



FACT SHEET

**Hazardous Waste Permit Reissuance for
Malmstrom Air Force Base
39 78th Street North
Malmstrom Air Force Base, Montana 59402-7536
EPA ID Number MT8571924556**

**Draft Hazardous Waste Permit #MTHWP-22-01
PUBLIC COMMENT PERIOD
Sunday, October 2, 2022, to Wednesday, November 16, 2022**

**Hazardous Waste Program
Waste and Underground Tank Management Bureau
P.O. Box 200901
1520 E. 6th Street
Helena, MT 59620-0901**

INTRODUCTION

The Montana Department of Environmental Quality (DEQ) is proposing to reissue a hazardous waste permit to Malmstrom Air Force Base (MAFB) for operation of a hazardous waste storage facility (HWSF) and continued remediation of contaminated areas on the base. As part of the permit reissuance process, the public is encouraged to provide comments on the draft permit and environmental assessment during the public comment period.

This Fact Sheet provides information about the proposed permit reissuance and the public comment period.

LAWS AND REGULATIONS

The Montana Hazardous Waste Act (MHWA) is the Montana equivalent of Subtitle C of the federal Resource Conservation and Recovery Act (RCRA). The MHWA and RCRA Subtitle C govern proper management and disposal of hazardous waste, including permitting requirements for certain treatment, storage, and disposal activities. In addition, these laws govern requirements for facility-wide investigation and remediation of releases of hazardous waste or hazardous constituents at permitted facilities. Regulations for hazardous waste management are found in the Code of Federal Regulations (CFR) at Title 40 CFR parts 260 through 273 and in the Administrative Rules of Montana (ARM) Title 17, chapter 53. Montana incorporates the federal hazardous waste provisions in the CFR by reference into the ARM.

Montana hazardous waste permits are issued under the authority of the Montana Hazardous Waste Act (MHWA) Title 75, chapter 10, part 4, Montana Code Annotated (MCA), and according to the ARM Title 17, chapter 53. This Fact Sheet was prepared in accordance with the requirements of 40 CFR 124.8, as incorporated by reference in ARM 17.53.1201.

For ease of reading, only federal regulatory citations are used in this Fact Sheet where federal regulations have been incorporated by reference in the ARM.

BACKGROUND

Site Description

The Malmstrom Air Force Base is located on the eastern city limits of Great Falls, Montana (Figure 1). The base was established in 1942 and covers 3,500 acres. The Missouri River is approximately one mile north of the base.



Figure 1 – Malmstrom Air Force Base Site Location

Permit Description

Hazardous waste permits issued to facilities in Montana are in effect for 10 years and must be reissued or terminated at the end of that period. A hazardous waste permit was initially issued to MAFB in 1989. The MAFB hazardous waste permit was reissued in 2001 and again in 2012. The permit allows storage of hazardous waste in an on-site storage building for up to one year. In addition, MAFB must conduct facility-wide investigation and remediation of hazardous waste and hazardous constituents that may have been released to environmental media (soil, sediment, groundwater and surface water).

In December 2021, MAFB applied for a third reissuance of its hazardous waste permit. The application was submitted within the regulatory timeframe and, after review, was deemed complete by DEQ. DEQ has prepared a draft permit for reissuance which includes provisions for continued management of the on-site storage building and continued implementation of facility-wide cleanup.

Hazardous Waste Storage Facility

The Hazardous Waste Storage Facility (HWSF, Figure 2) is 2,400 square feet, with separate bays and closets for segregated waste storage (Figure 3). The building is equipped with a fire suppression system and spill containment for each bay and closet.

Hazardous wastes stored in the HWSF include solvent wipes used for weapons cleaning, paint stripper and thinner, acids and bases, pesticides, and some pharmaceutical wastes. MAFB also uses the building for storage of Universal Wastes, such as mercury-containing light bulbs and batteries,

and non-hazardous wastes. Wastes stored in the HWSF are generated on base and at missile alert and launch control facilities under the control of MAFB.



Figure 2 – Hazardous Waste Storage Facility

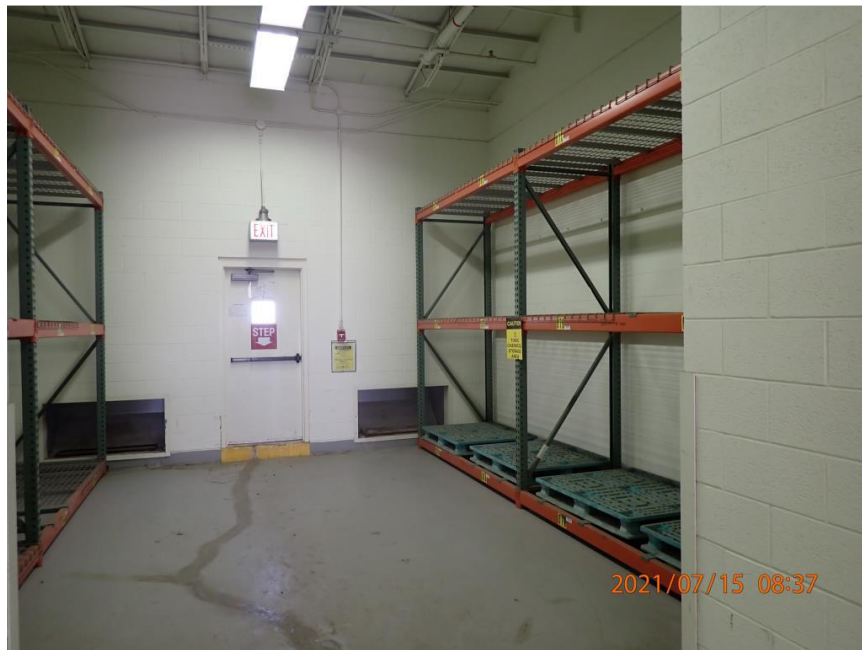


Figure 3 – Waste Storage Bay

Facility-Wide Corrective Action

Under its hazardous waste permit, MAFB must identify areas where contamination is present above concentrations that may pose a risk to human or ecological receptors, and then put in place appropriate corrective measures to address the releases. Areas where contamination is present are called Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs).

Since issuance of the initial permit in 1989, twenty-seven SWMUs and AOCs requiring some degree of investigation and remediation have been identified at the MAFB facility. Contamination in soil primarily results from leaking underground petroleum storage tanks and lead from artillery ranges, and groundwater contamination primarily results from chlorinated compounds released from a closed landfill. Corrective measures taken to address the contamination have included excavation and treatment of contaminated soils; excavation, stabilization, and off-site disposal of lead-contaminated soils; and in-situ treatment of groundwater.

To date, investigation and remediation of twenty-two of the SWMUs and AOCs have been completed. Oversight of five SWMUs with petroleum-related contamination was transferred to DEQ's petroleum site cleanup programs for further action if warranted. Groundwater remediation will continue at the closed landfill until contaminant levels meet Montana water quality standards.

The status of corrective action and a description of remedial actions taken for each of the identified SWMUs and AOCs is in Attachment III.1 of the proposed draft permit. Figure 4 shows an example of remedial action that is occurring near one of the closed landfills (LF-19).



Figure 4 – Substrate injection points to enhance bioremediation of contaminated groundwater

DRAFT PERMIT MTHWP-22-01

Conditions in the draft MAFB hazardous waste permit direct management of the HWSF and implementation of facility-wide corrective action. To comply with Montana's hazardous waste laws and regulations, MAFB must operate the storage facility and conduct facility-wide corrective action according to permit conditions. Permit noncompliance may result in enforcement action or permit termination by DEQ.

The draft permit is divided into three modules: Standard Permit Conditions, Hazardous Waste Storage Facility, and Facility-wide Corrective Action.

Standard Permit Conditions (Module I)

Module I includes standard language that applies to all permitted hazardous waste facilities. General conditions include requirements for reissuance and modifications, recordkeeping and reporting, authorized personnel for document signature, and procedures for dispute resolution.

Hazardous Waste Storage Facility (Module II)

Module II sets conditions for management of the HWSF including the following:

- Condition of containers (intact, covered, undamaged, etc.).
- Compatibility of containers with waste contents.
- Proper storage of ignitable, reactive, and corrosive wastes.
- Adherence to hazardous waste acceptance procedures.
- Maintenance of spill containment system, security devices, and safety and emergency equipment.
- Routine inspections of containers, safety and emergency equipment, and building security devices.
- Mandatory personnel training.
- Adherence to a preparedness and prevention plan.
- Adherence to a contingency plan during emergencies.
- Proper closure when the storage facility is decommissioned.

Facility-Wide Corrective Action (Module III)

Module III sets conditions for conducting remedial investigations, remedy selection, and remedy implementation including the following:

- Continued maintenance and operation of on-going remedies at SWMUs and AOCs.
- Notification and remedial investigation procedures for newly discovered SWMUs or AOCs, or new releases at previously identified SWMUs or AOCs.
- Certification of remedy completion.

PUBLIC PARTICIPATION

The public comment period allows interested citizens, members of the regulated community, and other governmental agencies an opportunity to comment on the draft permit. The public is given forty-five (45) days to review and comment on the draft permit before DEQ takes final action. DEQ is conducting the public comment period in accordance with 40 CFR 124.10.

Comments and Comment Period

The comment period for the draft permit extends from Sunday, October 2, 2022, to Wednesday, November 16, 2022. The public may comment on the draft permit and draft environmental assessment.

Written comments may be submitted to DEQ at any time within the 45-day comment period. Comments should include all reasonably available references, factual grounds for comments, and supporting material. The public has until close of business on Wednesday, November 16, 2022, to submit written comments.

Written comments may be submitted via U.S. Mail or email.

MAIL

Erica K. Shuhler, P.E.
MAFB Project Manager
Hazardous Waste Program
Montana Department of Environmental Quality
PO BOX 200901
Helena, MT 59620-0901

EMAIL

DEQhazwaste@mt.gov
subject line: MAFB Public Comment

Public Hearing

A public hearing will be held if DEQ determines, based upon requests, that there is a significant degree of public interest in the permit reissuance, draft permit, and/or draft environmental assessment. Requests for a public meeting must be submitted to the DEQ in writing by U.S. Mail or email to the address listed above, prior to the end of the comment period.

Review Locations for the Draft Permit, Fact Sheet, and Environmental Assessment

Copies of the draft permit, this fact sheet and the environmental assessment are available for review at the following locations:

Location Information	Review Hours
Great Falls Public Library 301 2 nd Ave. N Great Falls, MT 59401 (406) 453-0349	Monday 12–6PM Tuesday 10AM–8PM Wednesday 10AM–8PM Thursday 10AM–8PM Friday 10AM–6PM Saturday 10AM–6PM Sunday Closed
Montana Department of Environmental Quality Hazardous Waste Program Waste and Underground Tank Management Bureau Metcalf Building 1520 E. 6th Ave. Helena, Montana (406) 444-5300	Monday through Friday 8:00 am - 5:00 pm Websites: Fact Sheet, Draft Permit, Draft Environmental Assessment: http://deq.mt.gov/Public/publiccomment

PROCEDURES FOR REACHING A FINAL DECISION ON PERMIT REISSUANCE

After the close of the public comment period, DEQ will review all comments and prepare a Response to Comments. DEQ will explain any changes to the draft permit and environmental assessment and respond to all significant comments.

DEQ will then make a final decision on reissuance of the MAFB hazardous waste permit. Notice will be given to MAFB and each person who submitted written comments or requested a notice of the final decision. The final permit decision becomes effective thirty (30) days after the

service of notice of the decision unless a later date is specified or a public hearing is requested in writing in accordance with 40 CFR 124.11. If no comments are received, the final permit becomes effective immediately upon notice of DEQ's final decision.

FOR MORE INFORMATION

If you need further information, please contact Ms. Erica Shuhler at the address listed above, phone (406) 444-5852, or email erica.shuhler@mt.gov.