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Secretary for
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Department of Toxic Substances Control

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Gavin Newsom
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November 25, 2019

RESPONSE TO COMMENTS ON THE HAZARDOUS WASTE FACILITY DRAFT PERMIT, TRAVIS AIR FORCE BASE, 411 AIRMEN DRIVE, CALIFORNIA EPA ID. NO. CA5570024575

INTRODUCTION

In accordance with California Code of Regulations, title 22, section 66271.16, this document constitutes the Response to Comments (RTC) issued by the Department of Toxic Substances Control (DTSC) on the draft Hazardous Waste Facility Permit (Draft Permit) for Travis Air Force Base (Travis AFB). A public comment period was held from September 9, 2019 through October 25, 2019. During the public comment period, DTSC received two comments via electronic mail. One comment was received from Mr. Hans P. Beutelman, PhD, on behalf of Travis AFB, and the second comment was received from Mr. Nicholas Fung, California Department of Transportation (Caltrans). The comments are included as Attachments 1 and 2 to this RTC document. DTSC's responses to the comments are provided below.

COMMENT FROM DR. HANS BEUTELMAN (e-mail received by DTSC on 9/9/2019)

Public Comment:

Section IV unit specific condition 4 says "The Permittee shall maintain a minimum of 30 inches of aisle space between containers holding or designated to hold hazardous waste."

The approved application section F.3.b says "The aisle space between rows of pallets within any Building 1365 storage bays and staging areas will be maintained at a minimum of 28 inches." Since DTSC has already approved the application, and never commented on section F.3.b in the past, please revise the permit to match application.

DTSC Response:

DTSC acknowledges that Section F.3.b of the Permit Application submitted by Travis AFB states that a minimum of 28 inches of aisle space will be maintained between the hazardous waste

containers. However, in both the January 19, 2008 Travis AFB RCRA-equivalent Hazardous Waste Facility Permit and the Draft Permit, DTSC required a minimum of 30-inches of aisle space between hazardous waste containers as a unit-specific condition of the Hazardous Waste Facility Permit. This unit-specific condition requires a minimum of 30-inches of aisle space 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. Both Section F.3.b of the Travis AFB Permit Application and this public comment did not provide a reason for reducing the aisle space. As a result, the 30-inch aisle space unit-specific condition will remain unchanged in the final permit.

COMMENT FROM MR. NICHOLAS FUNG (e-mail received by DTSC on 9/12/2019)

Public Comment:

The information we received states that the hazardous waste will be stored at the facility for up to one year before being transported for disposal at an off-site facility. Could you please tell us where this off-site facility is located? It would be helpful to our review to know on which routes the hazardous waste will be transported.

DTSC Response:

Information regarding the locations of the facilities where Travis AFB sends its hazardous waste can be found on the U.S. EPA E-Manifestⁱ website and in the DTSC Hazardous Waste Tracking System (HWTS)ⁱⁱ.

2018 Records from the HWTS indicate that shipments of hazardous waste from Travis AFB were transported primarily to US Ecology Nevada (EPA ID: NVT330010000) located at Highway 95, 11 Mile S of Beatty, Nevada 89003; Recicladora Temarry De Mexico Sa De Cv (EPA ID: MXC130619001) located at Carretera Federal No. 2, Mexicali-Tijuana Km. 121, San Pablo, 21530 Tecate BC, Mexico; and World Oil Recycling (EPA ID: CAT080013352) located at 2000 N Alameda Street, Compton, California 90222.

The 2018-2019 U.S. EPA E-Manifest data is continuously updated. Caltrans may contact Ms. Vinke Menardo, Project Manager, DTSC Permitting Division at 916-255-6668 or at Vinke.Menardo@dtsc.ca.gov if further information is needed.

ⁱ E-Manifest Link: <https://rcrapublic.epa.gov/rcrainfoweb/action/modules/em/emindex>

ⁱⁱ HWTS Link: <https://hwts.dtsc.ca.gov/>

ATTACHMENT 1: COMMENT FROM DR. HANS BEUTELMAN

From: Beutelman, Hans <hans.beutelman@aecom.com>
Sent: Monday, September 9, 2019 1:44 PM
To: Menardo, Vinke@DTSC
Cc: BERNDSEN, DOUGLAS R GS-11 USAF AMC 60 CES/CEIE; KASHANI, ALI GS-13 USAF AFMC AFCEC/CZOW; Coe, Sam@DTSC; SASSAMAN, BRIAN L GS-13 USAF AFMC AFCEC/CZOW
Subject: RE: Travis AFB Draft Permit

Vinke – Section IV unit specific condition 4 says “The Permittee shall maintain a minimum of 30 inches of aisle space between containers holding or designated to hold hazardous waste.”

The approved application section F.3.b says “The aisle space between rows of pallets within any Building 1365 storage bays and staging areas will be maintained at a minimum of 28 inches.” Since DTSC has already approved the application, and never commented on section F.3.b in the past, please revise the permit to match application.

Hans P. Beutelman, PhD
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ATTACHMENT 2: COMMENT FROM MR. NICHOLAS FUNG

From: Fung, Nicholas@DOT <nicholas.fung@dot.ca.gov>

Sent: Thursday, September 12, 2019 8:50 AM

To: Vivas, Alejandro@DTSC <Alejandro.Vivas@dtsc.ca.gov>; Ortiz, Gamaliel@DTSC <Gamaliel.Ortiz@dtsc.ca.gov>

Cc: Dumas, Thomas A@DOT <tom.dumas@dot.ca.gov>

Subject: Follow-up: Travis Air Force Base Draft Hazardous Waste Permit Renewal

Hello. I am following up on the voicemail I left Mr. Vivas back on September 10.

The information we received states that the hazardous waste will be stored at the facility for up to one year before being transported for disposal at an off-site facility. Could you please tell us where this off-site facility is located? It would be helpful to our review to know on which routes the hazardous waste will be transported.

Thank you.

Nicholas Fung
Caltrans District 10
Metropolitan Planning
(209) 948-7190