

**Hill Air Force Base
Draft Permit Renewal
Fact Sheet**

On March 28, 2019 Hill Air Force Base (Hill AFB) submitted an application to the Division of Waste Management and Radiation Control to renew its hazardous waste permit. The current permit was issued on September 30, 2009.

Hill Air Force Base provides engineering, logistics management, and maintenance for a variety of Air Force assets. The associated industrial activities generate hazardous waste, as defined by R315-261 of the Utah Administrative Code, which is stored at the facility in containers prior to being shipped off-site for treatment and/or disposal. The Permit directs the management of hazardous waste storage operations at Hill Air Force Base and includes requirements for closure of the waste management facilities. Hill Air Force Base is located in Davis County.

The Division of Waste Management and Radiation Control has completed its review of the permit renewal application. A draft permit has been prepared and is available for review during the public comment period, which begins on August 7, 2020 and will conclude on September 21, 2020, at 5:00 p.m.

A public hearing to receive comment on the draft permit has been scheduled for 6:00 p.m. on Thursday, September 10, 2020 via Google Meet:

meet.google.com/rff-kfog-wdz
(US) +1 971-248-6830
PIN: 349 776 950#

For the public's convenience, a copy of the fact sheet and draft permit is available online at: <http://www.hazardouswaste.utah.gov/Public/PublicHearingsandCommentPeriods.htm>

Written comments will be accepted if received by 5:00 p.m. on September 21, 2020 and should be submitted to the address below.

Ty L. Howard, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Comments can also be sent by electronic mail to: dwmrcpublic@utah.gov. Comments sent in electronic format should be identified by putting the following in the subject line: Public Comment on Hill Air Force Base Draft Permit Renewal. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Following the public comment period on the draft Hill Air Force Base (Hill AFB) permit, all public comments will be evaluated and where appropriate will be included in the final decision on whether to reissue the permit. A final permit determination will then be made and the corresponding action taken.

Under Utah Code Section 19-1-301.5 a person who wishes to challenge a Permit Order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the director to fully consider the substance and significance of the issue.

The Hill AFB facility is an engineering, logistics management, and maintenance facility for the United States Air Force and operates a permitted transfer and storage facility. Hill AFB can manage RCRA waste streams. Waste is received and transported by truck. The facility is located at latitude 41° 07' 31" North and longitude 111° 59' 00" West. Hill AFB has one permitted storage facility comprised of two buildings. All waste sent to the Hill AFB facility is sent to other facilities for reclamation, treatment, and disposal.

The Draft Permit consists of four modules and nine attachments. A summary of each is provided below with the significant changes from the review noted. In June 2016, Title R315 of the Utah Administrative Code waste substantially changed. Most of the changes involved modification of the Code references. This resulted in a document where the numbering system reflected, to a large extent, the numbering system used in the Code of Federal Regulations (CFR). As a result, a citation that began as 40 CFR 264.32(a) became R315-264-32(a). There are exceptions to the changes, but they are few.

References to the Executive Secretary of the Division of Solid and Hazardous Waste have been changed throughout the Permit to the Director of the Division of Waste Management and Radiation Control.

Module 1, Standard Conditions

Attachments incorporated by reference have been added as enforceable conditions.

A condition regarding permit modification at the request of the Permittee has been added.

A clarification of submission of a permit renewal application for continuation of an expiring permit 180 days prior to Permit expiration has been added to this module.

Additional recordkeeping formats have been added to include electronic formats.

A condition allowing for reformatting documents and forms necessary to carry out administrative duties, as long as the documents and forms continue to contain the information required by the Permit, has been added.

Clarification of notice to the Director regarding planned changes to the hazardous waste management unit was added.

Claims of confidential information has been clarified with additional language.

Contact information for the Director and the Division have been updated and expanded.

The condition dealing with the manifest discrepancy report has been deleted from the permit, as HILL AFB has decided it will no longer accept offsite waste for storage at the hazardous waste storage facility.

Terms and conditions for protection of human health and the environment pursuant to Section 3005(C)(3) of RCRA (Section 212 of HSWA), codified as UAC R315-270-32 (b)(2) has been added.

A condition regarding the reimbursement of review and oversight costs for the Department of Environmental Quality has been added.

Module 2, General Hazardous Waste Storage Facility Conditions

A condition has been added to clarify requests to change the existing hazardous waste storage facility and the associated review process.

Three conditions regarding the offsite generated waste (Offsite Waste Receipt Notice, and two conditions under the Waste Analysis Plan (Condition II.E.) have been deleted from this permit, as HAFB has decided it will no longer accept offsite waste for storage at the hazardous waste storage facility.

Compressed gas cylinders have been added to the types of waste permitted for storage – provided they are managed in accordance with applicable DOT and OSHA regulations.

The data package associated with waste analysis has been clarified to specify that a complete data package includes: all appropriate logbooks containing essential information; data files containing raw data, completed data validation forms, and all worksheets that document acceptable accuracy and precision; final results; and all quality control data, calculations, chromatograms, etc., which support the reported data.

Language has been added to specify that a laboratory with provisional certification is not acceptable as a certified laboratory regarding laboratory analysis of waste.

A condition has been modified to specify that the Permittee shall conduct an evaluation of each new waste stream generated on site as they are generated and shall submit a report of the analysis to the Director.

The personnel training conditions have been clarified by requiring training on an annual basis and that training records. These records shall clearly indicate the person being trained, the employee's position, job description, and the type and amount of training received.

A condition has been modified to include the new requirement for maintenance of a Quick Reference Guide under the contingency plan.

Module 3, Management of Containers

A condition was added to clarify that the Permittee may store in the hazardous waste storage facility, in containers only, materials that may be a substance or mixture of substances that are not solid or hazardous waste.

A condition was added to clarify that replacement containers used to contain contents from a leaking container or the leaking container itself shall sufficiently labeled allow identification and tracking of the waste while it is managed at the facility.

Module 4, Corrective Action and RCRA/CERCLA Integration

The rule citation numbers have been updated.

No other significant changes were made.

Attachment 1 – Facility Description

Information about hazardous waste generation and subsequent storage at the permitted TSDF (Transfer Storage and Disposal Facility, a.k.a. Hazardous Waste Storage Facility (HWSF)) or transfer to an offsite TSDF for disposal was clarified.

A sentence referencing the acceptance of hazardous waste from other sources has been removed from a condition in this module. HILL AFB has decided it will no longer accept offsite waste for storage at the hazardous waste storage facility.

Information about the injection and withdrawal wells has been clarified.

Table 1-1 Traffic Survey Data has been updated from 2004 with the May 2018 24-hour traffic study data.

Attachment 2 – Waste Analysis Plan

Waste analysis requirements for Treatment Storage and Disposal Facilities have been added to this plan.

Waste determination requirements for generators has been added to this plan.

Information pertaining to the container location, tracking, and movement of hazardous waste at the Hazardous Waste Storage Facility has been moved from this attachment to Attachment 9 – Container Management Plan.

Waste analysis information, including generator/process knowledge and chemical and physical analysis, has been added to this plan.

Information pertaining to offsite generators has been deleted from this plan, as Hill AFB has decided not to accept waste for storage from offsite generators.

Information regarding the assessment and analysis of semi-volatile organic constituents in waste has been added to the plan.

Major specific waste categories (including how they are generated, what they are analyzed for, and how they are sampled) have been added to this plan. Table 2-3 summarizing the waste stream categories, characteristics, and analytical parameters has also been added.

Table 2-4 summarizing the analytical methods used to determine hazardous waste characteristics has been added to this plan.

Attachment 3 – Security Plan

A condition describing the 24-hour surveillance system has been clarified to specify that the fenced enclosure surrounding the hazardous waste storage facility is gated with access controls accessible only to facility staff.

Attachment 4 – General Inspection Requirements

A condition was modified to extend the record retention period automatically from the normal three years during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Director.

The inspection frequency listed in Table 4-1 for loading/unloading areas was changed to daily, as required by rule.

Attachment 5 – Personnel Training Plan

Table 5-1 Job Titles and Duties has been modified to include an updated job descriptions and primary duties.

Table 5-2 was added as a training matrix listing the training requirements for each position to clarify the training requirements.

Table 5-3 was added to describe the type of training/training course title and associated training content of each course.

Attachment 6 – Preparedness and Prevention Measures

No significant changes were made.

Attachment 7 – Contingency Plan and Emergency Procedures

The condition regarding the spill quantity requiring Emergency Plan implementation has been expanded to clarify the requirements.

The information contained in Table 7-1 Incident Commanders has been updated.

The information contained in Table 7-2 Outside Entities Requiring Notification by 75 CEG/CEIE has been updated.

Attachment 8 – Closure Plan, Post-Closure Plan Requirements

Language regarding sample analysis was added to specify that a Utah certified analytical laboratory shall analyze the samples in accordance with the applicable SW-846 methods.

The EPA Residential RSLs for Soil have been updated in Table 8-5.

The Hazardous Waste Storage Facility storage capacity information has been updated in Table 8-6.

Attachment 9 – Container Management Plan

A condition has been added to address the management of compressed gas cylinders at the hazardous waste storage facility.

Information pertaining to the container location, tracking, and movement of hazardous waste at the Hazardous Waste Storage Facility has been moved from Attachment 2 – Waste Analysis Plan to this attachment.

Information has been added to Table 9-1 Storage Unit and Containment System Capacities to describe how the storage capacities are calculated.