

# Permit Modifications

## a graded approach

- Class 1
  - Example: fixing typos, increasing monitoring or sampling
  - Permittee notifies Ecology and public.
- Class 1 prime –
  - Examples: changes in ownership, changing decon procedures
  - Requires Ecology's approval first

# Permit modifications, cont'd

- Class 2
  - Examples: increasing container or tank storage capacity, changes emergency procedures
  - Permittee must hold 60-day comment period
    - Public meeting required
  - Ecology can approve, reject, or modify
- Class 3
  - Examples: changing vit plant melter configuration, addition of corrective action programs.
  - Permittee holds comment period, as above, on application
  - Ecology holds 45-day comment period on draft permit
    - Public meeting Ecology's option.

# Why Two Comment Periods for Class 3 Mods?

The comment periods are separate and distinct because they are designed for two different purposes.

- The 60-day period allows comment on the permittee's request and assists Ecology in deciding whether to prepare a draft modification or a tentative denial.
- The 45-day period allows comment on Ecology's proposed action.

- Adapted from EPA, [RCRA-Online 13393](#), August 1990