



DEPARTMENT OF THE AIR FORCE
71ST FLYING TRAINING WING
VANCE AIR FORCE BASE OKLAHOMA

RECEIVED

OCT 09 2020

LAND PROTECTION DIVISION
DEPT. OF ENVIRON. QLTY

Colonel Timothy S. Danielson
Commander, 71st Flying Training Wing
246 Brown Parkway, Suite 224
Vance AFB OK 73705-5015

OCT 08 2020

Ms. Hillary Young
Chief Engineer, DEQ
Land Protection Division
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Ms. Young

In response to the Notice of Deficiency for the RCRA Post-Closure Permit Application received from your office on 17 August 2020, Vance provides the following:

Comment #1: The application does not include Part A of the RCRA Permit Application. Please provide an up to date Part A application pursuant to 40 CFR 270.13.

Response to Comment #1

Per the EPA guidance and instructions for RCRA Part A forms, "Only new and existing facilities that treat, store, or dispose of regulated hazardous waste are required to submit a RCRA Hazardous Waste

Part A Application as described in 40 CFR Part 270." Vance AFB is not a Treatment, Storage and Disposal Facility as defined by RCRA. Vance AFB is a small quantity generator that temporarily accumulates hazardous waste at the installation in accordance with regulations prior to offsite transportation and disposal, with all wastes managed under a Hazardous Waste Management Plan. As such, Vance AFB respectfully believes that Part A of the RCRA Permit Application is not applicable for this permit renewal.

Comment #2: The post-closure plans for sites ST008 and ST012, Attachment 1 and 2 respectively, include inspection and maintenance activities to be conducted for these units; however, inspection and maintenance activities to be conducted at other units are not included in the Application. Please provide a copy of the general inspection schedule pursuant to 40 CFR 270.14(b) (5) and 264.15(b).

Response to Comment #2

There are no other units at Vance AFB that are in Post-Closure. There is routine maintenance and repair of groundwater monitoring wells, injection wells, and other equipment as needed.

Comment #3: The Application includes neither preparedness and prevention information as required by 40 CFR Subpart C, or a request for a waiver of the preparedness and prevention requirements as allowed by 40 CFR 270.14(b) (6). Please provide either the required preparedness/prevention information or a justified request for a waiver of these requirements.

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Response to Comment #3

Vance AFB is an active military installation. The base is restricted by fencing, guards and a 24-hour security patrol. Entry to the Base is restricted to one or two gates all staffed by armed Air Force Military/civilian Security Forces personnel. Vance AFB has an Installation Emergency Action Response Plan that outlines emergency response procedures for the installation. There is also a Spill Prevention Control and Countermeasures plan (40 CFR Part 112) and an Oil and Hazardous Substance Pollution Contingency Plan (40 CFR Part 300). These plans include details of spill prevention measures, spill response action, and arrangements with local fire, police and hospitals.

There is a personnel training program which has been established to satisfy the requirements of 40 CFR 264.16. Training is conducted initially for new employees or for employees who have transferred to the facility. Training includes identification of hazardous waste, labeling and transportation of containers, manifesting and transportation, personnel safety, health, and fire and waste minimization. HAZWOPER training is also required for personnel who work in the Central Groundwater Treatment Facility.

Comment #4: The Application does not include a copy of the documentation filed for the closed units at the facility. Please provide a copy of this documentation pursuant to 40 CFR 270.14(b) (14).

Response to Comment #4

Please see attached letters from your office with approval of Closure Plans for Sites ST008 and ST012. Documentation that includes deed notification was not completed as instructed by an Air Force legal team. This documentation will be provided if or when Vance is to be closed at some point in the future.

If you have any comments about this response, please contact Ms. Marilyn Wells at (580) 213-6303.

"I certify under penalty of law that this document was prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

Sincerely,



TIMOTHY S. DANIELSON, Colonel, USAF
Commander

Atch (2)

DEQ Letter August 18, 1992

DEQ Letter June 6, 1994

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Joan K. Leavitt, M.D.
Commissioner

OKLAHOMA STATE
DEPARTMENT OF HEALTH

1000 NE TENTH
OKLAHOMA CITY, OK
73117-1299



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August 18, 1992

CERTIFIED MAIL

Colonel Larry D. Autry
Support Group Commander
Vance Air Force Base
Enid, Oklahoma 73705-5000

RE: Post-Closure Permit Application Call-In Letter
EPA ID#OK4571524095

Dear Colonel Autry:

The Oklahoma State Department of Health (OSDH) has accepted the closure certification for Vance Air Force Base's (VAFB) IRP Site 8, dated August 6, 1992, and is now prepared to call in the post-closure permit application for this facility, which will address IRP Sites 8 and 12, and possibly other Solid Waste Management Units (SWMU's).

Rule 310:270-3-2 [formerly Rule 210 of the Rules & Regulations for Industrial Waste Management] and 40 CFR 270.1(c) require all landfills certified closed after January 26, 1983 to have post-closure permits. This permit must address Groundwater Monitoring, Corrective Action and Post-Closure Care Requirements. Applicable sections of 40 CFR 270 for VAFB's Post-Closure Permit Application of landfills would include 270.1, 270.10, 270.13, 270.14 (numerous portions) and 270.21 (landfills). Additionally, applicable sections of the Hazardous Waste Management Regulations include Rule 310:270-11-1 (a)(6)(A) and (B), 11-1 (d), and 11-1 (e) [formerly Rules 601 (F) and (G), 604 and 605 of the Rules and Regulations for Industrial Waste Management].

As stipulated in 40 CFR 270.1 (b) and 270.10 (e)(4), VAFB will be allowed a maximum of six months from receipt of this letter, in which to submit the Part B portion of the application. Additionally at that time, a post-closure application form and post-closure permit fees will be due. A post-closure permit form is attached and VAFB will be invoiced for the post-closure permit fees at the time of the Part B submission. The appropriate post-closure permit fees will be calculated in accordance with Rule 310:270-13-4(d)(3) and Rule 310:270-13-4(f) of the Hazardous Waste Management Regulations, [formerly Rule 743 (C) and Table 2 of Rule 743 of the Rules and Regulations for Industrial Waste Management].

VAFB will be authorized to operate under the Closure and Post-Closure Plans of IRP Site 8 in accordance with Rule 310:270-3-2 and 40 CFR 265 until such time as the permit is determined. Upon permit issuance, the facility will operate under Rule 310:270-3-2 and 40 CFR 264.

ATCW1

August 18, 1992
Colonel Autry
Vance AFB
Page 2

If you should have any questions, please call me at (405) 271-7052, or have your staff contact Gail Hamill at (405) 271-7068.

Sincerely,



Damon D. Wingfield, Chief
Hazardous Waste Management Service

DW/GH

Attachment

cc: Ann Zimmerman (6H-HS), EPA Region VI
Bill Pehlivanian, HQ ATC/Environmental
Max Cumpston, VAFB/Northrop Environmental
Carolyn Ellis, Corps of Engineers
Gary Collins, R.S., District Sanitarian
David Kilmer, R.S., Garfield County Health Department



MARK S. COLEMAN
Executive Director

DAVID WALTERS
Governor

State of Oklahoma
DEPARTMENT OF ENVIRONMENTAL QUALITY

June 6, 1994

Peter U. Sutton, Colonel, USAF
Support Group Commander
246 Brown Parkway, Suite 230
Vance Air Force Base, Oklahoma 73705-5000

Re: Approval of the Amended Closure Plan - IRP Site 12
Vance AFB - EPA ID No. OK4571524095

Dear Colonel Sutton:

On April 14, 1994 Vance Air Force Base (VAFB) submitted an addendum to the closure plan of the Paint Stripping Equalization Tank (IRP Site 12). The amended plan did address the Department's concerns. VAFB also submitted the proof of publication of a public notice, dated May 5, 1994 providing the general public the opportunity to submit comments on the proposed plan or to request a public meeting. The Department did not receive any written comment nor a request for a public meeting during the thirty (30) day comment period. Based on the submitted information, the Department hereby approves the closure plan for this site.

Vance AFB may proceed with the closure of Site 12 as specified in the approved closure plan. Please also be aware that the 300-day permitting time frame for the Post-Closure Permit of IRP Sites 8 and 12 was resumed on the date of this letter.

If you have any questions or comments, please contact Saba Tahmassebi at (405) 271-7072.

Sincerely,

H. A. Caves, Assistant Division Director
Waste Management Division

HAC/ST

- cc: Ann Zimmerman (6H-HS), EPA Region VI
David Kilmer, R.S., Garfield Co. DEQ
Gary Collins, R.S., District Sanitarian
Max Cumpston, Northrop
Marilyn Wells, Vance AFB
Bill Chatron, Corps of Engineers
Roger Wilkson, HQ ATC/CEVR (IRP)