



State of Utah

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Department of
Environmental Quality

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DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Ty L. Howard
Director

September 30, 2020

Michelle L. Cottle
Chief, Environmental Branch
75th CEG/CEIE
7290 Weiner Street, Bldg. 383
Hill Air Force Base, UT 84056-5003

RE: Hill AFB Draft Permit Comments and Permit Renewal
UT0571724350

Dear Ms. Cottle:

The Division has reviewed your comments on the *Draft Hill AFB Resource Conservation and Recovery Act (RCRA) Hazardous Waste Storage Permit* that was issued for public comment on August 7, 2020. Please find the Division responses and a copy of the finalized Hazardous Waste Storage Permit enclosed. No other public comments were received by the Division.

If you have any questions, please call Karen Wallner at (801) 536-4279.

Sincerely,

Ty L. Howard, Director
Division of Waste Management and Radiation Control

TLH/KHW/al

Enclosure(s): DWMRC Response to Comments on the Hill AFB Draft Permit
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DSHW-2020-013985

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- c: Brian Hatch, Health Officer, Davis County Health Department
David W. Spence, Deputy Director, Davis County Health Department
Rachelle Blackham, Environmental Health Director, Davis County Health Department
Karl Nieman, HAFB
Jesse Newland, USEPA, Region 8

**DWMRC Response to Comments on the Hill AFB Draft Permit
(EPA ID UT0571724350)**

Hill AFB Comment 1.

Module I, page 5, Condition I.P.1.b., Monitoring and Records:

Request that Condition I.P.1.b. be revised as follows:

“All records that are required to be maintained under this Permit may be converted to retrievable electronic media for storage., ~~under a plan and using formats expressly approved by the Director.~~”

Hill AFB maintains compliance data as required by this permit in a variety of different electronic formats which can be readily accessed as necessary (e.g. during compliance inspections).

DWMRC Response to Comment 1.

Agreed. The condition has been modified as requested.

Hill AFB Comment 2.

Module I, page 9, Conditions I.W., I.W.1., I.X., and I.X.1., Manifest Discrepancy and Unmanifested Waste Reports:

Recommend that these conditions be deleted/removed as they no longer apply. The Hill AFB Hazardous Waste Storage Facility (HWSF) will not receive hazardous waste (HW) from off-site.

(note: the numbering of the remaining conditions in Module I (Conditions I.Y. thru I.GG.) should be revised because of this change).

DWMRC Response to Comment 2.

Agreed. The conditions have been removed as requested. The remaining conditions in Module I have been renumbered to reflect this change.

Hill AFB Comment 3.

Module I, page 11, Condition I.EE.12.

As stated in comment 2, above, the HWSF will not receive HW from off-site.

The regulation [UAC R315-262-40(a)] referenced in Condition I.EE.12. states:

“R315-262-40. Recordkeeping and Reporting Applicable to Small and Large Quantity Generators -- Recordkeeping.

- (a) A generator shall keep a copy of each manifest signed in accordance with Subsection R315-262-23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy shall be retained as a record for at least three years from the date the waste was accepted by the initial transporter.”

Suggest that Condition I.EE.12 be revised as follows to be consistent with the regulation:

‘Copies of manifests as required by UAC R315-262-40(a) shall be retained as a record for at least three years from the date the waste shipment was accepted [at the HWSF by the initial transporter.](#)’

DWMRC Response to Comment 3.

Agreed. The condition has been modified as requested.

Hill AFB Comment 4.

Module II, page 2, Condition II.D.2.a.

In the listing of wastes prohibited for storage at the HWSF (II.D.2), this condition includes:

“Water reactive wastes or materials, defined as DOT Division 4.3, and in UAC R315-261-23(a)(2)-(a)(5);”

UAC R315-261-23(a)(5) defines one category of wastes exhibiting the characteristic of reactivity: “...(5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.”

The current permit allows for storage of cyanide reactive wastes and Hill AFB requests that this be continued in the reissued permit. Certain types of waste generated by electroplating processes contain cyanide which would meet this definition of reactivity and may be stored at the HWSF.

Request that Permit Condition II.D.2.a. be revised as follows:

“Water reactive wastes or materials, defined as DOT Division 4.3, and in UAC R315-261-23(a)(2)-(a)([54](#));”

DWMRC Response to Comment 4.

Agreed. The condition has been modified as requested.

Hill AFB Comment 5.

Module II, page 2, Condition II.E.3.

Hill AFB requests clarification of the last sentence of the condition, which states:

“The Permittee shall inform the laboratory in writing that it is required to follow the Waste Analysis Plan conditions set forth in Attachment 2 (Waste Analysis Plan).”

Hill AFB is required to follow the Waste Analysis Plan (as stated in II.E.1) and must use a Utah certified lab (or other lab specifically approved by the Director) to comply with the Waste Analysis Plan requirements. Since it is State of Utah certified, the lab will be following approved test methods (SW846 or other, as specified) and approved QA and QC procedures.

Request that Condition II.E.3. be revised to clarify that the Waste Analysis Requirements apply to Hill AFB (the permittee). The lab must follow its own approved procedures. Hill AFB suggests possible rewording of the last sentence as follows:

“The Permittee ~~shall inform the laboratory in writing that it~~ is required to follow the Waste Analysis Plan conditions set forth in Attachment 2 (Waste Analysis Plan).”

DWMRC Response to Comment 5.

Agreed. The condition has been modified as requested.

Hill AFB Comment 6.

Module II, page 3, Condition II.E.4.

Hill AFB requests clarification/revision of the last sentence of the condition, which states:

“The Permittee shall conduct an evaluation of each new waste stream generated on site as they are generated and shall submit to the Director a report of the analysis in compliance with UAC R315-264-13.”

R315-264-13(a)(3)(i) states:

“(3) The analysis shall be repeated as necessary to ensure that it is accurate and up to date. At a minimum, the analysis shall be repeated:

(i) When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous wastes, or non-hazardous wastes if applicable under Subsection R315-264-113(d), has changed”

Hill AFB evaluates new and modified waste streams as they are generated (see Attachment 2, paragraph 6.1.4) and the evaluation results are included in the annual waste stream evaluation report required by Condition II.E.5.

Hill AFB suggests that the condition could be revised as follows to clarify that newly identified waste streams are evaluated in accordance with waste analysis requirements for RCRA TSDFs (R315-264-13) and the results of the evaluation are included in the annual report required by Condition II.E.5.:

“The Permittee shall conduct an evaluation, in accordance with UAC R315-264-13, of each new waste stream generated on site as they are generated and shall submit ~~to the Director~~ a report of this evaluation to the Director of the analysis in compliance with UADC R315-264-13 as specified in Condition II.E.5.”

DWMRC Response to Comment 6.

Agreed. The condition has been modified as requested.

Hill AFB Comment 7.

Module II, page 3, Condition II.E.6.

The condition states:

“The Permittee shall provide validated analytical laboratory data for use in support of Permit requirements. The Director may reject any data if it is [if it is] determined to be unreliable for any reason.”

Hill AFB requests that the requirement to provide analytical data could be clarified, and that in practice, the analytical data submitted would be any data which is requested by the Director (or representative) and required by the permit. Suggest adding “*Upon request*” to beginning of the first sentence.

DWMRC Response to Comment 7.

Agreed. The condition has been modified as requested.

Hill AFB Comment 8.

Module II, page 5, II.K.3. Contingency Plan, Emergency Coordinators:

The condition states:

“The names, addresses, and telephone numbers of all persons qualified to act as emergency coordinators shall be maintained in Attachment 7 (Contingency Plan and Emergency Procedures) of this Permit and supplied to the Director as required by UAC R315-264-52(d).”

Attachment 7, Table 7-1 lists the duty phone numbers and titles of the incident commanders. The note at the top of the table states that these should be used only if the emergency line is not operational, (i.e. ‘911’ should be the primary method of emergency response contact).

As also stated in Attachment 7, section 6.0:

“6.0 Incident Commanders/Emergency Coordinators [UAC R315-264-52(d) and R315-264-55]

6.0.1 A list of Hill AFB personnel authorized to act as Emergency Coordinators is given in Table 7-1 and for the purposes of this permit are designated as Incident Commander (IC). Military personnel are frequently reassigned and for the purpose of this Permit only the

position title and duty phone of the personnel are listed. Activation of this contingency plan shall result in a response from Hill AFB Fire and Emergency Services which shall cause the on-duty IC to be appointed.”

Hill AFB requests that Condition II.K.3. be revised so that it is consistent with Attachment 7, Section 6.0.1 and Table 7-1. The condition could be revised as follows:

“The name, addresses, and position, title, and duty telephone numbers of all persons qualified to act as emergency coordinators shall be maintained in Attachment 7 (Contingency Plan and Emergency Procedures) of this Permit and supplied to the Director as required by UAC R315-264-52(d).”

Additionally, Hill AFB will request that Table 7-1 be revised to add ‘911’ to the top row of the table as Hill AFB Fire and Emergency Services (emergency dispatch). (See Comment 23).

DWMRC Response to Comment 8.

Agreed. The condition has been modified as requested.

Hill AFB Comment 9.

Module II, page 6, Conditions II.L. through II.L.3. Manifest System:

The second sentence of Condition II.L.1. refers to R315-264-71, 72, and 76 which are requirements for TSDFs which receive wastes from off-site. This does not apply to the HWSF since it will not receive waste from off-site. Conditions II.L.2 and II.L.3 do not apply for the same reason.

As stated in R315-264-70:

“R315-264-70. Manifest System, Recordkeeping, and Reporting -- Applicability.

(a) Sections R315-264-71, 72, and 76 do not apply to owners and operators of on-site facilities that do not receive any hazardous waste from off-site sources. ...”

Hill AFB requests that the second sentence of Condition II.L.1 be deleted and that Conditions II.L.2 and II.L.3 also be deleted.

DWMRC Response to Comment 9.

Agreed. Condition II.L.1. has been deleted. However, the second sentence of Condition II.L.1. has been replaced with “The Permittee shall keep the records for three years from the date of initial transport.” Conditions II.L.2 and II.L.3 have been deleted.

Hill AFB Comment 10.

Module II, Page 6, Conditions II.M.3 and II.M.5

II.M.3:

The requirement for submittal of the Biennial Report references Condition I.Z. This reference may require revision due to renumbering of Module I conditions. (see Comment 2).

II.M.5:

Reference to Condition I.DD., address for submittal of all required reports, notifications, etc. may require revision due to renumbering of Module I conditions. (see Comment 2).

DWMRC Response to Comment 10.

Agreed. The Permit numbers have been reviewed and updated. The requirement for submittal of the Biennial Report has been changed to reference Condition I.X. The requirement for submittal of all required reports, notifications, etc. has been changed to reference Condition I.BB.

Hill AFB Comment 11.

Module III, page 1, Condition III.A.1., Applicability:

The last sentence of this condition states: “For the purposes of this Permit, the HWSF consists of Building 898 and Building 888 located at Hill AFB.”

However, as stated in Attachment 9, paragraph 3.4.2, “...Waste containers with volumes greater than 2 cubic yards that do not contain free liquids may be stored outside of buildings 888 and 898 within the fenced area of the HWSF in compliance with UAC R315- 264-175(c).”

Hill AFB suggests adding wording to the end of condition III.A.1 that would include the fenced area immediately surrounding buildings 888 and 898 as part of the regulated HWSF.

DWMRC Response to Comment 11.

Agreed. The condition has been modified to state, “For purposes of this Permit, the HWSF consists of Building 898, Building 888, and the outside fenced area immediately surrounding the two buildings located at Hill AFB.”

Hill AFB Comment 12.

Module III, page 3, Conditions III.L & III.L.1:

These conditions appear out of sequence with the numbering of adjacent conditions. Suggest changing III.L and III.L.1 to III.I and III.I.1 and then renumbering subsequent conditions through III.K.3.

DWMRC Response to Comment 12.

Agreed. The conditions have been renumbered.

Hill AFB Comment 13.

Module III, page 4, Condition III.J.1, Container Location/Tracking:

The condition refers to recordkeeping requirements for container location and tracking of waste containers (on a daily basis) while in storage at the HWSF that have been moved from

Attachment 2 (Waste Analysis Plan) to Attachment 9 (Container Management Plan), Section 4.0, in the 'redline' version of the draft permit.

Recommend revising this condition as follows:

“The Permittee shall record in the Operating Record the location of each container accepted into Buildings 898 and 888 in accordance with Attachment ~~2 (Waste Analysis Plan)~~9 (Container Management Plan) of this Permit.”

Also, recommend that Attachment 9 be reviewed to ensure that 'Container Location/Tracking Movement of Hazardous Waste' (section 4.0 through 4.0.5) is included in the final version of the permit. This section appears in the 'redline/strikeout version' for public review, but not in the 'clean version'.

DWMRC Response to Comment 13.

Agreed. The condition has been modified as requested. Attachment 9 has been verified to contain 'Container Location/Tracking Movement of Hazardous Waste' in the final version.

Hill AFB Comment 14.

Attachment 2, page 2-9, paragraph 6.1.3, third sub-paragraph:

The footnotes, 2 and 3, reference Conditions II.E.5 and II.E.6.

The numbering of Conditions II.E.1 through II.E.8 in Module II have been changed such that the requirements for re-characterization of waste (footnote 2) is now addressed in Condition II.E.4. and the requirement for annual review of waste streams (footnote 3) is now addressed in Condition II.E.5.

Recommend revising the footnotes as follows:

² in accordance with: Permit Condition II.E.4.

³ in accordance with: Permit Condition II.E.5.

DWMRC Response to Comment 14.

Agreed. The footnotes have been modified as requested.

Hill AFB Comment 15.

Attachment 2, pages 2-10 & 2-11, section 7.1, Spent Plating Solutions and Corrosion Control Liquid Wastes (waste stream category):

Request that the last paragraph be revised to clarify how samples of plating solutions and sludges, and containerized wastes in this category are sampled. Wording could be revised as follows:

“Samples of plating bath solutions will be taken directly from the tank using a clean ~~locally fabricated metal~~ tank dipper attached to a pole. If the sample is drawn from a container, a COLIWASA⁴ or drum thief will be used. Sludge and solid samples (from cyanide/cadmium plating process tanks) will be sampled using a clean scoop or dipper attached to an access pole. Another appropriate sampling tool may also be used to obtain a representative sample of this waste stream.”

DWMRC Response to Comment 15.

Agreed. The condition has been modified as requested. However, the last sentence states, “Other appropriate sampling tools may be used to obtain a representative sample of the waste stream.”

Hill AFB Comment 16:

Attachment 2, page 2-11, section 7.2, Blast Media Residues:

Request that the last paragraph be revised for clarification, to allow other appropriate sampling equipment/methods be allowed as long as they can be used to obtain a sample which will be representative of the waste stream.

Hill AFB suggests that the following sentence could be added to the end of the second paragraph: “Another appropriate sampling tools used to obtain a representative sample of the waste stream may also be used”

Additionally, it is suggested that this wording (or variation which has the same meaning) could be added to sections 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11, 7.12, 7.13, 7.14 to provide some flexibility in sampling while ensuring that the sampling tool used will obtain a representative sample of the waste.

DWMRC Response to Comment 16.

Agreed. The sentence, “Other appropriate sampling tools may be used to obtain a representative sample of the waste stream” or similar language has been added to sections 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11, 7.12, 7.13, 7.14.

Hill AFB Comment 17:

Attachment 2, page 2-13, section 7.6, Liquid Paint Wastes:

Hill AFB requests that the second sentence of the second paragraph be revised for clarification. Suggest that the words ‘*off-specification product*’ are replaced with ‘*waste*’ since this waste stream category includes discarded product, off-spec product, and paint process waste.

DWMRC Response to Comment 17.

Agreed. The words ‘*off-specification product*’ have been replaced with ‘*waste*’ as requested.

Hill AFB Comment 18:

Attachment 2, page 2-18, section 7.18, Lab Packs:

The last sentence of this section states that: “Lab packs are shipped directly off-site for treatment/disposal within 90 days.”

Lab packs are normally shipped to an off-site TSDF within 90 days of accumulation start date. However, if they cannot be shipped prior to the 90-day limit, they would be transferred to the HWSF for storage awaiting shipment. Hill AFB suggests that the following be added for clarification:

“Lab packs are shipped directly off-site for treatment/disposal within 90 days. [If lab pack\(s\) cannot be shipped off-site within 90 days they may be stored at the HWSF.](#)”

DWMRC Response to Comment 18.

Agreed. The condition has been modified as requested.

Hill AFB Comment 19:

Attachment 2, page 2-20, Table 2-2, Fingerprint Parameters:

- 1) Second row: Parameter: ‘Free Liquids’: the ‘method’ is listed as “Visual observation if solid or Paint Filter Liquids Test 9095B if semi-solid or unknown”

For the overwhelming majority of wastes which are evaluated for acceptance at the HWSF, which includes ‘fingerprint testing’, direct visual observation of a waste is sufficient to determine whether or not the waste contains free liquids and is consistent with the waste profile for the waste stream.

The only possible instance which would necessitate use of the Paint Filter Test method would be if the TSDF operations personnel were unable to make this determination by visual observation.

Hill AFB suggests that the Method listed for Free Liquids determination could be revised to better describe how the determination is made.

Recommend revision as follows:

“Visual Observation ~~if solid~~ or Paint Filter Liquids Test 9095B ~~if semi-solid or unknown~~[\(if determination cannot be made based solely upon visual observation\)](#)”

- 2) Fourth row: Parameter: ‘Ignitability’: this fingerprint test, ‘ignitability’ would be required for both liquids and solids being evaluated for acceptance at the HWSF and the test methods listed are: ‘1020C’-liquids and ‘1030’-solids.

Hill AFB requests that this fingerprint test parameter be removed because ignitability is determined via laboratory testing (method 1010B) of waste samples or through process knowledge. This determination is made prior to waste acceptance at the HWSF. Wastes which

require ignitability testing/evaluation and are managed at the HWSF will have this determination made as part of waste stream characterization (as listed in Table 2-3).

DWMRC Response to Comment 19.

Agreed. The condition has been modified as requested.

Hill AFB Comment 20:

Attachment 2, page 2-21 thru 2-25, Table 2-3, Waste Stream Categories, Characteristics, and Analytical Parameters:

The column headings: ‘Analytical Parameters’ and ‘Analytical Method SW-846’ contain the wording ‘(at minimum)’ and ‘Minimum’. This would suggest that the parameters and methods listed for each waste stream category apply to all wastes in that category. However, the analytical parameters and methods listed in this table represent the range of those which are used to characterize wastes in each corresponding waste stream category. Test methods used for characterization of specific waste streams from specific generation processes are selected based on knowledge of the waste composition and the process(es) of generation.

Consequently, Hill AFB recommends removing the word ‘minimum’ from both column headers.

DWMRC Response to Comment 20.

Agreed. The word ‘minimum’ has been removed from Table 2-3.

Hill AFB Comment 21:

Attachment 2, page 2-21 thru 2-25, Table 2-3, Waste Stream Categories, Characteristics, and Analytical Parameters:

Hill AFB suggests removing the SW 846 analytical method revision letters from methods 6010, 8260, and 8270 in the table.

The intent was to list the method numbers corresponding to each parameter requirement listed. The lab will use the most current method revision for which it has Utah certification. (see page 2-27, Table 2-4, footnote #3).

DWMRC Response to Comment 21.

Agreed. The analytical method revision letters have been removed from methods 6010, 8260, and 8270 in Table 2-3.

Hill AFB Comment 22:

Attachment 2, page 2-21, Table 2-3, Waste Stream Categories, Characteristics, and Analytical Parameters:

The entry for Waste Stream Category 003, Sludge and Semi-solids, under the analytical methods column, test method for pH determination listed as SW-846 9045D. In the SW-846, the method Scope and Application, paragraph 1.1 states:

“This method is an electrometric procedure for measuring pH in soils and waste samples. Wastes may be solids, sludges, or non-aqueous liquids. If water is present, it must constitute less than 20% of the total volume of the sample.”

And, under interferences, paragraph 3.1:

“Samples with very low or very high pH may give incorrect readings on the meter. For samples with a true pH of >10, the measured pH may be incorrectly low. This error can be minimized by using a low-sodium-error electrode. Strong acid solutions, with a true pH of <1, may give incorrectly high pH measurements.”

Also, R315-261-22(a)(1) cites only 9040C and 1110A as methods which can be used for the determination of the waste characteristic of corrosivity (EPA hazardous waste number D002).

Hill AFB recommends that method 9045D be replaced with 9040C for the determination of pH (corrosivity) for the sludge and semi-solid waste stream category. It should be noted that wastes in this category would only be tested for pH if they contain aqueous free liquid.

DWMRC Response to Comment 22.

Agreed. The condition has been modified as requested.

Hill AFB Comment 23:

Attachment 7, page 7-9, Table 7-1, Hill AFB Incident Commanders/Emergency Coordinators:

Hill AFB requests that this table be modified, as follows, to add ‘911’ at the top of the table as the primary contact for emergency response. This was noted in Comment 8, above. Additionally, Hill AFB requests to add its 24-hr command post phone number to the table as an alternate emergency response contact number.

TABLE 7-1. Hill AFB Incident Commanders/Emergency Coordinators

The following personnel serve as Incident Commanders/Emergency Coordinators during their duty hours. They are listed in the order of response, beginning with first responders and ending with the Air Logistics Complex (ALC) Commander, the highest authority on base. **These personnel should not be contacted directly unless the emergency line is not functional.** (911 on either the Hill AFB telephone network or an external telephone network, e.g., cellular phone.)

Incident Commanders	Duty Phone
Hill AFB Fire and Emergency Services (emergency dispatch)	911
Hill AFB – Command Post (24-hr)	801-777-3007
HILL AFB CHIEF, Fire and Emergency Services (office)	801-777-3021
CIVIL ENGINEERING GROUP COMMANDER	801-777-7505
75 TH AIR BASE WING COMMANDER	801-777-7500
OO-ALC COMMANDER	801-777-5076

DWMRC Response to Comment 23.

Agreed. Table 7-1 has been modified as requested.

Hill AFB Comment 24:

Attachment 7, page 7-12, Table 7-2, Outside Entities Requiring Notification by 75 CEG/CEIE:

Hill AFB requests that the following wording be updated to reflect a revised acronym:

AIR FORCE CIVIL ENGINEERING CENTER (AFCEC)	Reporting through the Enforcement Actions Spills & Inspections & Emergency Response (EASIER) reporting website
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DWMRC Response to Comment 24.

Agreed. The wording in Table 7-2 has been modified as requested.