/NM
Terry Cooper, SNL/NM
Jesse Farr, SNL-NM
Michael Hazen, SNL/NM
Jeffrey Jarry, SNL/NM
Tim Lewandowski, SNL/NM
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678546

**Proposed Revision No. 15
Sandia National Laboratories
Mixed Waste Site Treatment Plan
Compliance Plan Volume**

**Sandia National Laboratories
Albuquerque, New Mexico**


CERTIFICATION STATEMENT

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.



Michael W. Hazen, Vice President
Sandia Corporation
Albuquerque, New Mexico
Operator

5/23/16
Date Signed



Jeffrey Harrell, Manager
U.S. Department of Energy
National Nuclear Security Administration
Sandia Field Office
Owner

6/10/16
Date Signed

ENCLOSURE A

**Proposed Revision No. 15 to the Sandia National Laboratories
Mixed Waste Site Treatment Plan,
Compliance Plan Volume
Sandia National Laboratories/New Mexico**

ENCLOSURE A

Proposed Revision No. 15 to the Sandia National Laboratories
Mixed Waste Site Treatment Plan (STP)
Compliance Plan Volume (CPV),
Sandia National Laboratories/New Mexico (SNL/NM)

The Department of Energy/National Nuclear Security Administration (DOE/NNSA) and Sandia Corporation (Sandia) are requesting revision of the compliance schedules for covered waste, i.e., all treatability groups (TGs) that may become subject to the STP CPV for SNL/NM. The proposed revision request has been prepared for the New Mexico Environment Department (NMED) in accordance with the requirements of Section X.C, *Revisions*, of the Federal Facilities Compliance Order (FFCO), as revised and amended.

Proposed Revision No. 15 is comprised of the following requests:

- Addition of newly discovered covered waste to Mixed Transuranic (MTRU) treatability group (TG) in excess of one cubic meter or greater than 10% of the current waste volume (Proposed Revision 15.a, Enclosure A-1)
- Modification of specific compliance dates associated with TGs currently in the STP CPV (Proposed Revision 15.b, Enclosure A-2)
- Updating the description of parallel preferred options for management of wastes in the MTRU TG to reflect available options for management of remote-handled MTRU wastes.

Table 1 presents a summary of the TGs and the associated volumes reported in the FY15 Annual STP (Enclosure A-3).

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-1

DOE/NNSA and Sandia STP Proposed Revision for Addition of New Covered Waste (Section X. B. 5) Proposed Revision No. 15.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/NNSA 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 an additional volume of 1.0 cubic meter (m³) of newly discovered covered waste be added to the MTRU TG inventory. 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 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 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.

A waste volume of 1.0 m³ is requested for addition to the MTRU inventory. Some waste may be generated from the processing of experimental assemblies containing transuranic materials in the Auxiliary Hot Cell Facility. Process knowledge indicates that such waste is likely to be mixed waste due to the potential presence of metals from electronics and solder. The remaining waste would result from collection of unneeded radioactive MTRU sources.

Upon approval of this Revision, the waste volume will be incorporated into the STP and will be subject to the existing CPV activity milestones approved in this Revision No. 15. The DOE and Sandia will store this waste pending the acceptance of MTRU waste at the Waste Isolation Pilot Project (WIPP). Deletion requests for the MTRU waste will be submitted to the NMED in accordance with the requirements of the STP and FFCO.

Waste volume additions that do not meet the definition of a revision to the FFCO, per Section X.B.5; will continue to 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.

Schedule for treatment (VIII.B)

All 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 (m³)	TG Title and Waste Form	Waste Code*	Technology and Capacity Needs	Schedules for Treatment
MTRU	1.0	Mixed TRU (MTRU) Waste	D006, D007, D008, D011	Per CPV	Per CPV

ENCLOSURE A-2

DOE/NNSA and Sandia STP Proposed Revision for Establishment of Compliance Dates for All Treatability Groups (Section X. B. 2) Proposed Revision No. 15.b

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

Detailed description of the proposed revision (X.C.2.a)

The purpose of proposed Revision No. 15.a is to request the modification of remaining compliance activities and dates for all treatment technologies and associated treatability groups (TGs). The following compliance schedules are requested.

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. There is no covered waste in the current inventory of these TGs.

The requested dates to be established in the Deactivation compliance schedule are reflected in the following proposed schedule:

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 system testing and commence operation and begin treating mixed waste.	Completed
D. Complete recycling/treatment of mixed wastes to applicable regulatory standards or,	December 31, 2020
E. Complete shipping of wastes to an off-site treatment/recycling facility, and	December 31, 2020
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

Macroencapsulation: The treatment technology of Macroencapsulation applies to TG 4 (Elemental Lead), TG 9 (Inorganic Debris with TCLP Metals), and TG 12 (Organic Debris with TCLP Metals). Macroencapsulation is discussed in Section 3.1.1.2 of the CPV. There is no covered waste in the current inventory of these TGs.

The requested dates to be established in the Macroencapsulation compliance schedule are reflected in the following proposed schedule:

Macroencapsulation Schedule

Activity	Compliance Date
A. Submit permit application, amendment, or modification to NMED	Completed
B. Complete recycling/treatment of mixed waste to applicable regulatory standards or,	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility, and	December 31, 2020
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

Neutralization followed-by Stabilization: The treatment technology of Neutralization followed by Stabilization applies to TG 5 (Aqueous Liquids) and is discussed in Section 3.1.1.3 of the CPV. No waste is currently in inventory.

The requested dates to be established in the Neutralization followed by Stabilization compliance schedule are reflected in the following proposed schedule:

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 mixed wastes to applicable regulatory standards or,	December 31, 2020
E. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Amalgamation: The treatment technology of Amalgamation applies to TG 6 (Elemental Mercury) and is discussed in Section 3.1.1.4 of the CPV. No waste is currently in inventory. The Mercury Export Ban Act (Public Law 110-414) amended the Toxic Substances Control Act (TSCA) in 15 United States Code (USC) 2605(f) and prohibits Federal agencies from transferring elemental mercury. As long as this prohibition exists, the DOE/NNSA and Sandia will store this waste on-site.

However, compliance dates for treatment or shipment activities are included should the prohibition be clarified, modified or lifted. Additional discussion is provided in the rationale for the proposed Revision.

The requested dates to be established in the Amalgamation compliance schedule are reflected in the following proposed schedule:

Amalgamation Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	Completed
B. Complete recycling/treatment of mixed wastes to applicable regulatory standards or,	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Incineration: The treatment technology of Incineration applies to TG 7 (Organic Liquids I) and TG 18 (Particulates and Soils with Organic Contaminants). Incineration is discussed in Section 3.1.1.5 of the CPV. No waste is currently in inventory.

The requested dates to be established in the Incineration compliance schedule are reflected in the following proposed schedule:

Incineration Schedule

Activity	Compliance Date
A. Complete shipping of wastes to an off-site treatment/recycling facility.	December 31, 2020
B. Provide documentation to NMED that waste was received at off-site facility	Within 45 working days of receipt of waste at treatment/recycling facility

Thermal Desorption: The treatment technology of Thermal Desorption applies to TG 8 (Organic Debris) and is discussed in Section 3.1.1.6 of the CPV. No waste is currently in inventory.

The requested dates to be established in the Thermal Desorption compliance schedule are reflected in the following proposed schedule:

Thermal Desorption Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	Completed
B. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

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. There is no covered waste in the current inventory of these TGs.

The requested dates to be established in the Deactivation followed by Stabilization compliance schedule are reflected in the following proposed schedule:

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 system testing and commence operation and begin treating mixed waste.	Completed
D. Complete recycling/treatment to applicable regulatory standards, or shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

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. No waste is currently in inventory.

The requested dates to be established in the Evaporative Oxidation compliance schedule are reflected in the following proposed schedule:

Evaporative Oxidation Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	Completed
B. Complete recycling/treatment of mixed wastes to applicable regulatory standards or,	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Stabilization: The treatment technology of Stabilization applies to TG 15 (Soils <50% Debris & Particulates with TCLP Metals) and TG 19 (Liquids with Metals). Stabilization discussed in Section 3.1.1.9 of the CPV. There is no covered waste in the current inventory of these TGs.

The requested dates to be established in 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 mixed wastes to applicable regulatory standards or,	December 31, 2020
D. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Oxidation: The treatment technology of Oxidation applies to TG 16 (Cyanide Waste) and is discussed in Section 3.1.1.10 of the CPV. No waste is currently in inventory.

The requested dates to be established in the Oxidation compliance schedule are reflected in the following proposed schedule:

Oxidation Schedule

Activity	Compliance Date
A. Submit permit application, amendment or modification to NMED	Completed
B. Complete recycling/treatment of mixed wastes to applicable regulatory standards or,	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Incineration followed by Stabilization: The treatment technology of Incineration followed by Stabilization applies to TG 17 (Liquid/Solid with Organic and/or Metal Contaminants) and is discussed in Section 3.1.1.11 of the CPV. No waste is currently in inventory.

The requested dates to be established in the Incineration followed by Stabilization compliance schedule are reflected in the following proposed schedule:

Incineration followed by Stabilization Schedule

Activity	Compliance Date
A. Complete treatment to applicable regulatory standards or shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
B. 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

Off-Site Shipment / On-Site Macroencapsulation: The treatment technology of Off-Site Shipment / On-Site Macroencapsulation applies to TG 21 (Sealed Sources with TCLP Metals), TG 24 (Spark Gap Tubes with TCLP Metals), and TG 26 (Debris with Reactive Compounds and TCLP Metals). Off-Site Shipment / On-Site Macroencapsulation is discussed in Section 3.1.1.12 of the CPV. There is no covered waste in the current inventory of these TGs. A parallel treatment option is on-site macroencapsulation, which would be followed either by shipment to an off-site facility for disposal, or by storage pending development of further treatment and disposal options. On June 3, 2004, the NMED approved a site-specific treatment variance to allow for macroencapsulation of less than debris sized manufactured items exhibiting the toxicity characteristic for metal(s), containing radioactive material, and potentially externally contaminated with radioactive materials.

The requested dates to be established in the Off-Site Shipment / On-Site Macroencapsulation compliance schedule are reflected in the following proposed schedule:

Off-Site Shipment / Macroencapsulation Schedule

Activity	Compliance Date
A. Provide progress report of current status and availability of treatment and/or disposal options	Completed
B. Complete on-site macroencapsulation of waste, or	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility and	December 31, 2020
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

Size Reduction followed by Stabilization/Deactivation followed by Macroencapsulation: The treatment technology of Size Reduction followed by Stabilization/Deactivation followed by Macroencapsulation applies to TG 23 (Thermal Batteries) and is discussed in Section 3.1.1.13 of the CPV. No waste is currently in inventory. Deactivation followed by macroencapsulation is a parallel preferred option.

The requested dates to be established in the Size Reduction followed by Stabilization/Deactivation followed by Macroencapsulation compliance schedule are reflected in the following proposed schedule:

Stabilization Schedule

Activity	Compliance Date
A. Render existing thermal batteries non-reactive	Completed
B. Provide progress report of current status and availability of treatment and/or disposal options	Completed
C. Complete shipping of wastes to an off-site treatment/recycling facility and	December 31, 2020
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

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. No waste is currently in inventory.

The requested dates to be established in the Hydrothermal Processing compliance schedule are reflected in the following proposed schedule:

Off-Site Shipment Schedule

Activity	Compliance Date
A. Complete shipping of wastes to an off-site treatment/recycling facility and	December 31, 2020
B. 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

Stabilization of High Mercury Materials: The treatment technology of Stabilization of High Mercury Materials applies to TG 27 (High Mercury Solids and Liquids) and is discussed in Section 3.2.2 of the CPV. No waste is currently in inventory. The compliance activities and dates associated with this TG may be impacted by the Mercury Export Ban Act (Public Law 110-414) which amended the TSCA in 15 USC 2605(f) restricting Federal agencies from transferring elemental mercury. As long as this prohibition exists, the DOE/NNSA and Sandia will store this waste on-site. However, compliance dates for treatment or shipment activities are included should the prohibition be clarified, modified or lifted. Additional discussion is provided in the rationale for the proposed Revision.

The requested dates to be established in the Stabilization of High Mercury Materials compliance schedule are reflected in the following proposed schedule:

High Mercury Solids and Liquids Schedule

Activity	Compliance Date
A. Provide progress report of current status and availability of treatment and/or disposal options	Completed
B. Complete recycling/treatment of wastes to applicable regulatory standards or,	December 31, 2020
C. Complete shipping of wastes to an off-site treatment/recycling facility	December 31, 2020
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

Sorting of Heterogeneous Debris: The treatment technology of Sorting of Heterogeneous Debris applies to TG 10 (Heterogeneous Debris) and TG 25 (Classified Items with TCLP Metals). Sorting of Heterogeneous Debris is discussed in Section 3.3.1 of the CPV. There is no covered waste in the current inventory of these TGs.

The requested dates to be established in the Sorting of Heterogeneous Debris compliance schedule for TG 10 are reflected in the following proposed schedule:

Heterogeneous Debris Schedule

Activity	Compliance Date
A. Complete sorting of wastes or	December 31, 2020
B. Complete shipping of wastes to an off-site treatment/recycling facility and	December 31, 2020
C. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	December 31, 2020

The requested dates to be established in the Classified Items with TCLP Metals compliance schedule for TG 25 is reflected in the following proposed schedule:

Classified Items with TCLP Metals Schedule

Activity	Compliance Date
A. Complete sorting or on-site treatment of wastes or	December 31, 2020
B. Complete shipping of wastes to an off-site treatment/recycling facility and	December 31, 2020
C. Provide documentation to NMED that waste was received at off-site treatment/recycling facility	December 31, 2020

Mixed TRU (MTRU) Waste: The treatment and/or shipment of MTRU waste is discussed in Section 4.0 of the CPV. Approximately 1.0 m³ of MTRU is currently in inventory.

The requested dates to be established in the MTRU compliance schedule are reflected in the following proposed schedule:

MTRU Schedule

Activity	Compliance Date
A. Development of treatment technology	Completed
B. Submit permit application amendment, or modification to NMED for treatment of MTRU waste	Completed
C. Complete preparation of existing MTRU wastes for on-site certification or shipment to an off-site certifying facility	Within three (3) years after <ul style="list-style-type: none"> a) the applicable state's approval of the certifying facility's revised RCRA permit allowing them to receive SNL/NM waste b) the certifying facility is certified by WIPP for heterogeneous and/or homogeneous MTRU waste, as applicable, and c) the certifying facility's waste acceptance criteria are met.
D. Complete shipping of existing MTRU waste to an off-site facility for certification and disposal at the WIPP facility or direct shipment of certified MTRU waste to WIPP	December 31, 2020
E. Provide documentation to NMED that MTRU waste was received at an off-site certifying facility or at WIPP	Within 45 working days of receipt of waste at certifying facility

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

The DOE/NNSA and Sandia have developed on-site treatment technologies or identified off-site treatment and/or disposal facilities to address routine mixed waste utilizing the treatment technologies identified for these TGs. While the DOE/NNSA and Sandia fully intend to treat and/or dispose of all newly generated mixed waste within one year, precluding such waste from becoming a covered waste subject to the STP, the DOE/NNSA and Sandia also believe that a long-term compliance date should be established for each treatment technology for the following purposes:

- 1) *Characterization and shipment of MTRU waste* – the DOE/NNSA and Sandia are currently working with WIPP to characterize and ship all existing covered MTRU waste off-site, either to WIPP (for waste that has been certified) or to a certifying facility, e.g., LANL or INL. However, the WIPP facility and certifying facilities are currently not accepting any MTRU waste and may not accept waste for some time. The characterization and off-site shipment of MTRU is a very time-intensive process and the DOE/NNSA and Sandia believe that the current compliance dates should be extended for existing and future MTRU covered waste. This extension would allow for definitive planning and effective management of the MTRU waste
- 2) *Address waste discovered during sorting operations that would be immediately subject to the FFCO* - Typically, mixed waste that is identified during sorting activities is over one year old and is immediately subject to and protected by the FFCO. If such waste is discovered during

these sorting activities, and such waste would be included in one of these TGs, then an assigned compliance date is needed to provide a process for the DOE/NNSA and Sandia to comply with the FFCO. The compliance date defines the TG, ensures that the DOE/NNSA and Sandia treat and/or dispose of the waste within a specific timeframe, and continues the current notification pathway to the NMED.

- 3) *Support the effective waste management of newly generated or identified mixed wastes* - The establishment of a specific compliance milestone for each TG allows for more definitive planning and more effective waste management for both newly generated and newly discovered covered mixed waste. An example would be grouping small quantities of waste for specific treatment and disposal options into one larger quantity, thereby making more effective and efficient use of personnel and resources to characterize, treat, and/or dispose of such wastes.
- 4) *Maintain and ensure compliance with the STP* - The assignment of a compliance date serves the interest of the STP and the NMED by ensuring that the DOE/NNSA and Sandia treat or dispose of covered waste in a timely and compliant manner. An assigned compliance date for these TGs also allows the current documentation process to continue in accordance with the CPV.

The DOE/NNSA and Sandia are requesting that December 31, 2020 be established as a long-term compliance activity date, as reflected in the treatment technology schedules defined in the above section. By assigning this compliance date to all TGs now, the DOE and Sandia seek to avoid the submission of multiple revision requests to establish such dates in the near future.

The Mercury Export Ban Act (Public Law 110-414) amended the TSCA and restricts the movement of elemental mercury stating that "...no Federal agency shall convey, sell, or distribute to any other federal agency, any State or local government agency, or any private individual or entity any elemental mercury under the control or jurisdiction of the Federal agency". The intent is to ship all elemental mercury to a designated DOE facility for long term storage. Until a designated facility is identified and operational, the DOE/NNSA and Sandia will store any elemental mercury pending shipment. The Mercury Export Ban Act applies to TGs 6 and 11, and is discussed in Sections 3.1.1.4 and 3.2.2 of the CPV.

Anticipated length of delay resulting from the proposed revision including affected compliance dates

(X. C. 2. c)

No delays are anticipated other than potential delays associated with WIPP waste acceptance.

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

New schedules have been specified for most treatment technologies and will be implemented upon approval of Revision No. 15. Otherwise, no delays are anticipated.

ENCLOSURE A-3

Table 1 Summary of Treatability Groups and Associated Volumes

TG and Description	Proposed Revision No. 15 Volume
TG 1 Inorganic Debris with Explosive Component	0 m ³
TG 2 Inorganic Debris with a Water Reactive Component	0 m ³
TG 3 Reactive Metals	0 m ³
TG 4 Elemental Lead	0 m ³
TG 5 Aqueous Liquids (Corrosive)	0 m ³
TG 6 Elemental Mercury	0 m ³
TG 7 Organic Liquids I	0 m ³
TG 8 Organic Debris with Organic Contaminants	0 m ³
TG 9 Inorganic Debris with TCLP Metals	0 m ³
TG 10 Heterogeneous Debris	0 m ³
TG 11 Organic Liquids II	0 m ³
TG 12 Organic Debris with TCLP Metals	0 m ³
TG 13 Oxidizers	0 m ³

Continued next page

Table 1 Summary of Treatability Groups and Associated Volumes (concluded)

TG and Description	Proposed Revision No. 15 Volume
TG 14 Aqueous Liquids with Organic Contaminants	0 m ³
TG 15 Soils <50% Debris & Particulates with TCLP Metals	0 m ³
TG 16 Cyanide Waste	0 m ³
TG 17 Liquid/Solid with Organic and/or Metal Contaminants	0 m ³
TG 18 Soils <50% Debris & Particulates with Organic Contaminants	0 m ³
TG 19 Liquids with Metals	0 m ³
TG 20 Propellant with TCLP Metals	0 m ³
TG 21 Sealed Sources with TCLP Metals	0 m ³
TG 22 Reserved	Not Applicable
TG 23 Thermal Batteries	0 m ³
TG 24 Spark Gap Tubes with TCLP Metals	0 m ³
TG 25 Classified Items with TCLP Metals	0 m ³
TG 26 Debris Items with Reactive Compounds and TCLP Metals	0 m ³
TG 27 High Mercury Solids and Liquids	0 m ³
MTRU Mixed Transuranic Waste	2.0 m ³