From: Gent, Philip (ECY)
To: Spencer, Gail (ECY)
Cc: Hibbard, Richard (ECY); Martell, P John (DOH)
Subject: RE: Statement of Basis (SOB)
Date: Thursday, January 15, 2015 10:20:59 AM

Gail,

More than happy to opine. ☺

Philip Gent, PE
Waste Management Section
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7983
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From: Spencer, Gail (ECY)
Sent: Wednesday, January 14, 2015 12:37 PM
To: Gent, Philip (ECY)
Cc: Hibbard, Richard (ECY); Martell, P John (DOH)
Subject: RE: Statement of Basis (SOB)

Phil,
Sorry I didn't explain things more when I sent you the E-mail, yesterday. Yes, Rich explained to me that Hanford needs flexibility. So, I don't expect our standard SOB to be applicable to Hanford. But, I did want to include you in, in case you had suggestions or comments for the rest of the group.

-GS

From: Gent, Philip (ECY)
Sent: Wednesday, January 14, 2015 10:16 AM
To: Spencer, Gail (ECY)
Cc: Hibbard, Richard (ECY); Martell, P John (DOH)
Subject: RE: Statement of Basis (SOB)

Gail,

I agree it is 'do-able' not sure of the cost-benefit ratio
.
I could see guidance, a checklist, or a template on what a SoB should contain. I'm concerned about having a 'standard' SoB if it is created under the concept of all SoBs should be the same.

Is the intended scope for SoB standardization to apply to Ecology, Clean Air Agencies, Health, combination of some, all?

Looking specifically at Hanford, I have 4 separate SoBs for the Hanford AOP; one is for Standard Terms and Conditions, one is for toxic emissions, one is for radiological emissions, and one is for asbestos and open burn. This is done because the Hanford AOP is made up from requirements from Ecology, Health, and Benton Clean Air Agency.

If we have a standard SoB, then will all of the Hanford radiological SoB requirements be added to all of the SoBs in the state (many of which have no radiological requirements)?
NWP has placed a lot of the state-only requirements issue resolutions and permit shield discussion directly in the permit. Will it be expected to downgrade in the permit to place into the SoB? Will the Sob and permit become redundant?
Some items in the Hanford SoB are there at the request of DOE. Namely the forms to use to communicate changes requests to the AOP. These are not 'standard' so how would they be dealt with?

Not to be a stick in the mud, but I see Hanford as a large, complex, multi-faceted site that will either drive numerous requirements into a standard SoB no one else will every really need/use – or – I'll have a lot of work taking my SoBs and 'standardizing' them and throwing out 'not applicable' portions other need to have in a standard (e.g. do we have a list of all NESHAPS and then everyone will have to 'throw out' or 'NA' the ones not used?) and then adding Hanford centric items into it anyway.

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From: Spencer, Gail (ECY)
Sent: Tuesday, January 13, 2015 1:03 PM
To: Gent, Philip (ECY)
Cc: Hibbard, Richard (ECY)
Subject: FW: Statement of Basis (SOB)

Phil,
Yesterday, I sent the below E-mail and I forgot to include you. Please accept my apology and I hope you will have time to include your input.

-GS

From: Spencer, Gail (ECY)
Sent: Monday, January 12, 2015 12:44 PM
To: Le, Teddy (ECY); Rau, Crystal (ECY); Wigfield, Kim (ECY); Haller, Lynnette A. (ECY); Billings, Susan M. (ECY); Wood, Karen K. (ECY)
Cc: Johnston, Jeff (ECY)
Subject: Statement of Basis (SOB)

In September 2014, during EPA's review of our Title V Program, EPA recommended we standardize our SOB. Although each region has their own format, coming together and creating a standard SOB is 'do-able' but it would require some 'give and take' on everyone's part.

A few things that were noted during the review included permits missing MACT standards, state-only requirements needed clarification, deviations need to be recorded, permit shields should be clearly and carefully documented, etc. If we had a standard SOB it would possibly prevent these things from being overlooked.

I'd like to receive your input on this subject.

Gail Spencer | Statewide Title V Permit Coordinator
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