

Comments for Central Waste Complex Outdoor Storage Area-A Class 3 Permit Modification

public comment period

1. Unit Specific Permit Conditions V.34.B.3

The permittees will notify Ecology within at least five (5) working days prior to conducting the visual inspection required by Section H.4.1.1 of the Addendum H, "Closure Plan." Ecology and the Permittees will walk down the area to determine if any additional focused samples are required.

Response: This permit condition has three issues:

1. Unclear language: "within" typically implies a period shorter than the specified timeframe, whereas "at least" suggests a minimum of the specified timeframe.
2. Permit condition does not align with language in Section H.4.1.1.
3. The permit condition requirements are not under the control of the Permittees. The Permittees have no right or authority to mandate a walk down of the area by the regulator.

Recommendation: Revise permit condition language as follows:

The permittees will notify Ecology ~~within~~ at least five (5) working days prior to conducting the visual inspection required by Section H.4.1.1 of the Addendum H, "Closure Plan." ~~*Ecology and the Permittees will walk down the area to determine if any additional focused samples are required.*~~