

Anonymous

There is concern that the Draft Rev. 9A Permit does not clearly conform to the requirements of Chapter 173-303 WAC. In multiple instances, the draft appears to incorporate extensive Part B application material, engineering-level detail, generator information, and narrative content that belongs in the administrative record rather than in enforceable permit conditions and attachments. A dangerous waste permit should clearly identify the legally enforceable conditions, the regulatory basis for each condition, and the specific unit or activity to which each requirement applies. In addition, permit conditions should include clear regulatory citations so the public can determine whether Ecology has applied the correct standards to the correct unit groups. Where conditions are incorporated expressly or by reference, the regulatory basis should be stated clearly enough to satisfy WAC 173-303-815(2)(e). Without that clarity, meaningful public review is impaired. For these reasons, Ecology should revise the draft permit, identify the legal basis for each substantive permit condition, remove material that is not required to be part of the permit itself, and ensure that the fact sheet and administrative record provide the supporting detail necessary for informed public participation under WAC 173-303-840 and WAC 173-303-900.