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Pages (including cover sheet): 2

Date: 12/15/99

Re: Commitment from Dr. Triay to provide list of anticipated Class 2 modification requests

Comments: The following table contains a summary description of Class 2 permit modification requests that CAO/WID anticipate submitting to NMED in 2000.

991217



Class 2 Permit Modification Requests Currently Planned for Submittal to NMED

Permit Section	Category	Summary	Submittal Date
B3	B.2.b	Simplify Quality Assurance/ Quality Control laboratory procedures for identifying VOCs and SVOCs in solid samples.	January 4, 2000
B3	B.2.b	Simplify QA/QC laboratory procedures for identifying metals in solid samples.	January 4, 2000
B, B2	B.1.d	Reduce headspace gas sampling requirements for some solids and for thermally treated waste.	January 4, 2000
B1	B.1.d	Eliminate requirement for control-charting of repackaged homogenous solids with inadequate acceptable knowledge.	January 4, 2000
B1	B.1.d	Allow use of one sub-sample during analysis of solids for VOCs.	January 4, 2000
B3	B.1.d	Allow laboratories flexibility in retaining samples to address ALARA considerations.	March 27, 2000
B1	B.1.d	Allow laboratories flexibility in selecting methodology for performing pressure checks on canisters.	March 27, 2000
B, B6	A.4.b	Allow site certification audits to be performed every 11-13 months.	March 27, 2000
B, various	B.1.d B.6.a (and additional Class 1 changes)	Add RH Waste Analysis Plan and insert RH facility and waste handling descriptions. (These will be submitted as two modification requests.)	June 9, 2000
B	B.1.d	Reduce drum age criteria based upon number of layers and confinement.	June 15, 2000
B, various	B.1.d	Allow disposal of PCB contaminated waste.	September 21, 2000

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