

U. S. Department of Energy

Please see attached file containing comments from the U.S. Department of Energy

Comments on Ecology Chapter 173-441 WAC Rulemaking, Filing Date October 6, 2021

United States Department of Energy, Richland Operations Office and Office of River Protection

Section Citation	Requested Action	Basis for Requested Action
WAC 173-441-085(1)(d)	Add text in bold, "...permanently cease to operate at any point during the emission year. "	This change would clarify that a permanent operational cessation realized at any point in the emission year would obviate the need for third-party verification.
WAC 173-441-085(4)(a)(iii)	Delete WAC 173-441-084(4)(a)(iii) in full.	Changing a third-party verifier would not likely interfere with the new verifier's ability to perform a less-intensive verification during year two or three of a three-year period. A new verifier would be able to perform a satisfactory verification after obtaining a copy of the latest full verification report from the reporter or previous verifier.