

**Idaho Department of Environmental Quality  
Agency-Directed Permit Modification to the  
Mountain Home Air Force Base  
Post-Closure and Corrective Action Permit**

EPA ID No. ID3572124557

May 5, 2016

**1. IDAPA 58.01.05.012 [40 CFR §270.41 Modification or revocation and reissuance of permits.]**

The Idaho Department of Environmental Quality (DEQ) has received information from Mountain Home Air Force Base (MHAFB) (the permittee) that was not available at the time that the latest HWMA/RCRA Post-Closure and Corrective Action Permit was issued on January 11, 2015. This new information would have justified the application of different permit conditions at the time of issuance. The new information demonstrates that current levels of contamination at the Petroleum, Oil and Lubricants (POL) cap post-closure site do not appear to be at concentrations that would pose undue risk to non-residential and construction workers at the site, and therefore continued post-closure care of the site is not needed.

With this Permit Modification, the DEQ changes the length of post-closure care required for the Petroleum, Oil and Lubricants (POL) Cap at the Mountain Home Air Force Base (MHAFB), Mountain Home, Idaho, from 30 years to 25 years. Post closure care commenced on September 16, 1991; therefore, the post-closure care period would end September 16, 2016. The Permit Modification removes conditions relative to post-closure care, and removes the requirement to submit a post closure plan. These modifications only apply to the soil at the site in the proximity of the POL cap. Groundwater monitoring in the vicinity of the POL Cap was done under the purview of the Federal Facility Agreement (FFA), and has been completed.

Minor changes to remove inconsistencies in the Permit and update the constituents of concern for groundwater protection with the new information were also made.

**2. Citations**

**IDAPA 58.01.05.012 [40 CFR §270.41 Modification or revocation and reissuance of permits.]**

*When the Director receives any information (for example, inspects the facility, receives information submitted by the permittee as required in the permit (see §270.30), receives a request for revocation and reissuance under §124.5 or conducts a review of the permit file), he or she may determine whether one or more of the causes listed in paragraphs (a) and (b) of this section for modification, or revocation and reissuance or both exist. If cause exists, the Director may modify or revoke and reissue the permit accordingly, subject to the limitations of paragraph (c) of this section, and may request an updated application if necessary. When a permit is modified, only the conditions subject to modification are reopened. If a permit is revoked and reissued, the entire permit is reopened and subject to revision and the permit is reissued for a new term. (See 40 CFR 124.5(c)(2). If cause does not exist under this section, the Director shall not modify or revoke and reissue the permit, except on request of the permittee. If a permit modification is requested by the permittee, the Director shall approve or deny the request according to the procedures of §270.42, or §270.320 and 40 CFR part 124, subpart G. Otherwise, a draft permit must be prepared and other procedures in part 124 (or procedures of an authorized State program) followed.*

*(a) Causes for modification. The following are causes for modification, but not revocation and reissuance, of permits; the following may be causes for revocation and reissuance, as well as modification, when the permittee requests or agrees.*

*(1) Alterations. There are material and substantial alterations or additions to the permitted facility or activity which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit.*

*(2) Information. The Director has received information. Permits may be modified during their terms for this cause only if the information was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and would have justified the application of different permit conditions at the time of issuance.*

**Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA)  
Mountain Home Air Force Base Post-Closure and Corrective Action Permit, Module V, Permit  
Condition V.C.1.b.:**

*The thirty (30) year post-closure care period may be shortened upon application and demonstration to the Department that contaminants have attenuated and/or are no longer present at levels requiring control measures; or may be extended if the Department finds this is necessary to protect human health and the environment per IDAPA 58.01.05.008 [40 CFR § 264.117(a)]*

**Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA)  
Mountain Home Air Force Base Post-Closure and Corrective Action Permit, Module V, Permit  
Condition V.D.5:**

*Except as provided by specific language in this Permit or except for the Director's approval of a Class 1 or 2 Permit Modification, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(a) and (b)], any modifications which substantially alter the facility or its operation (as covered by this Permit) shall be administered as a Class 3 Permit Modification prior to such change taking place, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(c)].*

### **3. Background Information**

A clay cap exists in the southern corner of the Petroleum, Oils, and Lubricants (POL) Yard at the Mountain Home Air Force Base near Mountain Home, Idaho, and is identified as the "POL Cap" and/or "ST-13." Building 1307 is located immediately to the northwest of the POL Cap. The POL Cap isolates soils associated with a former underground storage tank (UST) excavation at this location. The installation historically contained four USTs which were removed in June 1988.

In 1991, a Resource Conservation and Recovery Act (RCRA) cap system was installed at this unit to prevent potential migration of constituents that could not be removed at the time. Post-closure care was required for a period of 30 years and the period commenced for the POL Cap on September 16, 1991. In 2013, MHAFB submitted an application to IDEQ to renew the Permit for an additional 10-year period (the original Permit was issued in October 1992). The renewed permit was effective January 11, 2015. The permit addresses post-closure care (the POL Cap is the only unit currently subject to post-closure care unit at the base as required by this Permit), and any future RCRA waste management units.

A *Post-Closure Sampling Plan*, dated May 4, 2015, outlined project objectives, field investigation tasks, reporting, and schedule for the POL Cap. At MHAFB's request, DEQ provided comments on this plan

and subsequently approved it. The *Post-Closure Sampling Plan* served as a basis for a field investigation program. The objectives of the plan were as follows:

- a. Confirm the extent of the cap system (conflicting information was identified regarding the size and final design elements).
- b. Identify and quantify (update) constituents of concern (COCs) beneath the cap.
- c. Assess if the remaining COCs are attenuated or no longer at concentration levels that require control measures.
- d. Describe the conceptual model (exposure scenarios, potential receptors, etc.) of the potential hazard.

MHAFB had the U.S. Army Corps of Engineers conduct the field investigation program to assess the POL Cap and evaluate current conditions in accordance with the *Post-Closure Sampling Plan*. The field program included a geophysical survey, a soil potholing task, a soil boring program, and soil sampling and analysis. The field investigation was completed in November 2015

In February 2016, MAHFB submitted the *Final Cap System Investigation Report for the Petroleum, Oil and Lubricant (POL) Yard Cap (ST-13)* to DEQ. The objective of report was to document the construction and limits of the POL Cap and to physically and chemically characterize soil covered by the POL Cap to determine if the post-closure care period could be shortened in order to obtain final site closure of the unit.

Ten borings were drilled and a total of 27 samples were taken, with 2 samples being duplicates. In all samples, there were hazardous constituents at concentrations above screening levels. The screening levels used in the evaluation were the 2004 Idaho Initial Default Target Levels (IDTLs).

The report presented a risk assessment decision based on leaving soil in place, but without post-closure care actions (the future scenario assessment considers the site without a cap in place). The levels of COCs identified in site soils were compared to site specific, risk-based, screening levels that are protective of human health and the environment based on IDEQ's 2004 *Idaho Risk Evaluation Manual (REM)* (<http://www.deq.idaho.gov/waste-mgmt-remediation/remediation-activities/risk-evaluation-manuals/>) protocol for indoor inhalation and construction exposure scenarios. Based on the data from the field investigation and inputs to the 2004 *Idaho Risk Evaluation Software*, with respect to non-residential indoor inhalation and construction work exposure, the cumulative cancer risk was calculated to be less than  $1 \times 10^{-5}$  (1 in 100,000) and the non-cancer hazard index was less than 1 (no adverse human health effects (noncancer) are expected to occur). The report concluded that these results indicate that the site does not pose a unacceptable risk at this time based on current use. Based on the results of this investigation, the report recommended that MHAFB proceed with a request for shortening the post-closure care time period and obtain final closure of the unit.

The DEQ reviewed the results of the report and confirmed the results of the risk assessment. DEQ also reviewed the hazardous constituents concentrations against the 2012 Idaho IDTLs, the IDAPA 58.01.05.011 (40 CFR 268.48) Universal Treatment Standards (UTS), and the Environmental Protection Agency (EPA) Regional Screening Levels (RSLs). Since some of the screening levels were exceeded, the data was evaluated to determine risk probability for carcinogens and hazard index for non-carcinogens.

The chemicals of primary concern in the risk analysis were arsenic and lead. The maximum concentrations found in the samples were 9.63 mg/kg for arsenic and 1110 mg/kg for lead. The RSL screening levels for arsenic and lead are 3 mg/kg and 800 mg/kg, respectively. Background levels for arsenic in the Mountain Home area have been documented to exceed this concentration; therefore, DEQ

views arsenic concentrations as high as 11 mg/kg to be within normal background levels. In the RSL Calculator, the lead does not contribute to the cancer risk or the non-cancer hazard index. Since the lead was not detected in the toxicity characteristic leaching procedure (TCLP) test, the lead in the soil does not appear to be extractable. Therefore, the lead concentration does not appear to pose an unacceptable risk to the composite worker (a typical full-time employee working onsite conducting maintenance activity outdoors).

At present, the location of the clay cap is within the POL yard, which is the primary storage area for all of the petroleum fuel used on the flight line. The long term plan for the MHAFB does not foresee base closure and assumes a continued flight mission. Therefore, it is appropriate to assume that the receptors of any chemical exposure will be non-residential workers and occasional construction workers, rather than residential occupants. DEQ used the *2004 Idaho Risk Evaluation Software*, the *2012 Idaho Petroleum Risk Evaluation Software*, and the EPA *Regional Screening Level Calculator* ([https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)) to confirm the risk analysis results in the report. In the non-residential, construction worker, and composite worker scenarios the target cancer risk and the target hazard index did not exceed screening levels. A summary of the risk evaluations is presented in Table 1. The EPA considers cleanup to constituent concentrations resulting in the total residual risk between  $10^{-4}$  to  $10^{-6}$ , and the hazard index not to exceed 1 adequate to satisfy the closure performance standard, which is found in IDAPA 58.01.05.008(40 CFR § 264.111).<sup>1</sup>

**Table 1. Summary of Risk Evaluations**

CALCULATOR	RECEPTOR									
	RESIDENTIAL				NON-RESIDENTIAL		CONSTRUCTION WORKER		COMPOSITE WORKER	
	CHILD		AGE-ADJUSTED		Site Risk	Site Hazard Index	Site Risk	Site Hazard Index	Site Risk	Site Hazard Index
	Site Risk	Site Hazard Index	Site Risk	Site Hazard Index						
2004 Idaho Risk Evaluation Software	3.35E-05	2.63	3.27E-05	0.393	1.75E-06	0.102	1.46E-07	0.0319		
2012 Idaho Petroleum Risk Evaluation Software					4.33E-07	0.00154	1.03E-08	0.00204		
RSL Calculator									3.75E-06	0.0289
Target	1.00E-05	1	1.00E-05	1	1.00E-05	1	1.00E-05	1	1.00E-05	1
Target Exceeded?	YES	YES	YES	NO	NO	NO	NO	NO	NO	NO

In conclusion, the remaining contamination at the POL cap does not appear to be at concentrations that would pose unacceptable risk to non-residential indoor or outdoor workers or occasional construction workers at the site.

**4. IDAPA 58.01.05.013 [40 CFR 124.6, Draft Permit; 40 CFR 124.5(c)(2), Conditions to be Modified]**

The proposed Permit Modifications are contained in **Attachment A** and consist of the following sections and attachments as follows:

MHAFB PERMIT:

- Module I – Standard Facility Conditions
- Module II – General Facility Conditions
- Module III – Groundwater Monitoring

<sup>1</sup> Cotsworth, EPA, memorandum to Regions 1-10, *Risk Based Clean Closure*, RCRA Online 14174, March 16, 1998.

Module IV – Closure

Module V – Post-Closure Care

Module VI – Corrective Action, Table VI-2

Appendix A – Required Submittals and Dates

**MHAFB PERMIT ATTACHMENTS:**

Attachment 6 – Post-Closure Care

Attachment 12 – Permit Modification/Revision Log

**5. IDAPA 58.01.05.008 [40 CFR § 264.117(a), Additional Information Supplied by the Permittee]**

The *Post-Closure Sampling Plan* and *Final Cap System Investigation Report for the Petroleum, Oil and Lubricant (POL) Yard Cap (ST-13)* are available in the Idaho DEQ Administrative Record.

**6. IDAPA 58.01.05.013 [40 CFR § 124.7, Statement of Basis]**

A Statement of Basis is not required; the Fact Sheet fulfills this requirement.

**7. IDAPA 58.01.05.013 [40 CFR § 124.8, Fact Sheet]**

**Attachment B** contains the fact sheet.

**8. IDAPA 58.01.05.013 [40 CFR § 124.8, Public Notice; 40 CFR §124.10, Public notice of permit actions and public comment period]**

**Attachment C** contains the public notice that a draft, modified permit has been prepared under IDAPA 58.01.05.013 [40 CFR § 124.6(d)], allowing 45 days for public comment, and the opportunity for a public hearing if requested. A copy of this notice has been provided to the permittee, and persons on the facility mailing list.

# **Attachment A**

## **Proposed Permit Modifications**

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**IDAHO**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**HWMA ~~POST-CLOSURE~~**

**~~and~~**

**CORRECTIVE ACTION  
PERMIT**

**for the**

**MOUNTAIN HOME  
AIR FORCE BASE**

**EPA ID No. ID3572124557**

**Effective Date: January 11, 2015**

**Revision Date: TBD**

**Book 1 of 1**



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C. L. "Butch" Otter, Governor  
Curt Fransen, Director

**Permittee: United States Air Force, 366 Fighter Wing, Mountain Home Air Force Base, Permit Number: ID3572124557**

## INTRODUCTION AND SIGNATURE PAGE

Pursuant to the Idaho Hazardous Waste Management Act of 1983 (HWMA), Idaho Code §§ 39-4401 et seq., and the "Rules and Standards For Hazardous Waste," as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA) and the regulations promulgated under the Idaho Administrative Procedures Act (IDAPA) 58.01.05.000 et seq., a Post-Closure and Corrective Action Permit (Permit) is hereby issued to the United States Air Force (USAF), 366 Fighter Wing, Mountain Home Air Force Base (MHAFB) (Permittee), to conduct future and specified corrective action, and maintain, and care for a closed hazardous waste facility at the MHAFB facility. The MHAFB occupies about 5,800 acres within Township 4 South, Range 5 East, Sections 16, 17, 20, 21, 22, 27, 28, 29, 32, 33 and 34 in Elmore County, Idaho. The location of the base by latitude and longitude is N 43.049511, W 115.866452.

This Permit is also to conduct any corrective action, if necessary, at the Saylor Creek Range (SCR), which encompasses 109,466 acres and is located in Township 7 South, Range 7 East, Sections 1-36; all of Township 7 South, Range 8 East, Sections 1-36; Township 8 South, Range 7 East, Sections 1-5, 8-17, 20-29, and 32-36; Township 8 South, Range 8 East, Sections 1-36; Township 9 South, Range 7 East, Sections 1-5, 8-17, and portions of 24, 25 and 36; Township 9 South, Range 8 East, Sections 1-18 and portions of 19, 20, 29, 30, 31 and 32, in Owyhee County, Idaho.

The Permittee shall comply with all of the terms and conditions of this Permit and Attachments 1 through 12 of this Permit. The Permittee shall comply with all applicable state regulations, including IDAPA 58.01.05.004 through 58.01.05.013 [Title 40 of the Code of Federal Regulations (CFR), Parts 124, 260 through 266, 268, and 270], and as specified in this Permit.

Applicable state regulations are those which are in effect on the date of final administrative disposition of this Permit and any self-implementing statutory provisions and related regulations which, according to the requirements of HSWA, are automatically applicable to the Permittee's hazardous waste management activities, notwithstanding the conditions of this Permit.

This Permit is based upon the administrative record, as required by IDAPA 58.01.05.013 [40 CFR § 124.9]. The Permittee's failure, in the application or during the permit issuance process, to fully disclose all relevant facts, or the Permittee's misrepresentation of any relevant facts, at any time, shall be grounds for the termination or modification of this Permit and/or initiation of an enforcement action, including criminal proceedings. To the extent there are inconsistencies between the Permit and the Attachments the language of the permit shall prevail. The Permittee must inform the Director of the Idaho Department of Environmental Quality (Director) of any deviation from the permit conditions or changes in the information on which the application is based, which would affect the Permittee's ability to comply or actual compliance with the applicable regulations or permit conditions, or which alters any permit condition in any way. The Director shall enforce all conditions of this Permit. Any challenges of any permit condition shall be appealed to the Idaho Board of Environmental Quality, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.19], and in accordance with the "Rules Governing Declaratory Rulings and Contested Proceedings," IDAPA 58.01.23.043.

The United States Environmental Protection Agency (EPA) shall maintain an oversight role of the state-authorized program and in such capacity, shall enforce any permit condition based on state requirements if, in the EPA's judgment, the Director should fail to enforce that permit condition. Any challenges to the EPA-enforced conditions shall be appealed to the EPA, in accordance with 40 CFR § 124.19.

This Permit is effective as of January 11, 2015, and shall remain in effect until January 11, 2025, unless, in accordance with IDAPA 58.01.05.012, the Permit is revoked and reissued [40 CFR § 270.41], modified [40 CFR § 270.42, Appendix I.A.6], terminated [40 CFR § 270.43], or continued [40 CFR § 270.51].

January 11, 2015

Date

Curt Fransen, Director  
Idaho Department of Environmental Quality

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## LIST OF ATTACHMENTS

The following attachment list includes excerpts from the Permittee's Administrative Record, i.e., permit application, supplemental reports, and other documents contained in the Department's supporting file for the Permit. The Director has, as deemed necessary, modified specific language in the Attachments. These modifications are described in the permit conditions (Modules I through V), and thereby supersede the language of the original Attachments. If the language of the Permit conflicts with either the Attachments or the original application, the language in the Permit shall prevail. These incorporated Attachments are enforceable conditions of this Permit as modified by the specific permit condition(s).

### ATTACHMENT 1

**RCRA PART A PERMIT APPLICATION**, consisting of:

RCRA Subtitle C Site Identification Form, pages 1 through 5 of the permit application

Hazardous Waste Permit Information Form, pages 1 through 6 of the permit application

### ATTACHMENT 2

**FACILITY DESCRIPTION**, consisting of:

LIST OF ACRONYMS AND ABBREVIATIONS, of the permit application

Section 1.0, INTRODUCTION, pages 1-1 through 1-3 of the permit application

Section 2.0, GENERAL FACILITY DESCRIPTION, page 2-1 through 2-4 of the permit application

### ATTACHMENT 3

**SECURITY**, consisting of:

Section 3.0, SECURITY, page 3-1 of the permit application

Appendix D, SECURITY PROCEDURES, pages D-1 through D-5, of the permit application

### ATTACHMENT 4

**SOLID WASTE MANAGEMENT UNITS**, consisting of:

Section 4.0, SOLID WASTE MANAGEMENT UNITS, page 4-1 of the permit application

Section 4.10, SOLID WASTE MANAGEMENT UNITS, page 4-1 of the permit application

Section 4.2, FFA SITES, pages 4-2 through 4-41 of the permit application

Section 4.2, NON-FFA SITES, pages 4-42, 4-44, 4-46 through 4-57 of the permit application

Section 4.3, OIL WATER SEPARATORS, Table C of the permit application (renumbered as Table 4-3),

Section 4.4, OWS 1100 – CLOSED IN PLACE 1996, supplement to the permit application.

**ATTACHMENT 5**

**CORRECTIVE ACTION FOR SWMUS**, consisting of:

Sections 5.0 through 5.1, CORRECTIVE ACTION FOR SWMUS, page 5-1 of the permit application, except that the second paragraph under 5-1, Existing SWMUs, shall be revised as follows:

“In addition to providing post-closure care for the POL Cap, the purpose of this permit is to provide for jurisdiction under the RCRA corrective actions program in the event the FFA terminates prior to selection of the final remedy under the FFA process for the sites addressed by this proposed permit. It is further expected that any of the two previously identified sites (FT-08 and SD-24) for which a "No Further Action" determination is made under the FFA process will be the subject of a Class 1 RCRA Permit Modification to delete that site from the proposed permit. Should the FFA be terminated, the most recent schedule of corrective action in the FFA shall be incorporated into the RCRA Part B Permit. Should MHAFFB need additional days added to some of the scheduled deadlines to facilitate the transfer of funding and administration of project activities as warranted by USAF guidelines, MHAFFB will notify IDEQ and work with IDEQ to determine the revised deadlines.”

Section 5.3, Table A.1 - FFA SWMUs, pages 5-2 through 5-11 of the permit application (renumbered as Table 5-1)

Section 5.4, Table A.1 - Non-FFA SWMUs, pages 5-12 through 5-28 of the permit application (renumbered as Table 5-2)

**ATTACHMENT 6**

**POST-CLOSURE CARE**, consisting of:

~~Appendix E-1, POL CAP POST-CLOSURE PLAN (To be supplied)~~

Appendix E-21, SOLID WASTE MANAGEMENT UNIT DESCRIPTIONS

Pages E-1 through E-9 of the permit application, except that item 6.1, POL (ST-13) Cap Inspection and Maintenance Plan, and item 10, POL Storage Yard, AST Tank 2 (Part of ST-38) shall be deleted; and item 11 shall be renumbered as item 10.

Figures 6-1 through 6-14, supplemental information for the permit application

**ATTACHMENT 7**

**CLOSURE**, consisting of:

Closure documents from MHAFB Administrative Record at DEQ State Office.

**ATTACHMENT 8**

**ENVIRONMENTAL RESTORATION SITES**, consisting of:

Section 8.0, Environmental Restoration Sites at Mountain Home AFB-FFA, pages 8-1 through 8-2 of the permit application

**ATTACHMENT 9**

**MAPS**, consisting of:

Section 9.0, MAPS, Figures 1 through 7 of the permit application (renumbered as Figures 9-1 through 9-7)

**ATTACHMENT 10**

**GROUNDWATER MONITORING PROGRAM**, consisting of

Appendix B, GROUNDWATER MONITORING PLAN, pages B-1 through B-2 of the permit application

**ATTACHMENT 11**

**FEDERAL FACILITY AGREEMENT**, consisting of:

Appendix C, FEDERAL FACILITY AGREEMENT, pages C-1 through C-79 of the permit application

LIST OF RECORDS OF DECISION, from DEQ files

LIST OF CONSENT ORDERS, from DEQ files

LIST OF NO FURTHER ACTION DETERMINATIONS, from DEQ files

**ATTACHMENT 12**

**PERMIT MODIFICATION/REVISION LOG**, consisting of:

Table 12-1, Permit Modification/Revision Log

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## DEFINITIONS

For purposes of this Permit, the following definitions shall apply:

- a. *Applicable or Relevant and Appropriate Requirements (ARARs)* – “Applicable” requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under Federal or State environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) site. “Relevant and appropriate” requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under Federal environmental or State environmental or facility siting laws that, while not “applicable” to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well suited to the particular site. Only those State standards that are identified by a State in a timely manner and that are more stringent than Federal requirements may be applicable.
- b. *Application* shall mean the following: “Final Resource Conservation and Recovery Act Part B Permit Application, Mountain Home Air Force Base,” March 2014, including the Part A Permit Application (Subtitle C Identification Form and Hazardous Waste Permit Information Form), signed March 4, 2014.
- c. *Area of Concern (AOC)* shall mean any area having a probable release of a hazardous waste or hazardous constituent which is not from a Solid Waste Management Unit (SWMU) and is determined by the Department to pose a current or potential threat to human health or the environment. Such areas of concern may require investigation and remedial action as required under Section 3005(c)(3) of the Resource Conservation and Recovery Act (RCRA) and Idaho Administrative Procedures Act (IDAPA) 58.01.05.012 [Title 40 of the Code of Federal Regulations (CFR) Parts 270.32(b)(2)] in order to ensure adequate protection of human health and the environment.
- d. *CERCLA* shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986.
- e. *Compliance Agreement* shall mean any document that specifies a decision, plan, or schedule regarding management of post-closure sites, SWMUs or AOCs at Mountain Home Air Force Base (MHAFB).
- f. *Corrective Action* shall mean any activities including investigations, studies, characterizations, and corrective measures in accordance with IDAPA 58.01.05.008 [40 CFR §§ 264.100 and 264.101].
- g. *Department* shall mean the Idaho Department of Environmental Quality (IDEQ).
- h. *Director* shall mean the Director of the IDEQ, or his designee or authorized representative.
- i. *Discovery (discovered)* shall mean the initial identification of an SWMU or other AOC, which has the potential to release hazardous waste or hazardous waste constituents to the environment.

- j. *Facility* shall mean all contiguous land, structures, other appurtenances, and improvements under the control of the Base Commander at the Mountain Home Air Force Base, including the Saylor Creek Range in accordance with IDAPA 58.01.05.004 (40 CFR § 264.10) and Idaho Code § 39-4409(5).
- k. *FFA* shall mean the Federal Facility Agreement of 1992 between the United States Air Force, the United States Environmental Protection Agency Region 10, and the Idaho Department of Environmental Quality regarding CERCLA response actions for SWMUs at the Mountain Home Air Force Base (MHAFB) or resulting from MHAFB operations.
- l. *HSWA* shall mean the Hazardous and Solid Waste Amendments of 1984.
- m. *HWMA* shall mean the State of Idaho, Hazardous Waste Management Act of 1983, as amended, Idaho Code § 39-4401, et seq.
- n. *Hazardous Waste* shall mean a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, or chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed [see 42 United States Code (U.S.C.) § 6903(5)].
- Under RCRA Corrective Action this term means any solid waste which (1) meets the definition of hazardous waste provided above; (2) is a listed waste; (3) demonstrates a characteristic of a hazardous waste; (4) or is mixed with a hazardous waste, provided it is not specifically excluded from the definition of a hazardous waste. Under the proposed Subpart S rule, EPA also intends to include all hazardous waste constituents listed in 40 CFR §261 Appendix VIII and the compounds listed in 40 CFR §264 Appendix IX in the definition of hazardous waste.
- o. *Hazardous Waste Constituent* shall mean any hazardous waste constituent identified in Appendix VIII of IDAPA 58.01.05.005 (40 CFR Part 261), and any of the compounds listed in Appendix IX of IDAPA 58.01.05.008 (40 CFR Part 264).
- p. *Hazardous Waste Management Unit* (HWMU) shall mean those operable units subject to the requirements of IDAPA 58.01.05.012 [40 CFR § 270.14 through .25].
- q. *Hazardous Waste Disposal Unit* (HWDU) shall mean those units in which hazardous waste has been placed in or on the land.
- r. *IDAPA* shall mean the Idaho Administrative Procedures Act, Chapter 52, Title 67, Idaho Code.
- s. *Landfill* shall mean a disposal facility or part of a facility where hazardous waste is placed in or on land and which is not a pile, a land treatment facility, a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, and underground mine, a cave or a corrective action management unit.
- t. *Permit* shall mean this Permit issued by the Idaho Department of Environmental Quality.
- u. *Permittee* shall mean the United States Air Force, Mountain Home Air Force Base.
- v. *RCRA* shall mean the Resource Conservation and Recovery Act of 1976, as amended by HSWA in 1984.

- w. *Record of Decision (ROD)* shall mean the public document that explains which cleanup alternative(s) will be used at CERCLA cleanup sites.
- x. *Release* shall mean any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes or hazardous waste constituents into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous waste constituents.
- y. *Solid Waste Management Unit (SWMU)* shall mean any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous wastes. Such units include any area at a facility at which solid wastes have been routinely and systematically released.
- z. Unless otherwise noted, all schedules refer to calendar time, i.e., thirty (30) days means thirty (30) calendar days

All definitions contained in IDAPA 58.01.05.004, 58.01.05.008, and 58.01.05.010 through 58.01.05.013 [40 CFR Parts 260, 264, 266, 268, 270, and 124] are hereby incorporated, in their entirety, by reference into this Permit, except that any of the definitions used above shall supersede any definition of the same term given in IDAPA 58.01.05.000 et seq. Where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted, scientific, or industrial meaning of the term.

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## ACRONYMS AND ABBREVIATIONS

ACC	Air Combat Command
<u>ACES</u>	<u>Automated Civil Engineer System</u>
<u>ACES-IDM</u>	<u>Automated Civil Engineer System - Integrated Data Model</u>
AFB	Air Force Base
AFCEE	Air Force Center for Environmental Excellence
AOC	Area of Concern
ARAR	Applicable and Relevant Requirement
AST	Aboveground Storage Tank
ASTM	American Society of Testing and Materials
BEW	Bedrock Extraction Well
BLM	Bureau of Land Management
BX	Base Exchange
MX	Military Exchange
CA/PC	Corrective Action/Post-Closure
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CES	Civil Engineering Squadron
CFR	Code of Federal Regulations
CME	Corrective Measures Evaluation
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
CO	Consent Order
CQA	Corrective Measures Quality Assurance
DEQ	Department of Environmental Quality
DP	Disposal Pit
DRMO	Defense Reutilization and Marketing Office
DU	Decision Unit
EOD	Explosive Ordnance Disposal
EPA	U.S. Environmental Protection Agency
ERP	Environmental Restoration Program
ESD	Explanation of Significant Difference
FEMA	Federal Emergency Management Act
FFA	Federal Facilities Agreement
FFA/CO	Federal Facilities Agreement/Consent Order
FT	Fire Training Area
FUDS	Formerly Used Defense Sites
HSWA	Hazardous and Solid Waste Amendments of 1984
HWDU	Hazardous Waste Disposal Unit
HWMA	Hazardous Waste Management Act of 1983, as amended
IC	Institutional Control
IDAPA	Idaho Administrative Procedures Act
IDEQ	Idaho Department of Environmental Quality
IDP	Installation Development Plan
<u>IDTL</u>	<u>Initial Default Target Level</u>
IRP	Installation Remediation Program
JP	Jet Propulsion
kg	kilogram
L	liter
LF	Landfill
LLC	Limited Liability Corporation
LOX	Liquid Oxygen
LTM	Long Term Monitoring

LUC	Land Use Control
mg	milligram
MHAFB	Mountain Home Air Force Base
MILCON	Military Construction
MMRP	Military Munitions Response Program
MOGAS	Motor Gasoline
MSW	Municipal Solid Waste
MWR	Morale, Welfare, and Recreation
NFA	No Further Action
NFRAP	No Further Remedial Action Proposed
NIOSH	National Institute for Occupational Safety and Health
NRA	No Remediation Action
NW	Northwest
OSHA	Occupational Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response
OT	Other
OU	Operable Unit
OWS	Oil Water Separator
PA	Preliminary Assessment
PBC	Performance Based Contracting
PBR	Precision Bombing Range
POL	Petroleum, Oil and Lubricants
QA/QC	Quality Assurance/Quality Control
RA	Remedial Action
RBCA	Risk-Based Corrective Action
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RI/FS	Remedial Investigation/Feasibility Study
RMC	RMC Consultants, Inc.
ROD	Record of Decision
RW	Radioactive Waste
SARA	Superfund Amendments and Reauthorization Act
SCR	Saylor Creek Range
SCS	Solid Conservation Service
SD	Storm Drain
SR	Skeet Range
SS	Storm Sewer
ST	Storage Tank
SWMU	Solid Waste Management Unit
TCLP	Toxicity Characteristic Leaching Procedure
U.S.C	United States Code
URS	United Research Services
USAF	U.S. Air Force
UST	Underground Storage Tank
UU/UE	unlimited use/unrestricted exposure
VOC	Volatile Organic Compound
WWII	World War II

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## MODULE I – STANDARD PERMIT CONDITIONS

### I.A. EFFECT OF PERMIT

The Permittee is required to ~~maintain the closed hazardous waste disposal unit (HWDU), [i.e., Petroleum, Oil and Lubricants (POL) Cap], and~~ perform corrective action as expressly described in this Permit. Any storage, treatment or disposal of hazardous waste by the Permittee at this Facility that is not authorized by this Permit, or by the Idaho Administrative Procedures Act (IDAPA) 58.01.05.006 [Title 40 of the Code of Federal Regulations (CFR) Part 262.34], and for which a permit is required under Idaho Code § 39.4409 or Section 3005 of the Resource Conservation and Recovery Act (RCRA) is prohibited.

Pursuant to IDAPA 58.01.05.012 [40 CFR § 270.4], compliance with this Permit generally constitutes compliance, for purposes of enforcement, with the Idaho Hazardous Waste Management Act (HWMA), as amended, except for those requirements not included in this Permit, which become effective by statute or future regulatory changes to include those requirements promulgated under IDAPA 58.01.05.011 [40 CFR Part 268] restricting the placement of hazardous waste in or on the land. As per IDAPA 58.01.05.012 [40 CFR § 270.30(g)], issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations.

The United States Air Force (USAF), the United States Environmental Protection Agency (EPA) Region 10, and Idaho Department of Environmental Quality (IDEQ) entered into a "Federal Facilities Agreement" (FFA) on January 16, 1992. That agreement provides for integration and satisfaction of the response action requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the corrective action requirements of the RCRA for those Solid Waste Management Units (SWMUs) addressed under the FFA. Compliance with the requirements of the FFA shall satisfy the corrective action requirements of this Permit for the SWMUs addressed under the FFA.

In 1995, IDEQ agreed with the No Further Action (NFA) determination regarding the six (6) SWMUs at the Saylor Creek Range. In the event additional SWMUs or Areas of Concern (AOCs) are identified at the Saylor Creek Range, these units will require full characterization in accordance with this Permit.

In 1997, IDEQ agreed with the NFA determination regarding Oil/Water Separator (OWS) SWMUs 1332E, 1332 SE and 2304. Another fifty-seven (57) OWS were evaluated in a 1997 Addendum to the 1990 RCRA Facility Assessment and further evaluated under the FFA. All OWS included in the 1997 Addendum, except OWSs 1347 and 1354, have been either closed or removed and are considered to require NFA. OWS 1347 and 1354 have been decommissioned; however, under the FFA, they are currently being re-investigated to ensure proper closure of sites. Any other OWS determined to be a HWMU or an SWMU shall be addressed by the Permit.

In 2009, IDEQ entered into a Consent Order (CO) with the USAF MHAFB regarding asbestos and pesticide contaminated soils excavated at its Military Family Housing Areas, and disposed at the Verlinde Hill Rubble Pile/Disposal Area (IDEQ, "Signed and Effective Consent Order for RCRA and Air Quality," July 15, 2009). In the event

additional SWMUs or AOCs are identified in the Family Housing Areas or at the Verlinde Hill Rubble Pile/Disposal Area, these units will require full characterization in accordance with this Permit. The Verlinde Hill Rubble Pile/Disposal Area was administratively determined not to be an SWMU in an IDEQ letter dated April 4, 2012, but should MHAFB fail to comply with the Verlinde Hill Solid Waste Management Unit Cap Maintenance Plan in accordance with 40 CFR Subpart M, Part 61, it shall be incorporated into this Permit as an SWMU and subject to all its terms and conditions.

A summary of the SWMUs identified at MHAFB, and their status is included in this Permit as Attachment 4, Solid Waste Management Units; Attachment 5, Corrective Action for SWMUs; and Attachment 6, Appendix E, Solid Waste Management Units That Require Post-Closure Care or Monitoring.

- I.A.1. Any SWMU included in the FFA for which action is not complete shall become subject to the requirements of this Permit immediately upon termination of the FFA.
- I.A.2. Any SWMU not included in the FFA is subject to the requirements of this Permit.
- I.A.3. A determination of NFA or for unlimited use, unrestricted exposure (UU/UE) shall not preclude the Director from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or the likelihood of a release from an SWMU at the facility is likely to pose a threat to human health or the environment.

I.B. ENFORCEABILITY

The terms and conditions of this Permit are enforceable pursuant to the HWMA or any other applicable federal, state, or local laws. Violations of this Permit may result in civil penalties in accordance with the HWMA [Idaho Code 39-4414], and/or criminal penalties in accordance with HWMA [Idaho Code 39-4415].

- I.B.1. Any person who knowingly makes any false statement or representation in any application, label, manifest, record, report, permit, or other document filed, maintained or used for the purposes of complying with the provisions of Idaho Code § 39-4415 shall be guilty of a misdemeanor and subject to a fine of not more than ten thousand dollars (\$10,000) or imprisonment not to exceed one (1) year, or to both, for each separate violation or for each day of a continuing violation.

I.C. OTHER AUTHORITY

The Department expressly reserves any right of entry provided by law, and any authority to order or perform emergency or other response activities as authorized by law.

I.D. PERMIT ACTIONS

- I.D.1. Within thirty (30) days of the termination of the FFA, the Permittee must identify areas that still require corrective action and submit a schedule to submit a request for modification, in accordance with the IDAPA 58.01.05.012 [40 CFR § 270.42], to incorporate any and all required permitting actions necessary to complete corrective action under RCRA.

- I.D.2. In the absence of the FFA, the Permittee shall submit written notification to the Director within fifteen (15) calendar days after discovery of newly-identified SWMU(s) or Areas of Concern (AOCs). The notification shall include the location of the new SWMU(s) or AOC(s) and information on the suspected or known wastes at the site.
- I.D.3. This Permit may be modified, revoked and reissued, or terminated for cause as specified in IDAPA 58.01.05.012 [40 CFR §§ 270.41, 270.42, or 270.43].
- I.D.4. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.
- I.D.5. The Director may modify this Permit when the standards or regulations on which the Permit was based have been changed by statute, amended standards or regulations, or by judicial decision after the effective date of this Permit.
- I.D.6. Except as provided by specific language in this Permit or except for the Director's approval of a Class 1 or 2 Permit Modification, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(a) and (b)], any modifications requested by the Permittee which substantially alter the facility or its operation (as covered by this Permit) shall be administered as a Class 3 Permit Modification prior to such change taking place, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.42(c)].
- I.D.7. Within forty-five (45) days of a permit modification being put into effect or approved, the Permittee shall provide two (2) clean copies of the relevant portions of the Permit and Attachments revised to incorporate the change (if not already reflected/provided in the change pages submitted with the Permit Modification Request) to the Director. The Permittee shall also submit an electronic version of all modified sections of the Permit and Attachments to the Director and to the EPA Region 10.
- I.D.8. The Permittee shall ensure Attachment 12, "Modification Tracking Log" is current, consistent with Permit Condition I.D.7.
- I.E. SEVERABILITY
- I.E.1. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any condition of this Permit, does not affect the validity of any other state or federal statutory or regulatory basis for said provision.
- I.E.2. In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant permitted standards in IDAPA 58.01.05.008 [40 CFR Part 264] until final resolution of the stayed condition, unless compliance with the related applicable and relevant interim status standards in IDAPA 58.01.05.009 [40 CFR Part 265] would be technologically incompatible with compliance with other conditions of this Permit that have not been stayed.

I.F. DUTIES TO COMPLY

I.F.1. The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an Emergency Permit issued in accordance with IDAPA 58.01.05.012 [40 CFR § 270.61]. Any Permit noncompliance, other than noncompliance authorized by an Emergency Permit, constitutes a violation of HWMA and is grounds for enforcement action, for Permit termination, revocation and reissuance or modification, or for denial of a Permit renewal application, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(a)].

I.F.2. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3007, 3008, 3013, or 7003 of RCRA [42 U.S.C. §§ 6927, 6928, 6934 and 6973], §§ 104, 106(a), or 107 of CERCLA [42 U.S.C. §§ 9604, 9606(a), or 9607], as amended by SARA, or any other state or federal law providing for protection of public health or the environment from any imminent and substantial endangerment to human health or the environment.

I.G. PERMIT EXPIRATION

I.G.1.a. Except as renewed, modified, revoked, reissued, or terminated by the Department, this Permit shall automatically expire ten (10) years from the effective date of this Permit.

I.G.1.b. This Permit shall be reviewed five (5) years after the effective date of this permit by the Department, and modified, as necessary, as per IDAPA 58.01.05.012 [40 CFR §§ 270.41 and 270.50].

I.H. CONTINUATION OF EXPIRING PERMIT

This Permit shall remain effective until a new permit or permit denial is made final, provided the Permittee complies with IDAPA 58.01.05.012 [40 CFR §§ 270.10(h), and 270.13 through 270.29] or provided the Department requires the Permittee to continue corrective action to protect human health and/or the environment. Conditions, which are continued pursuant to this permit condition, remain fully effective and enforceable.

I.I. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit as per IDAPA 58.01.05.012 [40 CFR § 270.30(c)].

I.J. DUTY TO MITIGATE

In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. Such mitigation shall not be a defense to enforcement action as per IDAPA 58.01.05.012 [40 CFR § 270.30(d)].

I.K. PROPER OPERATION AND MAINTENANCE

In accordance with IDAPA 58.01.05.012 [40 CFR 270.30(e)], the Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems to maintain compliance with the conditions of this Permit.

I.L. DUTY TO PROVIDE INFORMATION

I.L.1. The Permittee shall furnish to the Director, within a reasonable time, any relevant information that the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit, in accordance with IDAPA 58.01.05.008 and 58.01.05.012 [40 CFR §§ 264.74(a), and 270.30(h)].

I.L.2. All plans and schedules including revisions to previously submitted plans and schedules required by the conditions of this Permit are, upon written approval by the Director, incorporated into this Permit by reference and become an enforceable part of this Permit. This incorporation does not require a permit modification. Any noncompliance with such approved plans and schedules shall constitute noncompliance with this Permit.

I.M. INSPECTION AND ENTRY

In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(i)], the Permittee shall allow the Department, the Director, and/or their authorized officers, employees, or representatives, upon the presentation of credentials and other documents as may be required by law, to:

I.M.1. Enter at reasonable times upon the Permittee's premises where a regulated Facility or activity is located or conducted, or where records are kept as required by the conditions of this Permit;

I.M.2. Have access to and to copy, at reasonable times, any records that are kept as required by the conditions of this Permit;

I.M.3. Inspect, at reasonable times, any portion of the Facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

I.M.4. Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by HWMA or RCRA, any substances or parameters at any location.

I.N. MONITORING AND RECORDS

- I.N.1. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(j)(1)], samples and measurements taken by the Permittee for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the most recent appropriate method from IDAPA 58.01.05.005 [Appendix I of 40 CFR Part 261]. The Permittee shall use techniques and procedures specified in IDAPA 58.01.05.005 [Appendix III of 40 CFR Part 261], except as Permit Condition I.N.4 provides otherwise, when collecting, preserving, shipping, analyzing, tracking and controlling samples.
- I.N.2. Except as specifically required by regulation or elsewhere in this Permit (i.e., Permit Condition I.Z), and in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(j)(2)], the Permittee shall retain at the Facility records of all monitoring information, including all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, certification required by IDAPA 58.01.05.008 [40 CFR § 264.73(b)(9)], and records of all data used to complete the application for this Permit for a period of at least thirty-six (36) months from the date of the sample, measurement, report, record, certification, or application. This period may be extended by the Director at any time by notification, in writing, to the Permittee and is automatically extended during the course of any unresolved enforcement action at this Facility to three (3) years beyond the conclusion of the enforcement action.
- I.N.3. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(j)(3)], records of monitoring information shall specify the following:
- I.N.3.a. The date(s), exact place, and times of sampling or measurements;
- I.N.3.b. The name(s), title(s), and affiliation of individuals who performed the sampling or measurements;
- I.N.3.c. The date(s) analyses were performed;
- I.N.3.d. The name(s), title(s), and affiliation of individuals who performed the analyses;
- I.N.3.e. The analytical techniques or methods used; and
- I.N.3.f. The results of such analyses, including the Quality Control/Quality Assurance (QA/QC) summary
- I.N.4. The Permittee may substitute analytical methods which are equivalent to those specifically approved for use in this permit in accordance with the following:
- I.N.4.a. The Permittee submits to the Director a request for substitution of an analytical method(s) that is equivalent to the method(s) specifically approved for use in this Permit. The request shall provide information demonstrating that the proposed method(s) is equal or superior to the approved analytical method(s) in terms of sensitivity, accuracy, and precision (i.e., reproducibility); and,

I.N.4.b. The Director notifies the Permittee in writing that the substitution of the analytical method(s) is approved. Such approval shall not require a permit modification.

I.O. REPORTING PLANNED CHANGES

The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted Facility in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(1)]

I.P. REPORTING ANTICIPATED NONCOMPLIANCE

The Permittee shall give advance notice, in writing, to the Director of any planned change(s) in the permitted Facility, or any activity that may result in noncompliance with permit requirements, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(2)]. If advance notice is not possible, then the Permittee shall give notice within twenty-four (24) hours of the time the Permittee becomes aware of the anticipated noncompliance. Such notice does not authorize any noncompliance with this Permit or modification of this Permit.

I.Q. TRANSFER OF PERMIT

This Permit may be transferred to a new owner or operator only if it is modified or revoked and reissued in accordance with IDAPA 58.01.05.012 [40 CFR §§ 270.40(b), 270.41(b)(2) and 270.42]. Prior to transferring ownership or operation of the Facility during its Post-Closure Period and/or Corrective Action, the Permittee shall notify the new owner or operator in writing of the requirements of the requirements of IDAPA 58.01.05.008, and 58.01.05.012 [40 CFR §§ 264 and 270] and this Permit.

I.R. COMPLIANCE SCHEDULES

In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(5)], reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted on or before each schedule date. The Permittee shall comply with the schedules included Module VI, Tables VI-5 and VI-6; and Appendix A, Table A-1 of this Permit.

I.S. TWENTY-FOUR HOUR REPORTING

I.S.1. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(6)], the Permittee shall report to the Director any noncompliance with the Permit which may endanger human health or the environment. Any such information shall be reported orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances/noncompliance. The report shall include the following:

I.S.1.a. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies, or

I.S.1.b. Any information of a release or discharge of hazardous waste or a fire or explosion relating to hazardous waste management at the permitted Facility which could threaten the environment or human health.

I.S.2. The description in the oral report of the occurrence and its cause shall include:

- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident;
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to the environment and human health, where this is applicable;
- Estimated quantity and disposition of recovered material that resulted from the incident; and
- A qualitative review of actions taken, intended responses, and remedial actions.

I.S.3. Within five (5) calendar days after the Permittee is required to provide verbal notification, as specified in Permit Conditions I.S.1 and I.S.2 of this Permit, the Permittee shall provide to the Director a written submission. The written submission shall include, but not be limited to, the following:

- Name, address, and telephone number of individual reporting;
- A description of the of the incident (noncompliance and/or release), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazard(s) to the environment and human health outside the Facility, where this is applicable;
- The period(s) in which the incident (noncompliance and/or release) occurred (including exact dates and times);
- Whether the results of the incident remain a threat to human health and the environment (whether the noncompliance has been corrected and/or the release has been adequately remediated); and
- If not corrected, the anticipated time it is expected to continue; the steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance; and/or the steps taken or planned to adequately remediate the release.

I.S.4. The Permittee need not comply with the five (5) calendar day written notice requirement if the Director waives, in writing, the requirement, and the Permittee submits a written report within fifteen (15) calendar days from the time the Permittee is required to provide verbal notification, as specified in Permit Condition I.S.1 of this Permit. Reporting shall not constitute a defense for any noncompliance. Reporting requirements specified in this Permit do not supersede or replace any of the facility's other emergency reporting obligations.

I.T. OTHER NONCOMPLIANCE

In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(10)], the Permittee shall report to the Director all other instances of noncompliance not otherwise required to be reported in accordance with Permit Conditions I.P and I.S of the Permit. Reports shall be due within ten (10) days of when the non-compliance is discovered. The reports shall contain the information listed in Permit Condition I.S of this permit. Reporting shall not constitute a defense for any noncompliance.

I.U. OTHER INFORMATION

In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(11)], whenever the Permittee becomes aware that it failed to submit any relevant facts in the Permit Application, or submitted incorrect information in a Permit Application or in any report to the Director, the Permittee shall promptly submit such facts or information to the Director in accordance with Permit Condition I.X of this Permit.

I.V. SIGNATURE AND CERTIFICATION

The Permittee shall ensure that all plans, reports, notification, information requested by the Director, and other submissions to the Director are signed and certified, in accordance with IDAPA 58.01.05.012 [40 CFR §§ 270.11 and 270.30(k)].

I.W. CONFIDENTIAL INFORMATION

~~The Permittee may claim confidential any information required to be submitted by this Permit, in accordance with Title 9, Chapter 3, of the Idaho Code, IDAPA 58.01.05.012 [40 CFR § 270.12], or any other applicable federal, state, or local law. The Department shall determine whether the claim of confidentiality is warranted and in accordance with applicable state laws. The Permittee may claim confidential any information required to be submitted by this Permit, in accordance with IDAPA 58.01.05.004 and 58.01.05.012 [40 CFR §§ 260.2 and 270.12].~~

I.X. REPORTS, NOTIFICATIONS AND SUBMISSIONS

All reports, notifications, or other submissions, which are required by this Permit and IDAPA 58.01.05.012 [40 CFR § 270.30], shall be sent or given to the Director by certified mail, express mail, or hand delivered at:

Please submit two (2) copies and an electronic copy to:

Director,  
c/o Hazardous Waste Program Manager  
Idaho Department of Environmental  
Quality  
1410 North Hilton, 2<sup>nd</sup> Floor  
Boise, Idaho 83706-1255

Telephone No.: (208) 373-0502  
Twenty-four (24) hour telephone  
number: 1-800-632-8000

Please submit an additional electronic copy to:

Director  
c/o State of Idaho Coordinator  
Office of Air, Waste and Toxics, RCRA  
Program Unit  
U.S. Environmental Protection Agency –  
Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101

The addresses and telephone numbers listed above are current as of the effective date of this Permit and may be subject to change.

I.Y. DOCUMENTS TO BE MAINTAINED AT THE FACILITY.

I.Y.1. The Permittee shall maintain at the Facility, until Corrective Action/~~Post-Closure~~ is completed and Certification by an qualified Professional Engineer has been approved by the Director, and have readily available for inspection, the following documents and amendments, revisions and modifications to these documents:

I.Y.1.a. A complete copy of this Permit and its Attachments, Appendices, Tables and all modifications to this Permit;

I.Y.1.b. A complete copy of the final RCRA Part B Permit Application, including all attachments.

I.Y.1.c. Operating Record, as required by IDAPA 58.01.05.008 [40 CFR § 264.73] and this Permit. The Permittee is exempt from 40 CFR § 264.73(b)(8) for closure cost estimates, in accordance with 40 CFR § 264.140(c).

I.Y.1.d. Detailed chemical and physical analyses of representative samples of the hazardous remediation wastes to be managed at the site. At a minimum, the analyses must contain all of the information which must be known to treat, store or dispose of the waste according to IDAPA 58.01.05.008 [40 CFR § 264.1(j)(2)] and IDAPA 58.01.05.011 [40 CFR Part 268], and must be kept accurate and up to date.

I.Y.1.e. Personnel training documents, certifications, and records, as required by IDAPA 58.01.05.006 [40 CFR §§ 264.1(j)(5), (12) and (13)] and this Permit. Training records for former employees will be maintained for a period of three years, records for current employees will be maintained until post-closure is completed and certified by a qualified Professional Engineer.

I.Y.1.f. Procedures to prevent accidents and the Contingency and Emergency Plan, as required by IDAPA 58.01.05.006 [40 CFR §§ 264.1(j)(10), (12) and (13)]; and this Permit.

I.Y.1.g. Inspection Procedures, Schedules, Logs, Records and Results as required by IDAPA 58.01.05.008 [40 CFR § 264.1(j)(4), (12) and (13)] and this Permit. Records of inspections will be maintained for a period of at least three (3) years.

I.Y.1.h. ~~Copies of all Closure Plans~~A Post-Closure Plan as required by IDAPA 58.01.05.006 (40 CFR § 264.14112)~~and this Permit for the life of the facility.~~

I.Y.1.i. Survey plat record as required by IDAPA 58.01.05.008 [40 CFR § 264.119].

I.Z. DOCUMENTS TO BE SUBMITTED AFTER PERMIT ISSUANCE

~~I.Z.1. The Permittee shall submit the~~ Schedule and deliverables for the Corrective Action Program as described in Permit Condition VI. ~~following documents to the Director by the date shown:~~

~~I.Z.1.a. The POL Cap Assessment within one hundred and eighty (180) days after the effective date of this Permit.~~

~~I.Z.1.b. The POL Cap Post-Closure Plan within sixty (60) days after the submittal of the POL Cap Assessment.~~

~~I.Z.1.c. Schedule and Deliverables for the Corrective Action Program as described in Permit Condition VI.~~

~~I.Z.1. The Permittee shall submit to the Director the Compliance Schedules (VI-5 and VI-6) and deliverables for the Corrective Action Program in accordance with Permit Module VI.~~

I.Z.2. Failure to submit the information required in this Permit, or falsification of any submitted information, is grounds for termination of this Permit, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.43].

I.AA. FUNDING

I.AA.1. No provision of this permit shall be interpreted to require the Permittee to obligate or expend funds in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341; the Non-Appropriated Fund Anti-Deficiency Act, 10, U.S.C. Section 2783; or any other provision of law.

I.AA.2. Failure to obtain adequate funds or appropriations from Congress shall not, in any way, release the Permittee from its obligations to comply with the Corrective Measures Implementation (as required by Permit Condition ~~VI.G-3~~ **Error! Reference source not found.** of this Permit) or in any other requirement of this Permit or RCRA.

I.AA.3. If adequate funds for Corrective Measures Implementation or any other requirement of this Permit are not available, the Director reserves the right to pursue any action or actions deemed necessary to protect human health and the environment, not excluding judicial recourse or termination of the permit.

I.BB. BIENNIAL REPORT

I.BB.1. In accordance with IDAPA 58.01.05.012 [40 CFR § 270.30(l)(9)], the Permittee shall comply with Biennial Report requirements of IDAPA 58.01.05.008 [40 CFR § 264.75]

## MODULE II – GENERAL FACILITY CONDITIONS

### II.A. WASTE ANALYSIS

The Permittee shall obtain a detailed chemical and physical analysis of a representative sample any hazardous wastes to be managed at the post-closure site or at any newly-identified SWMUs. At a minimum, the analysis must contain all of the information that must be known to treat, store or dispose of the waste according to IDAPA 58.01.05.008 [40 CFR Part 264] and IDAPA 58.01.05.011 [40 CFR Part 268], and must be kept accurate and up to date; as required per IDAPA 58.01.05.008 [40 CFR §§ 264.1(j)(2), (12) and (13)].

### II.B. SECURITY

II.B.1. The Permittee shall comply with the Security Provisions of IDAPA 58.01.05.008 [40 CFR §§ 264.1(j)(3), (12), (13) and 264.117(b)], and as specified in Attachment 3 of this Permit, which:

II.B.1.a. Prevent entrance by people who are unaware of dangers, and minimize the possibility for unauthorized people or livestock to enter onto the ~~post-closure unit~~, SWMUs, AOCs or active portions of remediation waste management sites.

### II.C. INSPECTIONS

II.C.1. The Permittee shall comply with the Inspection Provisions of IDAPA 58.01.05.008 [40 CFR §§ 264.1(j)(4), (12) and (13)], IDAPA 58.01.05.012 [40 CFR § 270.14(b)(5)], and Attachment 6 of the Permit, by inspecting the ~~post-closure unit~~, SWMUs, AOCs, and ~~the~~ remediation waste management sites for malfunctions, deterioration, operator errors, and discharges that may be causing, or may lead to, a release of hazardous waste constituents to the environment, or may be a threat to human health. The Permittee shall conduct these inspections often enough to identify problems and remedy them before they can harm human health or the environment. Where a hazard is imminent or has already occurred, the Permittee must take remedial action immediately.

~~II.C.2. The permittee shall maintain an inspection schedule as per IDAPA 58.01.05.012 [40 CFR 270.14(c)(5)] and Attachment 6 of this Permit.~~

### II.D. TRAINING

The Permittee shall ensure that personnel who are involved in the ~~post-closure unit~~, SWMUs, AOCs, and remediation waste management sites are provided with classroom or on-the-job training on how to perform their duties in a way that ensures the waste sites comply with the requirements of IDAPA 58.01.05.008 [40 CFR §§ 264.1(j)(5), (12) and (13)], and on how to respond effectively to emergencies;

### II.E. PROCEDURES TO PREVENT ACCIDENTS AND CONTINGENCY AND EMERGENCY PLAN

II.E.1. The Permittee shall develop and maintain procedures to prevent accidents, and develop and maintain a Contingency and Emergency Plan to control accidents that occur, as required per IDAPA 58.01.05.008 [40 CFR § 264.1(j)(10)]. These procedures must address proper design, construction, maintenance, and operation of the SWMUs, AOCs,

and remediation waste management sites. The goal of the plan must be to minimize the possibility of, and the hazards from a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment. The plan must explain specifically how to treat, store and dispose of the hazardous remediation waste in question, and must be implemented immediately whenever a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment;

II.E.2. The plan shall also include the procedures for the precautions to prevent accidental ignition or reaction of ignitable or reactive waste, and how to prevent threats to human health and the environment from ignitable, reactive and incompatible waste, as required per IDAPA 58.01.05.008 [40 CFR § 264.1(j)(6)].

#### II.F. EMERGENCY CONTACT

The Permittee shall designate at least one employee, either on the Facility premises or on call (that is, available to respond to an emergency by reaching the Facility quickly), to coordinate all emergency response measures, as required per IDAPA 58.01.05.008 [40 CFR § 264.1(j)(11)]. This Emergency Coordinator must be thoroughly familiar with all aspects of the Facility's Contingency and Emergency Plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the Facility, and the Facility layout. In addition, this person must have the authority to commit the resources needed to carry out the Contingency and Emergency Plan required in IDAPA 58.01.05.008 [40 CFR § 264.1(j)(10)].

#### II.G. PLANS, RECORDKEEPING AND REPORTING

In addition to the record keeping and reporting requirements specified elsewhere in this Permit, the Permittee shall comply with the following:

II.G.1. In accordance with IDAPA 58.01.05.008 [40 CFR § 264.1(j)(12)], the Permittee shall develop, maintain and implement a plan or plans to meet the requirements in II.A through II.E of this section.

II.G.2. In accordance with IDAPA 58.01.05.008 [40 CFR § 264.1(j)(13)], the Permittee shall maintain records documenting compliance with the requirements in Permit Conditions II.A through II.G.1 of this section.

II.G.3. The Permittee shall update the tables in Module VI, in accordance with Permit Condition Error! Reference source not found. VI.C.9.

#### II.H. CLOSURE

Not applicable.

#### II.I. CLOSURE COST ESTIMATE AND FINANCIAL ASSURANCE

The Permittee, as a federal facility, is exempt from the closure cost estimate and financial assurance requirements, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.140(c)].

II.J. LIABILITY REQUIREMENTS

The Permittee, as a federal facility, is exempt from the liability coverage for sudden and accidental occurrence requirements, in accordance with IDAPA 58.01.05.008 [40 CFR §264.140(c)].

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## MODULE III – GROUNDWATER MONITORING

### III.A. APPLICABILITY

The Permittee is not subject to the groundwater monitoring activities required in IDAPA 58.01.05.008 [40 CFR § 264.118(1), as long as the FFA is in effect.

If the FFA is vacated, then the Groundwater Monitoring Program, applicable under the terms of this Permit and IDAPA 58.01.05.008 [40 CFR § 264.90(c)(2) and (3)], shall be undertaken in accordance with IDAPA 58.01.05.008 [40 CFR § 264.98, 264.99, and 264.100], and as stipulated in the following documents.

- Environmental Restoration Program Basewide Work Plan, ~~ACC 4-Base-PBC~~
- OU-3 Bedrock Vapor Extraction Well and System Installation Work Plan, ~~ACC 4-Base-PBC~~
- OU-3 Performance Monitoring Work Plan Addendum
- The latest Long-Term Monitoring Sampling Schedule ~~ACC 4-Base-PBC~~

These documents are available in the MHAFB Administrative Record as identified in Attachment 10 of this Permit.

- III.A.1. The Permittee shall operate, maintain and repair the groundwater monitoring system in a manner to minimize the possibility of a fire, explosion, or any unplanned, non-sudden release of waste constituents to the air, soil, or surface water which could threaten human health or the environment.

### III.B. GROUNDWATER PROTECTION STANDARD

The Permittee shall ensure that the Groundwater Protection Standard (GWPS), as required under IDAPA 58.01.05.008 [40 CFR § 264.92], is being met or that remedial actions are being taken to reduce contaminant levels to meet standards. The GWPS shall consist of the hazardous constituents and their corresponding concentration limits as maximum contaminant levels (MCLs) under the Safe Drinking Water Act (SDWA) or alternate concentration limits (ACL) established if and when the FFA is vacated. Where MCLs and ACLs cannot be established, the standard is established at background levels listed in Table III-1 of this Permit Module, as established under IDAPA 58.01.05.008 [40 CFR §§ 264.93 and 264.94]. ~~These are the twenty (20) constituents of concern identified at the POL Cap, which is under Post-Closure care.~~

### III.C. RECORDKEEPING AND REPORTING

- III.C.1.a. All reports, notifications, applications, or other materials required to be submitted to the Director shall be submitted in accordance with Permit Condition I.X of this Permit.

#### III.C.1.b. Operating Record

The Permittee shall enter all monitoring, testing, analytical, and corrective action data obtained pursuant to the documents listed in Permit Condition III.A into the operating record as required by IDAPA 58.01.05.008 [40 CFR § 264.73(b)(6)].

#### III.C.2. Compliance Period

The Groundwater Monitoring Program shall remain in effect until all activities identified in FFA, the 2009 RCRA and Air Quality CO, other compliance agreements, and this Permit have been satisfactorily completed, and have been certified.

**Table III-1. Constituents of Concern/Groundwater Protection Standards**

No.	Constituent of Concern	Chemical Abstract Number	Nonwastewater Standard Concentration Limit (mg/kg) <sup>1</sup> unless noted as "mg/L TCLP" <sup>2</sup>
1.	Acetone	67-64-1	160
2.	Anthracene	120-12-7	3.4
3.	Benzene	71-43-2	10
4.	2-butanone (methyl ethyl ketone)	78-93-3	36
5.	Chloroethane	75-00-3	6.0
6.	Chloroform	67-66-3	6.0
7.	Chromium	7440-47-3	0.60 mg/L TCLP
8.	Di-n-octyl phthalate	117-84-0	28
9.	1,1-Dichloroethane	75-34-3	6.0
10.	Ethylbenzene	100-41-4	10
11.	Fluoranthene	206-44-0	3.4
12.	Lead	7439-92-1	0.75 mg/L TCLP
13.	Methyl isobutyl ketone	108-10-1	33
14.	Methylene chloride	75-09-2	30
15.	Phenanthrene	85-01-8	5.6
16.	Pyrene	129-00-0	8.2
17.	Tetrachloroethylene	127-18-4	6.0
18.	Toluene	108-88-3	10
19.	1,1,1-Trichloroethane	71-55-6	6.0
20.	Xylene (mixed isomers)	1330-20-7	30

<sup>1</sup>IDAPA 58.01.05.011 [40 CFR 268.48(a), Table Universal Treatment Standards]  
<sup>2</sup>TCLP - Toxicity Characteristic Leaching Procedure

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## MODULE IV – CLOSURE

### IV.A. APPLICABILITY

There have been a number of RCRA HWMUs identified at MHAFB. Most were closed under interim status and one permitted facility was closed. There are no longer any operating interim status or permitted HWMUs at MHAFB. Therefore the requirements of IDAPA 58.01.05.012 [40 CFR § 270.14(b)(13)] do not apply.

The closed units are:

- POL UST Tanks (also referred to as the POL Cap) removed in 1988 and closed and capped September 18, 1991 (1987 Consent Order) (Closure approval is included as Attachment 7, Figure 7-1).
- OT-16 Popping Furnace closed October 1992 (1990 NOD) (Evidence of closure is included as Attachment 7, Figures 7-2a and 7-2b).
- Oil Water Separators (OWS) studies in 1995 determined that many OWS contained hazardous waste. OWS 1332E, 1332SE, and 2304 were closed January 24, 1997. Work plans were developed to decommission 40 OWSs located at 26 sites under RCRA.

The 40 OWSs were decommissioned and sampled for closure in two separate projects conducted in 1997 and 1998. An OWS inventory was completed at the end of 1999 and listed 20 remaining OWSs located at 18 sites. Five of the 20 were determined to no longer or never present. SOWs were developed to decommission 14 of the 15 remaining OWS under RCRA. The OWS that remained in service (OWS 268-New) was reengineered.

The EPA rejected the laboratory results associated with the 1997 and 1998 effort, and the Base resampled 11 of the 40 decommissioned OWS sites during the summer of 2001 under RCRA. These 11 sites were recommended for further evaluation under the FFA as site AOC-8. All OWSs have since been decommissioned; however two OWS, OWS 1347 and OWS 1354, are currently being re-investigated under the FFA to ensure proper closure of sites. No Further Action approval for OWSs 1332E, 1332SE, and 2304 is included as Attachment 7, Figure 7-3.

- DRMO Storage Units Closures (Final Closure Certification for Units 1 and 2 is included as Attachment 7, Figure 7-4).
  - DRMO Storage Unit 1, approved October 31, 2001
  - DRMO Storage Unit 2, approved October 31, 2001
- Tank at Old Entomology Shop (1987 Consent Order)

IV.A.1. The closure certification or other documents showing approval are listed in Attachment 7 and available in the Operating Record.

IV.A.2. The utilized closure plans for the above units shall be available in the Operating Record.

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~~IV.A.3. The plat and certification regarding the plat, as required per IDAPA 58.01.05.008  
[40 CFR § 264.119(b)] for the POL Cap shall be maintained in the Operating Record~~

## MODULE V – POST-CLOSURE CARE

### V.A. APPLICABILITY

Section 3004(p) of RCRA and IDAPA 58.01.05.008 [40 CFR § 264.117] require the Permittee to provide post-closure maintenance and monitoring of waste containment systems in accordance with the requirements of IDAPA 58.01.05.008 [40 CFR Subpart N, Landfills]. IDAPA 58.01.05.008 [40 CFR § 264.310] requires post-closure care for any/all soil areas, and groundwater found contaminated, as a result of the operation of the four, 12,000-gallon underground storage tanks (UST) in the Petroleum, Oil, and Lubricants (POL) Yard . In 1988 the USTs were removed, and in 1991 a RCRA cap was installed to prevent further migration of hazardous waste constituents, which could not be practically removed. Cap construction was completed in March 1991. Closure certification required under IDAPA 58.01.05.008 [40 CFR Parts 264.115-119] was completed on May 23, 1988, and approved on September 16, 1991. Hereafter this unit is referred to as the POL Cap.

#### V.A.1. POL Cap

The USAF entered into an FFA with the EPA and the Department, effective January 16, 1992. The FFA was established to satisfy the response action requirements of CERCLA, Section 120 (42 U.S.C. § 9620) and the corrective action requirements of RCRA, Sections 3004 (u) and 3004 (v) [42 U.S.C. §§ 6924 (u) and (v)]; HWMA [Idaho Code § 39-4409(5)]; and IDAPA 58.01.05.008 [40 CFR § 264.101]. The FFA is fully incorporated and enforceable as part of the Permit. The parties to the FFA have expressly agreed to address/satisfy the post-closure care requirements of the POL Cap with regards to groundwater monitoring and complying with all other applicable requirements of IDAPA 58.01.05.008 (40 CFR Subpart F, Groundwater Monitoring) ~~throughout the post-closure care period.~~

In February 2015, MHAFB provided the Department with new information regarding the concentration of chemical constituents in the soils underneath the clay cap. This new information would have justified the application of different permit conditions at the time of issuance. The new information, provided in the *Final Cap System Investigation Report for the Petroleum, Oil and Lubricant (POL) Yard Cap (ST-13)*, demonstrates that levels of contamination at the Petroleum, Oil and Lubricants (POL) cap post-closure site do not appear to be at concentrations that would pose unacceptable risk to non-residential and construction workers at the site, and therefore continued post-closure care of the site is not required by this Permit.

~~V.A.1.a. With regards to the POL Cap, the Permittee is responsible for following the requirements for cap inspection, monitoring, and maintenance throughout the post-closure care period by following the provisions of this Permit and the Post-Closure Plan in Attachment 6.~~

~~V.A.1.a.~~

#### V.A.2. Verlinde Hill Rubble Pile Cap

In 2009, the Department entered into a Consent Order (CO) with the USAF MHAFB regarding asbestos and pesticide contaminated soils excavated at its Military Family

Housing Areas, and disposed at the Verlinde Hill Rubble Pile/Disposal Area (IDEQ, "Signed and Effective Consent Order for RCRA and Air Quality," July 15, 2009).

V.A.2.a. The Verlinde Hill Rubble Pile cap is being addressed through compliance with the MHAFFB, "Verlinde Hill Solid Waste Management Unit Cap Maintenance Plan, Mountain Home AFB, Idaho," August 2011. Accordingly, the post-closure requirements of this Permit for the Verlinde Hill Rubble Pile cap are addressed by this plan, and is therefore not subject to further HWMA regulation based on known information.

V.B. UNIT IDENTIFICATION

The Permittee shall provide post-closure care for the POL Cap subject to the terms and conditions of this permit.

V.B.1. POL Cap (ST-13)

<b>Table V-1. POL Cap with Post-Closure Care</b>	
<b>Name:</b>	POL Cap (OU-3, ST-13)
<b>Adjacent Building/Structure No.:</b>	Building 1307
<b>Removed tanks:</b>	Tank 1 – JP-4 Tank 2 – Motor Oil Tank 3 – Hydraulic Oil Tank 4 – Hydraulic Oil
<b>Dates Operated:</b> (up to the date the Dept. certifies the unit is closed)	1940's to September 16, 1991
<b>Description of Original Unit:</b>	Four (4) former underground storage tanks (USTs) ranging in size from 12,000 to 15,000 gallons, removed in June 1988
<b>Description of Wastes Contained:</b>	Slop waste from aircraft maintenance
<b>Description of Post-Closure Unit:</b>	Landfill consisting of a RCRA Subtitle C clay cap
<b>Duration of Post-Closure Period:</b>	<del>Thirty (30) Twenty-five ye years</del> <del>ars f</del> from September 16, 1991. The <del>25 year</del> <del>thirty (30) year</del> post-closure care period <del>may be shortened upon application and demonstration to the Department that contaminants have attenuated and/or are no longer present at levels requiring control measures, or</del> may be extended if the Department finds this is necessary to protect human health and the environment.
<b>Contaminants of Concern (COC):</b>	<del>Acetone; Anthracene; Arsenic; Benzene; Benzo(a)pyrene; 2-butanone; Cadmium; Chloroethane; Chloroform; Chromium; Di-n-octyl phthalate; 1,1-Dichloroethane; 1,2-Dichloropropane; Ethylbenzene; Fluoranthene; Lead; Mercury; Methyl isobutyl ketone; Methylene chloride; Naphthalene; Phenanthrene; Pyrene; Tetrachloroethylene; Toluene; 1,1,1-Trichloroethane; Xylene (mixed isomers)</del> Acetone; Anthracene; Benzene; 2-Butanone (methyl ethyl ketone); Chloroethane; Chloroform; Chromium; Di-n-octyl phthalate; 1,1-Dichloroethane; Ethylbenzene; Fluoranthene; Lead; Methyl isobutyl ketone; Methylene chloride; Phenanthrene; Pyrene; Tetrachloroethylene; Toluene; 1,1,1-Trichloroethane; Xylene (mixed isomers)
<b>Regulatory Authorities</b>	HWMA/RCRA: Landfill cap post-closure care, <u>land use</u> CERCLA: Groundwater monitoring
<b>History:</b>	The POL Cap (also known as Site ST-13) is located in the south corner of the POL Yard, southeast of Building 1307. Four 12,000- and 15,000-gallon USTs were present at the Site into which all manner of slop waste from aircraft maintenance was dumped prior to environmental regulation. This practice was discontinued in January 1987 and locks placed on the tank fill pipes to prevent their use. The date of installation of the USTs is unknown, but they may have been installed in the 1940's as part of the original fuel distribution system at the Base.  Samples of the contents were taken to ascertain the proper disposal method. The content of one of the tanks was determined to be a hazardous waste. The contents of the remaining three tanks were determined to be waste POL product. The liquid hazardous waste was removed and disposed of by the Defense Reutilization and Marketing Office (DRMO) in accordance with Federal and

**Table V-1. POL Cap ~~with Post-Closure Care~~**

State Laws and Regulations. A sludge was found remaining on the bottom of the tank. The sludge was sampled and analyzed and also found to be a hazardous waste due to the presence of various hydrocarbons, halogenated hydrocarbons, and heavy metal contaminants.

In June 1988, the four USTs were removed by U.S. Pollution Control, Inc., and disposed of off base through the DRMO.

Soil samples collected before and during the removal of the tanks indicated that soil had been impacted by several volatile organic compounds and chlorinated hydrocarbons, including: 1,1-dichloroethane, 1,1,1-trichloroethane, tetrachloroethene, benzene, ethyl benzene, toluene, and xylenes, as well as some heavy metals.

In March 1991, the tank excavation was backfilled with clean fill and was covered with a clay cap. Site closure was done under the regulatory authority of the RCRA. The tank system was certified closed on September 16, 1991.

The cap system consists of the following soil layers.

- 6-inch gravel erosion control layer
- 8-inch large cobble layer
- flexible membrane liner
- 66-inch (minimum) compacted clay barrier layer (with 24 inches to be below the frost zone), and with a compacted permeability of no greater than  $1 \times 10^{-7}$  cm/sec
- Approximately 48-inch random fill to the bottom of the original excavation (bedrock).

In November 2015, the Army Corps of Engineers conducted an investigation to determine the boundaries and structure of the cap and to perform soil sampling to determine remaining hazardous waste constituents in the soils under the cap. In February 2016, MHAFB presented DEQ the Final Cap System Investigation Report for the Petroleum, Oil and Lubricant (POL) Yard Cap (ST-13), that provided the investigation results, and a risk assessment. The information demonstrated that in accordance with the Idaho Initial Default Target Levels (IDTL) protocol, the soils under the clay cap did not pose undue risk to industrial workers or construction workers.

The cap is graded to promote drainage of runoff and prevent ponding of water on the cap. The slope angle is 3 percent. The center is slightly mounded (approximately 1 ft elevation over the limits of the cap area. The entire cap drains to the south side into the storm drainage ditch at that location. The cap is a rectangular area approximately 58 feet x 6865 x 33 feet.

Groundwater monitoring is being conducted under the FFA.

V.C.V.B.2. POST-CLOSURE CARE PROCEDURES AND USE OF PROPERTY

V.C.1.V.C. Post-Closure Care Period

The Permittee shall conduct post-closure care for the POL Cap described in Permit Condition V.A.2.a above. Post-closure care ~~shall~~will be conducted for ~~thirty (30) years~~twenty-five (25) years after the completion of closure, which commenced on September 16, 1991.

V.C.1.a. Post-closure care shall be in accordance with IDAPA 58.01.05.008 (40 CFR § 264.117 – 120), ~~this Permit, and the Post-Closure Plan contained in Attachment 6 – Post-Closure Care (to be submitted as a permit modification in accordance with the schedule in Appendix A – Required Submittals and Dates).~~

V.C.1.b. The ~~thirty (30) year~~ post-closure care period may ~~be shortened upon application and demonstration to the Department that contaminants have attenuated and/or are no longer present at levels requiring control measures; or may~~ be extended if the Department finds this is necessary to protect human health and the environment per IDAPA 58.01.05.008 [40 CFR § 264.117(a)].

V.C.2. Land Use

The Permittee shall limit the future uses of POL Cap to the current use (an inactive landfill) or future uses that do not pose unacceptable risk. Residential land use

may pose unacceptable risk. Development for uses other than an inactive landfill shall require an evaluation of risk and approval by the Director.

V.C.2.a. The Permittee shall notify the Director at least forty-five (45) days prior to any proposed land use changes that are inconsistent with the objectives, or restrictions, and controls.

V.C.2.b. The Permittee shall seek prior concurrence from the Director to ~~(a) terminate land use controls or implementation actions, or (b)~~ modify land use from current uses at the POL Cap.

V.C.2.c. The Permittee shall provide notice to the Director, at least six (6) months prior to any transfer or sale of the POL Cap including transfers to private, state or local entities, so that the Director can be involved in discussions to ensure that appropriate provisions are included in the transfer terms or conveyance documents to maintain effective restrictions and controls. Once the transfer or sale is completed, the Permittee shall provide a copy of executed deed or transfer assembly to the Director. In the event of a sale or transfer, the Permittee shall submit a permit modification request to update the Permit with the applicable requirements. In addition, the Permittee shall seek prior concurrence before any anticipated action that may disrupt the effectiveness of the restrictions and controls, or any action that may alter or negate the need for restrictions and controls at the POL Cap. Such concurrence shall be in the form of a permit modification request approval by the Director.

V.C.3. POL Cap Notation

In lieu of filing a notation regarding the property that the POL cap is located on with the local zoning authority as required by IDAPA 58.01.05.008 [40 CFR § 264.119(b)(1)], the Permittee shall ensure that the Base Civil Engineering Squadron Real Property Office maintains a notation regarding the property that the POL Cap is located on in the Automated Civil Engineer System (ACES) Integrated Data Model (ACES-IDM) electronic record and the Real Property file

V.C.3.a. This notation shall in perpetuity notify any potential purchaser of the property that the land has been used to manage hazardous wastes, and its use is restricted under IDAPA 58.08.01.008 [40 CFR Part 264 Subpart G] regulations. It shall also notify the purchaser that the survey plat, and record of the type, location, and quantity of hazardous constituents identified at the POL Cap site, as required by IDAPA 58.08.01.008 [40 CFR §§ 264.116 and 264.119(a)] have been filed with the authority with jurisdiction over local land use (the Base Civil Engineer Squadron Real Property Office), and with the Department, as required by IDAPA 58.01.05.008 [40 CFR § 264.119(b)(1)].

V.C.3.b. Sixty days before transfer of ownership of the property, upon which the POL cap is located, to any entity, the Permittee shall provide to the local zoning authority and to the Director (1) a record of the type, location and quantity of hazardous waste disposed of in the POL Cap, and (2) a survey plat indicating the location and dimensions of the POL cap with respect to permanently surveyed benchmarks. This plat shall be prepared and certified by a professional land surveyor. The plat shall contain a note, prominently displayed, which stated the owner's or operator's obligation to restrict disturbance of the waste disposal unit in accordance with the applicable IDAPA 58.01.05.008 (40 CFR 264 Subpart G) regulations.

V.C.2.b.

~~V.C.3. The Permittee shall provide notice to the Director, at least six (6) months prior to any transfer or sale of the POL Cap including transfers to private, state or local entities, so that the Director can be involved in discussions to ensure that appropriate provisions are included in the transfer terms or conveyance documents to maintain effective restrictions and controls. Once the transfer or sale is completed, the Permittee shall provide a copy of executed deed or transfer assembly to the Director. In the event of a sale or transfer, the Permittee shall submit a permit modification request to update the Permit and the Post-Closure Plan with the applicable requirements.~~

V.C.4. Groundwater Monitoring System

In the event that the parties to the FFA expressly agree that the post-closure care ground water monitoring requirement are outside the scope of the FFA, or the FFA is terminated prior to completion of the post-closure care period for the POL Cap, the Permittee shall operate and maintain the groundwater monitoring system and comply with all other applicable requirements of IDAPA 58.01.05.008 [40 CFR § 264 Subpart F] and Module V of this Permit during the post-closure period. [40 CFR 264.117(a)(1)]

~~V.C.4.a. In this event, the Permittee shall submit a permit modification request to update the Permit and the Post-Closure Plan with the applicable requirements.~~

~~V.C.5. Landfill Requirements~~

~~The Permittee shall comply with the maintenance provisions of IDAPA 58.01.05.008 [40 CFR § 264.118 and 40 CFR § 264.310(b)] for hazardous waste disposal units (i.e., landfills), and as follows:~~

~~V.C.5.a. Maintain the integrity and effectiveness of the cap and final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events as per IDAPA 58.01.05.008 [40 CFR § 264.310(b)(1)];~~

~~V.C.5.b. Prevent run-on and run-off from eroding or otherwise damaging the final cover as per IDAPA 58.01.05.008 [40 CFR § 264.310(b)(5)];~~

~~V.C.5.c. Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of IDAPA 58.01.05.008 (40 CFR § 264.309) as per IDAPA 58.01.05.008 [40 CFR § 264.310(b)(6)];~~

~~V.C.5.d. Maintain the security of the unit in accordance with IDAPA 58.01.05.008 [40 CFR § 264.14].~~

~~V.C.5.e. Conduct all post-closure care activities in accordance with the provisions of the Post-Closure Plan, prepared in accordance with Permit Condition V.E, which shall be submitted by the Permittee in the form of a permit modification request and approved by the Director, in accordance with the submittal schedule in Appendix A—Required Submittals and Dates.~~

~~V.C.5.f.V.C.4.a. The Permittee shall not allow any use of the POL Cap that will disturb the integrity of the final cover, liners, any components of the containment system, as per IDAPA 58.01.05.008 [40 CFR § 264.117(c)], unless a demonstration (approved by the Director) can be made that a disturbance is necessary to the proposed use of the property and~~

~~shall not increase the potential hazard to human health and/or the environment, or is necessary to reduce the threat to human health and/or the environment.~~

V.C.5. Recordkeeping

V.C.5.a. POL Cap Closure Plan: The Permittee shall maintain copy of the final approved and implemented *Closure Plan and Cap System Plan* used during the POL Cap closure in 1991, and the subsequent Professional Engineer certification and plat survey, required per IDAPA 58.01.05.008 [40 CFR § 264.119(b)], in the Operating Record for the life of the facility

V.C.5.b. POL Cap Legal Description: The Permittee shall maintain in the facility Operating Record a legal description of the POL Cap site, and a map denoting the POL Cap exact location and dimensions, including the depth with respect to permanently surveyed benchmarks, as required per IDAPA 58.01.05.008 [40 CFR § 264.309(a)]. The map shall include a description of waste under the POL Cap, including extent of contamination, contaminants of concern, and estimates of the concentrations, as required by IDAPA 58.01.05.008 [40 CFR §264.73(2)]; and the property notations made, to whom they were made, and what information was included.

~~The plat and certification regarding the plat, as required per IDAPA 58.01.05.008 [40 CFR § 264.119(b)] for the POL Cap shall be maintained in the Operating Record~~

~~V.C.6. The property notations made, to whom they were made, and what information was included.~~

~~V.D. POL Cap Map – The Permittee shall maintain a map or diagram showing the location of the POL Cap and the quantity and location of hazardous was under the POL Cap in the Operating Record as required by IDAPA 58.05.01.008(40 CFR § 264.73) until closure of the facility. This may be accomplished by keeping the *Final February 2016 Final Cap System Investigation Report for the Petroleum, Oil and Lubricant (POL) Yard Cap (ST-13), February 2015, Army Corps of Engineers* in the Operating Record.~~

~~The Permittee shall perform a baseline assessment of the POL Cap and surface water drainage structures and submit the information in a report to the Department for approval in accordance with the compliance schedule in Appendix A – Required Submittals and Dates. This assessment shall be certified by the owner or operator in accordance with Permit Condition I.V, and performed by personnel experienced with the design and construction of clay caps on RCRA Subtitle C landfills. The assessment shall include the following:~~

~~V.D.1. Survey of the cap delineating the boundaries and benchmark, coordinates of the corners, and a complete legal description of the site.~~

~~V.D.2. Map depicting the site, including the boundaries of the cap, adjacent buildings and other structures, roads, fences, placement of signs, drainage ditches, and elevations, and other important characteristics.~~

~~V.D.2.a. The property notations made, to whom they were made, and what information was included.~~

~~V.D.3. Photographs of the site.~~

- ~~V.D.4. Description of the cap, including materials of construction and design features.~~
- ~~V.D.5. Evaluation of the integrity of the cap and comparison of the cap to the original cap design, including grading, slope, and any evidence of subsidence or erosion.~~
- ~~V.D.6. Description of waste under the cap, including extent of contamination, contaminants of concern, and estimates of the concentrations at the time of closure in 1991.~~
- ~~V.D.7. Description and engineering design of the surface water drainage structures.~~
- ~~V.D.8. Evaluation of the surface water control structures, and how these structures are expected to manage the 25-year, 24-hour design storm event.~~
- ~~V.D.9. Description of standards used to evaluate design and integrity of unit.~~
- ~~V.D.10. Description of security features including fencing and signage.~~
- ~~V.D.11. Summary and recommendations on any deficiencies noted, inspection requirements and schedule and periodic maintenance requirements, and standards to be followed.~~
- ~~V.D.12. Any recommendations with regarding to inspection requirements and schedule and periodic maintenance requirements, and standards to be followed shall be included in the Post-Closure Plan, required per Permit Condition V.E.~~

~~V.E. POST-CLOSURE PLAN~~

- ~~V.E.1. The Permittee shall submit a Post-Closure Plan to the Director in the form of a permit modification request, in accordance with Permit Conditions I.V and I.X, for review and approval in accordance with the schedule in Appendix A – Required Submittals and Dates.~~

~~V.E.2. Post-Closure Care Objectives~~

~~— The Post-Closure Plan shall include implementation actions to address the following post-closure care objectives:~~

- ~~V.E.2.a. Limit the future uses of POL Cap to the current use (an inactive landfill) or future uses that do not pose unacceptable risk. Residential land use poses unacceptable risk and is therefore prohibited. Development for uses other than an inactive landfill would require an evaluation of risk and approval by the Director.~~
- ~~V.E.2.b. Prevent activities and land uses that disturb the cap or the surface water drainage structures, except as approved by the Director.~~
- ~~V.E.2.c. Limit direct human and ecological contact with contaminated material below the cover and minimize infiltration of surface water.~~
- ~~V.E.2.d. Maintain the integrity (e.g., thickness, grade) of the cap to minimize the potential for leachate production and movement.~~

~~V.E.3. Post Closure Plan Contents~~

~~The Post-Closure Plan shall include the following information:~~

- ~~V.E.3.a. The activities that will be carried on during the post-closure care period and the frequencies of these activities, in accordance with the applicable portions of IDAPA 58.01.05.008 [40 CFR 264.118(b)] and Permit Conditions V.E.4, V.E.5, V.F and V.G.~~
- ~~V.E.3.b. The point of contact as listed in V.J, in accordance with IDAPA 58.01.05.008 [40 CFR 264.118(b)(3)].~~
- ~~V.E.3.c. The activities that will be prohibited during the post-closure period, and in accordance with Permit Condition V.C.4.f.~~
- ~~V.E.3.d. A legal description of the cap, and a map denoting the exact location and dimensions, including the depth with respect to permanently surveyed benchmarks, as required per IDAPA 58.01.05.008 [40 CFR § 264.309(a)].~~
- ~~V.E.3.e. The property notations made, to whom they were made, and what information was included, as listed in V.K.~~
- ~~V.E.3.f. A description of how the security of the unit will be maintained in accordance with IDAPA 58.01.05.008 [40 CFR § 264.14].and in accordance with Permit Condition V.H.~~
- ~~V.E.3.g. A description of how surveyed benchmarks used in complying with the surveying and recordkeeping requirements of IDAPA 58.01.05.008 [40 CFR § 264.309] will be to protected and maintained as required per IDAPA 58.01.06.008 [40 CFR § 310(b)(6)].~~
- ~~NOTE: The Permittee is not subject to the groundwater monitoring activities required in IDAPA 58.01.05.008 [40 CFR § 264.118(1)], as long as the FFA is in effect.~~
- ~~V.E.3.h. The notification requirements listed in Permit Conditions V.F.1.f and V.K.~~
- ~~V.E.3.i. The process for amending the Plan in accordance with Permit Condition V.M.~~
- ~~V.E.3.j. The process to follow should the Permittee or any subsequent owner or operator wish to remove hazardous wastes and hazardous waste residues, the liner, or any contaminated soils, in accordance with Permit Condition V.N.~~
- ~~V.E.3.k. The process for certifying the completion of post-closure care as listed in V.O.~~

~~V.E.4. Inspection Plan~~

~~The Permittee shall develop a written Inspection Plan, and include it as part of the Post-Closure Plan. The inspection plan shall describe the following:~~

- ~~V.E.4.a. The inspection requirements as listed in V.FI~~
- ~~V.E.4.b. The inspections conducted during the post-closure care period, the frequency of inspections, inspection procedures, the type of problems to be looked for, and logs to be kept. The following items, as applicable, should be included as items to check for in the written inspection plan:~~

- ~~Security control devices;~~
  - ~~Erosion damage;~~
  - ~~Cover settlement, subsidence, and displacement;~~
  - ~~Cover condition;~~
  - ~~Integrity of the run-on and run-off control measures;~~
  - ~~Cover drainage system function; and~~
  - ~~Benchmark integrity;~~
- V.E.4.c. ~~The rationale for determining the length of time between inspections;~~
- V.E.4.d. ~~The remedial actions to be taken if any deterioration or malfunctions are noted from inspections at the facility.~~
- V.E.4.e. ~~The personnel who will be performing the inspections on a quarterly basis, and on an annual basis, throughout the entire post-closure period.~~
- V.E.4.f. ~~The records of inspections that will be maintained. Records of inspection shall be kept in an inspection log or summary. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.~~
- V.E.4.g. ~~A description of the contents of the Annual Inspection Report required in Permit Condition V.F.1.e.~~
- V.E.5. ~~Maintenance Plan~~
- ~~The Permittee shall develop a written Maintenance Plan, and include it as part of the Post-Closure Plan. The Maintenance Plan shall include the following:~~
- V.E.5.a. ~~A list of hazardous constituents that had been identified at the site,~~
- V.E.5.b. ~~A description of the cap system,~~
- V.E.5.c. ~~A description of the system used to prevent run-on onto the POL Cap,~~
- V.E.5.d. ~~A description of the on-site storm water drainage feature (e.g., drainage ditch) used to convey run-off from the POL Cap,~~
- V.E.5.e. ~~A description of the preventative and corrective maintenance procedures, equipment requirements, and material needs. Include the following items in the Maintenance Plan, as applicable:~~
- ~~\_\_\_\_\_~~
- ~~Erosion damage repair;~~

- ~~• Correction of settlement, subsidence and displacement;~~
- ~~• Fence maintenance and repair,~~
- ~~• Weed and litter control, and other cover maintenance; and~~
- ~~• Repair of run-on and run-off control structures.~~

~~V.E.5.f. A description of the rationale to be used to determine the need for corrective maintenance activities.~~

~~V.F. INSPECTIONS~~

~~V.F.1.a. The Permittee shall inspect the components, structures, and equipment at the site in accordance with IDAPA 58.01.05.008 [40 CFR § 264.117(a)(1)(ii)] and the inspection plan and schedule in the approved Post-Closure Plan referenced in Permit Condition V.E of this Permit.~~

~~V.F.1.b. The Permittee shall inspect the cover system at the site in accordance with IDAPA 58.01.05.008 [40 CFR § 264.117(a)(1)(ii)] and the inspection schedule in the approved Post-Closure Plan referenced in Permit Condition V.E of this Permit.~~

~~V.F.1.c. The Permittee shall complete appropriate inspection forms and reports and maintain them in the Environmental Office, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.15(d)]. All inspection forms shall be kept for a period of at least three (3) years. All reports shall be kept for the duration of the post-closure care period.~~

~~V.F.1.d. Quarterly Inspections~~

~~Quarterly visual inspections shall be performed to ensure the cap integrity, to identify specific conditions that threaten the cap's integrity, and for proper functioning of the run-on/run-off grading.~~

~~V.F.1.e. Annual Inspection and Report~~

~~The POL Cap shall be inspected and evaluated annually to determine the general condition of the cap for establishing the general maintenance program for the surface to be performed that year. This information shall be summarized and provided in a report to the Director for approval in accordance with the schedule in Appendix A—Required Submittals and Dates.~~

~~An annual inspection shall be performed and certified by the owner in accordance with Permit Condition I.V, and performed by personnel experienced with the design and construction of clay caps on RCRA Subtitle C landfills.~~

~~(a) The annual inspection shall be conducted in the spring of each year following the spring thaw, but no later than April 30 of each year.~~

- ~~(b) The report shall be submitted to the Director no later than 30 days after the annual inspection.~~
- ~~(c) The inspector shall conduct the inspection in accordance with procedures outlined in Design, Construction and Maintenance of Cover Systems for Hazardous Waste (PB87-191656) or similar standard.~~
- ~~(d) The surface runoff control structure shall be inspected following periods of increased runoff (i.e., heavy rainfall, heavy snowfall, etc.), and, at a minimum, at the annual inspection.~~
- ~~V.F.1.f. If any problems are seen during the any of the inspections, they shall be so noted on the inspection form and verbally communicated to the Director. All problems with the unit shall be resolved within a 72-hour period, if feasible. If not feasible, a management action plan and implementation schedule shall be established within 72 hours and the Director shall be notified of the management action plan and implementation schedule.~~
- ~~V.F.1.g. The Permittee shall remedy, as required by IDAPA 58.01.05.008 [40 CFR § 264.15(c)], any deterioration or malfunction discovered by an inspection immediately, as specified in the Post-Closure Plan (Attachment 6 of this Permit).~~
- ~~V.F.1.h. The Permittee shall keep a log of any and all maintenance activities or repairs. This log shall be maintained by the Base Environmental Coordinator for the entire post-closure period.~~
- ~~V.F.1.i. The Permittee may add inspection requirements to an existing inspection form in cases where such additional requirements result in a more comprehensive or detailed Inspection Plan, without receiving a permit modification. These changes shall be noted in the Facility Operating Record at the time the changes are made.~~
- ~~V.G. ADDITIONAL POST-CLOSURE CARE ACTIVITIES~~
- ~~In addition to the quarterly and annual landfill inspections, the Permittee shall complete the following supporting activities on an annual basis (at a minimum) and shall incorporate these requirements into the Post-Closure Plan.~~
- ~~V.G.1. Verify that the Installation Development Plan (IDP) has been updated to include a map and details of the land use controls; a discussion as to the purpose of the Land Use Controls (LUCs); regulatory requirements for the LUCs; and the MHAFB entities responsible for implementing, monitoring, and enforcing the LUCs for the POL Cap.~~
- ~~V.G.2. Verify that there have not been any changes to the LUC information or procedures in the IDP. Also, verify that there were no process changes that alter LUC coverage in the IDP for the POL Cap.~~
- ~~V.H. POST-CLOSURE SECURITY~~
- ~~V.H.1. The Permittee shall provide security to the POL Cap as described in Attachment 3— Security, and Attachment 6— Post-Closure Care of the Permit, IDAPA 58.01.05.012 [40 CFR § 270.14(b)(4)] and IDAPA 58.01.05.008 [40 CFR § 264.14]. This consists of~~

~~fences, barriers, warning signs, or other means to control entry onto the closed portion of the facility. Post-Closure Security shall be incorporated into the Post-Closure Plan.~~

~~V.H.2. Site security operations shall be continued throughout the duration of the Post-Closure period.~~

~~V.I. COPY OF PLAN~~

~~V.I.1. The Post-Closure Plan shall include a copy of the final approved and implemented Closure Plan and Cap System Plan used during the POL Cap closure in 1991, and the subsequent Professional Engineer certification and plat survey.~~

~~V.I.2. A copy of the approved Post-Closure Plan shall be maintained at MHAFB for the duration of the post-closure monitoring period.~~

~~V.J. POST-CLOSURE POINT OF CONTACT~~

~~The point of contact for all correspondence concerning this closed POL Cap site during the entire post-closure period shall be:~~

~~Hazardous Waste Program Manager~~

~~366 CES/CEIEC~~

~~1030 Liberator Street~~

~~Mountain Home Air Force Base, Idaho 83648~~

~~Telephone number (208) 828-4120~~

~~V.K. NOTICES AND CERTIFICATION (I-3)~~

~~The Post-Closure Plan shall include a description of the required notices and certifications described in V.K.2.~~

~~V.K.1. Installation Development Plan~~

~~Ensure that the Installation Development Plan (IDP) is updated to include the following:~~

- ~~• A map and details of the restrictions and controls;~~
- ~~• A discussion of the purpose of the restrictions and controls, and regulatory requirements for the restrictions and controls; and~~
- ~~• Base entities responsible for implementing, monitoring, and enforcing the restrictions and controls.~~

~~V.K.1.a. Notify the Director of any changes to the restrictions and control information or procedures included in the IDP or process changes which alter the POL Cap coverage in the IDP.~~

~~V.K.2. Submittal of Record of Wastes and Survey Plat~~

~~The Permittee shall ensure that the appropriate local zoning authority has on file the survey plat and a record of the type, location, and quantity of hazardous constituents that had been identified at the POL Cap site as required by IDAPA 58.01.05.008 [40 CFR § 264.116].~~

~~V.K.2.a. The POL Cap could lie on either fee-owned-deeded lands or lands withdrawn from the public domain. Submit the survey plat and record of the type, location, and quantity of hazardous constituents that had been identified at the POL Cap site for recordation at the local recording office, which for fee-owned-deeded land is both the Elmore County Courthouse, and the Base Civil Engineering Squadron (CES) Real Estate Office. Withdrawn public domain land is only recorded at the base CES Real Estate office.~~

~~V.K.2.b. Notation~~

~~The Permittee shall ensure that the deed to the property that the POL Cap is located on includes a notation that shall in perpetuity notify any potential purchaser of the property that the land has been used to manage hazardous wastes, its use is restricted under IDAPA 58.08.01.008 [40 CFR Part 264 Subpart G] regulations, and that the survey plat and record of the type, location, and quantity of hazardous constituents identified at the POL Cap site as required by IDAPA 58.08.01.008 [40 CFR §§ 264.116 and 264.119(a)] have been filed with the local zoning authority or the authority with jurisdiction over local land used, and with the Department, as required by IDAPA 58.01.05.008 [40 CFR § 264.119(b)(1)].~~

~~V.K.2.c. Certification~~

~~The Permittee shall submit to the Department a certification, signed by the owner or operator, indicating that the notation has been recorded as required by IDAPA 58.01.05.008 [40 CFR § 264.119(b)(2)]. A copy of the document in which the notation has been recorded shall be included in the submittal~~

~~V.L. USE OF UNITS~~

~~The Permittee shall not allow any use of the POL Cap that disturbs the integrity of the final cover, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period, as per IDAPA 58.01.05.008 [40 CFR § 264.117(c)], unless the Director finds the disturbance necessary to the proposed use of the property and the disturbance does not increase the hazard to human health or the environment, or the disturbance is necessary to reduce a threat to human health or the environment.~~

~~V.M. AMENDMENTS TO POST-CLOSURE PLAN~~

~~The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request shall be in accordance with applicable requirements of IDAPA 58.01.05.013 and 58.05.01.05.008 (40 CFR Parts 124 and 270), and must include~~

~~a copy of the proposed amendments to the Post-Closure Plan for approval by the Director, as per IDAPA 58.01.05.008 [40 CFR §.264.118(d)].~~

~~V.M.1. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect post-closure care.~~

~~V.M.2. The Permittee must submit a written request for a permit modification at least sixty (60) days prior to the proposed change in facility design or operation, or no later than sixty (60) days after an unexpected event has occurred that affects the cap integrity, surface water drainage systems, or any other aspect of post-closure care.~~

~~V.N. REMOVAL REQUEST~~

~~(Note: The Department may allow a variance to this condition if a disturbance is necessary to the proposed use of the property and shall not increase the potential hazard to human health or the environment, or is necessary to reduce a threat to human health or the environment. [40 CFR § 264.117(c)(1) and (2)])~~

~~V.N.1.V.C.5.c. If the Permittee or any subsequent owner or operator of the land upon which the POL Cap is located wishes to remove hazardous wastes and hazardous waste residues, the liner, or any contaminated soils, then in accordance with IDAPA 58.01.02.008 [40 CFR § 264.119(c)], he shall request a modification to this Permit in accordance with the applicable requirements in IDAPA 58.01.05.013 and 58.05.01.05.008 [40 CFR Parts 124 and 270].~~

~~V.N.2. The Permittee or any subsequent owner or operator of the land upon which the POL Cap is located shall demonstrate that the removal of hazardous wastes shall satisfy the criteria of IDAPA 58.01.05.008 [40 CFR § 264.117(c)]. By removing hazardous waste, the owner or operator may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of this chapter. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the owner or operator may request that the Director approve either:~~

~~V.N.2.a. The removal of the notation on the deed to the facility property or other instrument normally examined during title search; or~~

~~V.N.2.b. The addition of a notation to the deed or instrument indicating the removal of the hazardous waste.~~

~~V.O.V.D. CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE (I-3c)~~

~~No later than sixty (60) days after completion of the established post-closure care period for the POL Cap, the Permittee shall submit to the Director, by registered mail, a certification that the post-closure care for the POL Cap was performed in accordance with the specifications in the approved Post-Closure Plan referenced in Permit Condition V.C of this Permit (Module V of this Permit) as per IDAPA 58.01.05.008 [40 CFR § 264.120].~~

~~V.O.1.V.D.1. The certification must be signed by the Permittee and a registered Professional Engineer. Documentation supporting the registered Professional Engineer's certification must be furnished to the Director upon request until the Department releases the Permittee from the requirements for post-closure care under IDAPA 58.01.05.008 [40 CFR § 264.145(i)].~~

~~V.P.V.E.~~ FINANCIAL ASSURANCE

The Permittee, as a federal facility, is exempt from the financial assurance requirements, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.140(c)].

~~V.Q.~~ ~~POST-CLOSURE PERMIT ACTIONS~~

~~This Permit may be modified, revoked and reissued, or terminated for cause in accordance with Permit Condition I.D of this Permit.~~

**Table VI-2. SWMUs and AOCs at MHAFB with Known Releases**

<b>SWMU/AOC No/Letter</b>	<b>SWMU/AOC Name</b>	<b>Regulatory Authority and Status</b>
LF-01	Lagoon Landfill	FFA: Land Use Controls (LUCs), Institutional Controls (ICs), and Long Term Monitoring (LTM)
LF-02	B-Street Landfill	FFA: LUCs, ICs and LTM
LF-03	Former Base Landfill	FFA: Closed with LUCs through Idaho Central District Health Department. No further remedial action proposed (NFRAP). Annual inspection and methane monitoring under ERP. Additional actions as per the Municipal Solid Waste Post-Closure Plan
OU-3	Basewide Regional Groundwater	FFA Corrective Action
FT-08	Fire Training Area 8 Soils	FFA Corrective Action
ST-11	Fuel Hydrant System Spill	FFA Corrective Action
ST-13	POL Cap	HWMA/RCRA Post-Closure Permit. <u>In February 2016, MHAFB provided an investigation report that provided sufficient evidence to determine that post closure care was not necessary so as long as the land use remained the same (POL yard). is proposing a cap inspection and maintenance plan as part of the Part B application.</u> FFA: For groundwater monitoring; LTM continues for regional groundwater assessment at MW-24.
DP-17	Used Tire Disposal Site/Coal Ash Disposal Site	FFA: Combined with LF-23
LF-23	Solid Waste Disposal Area	FFA: LTM and LUCs - Long Term Maintenance and Annual Inspections for implementation of LUCs. Land use controls to restrict future uses to industrial.
SD-24	Liquid Oxygen (LOX) Loading Plant (Synonymous with OU-3 Regional Groundwater)	FFA: Bedrock vapor extraction and groundwater monitoring. Soils are UU/UE.
ST-38	POL Storage Area, AST #1A	FFA
AOC-7	Coal Storage Yard	FFA: Requires evaluation before the next Five Year Review
AOC-8 (OWSs 1347 and 1354)	Oil Water Separators 1347 and 1354	FFA: Final work to be completed in 2014
Any additional units to be submitted by Permittee in accordance with Permit Condition <del>VI.C.9</del> <u>VI.C.9</u> of this Permit.		

**APPENDIX A – REQUIRED SUBMITTALS AND DATES**

<b>Table A-1. Required Submittals and Dates</b>	
<b>Required Submittal/Document</b>	<b>Due Dates</b>
POL Cap Assessment to Fulfill Closure Performance Standards	180 Days after the Effective Date of this Permit <u>(Received July 10, 2015)</u>
<del>POL Cap Post-Closure Plan, Example Quarterly and Annual Inspection Forms, and Example Inspection Log</del>	<del>60 Days after the submittal of the POL Cap Assessment</del>
POL Cap Post-Closure Notice	30 Days after the submittal of the POL Cap <u>Post-Closure Plan (Received October 14, 2015, Final received November 19, 2015)</u>
<del>Submittal of a Class 2 Permit Modification Request and a Request for Temporary Authorization to add the Post-Closure Plan to the Permit as Attachment 6</del>	<del>15 days after the Director approves the Post-Closure Plan.</del>
<del>POL Cap Post-Closure Annual Report</del>	<del>Annually</del>
<del>Non-Compliance Report (Permit Condition I.T)</del>	<del>March 1 and September 1 every year</del>
<del>Updated Tables VI-1 through VI-4, SWMUs and AOCs at MHAFB (Permit Condition VI.D)</del>	<del>Annually (If there are no changes to the tables, a letter to that effect shall suffice, with no permit modification necessary)</del>
Biennial Report	March 1, 2016, 2018, 2020, 2022, 2024
Waste Minimization Certification	Not required
Waste Minimization Report	Not required
Permit Application Re-application	180 Days Prior to Expiration Date of this Permit

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**IDAHO**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**ATTACHMENTS to the**  
**HWMA ~~POST-CLOSURE~~ and**  
**CORRECTIVE ACTION**  
**PERMIT**

for the

**MOUNTAIN HOME**  
**AIR FORCE BASE**

**EPA ID No. ID3572124557**

**Effective Date: January 11, 2015**

**Revision Date: TBD**

HWMA POST-CLOSURE/CORRECTIVE ACTION PERMIT

FOR THE

MOUNTAIN HOME AIR FORCE BASE

**LIST OF ATTACHMENTS**

EFFECTIVE DATE: JANUARY 11, 2015

REVISION DATE: TBD

## LIST OF ATTACHMENTS

The following attachment list includes excerpts from the Permittee' s Administrative Record, i.e., permit application, supplemental reports, and other documents contained in the Department's supporting file for the Permit. The Director has, as deemed necessary, modified specific language in the Attachments. These modifications are described in the permit conditions (Modules I through V), and thereby supersede the language of the original Attachments. If the language of the Permit conflicts with either the Attachments or the original application, the language in the Permit shall prevail. These incorporated Attachments are enforceable conditions of this Permit as modified by the specific permit condition(s).

### ATTACHMENT 1

**RCRA PART A PERMIT APPLICATION**, consisting of:

RCRA Subtitle C Site Identification Form, pages 1 through 5 of the permit application

Hazardous Waste Permit Information Form, pages 1 through 6 of the permit application

### ATTACHMENT 2

**FACILITY DESCRIPTION**, consisting of:

LIST OF ACRONYMS AND ABBREVIATIONS, of the permit application

Section 1.0, INTRODUCTION, pages 1-1 through 1-3 of the permit application

Section 2.0, GENERAL FACILITY DESCRIPTION, page 2-1 through 2-4 of the permit application

### ATTACHMENT 3

**SECURITY**, consisting of:

Section 3.0, SECURITY, page 3-1 of the permit application

Appendix D, SECURITY PROCEDURES, pages D-1 through D-5, of the permit application

### ATTACHMENT 4

**SOLID WASTE MANAGEMENT UNITS**, consisting of:

Section 4.0, SOLID WASTE MANAGEMENT UNITS, page 4-1 of the permit application

Section 4.10, SOLID WASTE MANAGEMENT UNITS, page 4-1 of the permit application

Section 4.2, FFA SITES, pages 4-2 through 4-41 of the permit application

Section 4.2, NON-FFA SITES, pages 4-42, 4-44, 4-46 through 4-57 of the permit application

Section 4.3, OIL WATER SEPARATORS, Table C of the permit application (renumbered as Table 4-3),

Section 4.4, OWS 1100 – CLOSED IN PLACE 1996, supplement to the permit application.

**ATTACHMENT 5**

**CORRECTIVE ACTION FOR SWMUS**, consisting of:

Sections 5.0 through 5.1, CORRECTIVE ACTION FOR SWMUS, page 5-1 of the permit application, except that the second paragraph under 5-1, Existing SWMUs, shall be revised as follows:

"In addition to providing post-closure care for the POL Cap, the purpose of this permit is to provide for jurisdiction under the RCRA corrective actions program in the event the FFA terminates prior to selection of the final remedy under the FFA process for the sites addressed by this proposed permit. It is further expected that any of the two previously identified sites (FT-08 and SD-24) for which a "No Further Action" determination is made under the FFA process will be the subject of a Class 1 RCRA Permit Modification to delete that site from the proposed permit. Should the FFA be terminated, the most recent schedule of corrective action in the FFA shall be incorporated into the RCRA Part B Permit. Should MHAFFB need additional days added to some of the scheduled deadlines to facilitate the transfer of funding and administration of project activities as warranted by USAF guidelines, MHAFFB will notify IDEQ and work with IDEQ to determine the revised deadlines."

Section 5.3, Table A. FFA SWMUs, pages 5-2 through 5-11 of the permit application (renumbered as Table 5-1)

Section 5.4, Table A. Non-FFA SWMUs, pages 5-12 through 5-28 of the permit application (renumbered as Table 5-2)

**ATTACHMENT 6**

**POST-CLOSURE CARE**, consisting of:

~~Appendix E-1, POL CAP POST-CLOSURE PLAN (To be supplied)~~

Appendix E-~~1~~12, SOLID WASTE MANAGEMENT UNIT DESCRIPTIONS,

-Pages E-1 through E-9 of the permit application, except that item 6.1, POL (ST-13) Cap Inspection and Maintenance Plan, and item 10, POL Storage Yard, AST Tank 2 (Part of ST-38) shall be deleted; and item 11 shall be renumbered as item 10.

Figures 6-1 through 6-14, supplemental information for the permit application

**ATTACHMENT 7**

**CLOSURE**, consisting of:

Closure documents from MHAFFB Administrative Record at DEQ State Office.

**ATTACHMENT 8**

**ENVIRONMENTAL RESTORATION SITES**, consisting of:

Section 8.0, Environmental Restoration Sites at Mountain Home AFB-FFA, pages 8-1 through 8-2 of the permit application

**ATTACHMENT 9**

**MAPS**, consisting of:

Section 9.0, MAPS, Figures 1 through 7 of the permit application (renumbered as Figures 9-1 through 9-7)

**ATTACHMENT 10**

**GROUNDWATER MONITORING PROGRAM**, consisting of

Appendix B, GROUNDWATER MONITORING PLAN, pages B-1 through B-2 of the permit application

**ATTACHMENT 11**

**FEDERAL FACILITY AGREEMENT**, consisting of:

Appendix C, FEDERAL FACILITY AGREEMENT, pages C-1 though C-79 of the permit application

LIST OF RECORDS OF DECISION, from DEQ files

LIST OF CONSENT ORDERS, from DEQ files

LIST OF NO FURTHER ACTION DETERMINATIONS from DEQ files

**ATTACHMENT 12**

**PERMIT MODIFICATION/REVISION LOG**, consisting of:

Table 12-1. Permit Modification/Revision Log

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HWMA POST-CLOSURE/CORRECTIVE ACTION PERMIT  
FOR THE  
MOUNTAIN HOME AIR FORCE BASE

**ATTACHMENT 6 – POST-CLOSURE CARE**

~~POL CAP POST-CLOSURE CARE PLAN (To be supplied in accordance  
with the scheduled in Appendix A)~~

APPENDIX E - SOLID WASTE MANAGEMENT UNITS (SWMU) THAT  
REQUIRE POST CLOSURE CARE OR MONITORING

EFFECTIVE DATE: JANUARY 11, 2015  
REVISION DATE: TBD

6.0 POST-CLOSURE CARE

~~APPENDIX E-1 – POL CAP POST-CLOSURE PLAN (to be supplied)~~

APPENDIX E-~~12~~ – SOLID WASTE MANAGEMENT UNITS (SWMU) THAT REQUIRE POST CLOSURE CARE OR MONITORING

Appendix E-1 presents a description of the existing SWMUs that require post-closure care or monitoring that are addressed in this RCRA Part B Permit Post-Closure Application. Information presented herein was obtained in most part from the FFA and the Revised Final 2011 Five-Year Remedy Review Report prepared for MHAFB by URS (URS, 2011), and is in accordance with 270.14 (b)(13), (b)(14) and (b)(15).

1. LF-01 (Lagoon Landfill) (Land Use Controls and annual inspection of cap)

The primary O&M activities associated with Site LF-01 include LTM for site-related monitoring wells to monitor groundwater quality and ensure post-closure activities are being completed according to the post-closure plan (MACTEC 2002). In accordance with the specific ICs for Site LF-01 as described in the ESD for the ROD, signed October 13, 2006, for four OUs (OU-1, OU-3, OU-5, and OU-6) of MHAFB, an annual on-site inspection is completed for Site LF-01. During each inspection, the overall cap integrity including erosion, presence of burrowing animals, condition of drainage ditches, site drainage, and public access is reviewed for any compliance issues. Each inspection verifies compliance with the IC requirements, objectives, and controls in the ROD and ESD. A report discussing conditions and any recommendations required for maintenance and repairs is completed after each inspection for ICs. The most recent inspection report is included in Appendix A. Required follow-up actions on the 2-foot thick monofill cap are accomplished under the MHAFB environmental compliance program. Environmental restoration oversight on the monofill cap is of interest due to the fact that ERP Site LF-01 (four disposal trenches) resides under the cap.

2. LF-02 (B-Street Landfill) (Land Use Controls and annual inspection of cap)

The primary O&M activities associated with Site LF-02 include LTM for site-related monitoring wells to monitor groundwater quality and ensure annual landfill inspections of the LUCs are being completed in accordance with the ESD. In accordance with the specific ICs for Site LF-02 as described in the ESD for the 1993 ROD, signed October 13, 2006, an annual on-site inspection is completed for Site LF-02. During each inspection the general landfill condition is observed with particular attention paid to the fenced area surrounding the asbestos disposal trenches and whether any unauthorized activities (e.g., digging or dumping) are being done on the other areas (trench area, ash disposal area, and drum disposal area) under the LUCs. Each inspection verifies compliance with the IC requirements, objectives, and controls in the ROD and ESD. A report discussing conditions and any recommendations required for maintenance and repairs is completed after each annual inspection for ICs.

3. LF-03 (Land Use Controls and annual inspection of cap)

Inspections by MHAFB personnel will be conducted on the northern section on a semiannual basis (biannual inspection) for the first year of post-closure care, and annually thereafter for the 30-year period. Inspections by the Central District Health Department

(“CDHD”) will occur as requested, or as provided by law. Records of inspections detailing observations will be kept in a log book so that changes in any of the MSWLF cells can be monitored; in addition, records will be kept detailing changes in post-closure care personnel to ensure that changing personnel will not affect post-closure care due to lack of knowledge of routine activities. The inspection forms that will be used can be found in Appendix D of the 2009 Municipal Solid Waste Landfill Post-Closure Plan and will serve to guide the inspections of the area.

Annual inspections of the southern section will be conducted by ERP personnel and/or their contractors. Records of inspections detailing observations will be kept in the restoration files, as required.

The condition of the facility will be documented with notes, maps and photographs. Monitoring of the landfill will include an examination of access, signage, surface water controls, concrete structures, final cover integrity, vectors and gas emissions. Maintenance activities will be implemented as needed to remedy potential or real problem situations identified during routine inspections.

4. FT-08 (Remediate soils and unsaturated bedrock vapors. ROD approved VE system in place)

RAWP dated February 26, 2010 and approved by the EPA and DEQ. The primary activities associated with the performance monitoring include the following:

- Effluent monitoring - The combined effluent vapor from the exhaust stack are sampled bimonthly and analyzed for COCs by EPA Method TO-15.
- Soil extraction well sampling - Vapor samples are collected from the SEWs to monitor COCs by EPA Method TO-15.
- Vapor monitoring well sampling - Vapor samples are collected from the VMWs to monitor COCs by EPA Method TO-15.
- Soil sampling - Direct push soil samples are collected at eight locations at Site FT-08. Six of the locations are next to the new vapor monitoring well locations to assess contamination site wide; one location is near SEW-9 to assess the TCE plume core; and one location is near bedrock extraction well (BEW)-1 to assess the area between the BTEX and TCE plumes. All direct push samples are analyzed for the COCs.

In addition, the primary activities associated with system operations include the following:

- SVE system – The system utilizes a trailer-mounted portable SVE system to apply a vacuum to soil through 10 shallow extraction wells (SEW-1 through SEW-10) installed in the soil at Site FT-08. Relative humidity and absolute humidity data are from the MHAFB Weather Station and onsite instruments at various times and are evaluated to determine if differences in humidity have an effect on the flow rates of the system. Vacuum responses are monitored in all available locations including vacuum monitoring clusters (soil and bedrock), unused SVE wells, and bedrock vapor monitoring ports in nearby monitoring well MW39.

- Air injection system - Operation of the air injection system includes inspection of the system and collection of field data twice per week. Periodic inspections include visual inspection of the blower unit and associated piping for defects, and verifying the discharge temperature is within operating range. Field data include temperature, pipe pressure, barometric pressure, and differential pressure. Air flow rates are computed from the field data.

Performance monitoring and system operations activities are presented and summarized in quarterly Remedial Action/Operation (RA/O) Technical Memoranda.

5. ST-11 (Vapor Extraction)

In accordance with the specific ICs for Site ST-11, as described in the ESD signed March 23, 2004 for the 1995 ROD, four operable units (OU-1, OU-3, OU-5, and OU-6) at MHAFB, a visual inspection is completed at least annually. The visual inspection is completed to verify compliance with the IC requirements, objectives, and controls in the ROD and the ESD; to determine violations of these controls; and to look for indications of tampering, incompatible use, and trespass. A report of the inspections is included in the LTM Annual Report each year including a statement as to whether all requirements, objectives, and controls in the ROD and ESD have been complied with and whether MHAFB's administrative procedures are effective.

The Air Force is completing performance monitoring and system operations according to the Final Remedial Action Report dated December 29, 2010 and approved by the EPA and DEQ. The primary activities associated with the performance monitoring include the following:

- Vapor monitoring well sampling - Vapor samples are collected from the MW20 and MW26 to monitor COCs by EPA Methods TO-14 and TO-15.
- Perched groundwater sampling – Perched groundwater samples will be collected over the operation life of the system, with one additional year of perched groundwater monitoring under the Basewide LTM program to monitor system effectiveness. The LTM program is summarized in Section 4.3.11. Semiannual groundwater sampling is completed at nine PZMWs located at Site ST-11 in accordance with the LTM program. The sampled wells include: PZMW7, PZMW8, PZMW11, PZMW12, PZMW13, PZMW14, PZMW15, PZMW16, and PZMW17. The wells are sampled for BTEX (by EPA Method 8260b) and field parameters.
- Regional groundwater sampling – Performance monitoring will begin approximately 6 weeks after completion of *in situ* chemical oxidation injection activities. Bimonthly sampling of the PZMWs will continue after the three rounds of bimonthly performance monitoring are completed if RAOs have not been met and/or active remediation is still necessary. Once RAOs have been met and active remediation is no longer necessary, quarterly sampling will be performed as part of the Basewide LTM program to monitor site conditions. The data from the post-remedy monitoring will be evaluated by the FFA team to determine when and whether active monitoring of the perched groundwater can be concluded. Samples will be analyzed for VOCs by EPA Method 8260b. Sampling of groundwater and bedrock vadose zone vapors from nearby regional monitoring wells,

MW20 and MW26, will also be completed.

In addition, the primary activities associated with system operations include active removal of contaminated subsurface vapors are completed by using a semi-permanent trailer-mounted blower-based VE system. In addition to subsurface vapors, the VE system is also targeted at removing residual phase non-aqueous phase liquid floating on the perched groundwater and residing in the fractured bedrock vadose zone. The system is connected to VEW-3 and VEW-6 through abandoned electrical conduits that enter into a vault at manhole number 1. Although these two VEWs are located adjacent to each other, they are screened at different vertical intervals and together are expected to exert an influence over the entire vertical and lateral extent of site contamination.

Performance monitoring and system operations activities are presented and summarized in quarterly RA/O Technical Memoranda.

6. ST-13, Groundwater covered under MW-24 LTM

Soil samples collected before and during the removal of four UST's at the POL yard indicated that soil had been impacted by several volatile organic compounds. Because contaminated soils were removed during the UST removal and the excavation filled and capped, and because the site was closed under RCRA, a follow-on CERCLA investigation, Human Health Risk Assessment, and Ecological Risk Assessment was not done at the Site. There was a miscommunication between the CERCLA and RCRA programs as to who was going to monitor the site (cap). RCRA Post Closure required installation of a protective cap while the FFA made a decision that the site could be closed for soils to UU/UE. This part of the post-closure care was accidentally dropped and is now being addressed through the Part B permit. MHAFFB installed a cap in 1994 and will institute an inspection and maintenance program detailed in a proposed CIMP.

Continued monitoring of the regional groundwater and occurrence of LNAPL (including continued use, as necessary, of a passive fuel absorbent sock) is recommended at MW24 under OU-3 as part of the LTM program. No recommendation or follow-up action was needed for this site as it does not require re-evaluation during future FYRs.

7. LF-23 (Land Use Controls and annual inspection of cap)

The primary O&M activities associated with Site LF-23 will include LTM for site-related monitoring wells to monitor groundwater quality and ensure annual inspections of the LUCs are completed in accordance with the ESD. An annual on-site inspection will be completed for Site LF-23 in accordance with the specific LUCs for Site LF-23 as described in the July 2011 ESD for the 1995 ROD. During each inspection, the general landfill condition will be observed with particular attention paid to the area with signage surrounding the coal ash and debris area and whether any unauthorized activities (e.g., digging or dumping) are being done under the LUCs and the warning signs will be inspected to ensure they are properly in place. Each inspection will verify compliance with the LUC requirements, objectives, and controls in the ROD and ESD. A report discussing conditions and any recommendations required for maintenance and repairs will be

completed after inspection for LUCs.

8. SD-24 (Bedrock vapor extraction)

For permit purposes this site is included under OU-3, SD-24 designation is only used internally in the USAF to apportion funds. SD-24 is closed for soils.

9. OU-3 (Continue operation of existing systems and LTM)

The primary O&M activities associated with the implemented remedial action (NRA with LTM) include LTM of regional groundwater, perched groundwater, and bedrock vadose zone vapors for OU-3. The LTM program was initiated in May 1996 in accordance with the Final Post-ROD Groundwater Monitoring Plan for OU-3. Changes have been made to the LTM program since 1996 based on deficiencies identified in the 2001 FYR and in subsequent annual LTM reports. The most significant change to the LTM program since the 2006 FYR includes the installation of one regional groundwater monitoring well with vapor ports (MW39) in January 2009.

Regional groundwater, perched groundwater, and bedrock vadose zone vapors are currently sampled in accordance with the 2007 through 2011 LTM Work Plan Addendum, the Site SD-24 Remedy Optimization Work Plan Addendum, and the installation of new well MW39. Groundwater is currently sampled from four regional groundwater monitoring wells on a quarterly basis, four regional groundwater monitoring wells on a semiannual basis, and seven wells on an annual basis. Sixteen wells have vapor monitoring ports installed at multiple depths for a total of 49 sampling ports. Semiannual groundwater sampling is completed at nine perched zone monitoring wells located at Site ST-11.

In addition, six MHAFB production wells are sampled on a quarterly basis to meet requirements of the Safe Drinking Water Act. VOCs, including TCE, have not been detected above MCLs in any of the MHAFB drinking water supply wells or perimeter wells.

10. Verlinde Hill Rubble Pile:

MHAFB has developed a Cap Maintenance Plan (CMP) for the Verlinde Hill Phases 5, 6, and 7 Rubble Area cap. The CMP includes:

- Vegetative layer inspection and maintenance to ensure that long-term vegetative surface is adequately established and maintained. Over time, areas may need to be reseeded. If reseeded is required, use a dry-land seed mix in late fall to take advantage of spring moisture to establish seedlings. Specifically, the CMP includes time and frequency of vegetative cover inspections, who will conduct the inspections (qualification of personnel), and procedures for documenting inspections. The CMP also describes the conditions that would trigger reseeded, procedures, timing for reseeded, and documentation protocols for maintenance activities.
- Routine inspections of cap cover and surrounding area for potential erosion of cap and berms and signs of deteriorating conditions. If erosion is occurring that could result in

cap deterioration and potential exposure of buried materials, the area requires re-grading and reseeding. The CMP identifies key inspection times and will include late spring after the last frost and early fall. The CMP will include protocols for erosion inspections and animal destruction (e.g., burrowing) of the cap and surrounding areas (when, how, and documentation). The CMP also describes the conditions that would trigger maintenance activities, procedures and timing for activities, and documentation protocols.

- Routine inspection of fence perimeter and warning signs; repair or replace as necessary. The CMP identifies frequency of inspections, triggers for repairing or replacing signs and fencing, and documentation protocol.
- Routine inspection of cap cover and surrounding area for ACM on the surface. If found, the ACM material will be removed and properly disposed of. The CMP identifies protocol on how ACM inspections will be conducted, frequency of inspections, and protocol for ACM removal and disposal. Activities will be similar to those actions identified in the Asbestos Contingency Plan.

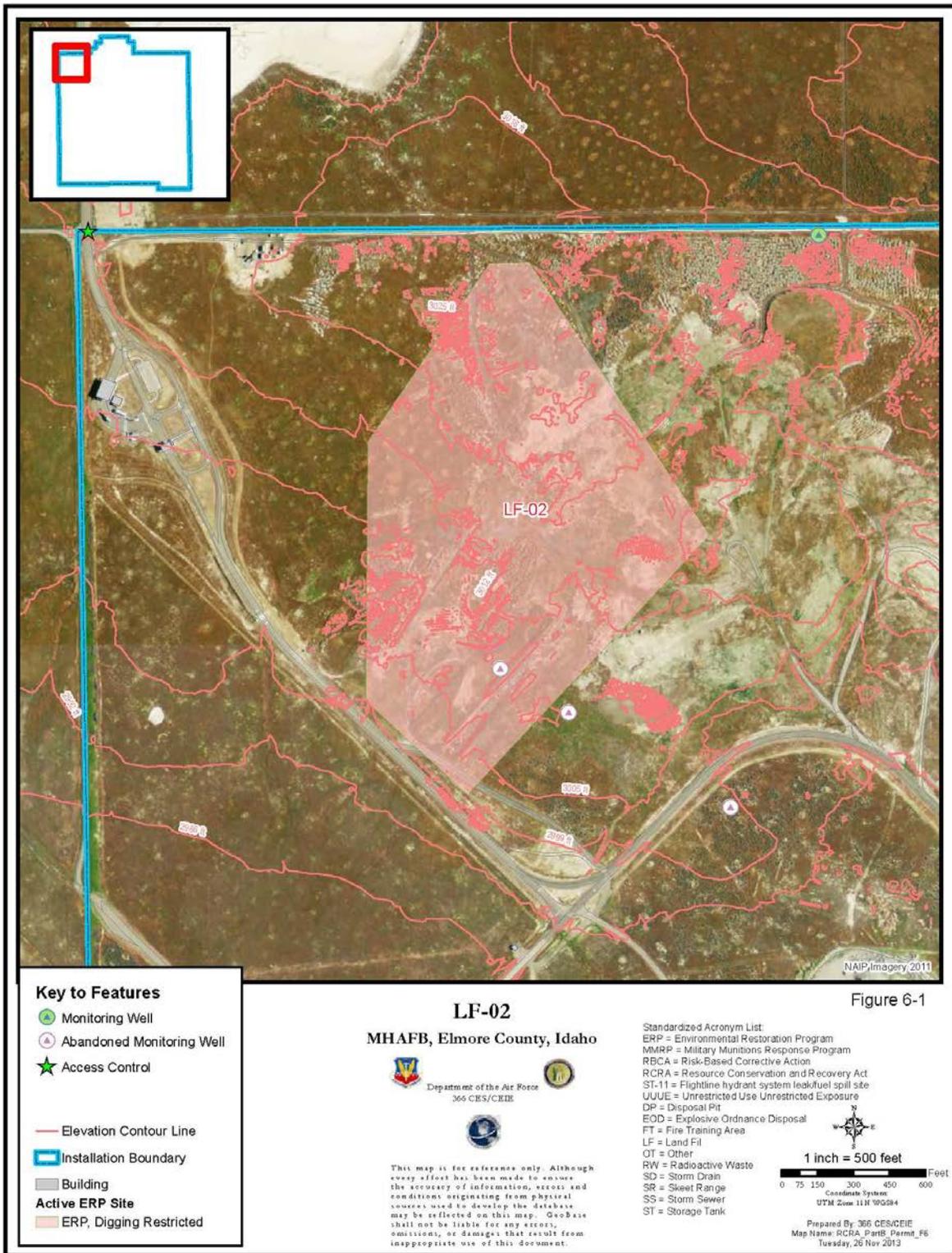


Figure 6-1. LF-02

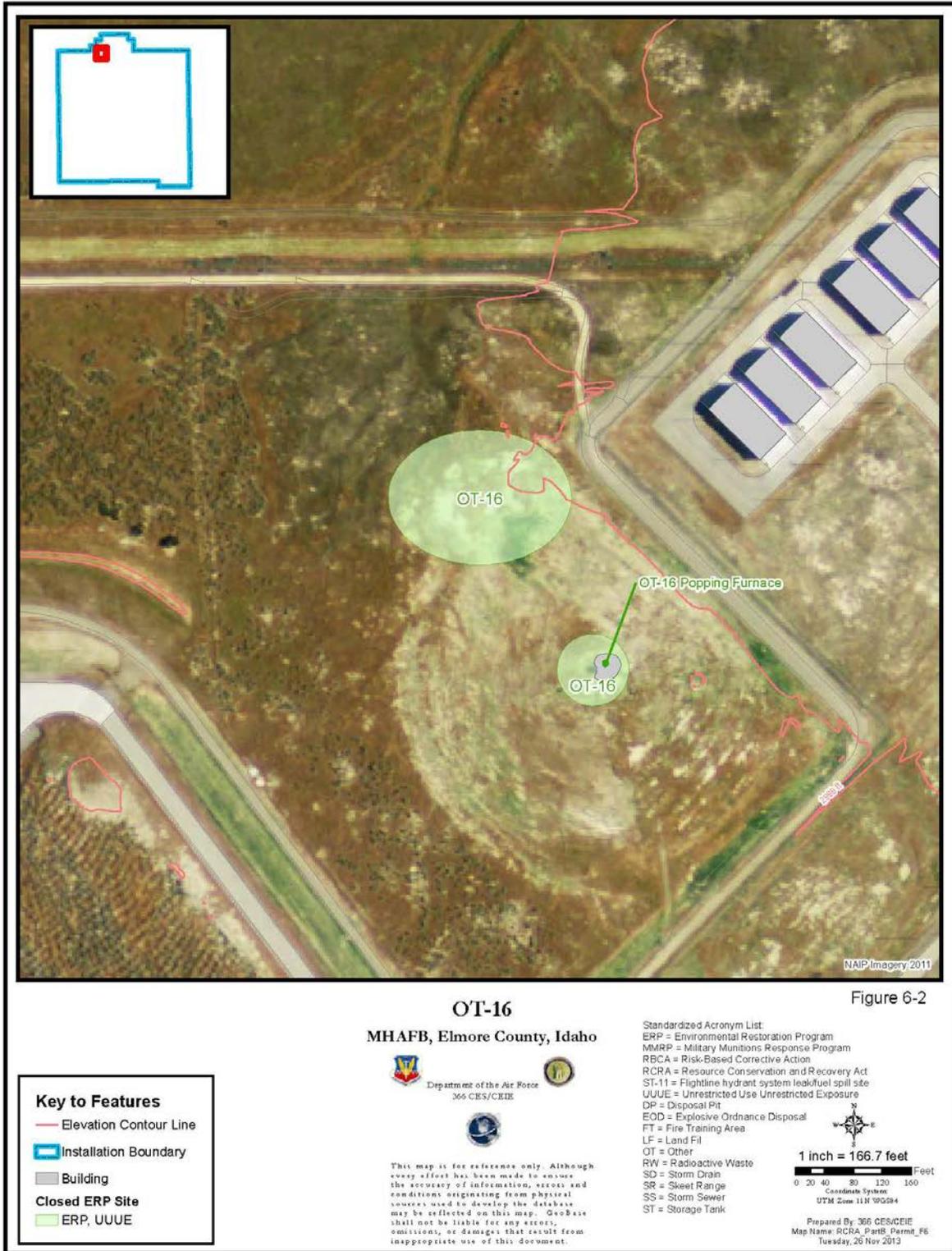


Figure 6-2. OT-16

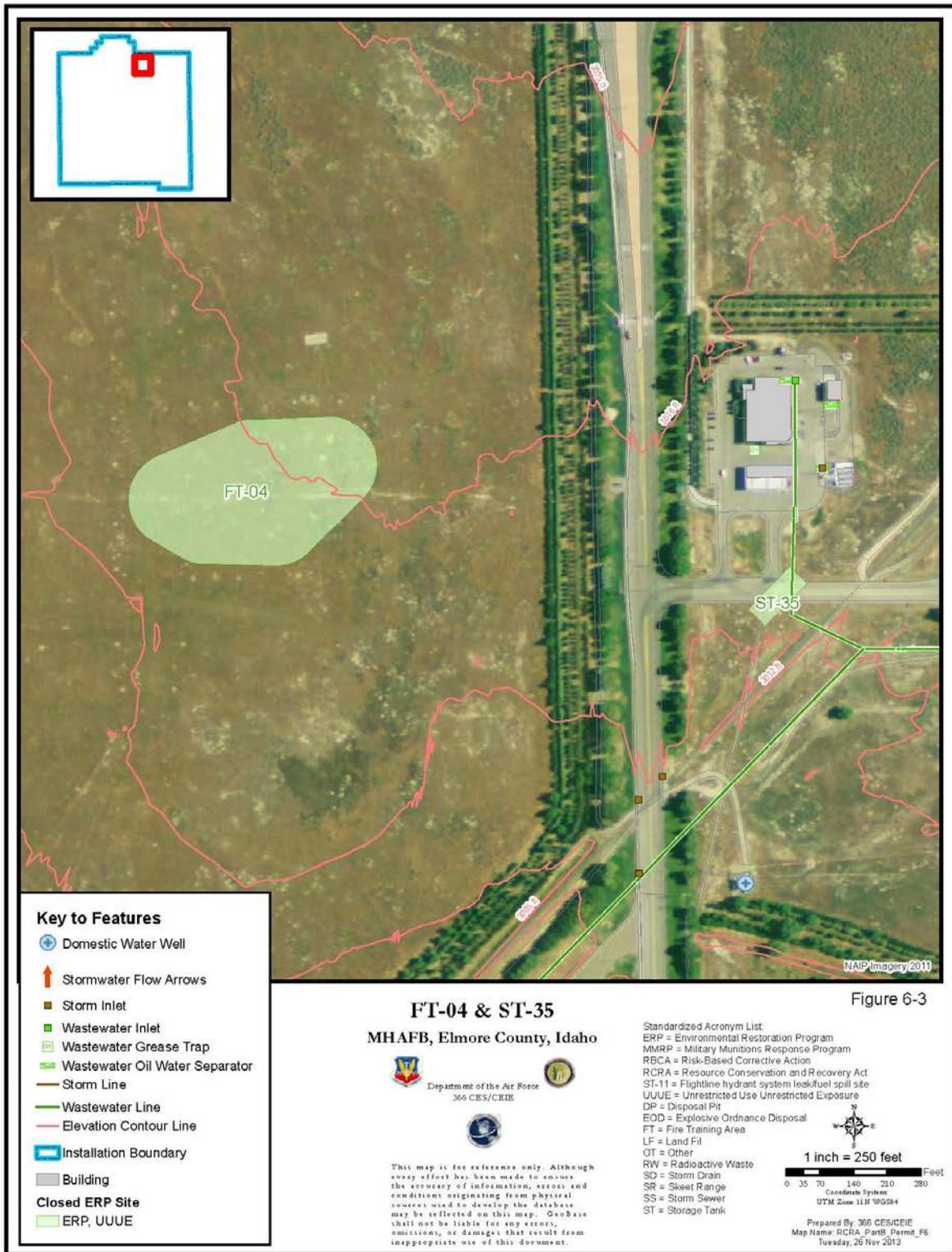


Figure 6-3. FT-04 and ST-35

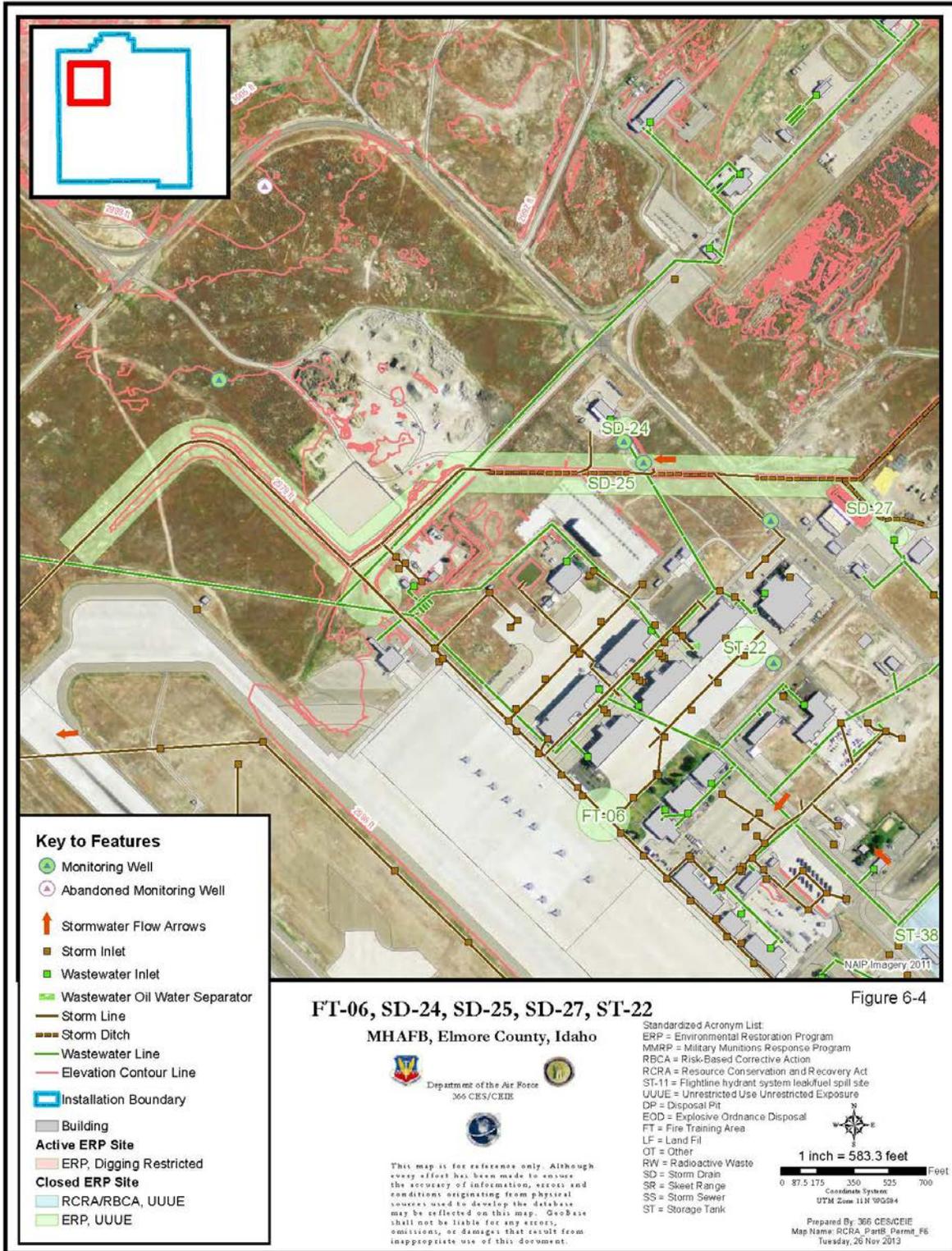


Figure 6-4. FT-06, SD-24, SD-25, SD-27, ST-22

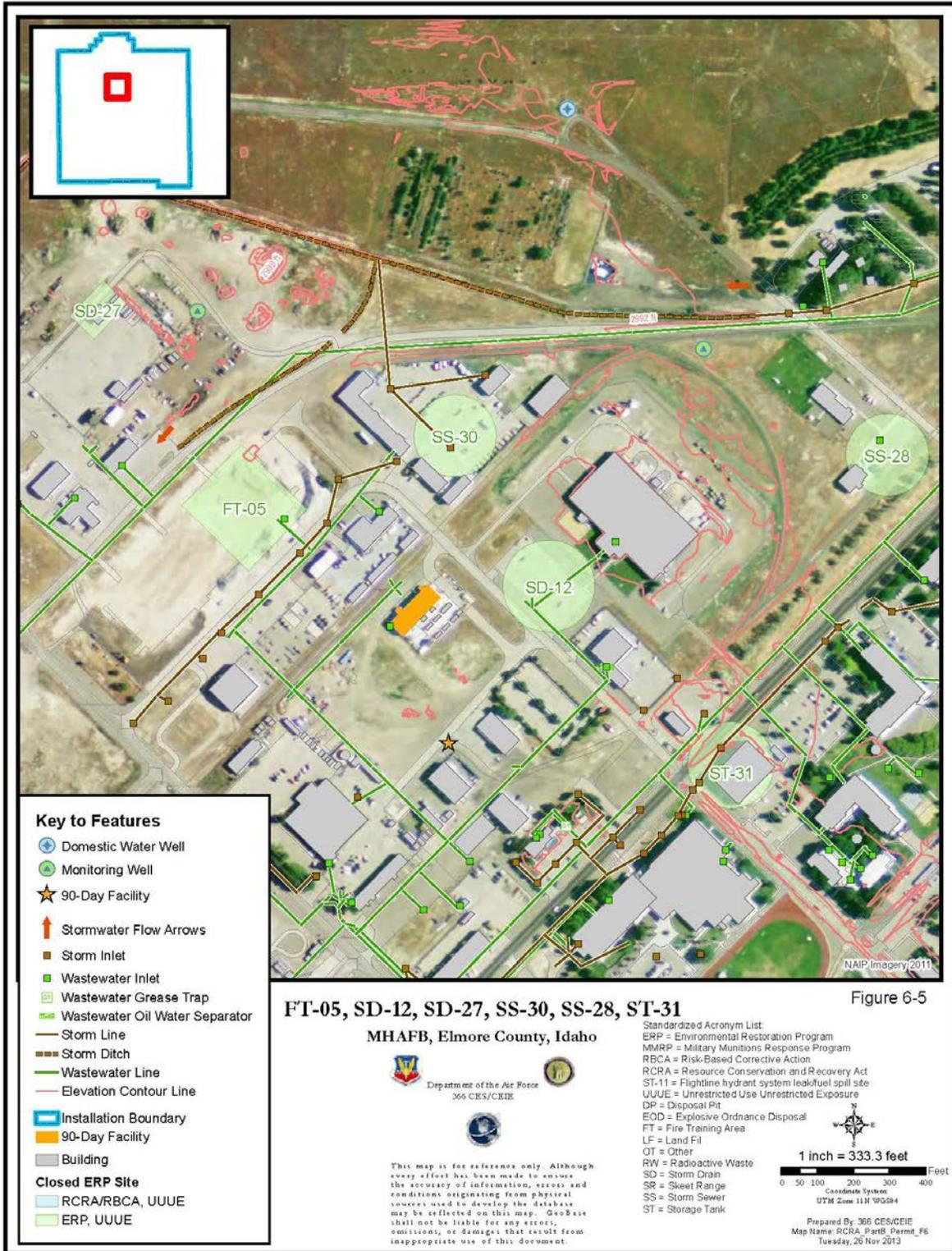


Figure 6-5. FT-05, SD-12, SD-27, SS-30, SS-28, ST-31

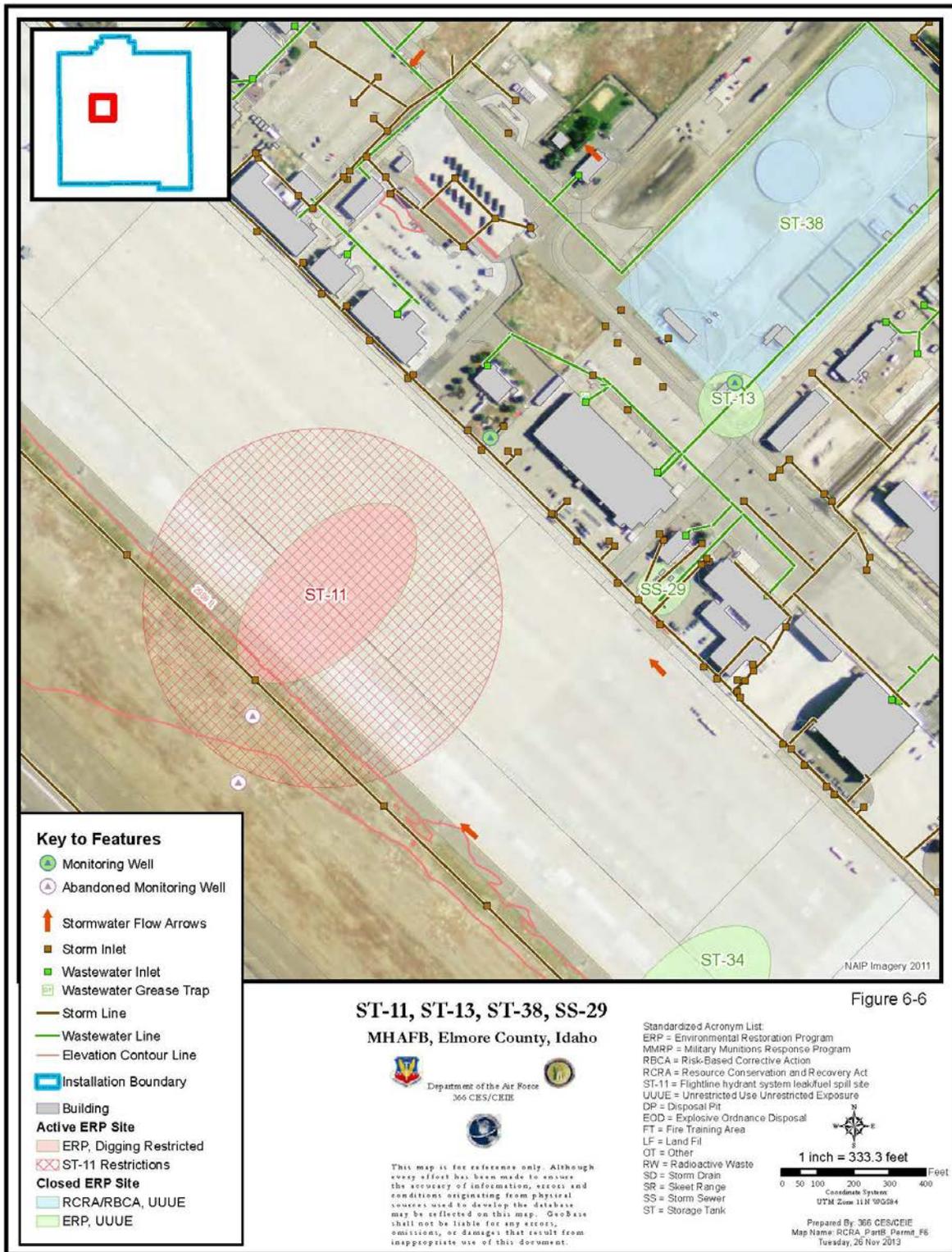


Figure 6-6. ST-11, ST-13, ST-38, SS-29

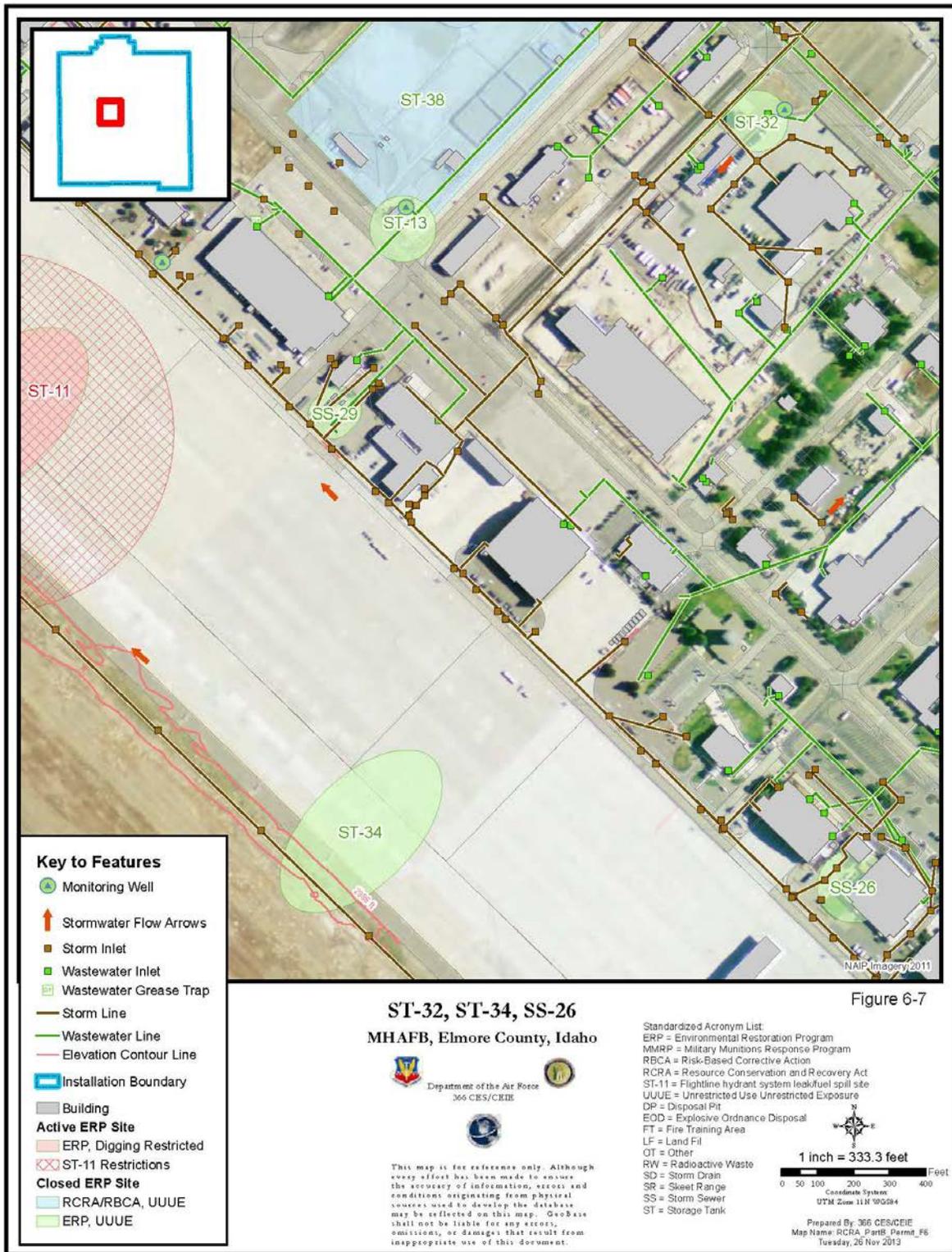


Figure 6-7. ST-32, ST-34, SS-26

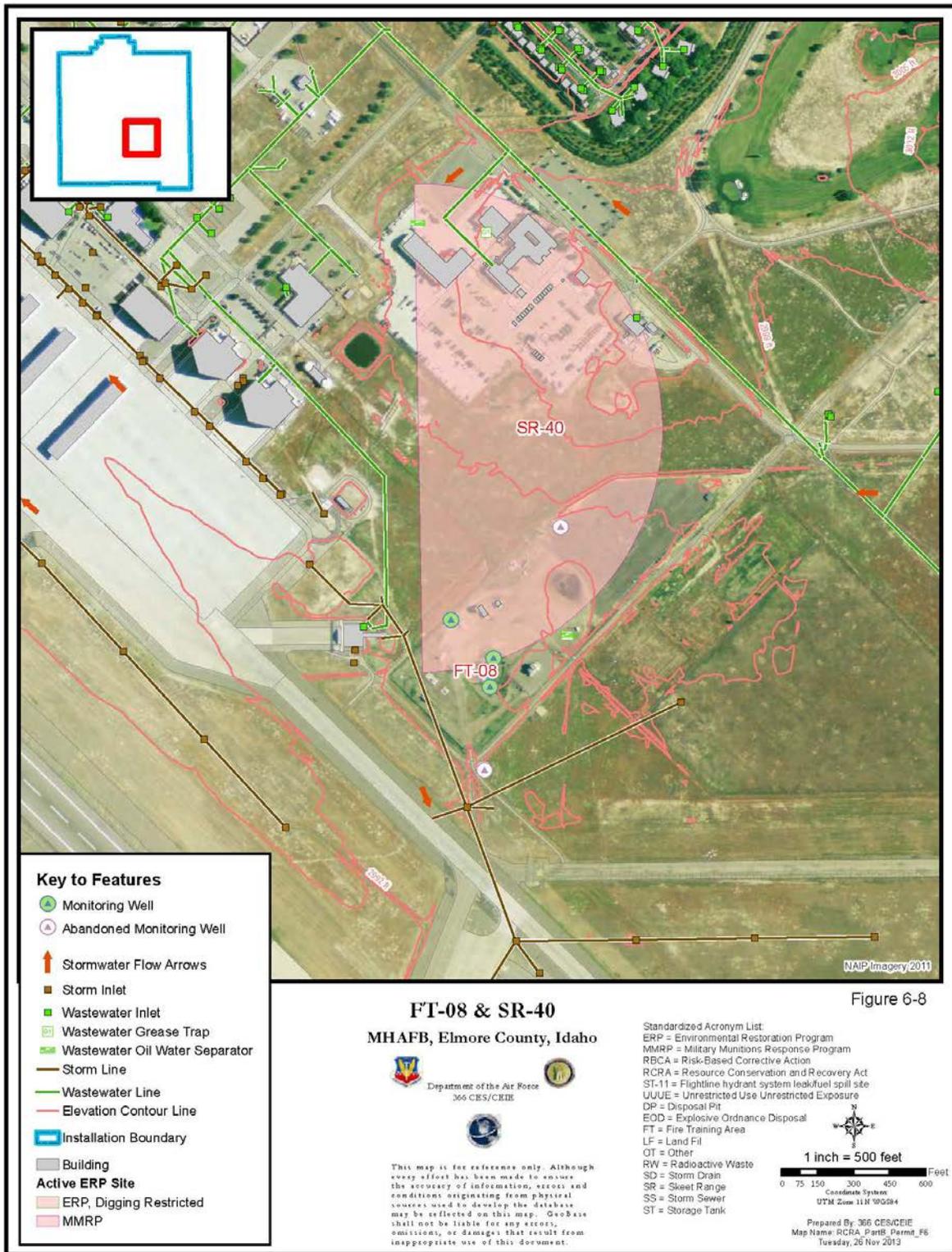


Figure 6-8. FT-08 and SR-40

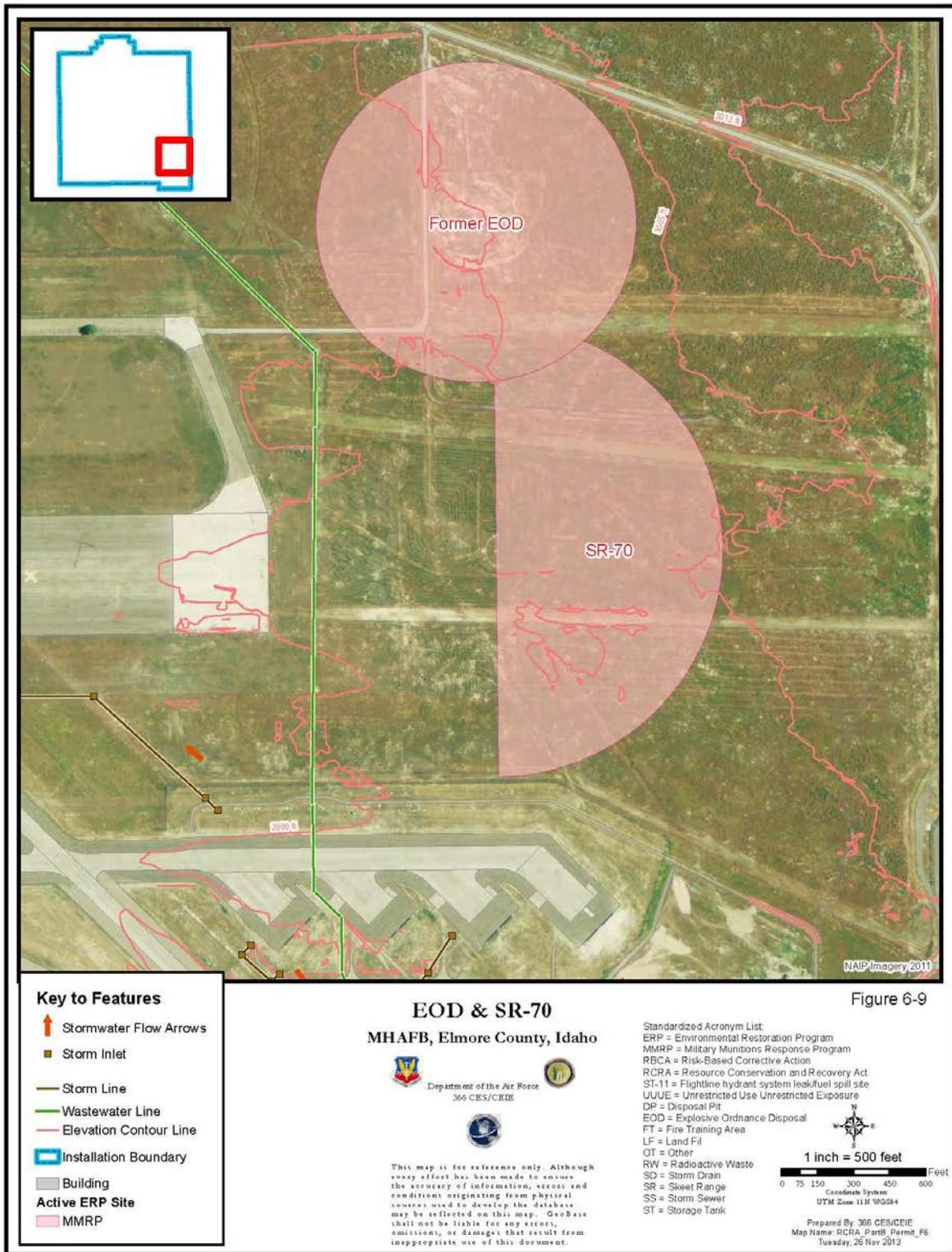


Figure 6-9. EOD & SR-70

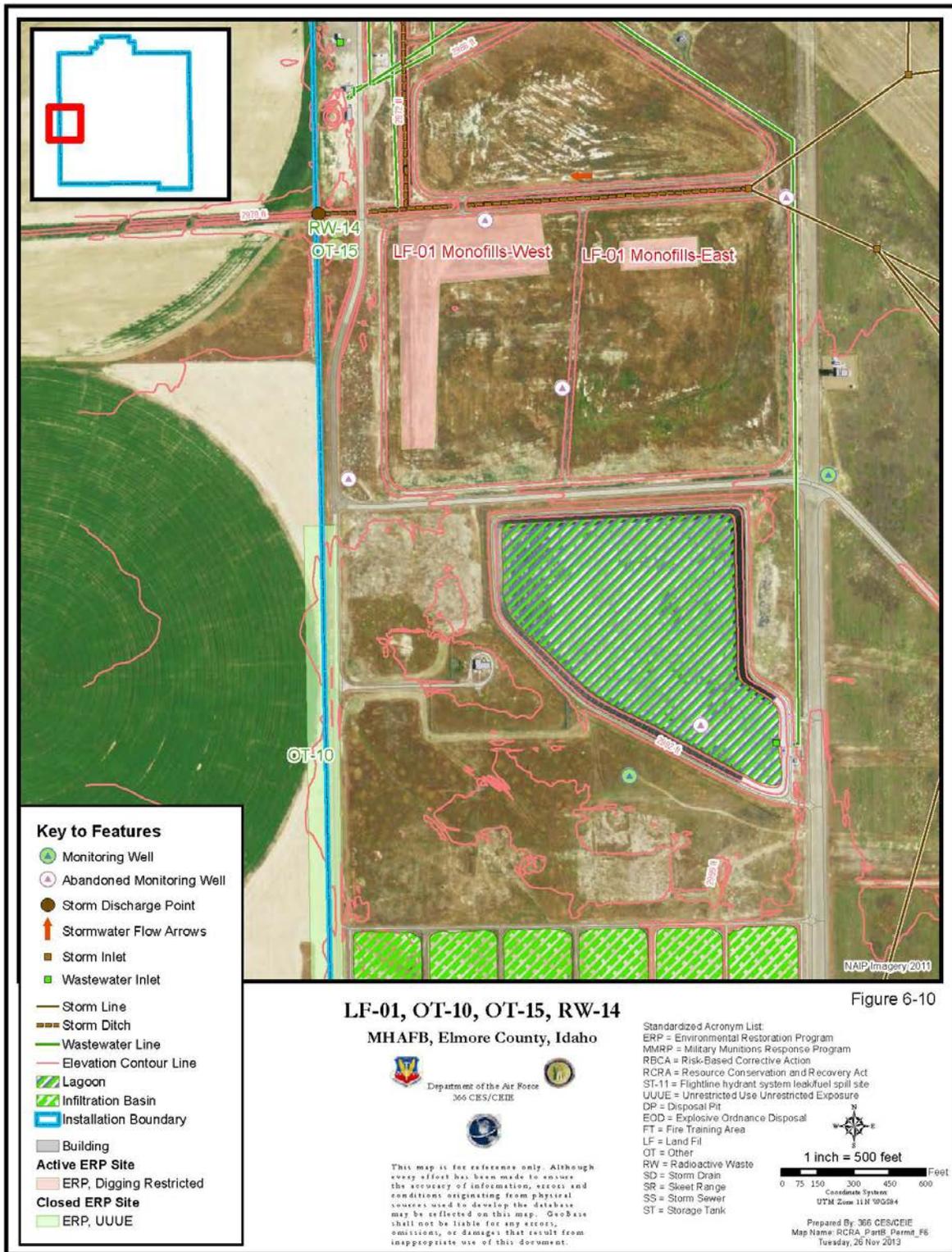


Figure 6-10. LF-01, OT-10, OT-15, RW-14

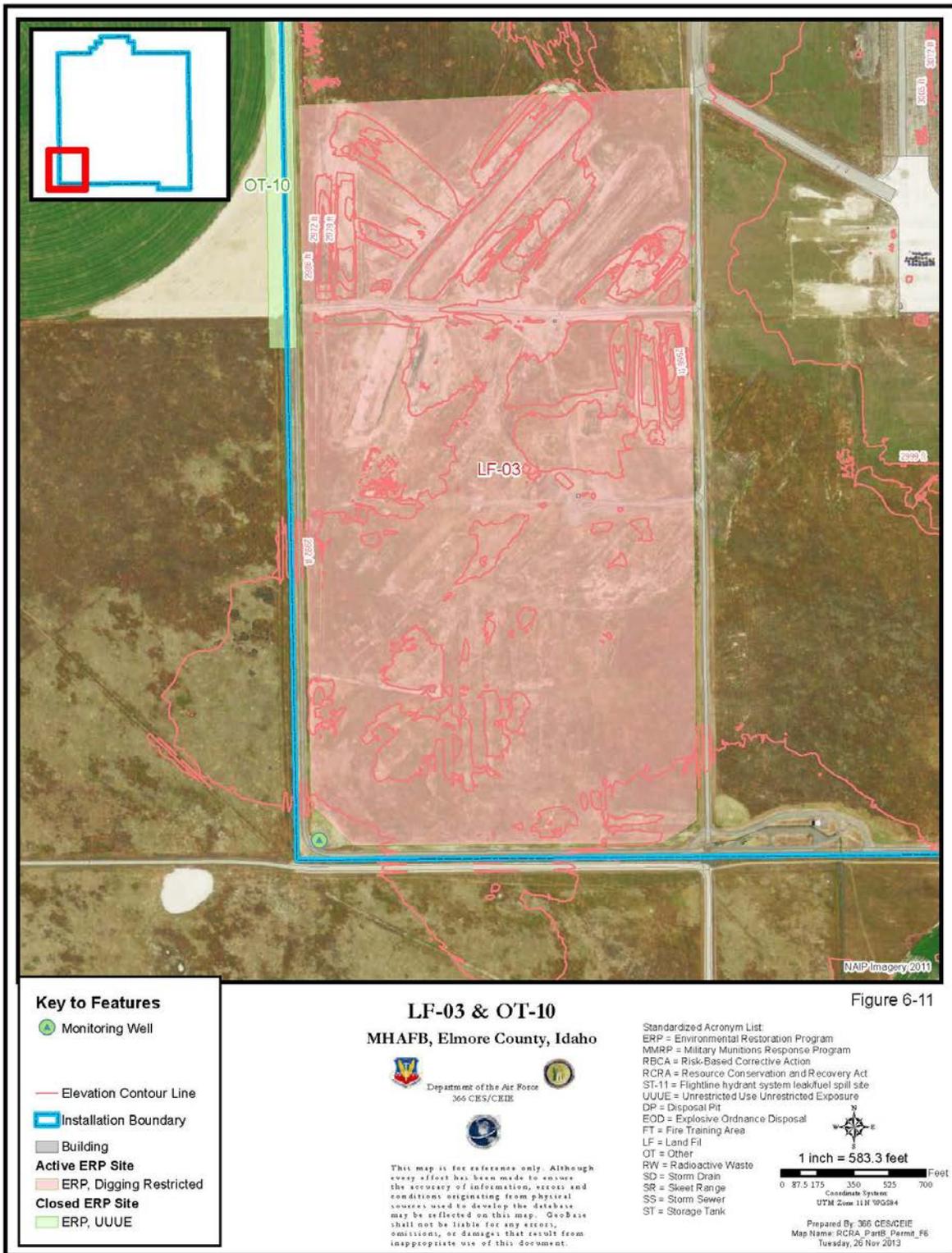


Figure 6-11. LF-03 and OT-10

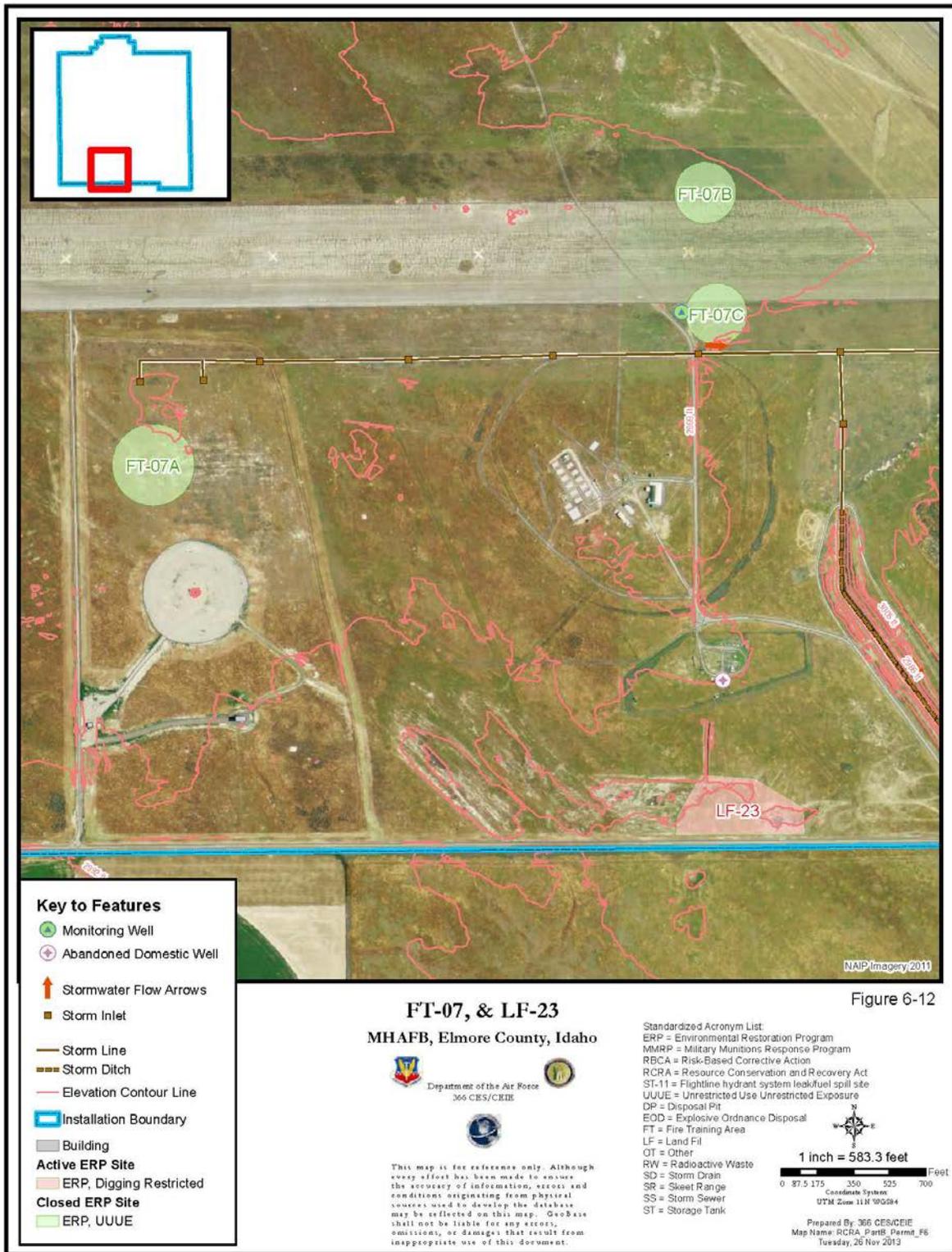


Figure 6-12. FT-07 and LF-23

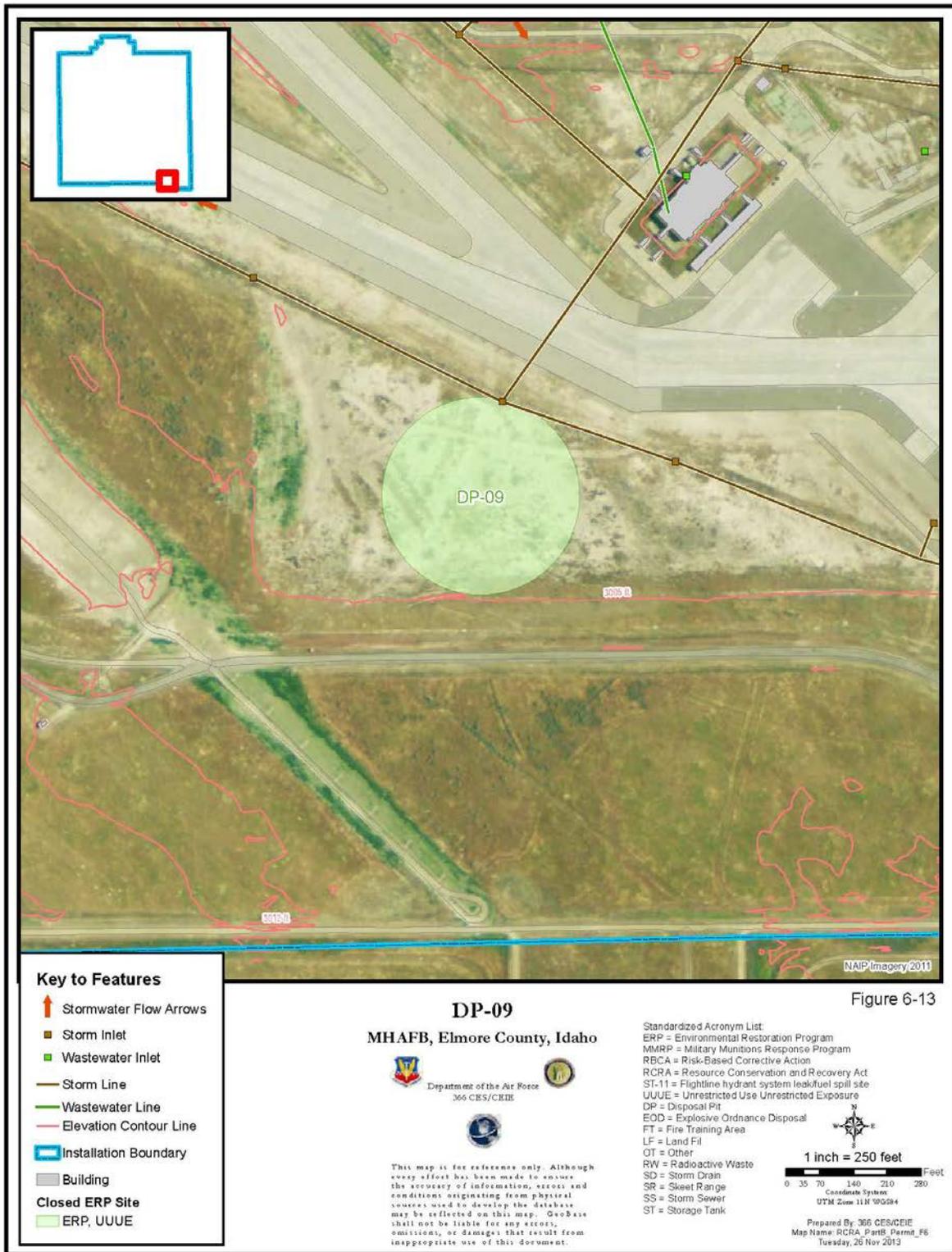


Figure 6-13. DP-09

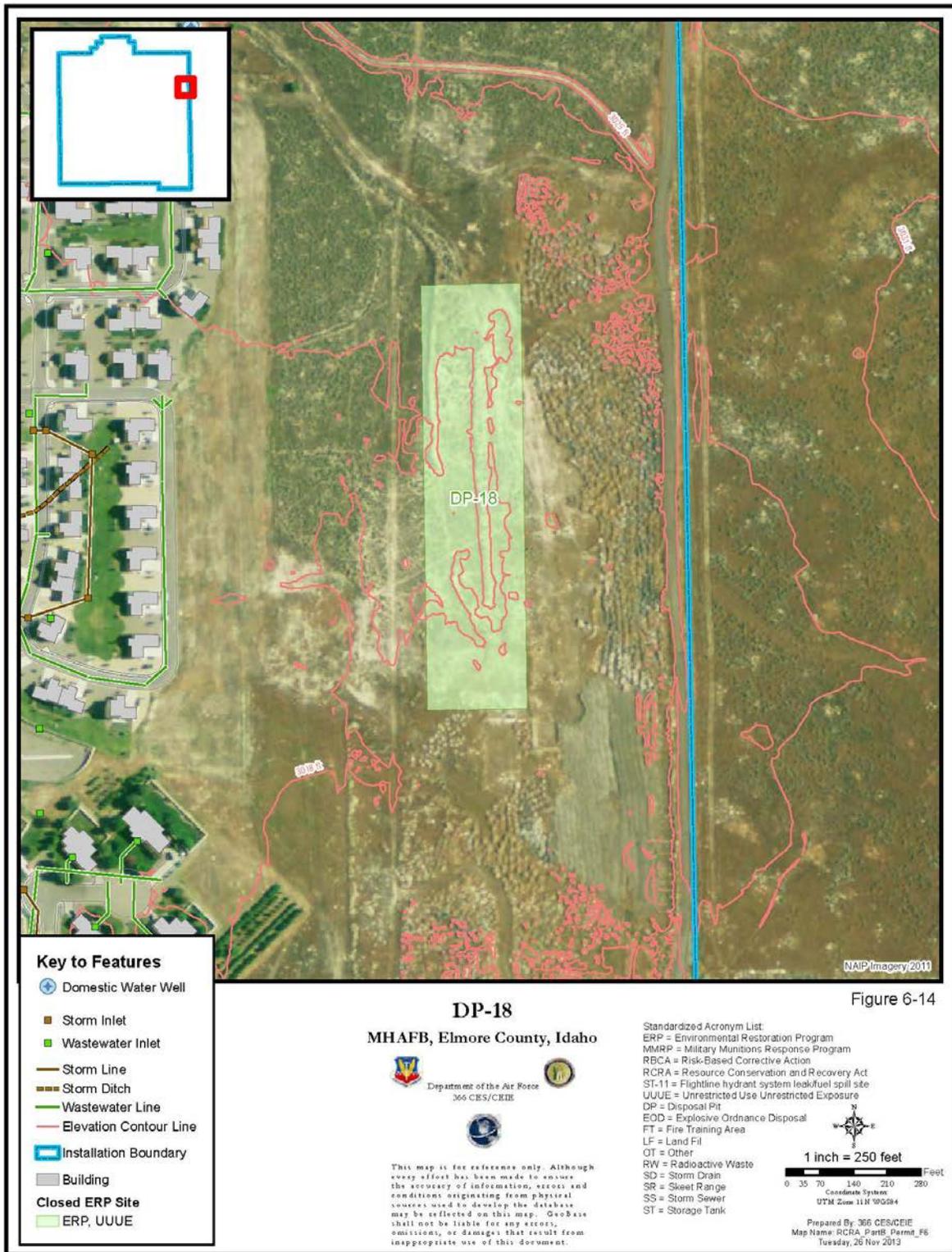


Figure 6-14. DP-18

HWMA POST-CLOSURE/CORRECTIVE ACTION PERMIT  
FOR THE  
MOUNTAIN HOME AIR FORCE BASE

**ATTACHMENT 12 – PERMIT MODIFICATION/REVISION LOG**

EFFECTIVE DATE: JANUARY 11, 2015  
REVISION DATE: TBD

12.0 – PERMIT MODIFICATION/REVISION LOG

This attachment contains information concerning permit modifications

The current revision is revision 0 (new permit) dated January 9, 2015.

Table 12-1. Permit Modification/Revision Log				
Rev. No.	Date Transmitted to DEQ	Date Approved by DEQ	PMR Class	Summary of Changes
0	N/A	December 9, 2014	N/A	This is the renewed permit.
<u>1</u>	<u>N/A</u>	<u>TBD</u>	<u>Major</u>	<u>This is a DEQ-initiated Modification, based on receiving new information from MHAFB regarding the POL Cap. This modification shortens the post-closure care period from thirty (30) years to twenty five (25) years. The Permit Modification also removes conditions relative to post-closure care, removes the requirement to submit a post closure plan, updates the constituents of concern for groundwater protection, and makes minor changes to remove inconsistencies in the Permit.</u>

# **Attachment B**

## **Fact Sheet**

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**FACT SHEET**  
**MODIFICATION OF THE HWMA/RCRA**  
**POST-CLOSURE AND CORRECTIVE ACTION PERMIT**  
**FOR THE MOUNTAIN HOME AIR FORCE BASE**  
**EPA ID No. ID3572124557**

This fact sheet sets forth the principle facts pertaining to a proposal to modify the Mountain Home Air Force Base (MHAFB) Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) Post-Closure and Corrective Action Permit. The Director has received information that was not available at the time of the most recent permit renewal. Therefore, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.41(a)(2)], the Idaho Department of Environmental Quality (DEQ) has initiated this permit modification to incorporate that information and effect the resulting reduction of the post-closure care period from thirty (30) years to twenty-five (25) years. The proposed modification also removes post-closure conditions specified for the Petroleum, Oil and Lubricant (POL) cap site, updates constituents of concern for groundwater protection, and addresses minor wording inconsistencies in the permit.

The MHAFB entered into a Federal Facility Agreement (FFA) with the United States Environmental Protection Agency and Idaho Department of Health and Welfare, Division of Environmental Quality, effective January 16, 1992, to integrate and satisfy the response action requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the corrective action requirements of RCRA. This permit provides for secondary jurisdiction under the RCRA corrective action program in the event the FFA terminates prior to selection of the final remedy under the FFA process for the sites addressed by this permit. The permit will continue to include provisions for taking over any remaining corrective action work under the FFA should the FFA be vacated, and for evaluating any newly discovered release site.

This fact sheet was prepared in accordance with the requirements of IDAPA 58.01.05.013 [40 CFR §124.8].

**A. PURPOSE AND BASIS FOR THIS PERMIT MODIFICATION**

The proposed revisions are being made in accordance with both the agency initiated modification provisions of the state of Idaho's Rules and Standards for Hazardous Waste, including IDAPA 58.01.05.012 [40 CFR §270.41(a)(2)], and the IDAPA 58.01.05.008 [40 CFR §264.117(a)(2)(i)], which allows the DEQ to shorten the post-closure care period if the reduced period is sufficient to protect human health and the environment.

Final approval of this proposed modification would allow MHAFB to discontinue post-closure monitoring of the cap and subsurface soils associated with the POL tanks that were removed in 1988. Any necessary groundwater monitoring activities are being performed under the FFA.

This draft permit modification was prepared by the DEQ, based upon the changes it has deemed necessary based upon soil sampling information collected in the months subsequent to January 2015 issuance of the MHAFB permit renewal.

**B. PROCEDURES FOR REACHING A FINAL DECISION**

The DEQ hereby proposes to approve the draft modification. IDAPA 58.01.05.013 [40 CFR §124.10] requires that the public be given 45 calendar days to comment on an agency-initiated permit modification being presented for approval under the HWMA. The comment period will begin on May 18, 2016 and will end on July 5, 2016. Any person interested in commenting on this draft modification must do so within this 45-calendar day comment period. Only the modified portions of the Permit are open for public comment.

All persons wishing to comment on the Post-Closure and Corrective Action Permit should submit their comments in writing to:

*Mr. Robert Bullock  
c/o Ms. Jenny Shafer  
Idaho Department of Environmental Quality  
Waste Management and Remediation Division  
1410 North Hilton  
Boise, Idaho 83706-1255  
(208) 373-0502  
[robert.bullock@deq.idaho.gov](mailto:robert.bullock@deq.idaho.gov)*

Comments may also be submitted through the comment form on the DEQ website at [www.deq.idaho.gov/public-comment-opportunities](http://www.deq.idaho.gov/public-comment-opportunities). Comments should include all reasonable available references, factual grounds, and supporting material.

Opportunity for a public hearing may be provided if signed, written requests for a hearing, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.11], are submitted to DEQ and received on or before June 1, 2016. If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held. The decision on whether there is sufficient public interest in holding the hearing will be based on the receipt of written comments and requests for a public hearing.

When making the final determination regarding the approval of this Post-Closure and Corrective Action Permit, DEQ will consider all written comments received during the public comment period, those received during the public hearing (if held), the requirements of the hazardous

waste regulations of IDAPA 58.01.05.000 *et seq.*, and all other applicable federal, state, or local laws.

### **C. FACILITY/UNIT DESCRIPTION AND CHRONOLOGY OF REGULATORY ACTIONS**

MHAFB is an active United States Air Force military installation located approximately 10 miles southwest of Mountain Home, Idaho. MHAFB occupies approximately 5,800 acres and is situated at an elevation of approximately 3,000 feet above mean sea level. Approximately 7,500 service men and women and their dependents live at MHAFB.

The facility has no permitted treatment storage or disposal facilities, and there are approximately 58 units that have been closed under applicable IDAPA hazardous waste regulations. One closed unit is currently subject to post-closure requirements. The entire base was subject to a HWMA/RCRA Facility Assessment in 1991 which identified a number of areas where solid and or hazardous wastes had been released to the environment as a result of operations, thereby subjecting the base to HWMA/RCRA corrective action.

The one closed HWMA/RCRA unit requiring post-closure care involves soil areas contaminated with hazardous waste as a result of four 12,000 - 15,000 gallon underground storage tanks (USTs) that were used to store motor oil sludge and hydraulic oil sludge. In 1988, the USTs were removed and in 1991, a HWMA/RCRA clay cap was installed to prevent further migration of hazardous waste constituents that could not be practically removed. Post closure care commenced for the POL cap on September 16, 1991.

Post-closure care for the POL cap currently consists of monitoring and maintaining the cap and the surface water drainage systems for a period of 30 years. Groundwater monitoring for the unit is being managed under the FFA.

In November of 2015, a field investigation was completed at MHAFB for the purpose of assessing the POL clay cap and subsurface conditions beneath the cap. The investigation included: a geophysical investigation to determine the areal extent of the cap; a pothole (vacuum excavation) exploration program to confirm the limits of the cap outline by geophysics; and documentation of the presence of a geotextile membrane covering the clay cap. Subsurface samples (including borings) from beneath the cap were collected and analyzed. MHAFB provided DEQ a report on the investigation in February 2016.

The DEQ has reviewed the *Final Cap System Investigation Report for the POL Yard Cap (ST-13)*, and determined that the concentrations of hazardous chemicals remaining in the soil beneath the clay cap do not appear to pose unacceptable risk to non-residential and construction workers. Therefore, it does not appear that continued maintenance of the clay cap installed in 1991 is necessary.

**D. CONCLUSION**

The existing post-closure care period, as established at Permit Condition V.C.1, is set to expire on September 8, 2021. If the post-closure care period is revised to 25 years rather than 30 years, the post-closure care period will be scheduled to be complete on September 8, 2016. At that time, MHAFB may submit to the Director of DEQ a certification of completion of post-closure care signed by the appropriate Air Force authority, and a registered Professional Engineer, in accordance with Permit Condition V.O. This certification must be transmitted within 60 days of completion of post-closure care. Upon acceptance and concurrence by the DEQ, permit conditions will no longer require MHAFB to maintain the POL cap.

**E. PERMIT ORGANIZATION**

The MHAFB Post-Closure and Corrective Action Permit is organized into the following modules, appendices, and attachments. Those modules and attachments that include modifications as proposed in this action are indicated in red. All others are unchanged.

MODULE	TITLE
I	Standard Facility Conditions
II	General Facility Conditions
III	Groundwater Monitoring Program
IV	Closure
V	Post-Closure Care
VI	Corrective Action (Table VI-2)
Appendix A	Required Submittals and Dates

Attachments	Topic
1	RCRA Part A Permit Application
2	Facility Description
3	Security
4	Solid Waste Management Units
5	Corrective Action for Solid Waste Management Units
6	Post-Closure Care
7	Closure
8	Tables
9	Maps
10	Groundwater Monitoring Program
11	Federal Facility Agreement
12	Permit Modification/Revision Log

# **Attachment C Public Notice**

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# Public Notice: Request for Comments



Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706

Phone: (208) 373-0502  
Fax: (208) 373-0154

## Notice of Intent to Modify Hazardous Waste Permit for Mountain Home Air Force Base [Docket No. 10HW-1603]

**Notice Issued:** May 18, 2016

### What is the purpose of this notice?

The Idaho Department of Environmental Quality (DEQ) is proposing to issue a modified Hazardous Waste Post-Closure and Corrective Action Permit for the Mountain Home Air Force Base (MHAFB). The permit modifications are based on the RCRA regulation allowing the responsible agency, DEQ, to shorten the post-closure care period if the reduced period is sufficient to protect human health and the environment. Such modifications are not unilaterally approved by DEQ. Before approval, you (the public), are provided an opportunity to comment on the modified portions of the draft permit prepared by DEQ.

**What is proposed?** The DEQ is proposing to reduce the post-closure care period for the capped closed hazardous waste management unit at MHAFB to twenty-five (25) years, and remove conditions related to post-closure care, based on the results of a field investigation performed to assess the POL clay cap and subsurface conditions beneath the cap. The field investigation provided evidence that the concentrations of the hazardous chemicals remaining in the soil underneath the clay cap do not pose an unacceptable risk to non-residential and construction workers, and so the clay cap does

not require maintenance, nor other post-closure care.

The modified portions of the draft Permit are hereby proposed for approval.

### Where can I get more information?

**In person:** A copy of the draft modified portions of the Permit and a Fact Sheet are available for review at DEQ's State Office at 1410 N. Hilton, Boise, Idaho.

**On line:** The draft modified portions of the Permit and a Fact Sheet are available on DEQ's website at <http://www.deq.idaho.gov/news-public-comments-events.aspx>.

**By phone:** Call Mr. Robert Bullock at (208) 373-0502.

Persons wanting to be added to or deleted from the facility mailing list should contact Ms. René Anderson at the same address and/or at (208) 373-0210

### When are written comments due?

Submit written comments through 5 p.m. MST, July 5, 2016. Comments should be addressed to: Mr. Robert Bullock, c/o Ms Jenny Shafer, at the address listed above; or submitted via the online form at the DEQ website listed above.

### Contact Names:

**DEQ Contact:** Robert Bullock

**Phone:** (208) 373-0502

**Email:**

[Robert.Bullock@DEQ.Idaho.gov](mailto:Robert.Bullock@DEQ.Idaho.gov)

### Mountain Home Air Force Base

**Contact:** Curtis Ohlsen

**Phone:** (208) 828-4120

**Email:** [Curtis.Ohlsen@us.af.mil](mailto:Curtis.Ohlsen@us.af.mil)

### Who is responsible for implementing this permit?

Mountain Home Air Force Base

**Who is the issuing office?** Idaho Department of Environmental Quality

### What are DEQ's responsibilities?

DEQ is the regulatory agency that helps protect and enhance Idaho's water and air quality, and helps ensure proper management and disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities.

### What legal requirements apply?

Idaho's rules for administrative procedure require that DEQ provide the public, through a newspaper notice, the opportunity to submit written comments on the draft permit modification.

**What Happens Next?** DEQ will consider any comments and/or requests for a hearing, and announce a time and place for a hearing, modify the proposed changes, or approve the modified permit as proposed.