

Permit Section	Changes Requested	Explanation and Supporting Information
<p>Attachment 4, Appendix A, Reqt Source: WAC 173-303-350(3)(d)</p>	<p>DOE/RL-94-02, Sections 2.2 and 2.2.1.1, discusses personnel job titles, which will fill duties and responsibilities of the Emergency Coordinator, described in WAC 173-303-360. A list of current assigned or “on-call” BEDs/BWs is maintained at the Patrol Operations Center per II.A.4. A list of BEDs/BWs for each Hanford TSD unit required to have an emergency coordinator is maintained in Permit Attachment 4A. Changing BEDs/BWs is a Class 1 modification, self-implemented.</p>	<p>The stricken text relates to WAC 173-303-201(9)(b) generator requirements, not WAC 173-303-350 TSD unit requirements. The WAC 173-303-201(9)(b) generator requirements and associated implementation processes are addressed in another portion of Appendix A. Pertinent elements of the stricken text need to be relocated to the WAC 173-303-201(9)(b) portion of Attachment 4, Appendix A.</p> <p>These changes are needed to accommodate recent Dangerous Waste regulation changes described in Ecology Publication 19-04-005 and also to align with II.A conditions.</p> <p>Attachment 4, Appendix A is published by the DOE and a copy is provided to Ecology for incorporation into the permit. DOE intends to incorporate the changes shown. Does Ecology have any concerns with incorporating the changes shown?</p>
<p>Attachment 4, Appendix A, Reqt Source: WAC 173-303-201(9)(b)</p>	<p>DOE/RL-94-02, Sections 2.2 and 2.2.1.1 discusses personnel job titles, which will fill duties and responsibilities of the Emergency Coordinator, described in WAC 173-303-201(13). A list of current assigned or “on-call” BEDs/BWs is maintained at the Patrol Operations Center per II.A.4. A list of BEDs/BWs for central accumulation areas and satellite accumulation areas is maintained in Permit Attachment 4A. Changing BEDs/BWs on this list is not subject to permit modification requirements. Updates to the list will be provided to Ecology per II.A.4.a.</p>	<p>These changes are needed to accommodate recent Dangerous Waste regulation changes described in Ecology Publication 19-04-005 and also to align with II.A conditions.</p> <p>Attachment 4, Appendix A is published by the DOE and a copy of the revised document will be provided to Ecology for incorporation into the permit. DOE intends to incorporate the changes shown. Does Ecology have any concerns with incorporating the changes shown?</p>
<p>Condition II.A.5</p>	<p>The proposed/draft changes eliminate text published in: 8C.2019.Q2 (PCN-HFSW-2019-03) 8C.2019.Q3 8C.2019.Q4.</p>	

	<p>The permittee requests Ecology relocate the original II.A.5 text to a new section (i.e., II.A.7).</p>	
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