From: Faust, Eric T
To: Gent, Philip (ECY)
Cc: Trimberger, Bryan R; Skinnarland, Ron (ECY); Heuston, Daniel (ECY); Kaldor, Reed A
Subject: RE: AOP Renewal Application
Date: Monday, August 28, 2017 12:27:35 PM

Phil,

I apologize that the permit renewal did not get out of our shop by mid-August. The application was signed out by Doug Shoop this past Friday, but it is currently at MSA undergoing the printing and CD creation process.

I would ask that if Reed has a PDF available of the certified, complete application file, that he provide me a copy while it is undergoing the transmittal process. I could provide that electronic application file to you in advance of your formal receipt of our letter (17-ESQ-0092). If you would like that file, please let me know.

Thanks,

Eric

From: Gent, Philip (ECY) [mailto:pgen461@ECY.WA.GOV]
Sent: Monday, August 28, 2017 12:19 PM
To: Faust, Eric T <Eric.Faust@rl.doe.gov>
Cc: Trimberger, Bryan R <Bryan_R_Trimberger@orp.doe.gov>; Skinnarland, E R (Ron) <rski461@ecy.wa.gov>; Heuston, Daniel (ECY) <DHEU461@ECY.WA.GOV>
Subject: AOP Renewal Application

Eric,

I'm starting to become nervous about the renewal application schedule.

1. WAC 173-401-710 (3), permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with subsection (1) of this section and WAC 173-401-500. {emphasis added}

2. WAC 173-401-500 (4), allows for sixty days for Ecology to review the application for completeness.

The submission date of the renewal will either cause ecology to:

1. Accelerate our timeframe to resolve any issues that might be in the application that makes it incomplete in an

attempt to allow DOE to correct the issues before the end of September or

2. Work at the regular pace and hope the application is complete to support the use of a permit shield

Another concern is that NOC applications take precedence over AOP work. Ecology currently has two active NOCs with WRPS, three on hold, and one expected in mid-September. All of these will demand the same personnel and create and issue where DOE will need to assist Ecology with the establishment of priorities for work execution.

Philip