



STATEMENT OF BASIS
Prepared by
California Department of Toxic Substances Control



For
Travis Air Force Base
Fairfield, California
September 9, 2019

Facility/Unit Type:	Hazardous Waste Storage Facility
Waste Types:	Resource Conservation and Recovery Act (RCRA) and non-RCRA
Permit Type:	RCRA-equivalent Hazardous Waste Facility Permit



Facility Map: The red dot indicates the entrance of the two permitted units: Building 1365 (yellow outline) and Tank Farm (red outline). (Image Source: Google Maps)

Document Organization

This Statement of Basis is divided into three (3) sections as follows:

1. INTRODUCTION
2. FACILITY DESCRIPTION
3. DRAFT PERMIT CONDITIONS

List of Acronyms

CEQA	California Environmental Quality Act
DTSC	Department of Toxic Substances Control
EERD	Enforcement and Emergency Response Division
HWMUs	Hazardous Waste Management Units
RCRA	Resource Conservation and Recovery Act

1. INTRODUCTION

This Statement of Basis has been prepared by the Department of Toxic Substances Control (DTSC) in accordance with California Code of Regulations, title 22, section 66271.6 to explain the Draft RCRA Hazardous Waste Permit (Draft Permit) prepared for Travis Air Force Base (AFB). Travis AFB is located at 411 Airmen Drive, Travis Air Force Base, California 94535. The purpose of this Statement of Basis is to briefly describe the conditions in the Draft Permit and the reasons for them.

Any questions or comments regarding this matter can be directed to:

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You may review the proposed Draft Permit and supporting documents at the following locations:

Mitchell Memorial Library
510 Travis Avenue
Travis Air Force Base, CA 94535
(707) 424-3279

Suisun Public Library
601 Pintail Drive
Suisun City, CA 94585
(866) 527-7587

DTSC Sacramento Regional Office, File Room
8800 Cal Center Drive
Sacramento, California 95826
(916) 255-3758; Call for appointment

2. FACILITY DESCRIPTION

Travis Air Force Base is owned and operated by the United States Air Force, 60th Mobility Wing. Travis AFB generates large quantities of RCRA and non-RCRA hazardous waste through their aircraft maintenance activities onsite. These wastes are stored in their Hazardous Waste Storage Facility (Facility). The Facility is approximately 400 feet (north-south) by 225 feet (east-west) and occupies a 2.25-acre site surrounded by a six-foot high chain link security fence with a three barbed-wire trigger. The Facility consist two (2) hazardous waste management units:

1. Building 1365 (capacity: 56,760 gallons)
2. Tank Farm (capacity: 15,000 gallons; six (6) tanks with each 2,500-gallon capacity)

Hazardous wastes are generated at different accumulation points throughout the Facility. The hazardous wastes are taken to the Facility for storage before they are shipped off-site for further management.

The regulated hazardous waste management activities include storage in containers, and six (6) Onground storage tanks (Tanks). The Facility manages flammable solvents, contaminated fuels and lubricants, stripping chemicals, waste petroleum products, waste paint, absorbent materials, spilled and outdated materials, asbestos, used oils, and waste fuels.

3. DRAFT PERMIT CONDITIONS

The following section briefly describes the derivation of the conditions of the Draft Permit and the reasons for them. There are three (3) types of conditions in the Draft Permit – General Conditions, Special Conditions, and Conditions for Corrective Action.

A. General Conditions

Pursuant to California Health and Safety Code section 25200, the following general conditions are included in the Draft Permit to ensure the Facility is operated in accordance with all applicable State laws and are protective of human health and the environment. DTSC includes these types of general conditions in all similar permits to establish the legal and regulatory requirements that apply to hazardous waste management activities at permitted facilities.

1. The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
2. The Permittee is permitted to store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
3. Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
4. DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.

5. Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
6. Pursuant to California Health and Safety Code, division 20, chapter 6.5, article 8, California Code of Regulations, title 22, section 66270.43, and California Code of Regulations, title 22, division 4.5, chapter 21, article 3, DTSC may revoke or suspend this Permit or suspend the operation of a facility on various grounds, including, but not limited to, activities of the Permittee (or any trustee, officer, director, partner, or any person holding more than five percent of the equity in, or debt liability of, the Permittee's business concern) resulting in any violation of or non-compliance with federal or state statutes, requirements, or regulations relating to the generation, transportation, treatment, storage, recycling, disposal, or handling of a hazardous waste; activities resulting in a federal or state conviction significantly related to the fitness of the permit applicant or the Permittee; omission of information in the Permit application or during the permit application process or a misrepresentation of subsequent information reported by the Permittee; a determination that conditions that may present an imminent and substantial endangerment to the public health or safety or the environment; or non-payment any fees, penalties, or costs owed to DTSC.
7. In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
8. This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

B. SPECIAL CONDITIONS

DTSC has added the following Special Conditions to the Draft Permit. A summary of the basis for the additional permit conditions follows:

B.1 Unit-Specific Special Conditions for Building 1365

1. The Permittee shall store containers of hazardous waste on pallets and shall not stack containers of hazardous waste more than two (2) containers high, not more than six feet high, and shall not stack containers holding ignitable waste.

This special condition was included to ensure that the hazardous wastes stored in Building 1365 are organized in a way that minimizes the chance of spills or releases to help protect human health, the environment, and protect the employees managing the containers and the inspectors inspecting the Facility.

2. The Permittee shall store containers of liquid hazardous waste on pallets with built-in secondary containment when storing liquid hazardous waste in the west bays (Bays 7-15), no stacking will be allowed.

This special condition was included to ensure that all liquid wastes stored in the west bays (Bays 7-15), which do not have a 3.5-inch curb in front of each bay, have sufficient containment for any leaks, spills, and/or releases. The Draft Permit authorizes the storage of liquid hazardous waste in the west bays (Bays 7-15). Therefore, the Facility must use pallets with secondary containment when storing liquid hazardous waste in the west bays. The entire container building (east and west bays) has a 6-inch curb that acts as an additional containment system.

3. The Permittee shall store all containers of hazardous waste that arrive at Building 1365 in their compatible bays within ninety (90) days of the hazardous waste accumulation date.

This special condition was included to ensure the Facility does not use the staging areas in Building 1365 to extend the 90-day time limit allowed for accumulation of hazardous waste in accordance with California Code of Regulations, title 22, section 66262.34.

4. The Permittee shall maintain a minimum of 30 inches of aisle space between containers holding or designated to hold hazardous waste.

This special condition was included to ensure that there is adequate aisle space between the containers to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in accordance with California Code of Regulations, title 22, section 66264.35

5. For the purposes of calculating the permitted maximum capacity or volume for storage and for secondary containment, all containers stored or located in this Unit shall be assumed to be full, and all materials that are stored or located in this Unit shall be included in the calculation for the Unit.

This special condition was included to ensure the Facility does not exceed the hazardous waste storage capacity stated in the Draft Permit and Application Part B, and to make compliance determinations more consistent.

6. The Permittee shall submit an updated Seismic Evaluation for Building 1365 for DTSC review within one (1) year of the effective date of this Permit.

A previous Seismic Evaluation (dated July 26, 2006) demonstrating that Building 1365 meets seismic requirements was provided in the Permit Application. This special condition was included to verify that the Facility can meet the current seismic requirements identified in American Society of Civil Engineers (ASCE) 7-16 or ASCE 41-17 for Seismic Evaluation and Retrofit of Existing Buildings for Building 1365.

B.2 Unit-Specific Special Conditions for Tank Farm

1. Within five (5) years from the effective date of this Permit, the Permittee shall provide a tank assessment as described in California Code of Regulations, title 22, section 66264.192(l) to DTSC. This assessment shall be reviewed and certified by an independent, qualified, professional engineer, registered in California, in accordance with subsection 66270.11(d), attesting that the tank systems have sufficient structural

integrity and are acceptable for the transferring, storing and treating of hazardous waste. The assessments shall be valid for a maximum period of five (5) years or the remaining service life of the tank system, as stated in the engineer's assessment, whichever is less. The tank assessment must be submitted to DTSC within 60 days after completion of the assessment for review.

This special condition was included to ensure that all Tanks authorized in this Draft Permit to store hazardous waste will continue to be operated in a way that is protective of human health and the environment.

2. The Permittee shall collect all rainwater and washwater accumulated within the Tanks' tertiary containment and determine whether it is hazardous waste; if it is hazardous waste, the Permittee shall manage it accordingly.

This special condition was included to ensure that all water accumulated in the Tanks' tertiary containment, if identified as hazardous waste, is managed as hazardous waste pursuant to California Code of Regulations, title 22, section 66264.193. This includes removing the waste in a timely manner as is necessary, and within 24 hours, to prevent overflow of the containment system and evaluating the Tanks' containment system.

3. The Permittee shall install the additional anchorage needed in the Tank Farm, identified in the Facility's Tank Seismic Evaluation (dated March 5, 2019), within two (2) years of the effective date of this Permit and shall provide the following:
 - a. The Permittee shall provide DTSC a copy of each request for funding submitted to the Department of Defense, until funding has been granted.
 - b. Submit a Work Plan to DTSC for review that will describe the anchorage installation and schedule of completion ninety (90) days before construction begins.
 - c. Submit a construction completion report to DTSC within thirty (30) days after the anchorage installation has been completed that has been reviewed and certified by an independent, qualified, professional engineer registered in California in accordance with CCR, title, section 66270.11(d) attesting that the anchorage remedies the deficiencies provided in the Facility's Tank Seismic Evaluation (dated March 5, 2019) and that includes a description of the added anchorage, photos, and as-built drawings.

This special condition was included to ensure the Facility installs, in a timely manner, the required anchorage to the Tanks pursuant to seismic requirements in California Code of Regulations, title 22, section 66264.192. The Tank Seismic Evaluation submitted with the Part B Permit Application identified the Tanks' existing anchoring as not in compliance to the standards of ASCE 7-16 and ACI 318. The installation of the anchoring includes adding new anchor bolts and anchor plates for each Tank.

4. The Permittee shall not exceed a total of 1,500 gallons of hazardous waste in any single tank until the completion of Tank Farm Unit-Specific Condition 4 is met. The maximum height of liquid in all six (6) Tanks must not exceed 43 inches and must be recorded daily at the end of each operating day in the Hazardous Waste Storage Facility Daily

Inspection Checklist (Appendix 9 of Operations Plan).

This special condition was included to ensure that the Facility operates the Tank Farm in a manner that is safe for both the environment and public health. Tank systems are considered Unfit-for-Use for storing hazardous waste at the maximum capacity of 2,500 gallons for each Tank until the Tank Farm unit-specific special condition 4 is completed.

5. The Permittee shall follow Section D and Appendix 9 of the Operation Plan when Tanks 1 and 2 are used to store jet fuel contaminated with only water. Records including dates for all Retrograde Material sold to offsite industrial users must be maintained at the Facility and kept for a minimum of three (3) years.

This special condition was included to ensure the Facility manages the jet fuel contaminated with only water as hazardous waste one (1) year after the date when the jet fuel contaminated with only water became a Retrograde Material. Any Retrograde Material that has not been used, distributed or reclaimed through treatment by the owner within one year after the date when the material became a Retrograde Material is a "recyclable material" as defined in Health and Safety Code, section 25120.5 and California Code of Regulations, title 22, section 66260.10. In accordance with Health and Safety Code section 25143.2, recyclable materials must be managed as a hazardous waste. Therefore, this special condition ensures that the Facility keeps track via E-Manifest of the jet fuel contaminated with only water when it becomes recyclable material.

6. The Permittee shall manage the Retrograde Material as hazardous waste after one (1) year from the date the jet fuel contaminated with only water became a Retrograde Material, unless the Permittee has sold and distributed the jet fuel contaminated with only water as Retrograde Material.

This special condition was included to ensure that the Facility manages jet fuel contaminated with only water as hazardous waste if it is not sold within one year (1) after it became Retrograde Material. Pursuant to Health and Safety Code 25120.5(e), the jet fuel contaminated with only water changes from Retrograde Material to recyclable material after one (1) year.

B.3. General Special Conditions

1. The Permittee shall not store hazardous waste in any of the permitted storage units for more than one year from the date such hazardous waste arrives at the Facility unless the Permittee proves to DTSC that such storage is solely for the purpose of accumulating certain quantities as are necessary to facilitate proper recovery, treatment or disposal pursuant to California Code of Regulations, title 22, section 66268.50.

This special condition was included to simply reiterate the requirement that no long-term storage of hazardous waste or disposal activities of hazardous waste should occur at the Facility unless necessary under section 66268.50.

2. In the event that any cracks, gaps or tears are detected in a hazardous waste management unit or a secondary containment system or device, repairs shall be initiated as soon as possible and completed within one week of discovery of the

problem. The Permittee shall notify DTSC within 24 hours whenever a crack, gap or tear is found. Within seven days of discovery of the problem, the Permittee shall notify DTSC in writing of the corrective measures that have been taken.

This special condition was included to ensure the Facility complies with section 66264.175(b)(1) and provides an acceptable time table for notifying DTSC and returning to compliance.

3. The Permittee shall conduct sampling activities only within an authorized unit or within a secondary containment system or device of a loading and unloading area designated in the permit.

This special condition was included to ensure that any spills of hazardous waste that may result during sampling activities are adequately contained.

C. CORRECTIVE ACTION

The following conditions listed in this section are included in the Draft Permit in the case of discovery of new releases and include requirements for reporting, assessment, access and mitigation of newly discovered releases.

1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.
3. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the

Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.

4. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.