

## Changes: Draft to Final

Minor changes have been made to the content of the draft NRECA approvals to improve readability. These changes are listed below.

1. Several changes have been made to the format of the approvals to maintain consistency with other PCB approvals issued by EPA Headquarters. These are non-substantive changes limited mostly to font, page format, and the appearance of the first page of the approval document.
2. We clarified in the *Definitions and Acronyms* section that “Secure Electric Cooperative Asset” and “Site” are interchangeable within the approval.
3. We clarified in Condition 5 that the Office of Resource Conservation and Recovery is in EPA Headquarters to avoid confusion about whether ORCR was located in the Regions or in Headquarters.
4. We changed the wording in Condition 9 surrounding disposal option (D). Instead of “EPA-approved PCB disposal facilities are allowable under the PCB regulations...” it now says “PCB disposal facilities permitted under 40 CFR part 761 are disposal options...” This is more precise and in line with language used in regional approvals.
5. We removed duplicative information from Condition 5 *Notifications* regarding membership changes. Condition 12 will cover membership changes in its entirety.
6. We clarified in Condition 12 the role of the new member cooperative with respect to how a new application is triggered. The draft accidentally omitted that a company that joins NRECA must **want** to obtain an approval with similar conditions before NRECA should submit their name for consideration. Similarly, “as new members join NRECA” was replaced with “as needed” to account for the possibility that a new member may not want to be considered for a similar approval, thus their name need not be submitted to the EPA.
7. We removed a sentence about subparts J and K from the *Decision to Approve*, since this is covered in Condition 14.
8. One member cooperative, Consumers Energy, was removed from Appendix II because they were granted a near identical approval in June 2014 as a member of USWAG. Therefore, Consumers Energy is not eligible to receive this approval.