



Brian Schweitzer, Governor  
Richard H. Opper, Director

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May 24, 2012

Todd Everts  
Environmental Quality Council  
Capitol Complex  
Helena, MT 59620

**Subject: Draft Environmental Assessment and Fact Sheet for the Malmstrom Air Force Base, Great Falls, Montana**

Dear Mr. Everts:

Enclosed is a draft Environmental Assessment and Fact Sheet for the above-referenced facility. If you have any questions, please contact me at 406/444-2876 or the e-mail address listed below.

Sincerely,

Rebecca Holmes  
Environmental Science Specialist  
Waste and Underground Tank Management Bureau  
Permitting and Compliance Division  
e-mail: [rholmes@mt.gov](mailto:rholmes@mt.gov)

Enclosures

cc: HW facility file: Malmstrom Air Force Base – Public Participation #1 (w/o enclosure)





# Montana Department of **ENVIRONMENTAL QUALITY**

## **FACT SHEET**

### **FOR RE-ISSUANCE OF A HAZARDOUS WASTE OPERATING AND CORRECTIVE ACTION PERMIT**

**Malmstrom Air Force Base  
39 78<sup>th</sup> Street North  
Malmstrom Air Force Base, Montana 59402-7536  
EPA ID Number MT8571924556**

Prepared by:

Montana Department of Environmental Quality  
Permitting and Compliance Division  
Waste and Underground Tank Management Bureau  
Hazardous Waste Section  
1520 E. 6<sup>th</sup> Ave.  
Helena, Montana 59620

### **PUBLIC COMMENT PERIOD**

**May 30, 2012 to July 13, 2012**

## **Introduction**

The Montana Department of Environmental Quality (DEQ) is proposing to re-issue an operating hazardous waste permit to Malmstrom Air Force Base (MAFB) for operation of a hazardous waste storage facility and continued implementation of facility-wide cleanup of contaminated areas. This Fact Sheet provides information about the proposed permit re-issuance and the public comment period.

Montana hazardous waste permits are in effect for 10 years. The draft permit described in this Fact Sheet is the second reissuance of a hazardous waste permit to MAFB. The State of Montana issued an initial operating permit to MAFB in 1989, in conjunction with a corrective action permit issued to the facility by the U. S. Environmental Protection Agency (EPA). A combined operating and corrective action permit was issued by the State in 2001.

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

## **Regulatory Citations**

The Montana Hazardous Waste Act (MHWA) is the state equivalent of Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA). These Acts require proper management and disposal of hazardous waste.

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

## **Background**

**Facility:** 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 encompasses 3,500 acres. The Missouri River is approximately one mile north of the base. A Minuteman Missile Complex of 150 missiles is under the control of the MAFB 341<sup>st</sup> Strategic Missile Wing.

## **Regulatory Background**

Hazardous waste permits issued to facilities in Montana are in effect for 10 years and must be re-issued or terminated at the end of that period. The State of Montana issued a hazardous waste permit to MAFB in 1989 to allow storage of hazardous waste for greater than 90 days in an on-site storage building. At the same time, the EPA issued MAFB a permit under the Hazardous and Solid Waste Amendments to RCRA. The EPA permit required that MAFB conduct remedial investigation and cleanup of contaminated areas throughout the facility.

The MAFB hazardous waste permit was re-issued in 2001. Because DEQ received oversight authority for facility-wide cleanup from EPA, the re-issued hazardous waste permit included requirements for operation of the on-site storage building and for facility-wide cleanup.

MAFB submitted a permit application prior to termination of its current permit, requesting reissuance. DEQ has prepared a draft permit for reissuance which includes provisions for management of the on-site storage building and continued implementation of facility-wide corrective action.

***Hazardous Waste Operating Permit Background:*** Owners and/or operators who are classified as Large Quantity Generators may not store hazardous waste on-site for more than 90 days without a permit. MAFB was issued a hazardous waste operating permit to store hazardous waste in a storage building called the Hazardous Waste Storage Facility (HWSF). The building is a 2,400-square foot building located in the north-northeast portion of the base (Figure 1). Hazardous waste containers are stored in seven large storage modules and two small closets. Typical wastes stored at the HWSF include acids, bases, solvents, paint stripper and thinner, pesticides, and spill cleanup products.

Under the two previous permits, other military organizations in Montana were allowed to transport their hazardous waste to MAFB for storage in the HWSF and eventual transportation to final disposal at a permitted off-site hazardous waste treatment, storage, and disposal facility. Under the proposed reissuance, MAFB may only accept hazardous waste from the MAFB and other United States Air Force facilities under the control of MAFB, such as missile alert and launch control facilities.

***Corrective Action Permit Background:*** In 1984, Congress amended RCRA to include requirements for facility-wide remediation of releases at hazardous waste permitted facilities. The RCRA amendments, known as the Hazardous and Solid Waste Amendments or HSWA, are established in Section 3004(u) of RCRA and are codified in 40 CFR 264.101. Montana has incorporated this codification in ARM 17.53.800 et seq. Through HSWA, Congress required that permits issued to hazardous waste facilities must contain requirements for cleanup of on-and off-site areas where releases of hazardous waste or hazardous constituents have occurred or are occurring.

The corrective action permit issued by EPA in 1989 and the subsequent permit issued by the State of Montana required MAFB to: a) identify areas where contamination is present, b) identify any releases that have occurred or are occurring from these areas, and c) implement appropriate corrective measures to address the releases. In the permits, areas where contamination is present are termed Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs).

MAFB identified 26 potentially contaminated SWMUs and AOCs that required some degree of investigation and remediation. Investigation and remediation has been completed at all but one of the SWMUs and AOCs. MAFB has implemented on-going corrective measures for groundwater contamination at the remaining SWMU, a closed landfill. Attachment III.1a of the proposed draft permit contains the status of corrective measures at each of the identified SWMUs and AOCs.

## **Draft Permit MTHWP-12-01**

To be in compliance with Montana's hazardous waste rules and laws, MAFB must operate the HWSF and conduct facility-wide corrective action according to the permit conditions. Permit noncompliance may result in enforcement action or permit termination by DEQ.

### Major Changes

1. Under the two previous permits, the Defense Reutilization and Marketing Services (DRMS) was the designated operator of the HWSF and MAFB the owner. In draft permit MTHWP-12-01, MAFB is the owner and the operator.
2. Other military organizations in Montana were allowed, under the previous permits, to transport their hazardous waste to MAFB for storage in the HWSF and eventual transportation to final disposal at a permitted off-site hazardous waste treatment, storage, and disposal facility. Under draft permit MTHWP-12-01, MAFB may only accept hazardous waste from the MAFB base and other United States Air Force facilities under the control of MAFB, such as missile alert and launch control facilities.

Draft permit MTHWP-12-01 contains the following requirements and conditions:

### General Standards

The draft permit includes standard language applicable to all hazardous waste permits. General conditions include requirements for permit applications and modifications, recordkeeping and reporting, who is authorized to sign documents, and procedures for informal dispute resolution.

### Hazardous Waste Storage Facility

- Containers must be in good condition, closed, and compatible with their contents;
- Routine inspections of containers, safety and emergency equipment, and HWSF building security devices must be conducted;
- Adherence to waste acceptance procedures;
- Maintenance of the HWSF spill containment system, security devices, and safety and emergency equipment;
- Mandatory training of all HWSF personnel;
- Adherence to the preparedness and prevention plan;
- Adherence to the contingency plan during emergencies;
- Proper closure of the HWSF according to the closure plan.

### Facility-Wide Corrective Action

- Continued maintenance and operation of on-going remedies at SWMUs;
- Notification and remedial investigation if new SWMUs or AOCs are discovered, or new releases are discovered at old SWMUs or AOCs;
- Completion certification of facility-wide corrective measures when remedies are completed at all SWMUs and AOCs.

## **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 any final action. DEQ is conducting the public comment period in accordance with 40 CFR 124.10.

Comments and Comment Period

**The comment period on the draft permit extends from May 30, 2012 to July 13, 2012.**

Written comments may be submitted to DEQ within the 45-day comment period. Comments should include all reasonably available references, factual grounds for comments, and supporting material.

Public Hearing

A public hearing will be held if DEQ determines, based upon requests, there is a significant degree of public interest in the proposed remedy selection. If requested, a formal public meeting may be held. Requests for a public meeting must be submitted to the Department in writing by U.S. Mail to the address below or by E-mail to [wutbcomments@mt.gov](mailto:wutbcomments@mt.gov).

Location of the Draft Permit, Fact Sheet, and Environmental Assessment

Copies of the draft permit, Fact Sheet and Environmental Assessment are available for review on DEQ's website: <http://deq.mt.gov/pubcom.mcp> and <http://deq.mt.gov/ea.mcp>. The documents are also available for review at the following locations:

<b>Location Information</b>	<b>Review Hours</b>
<p><b>Great Falls Public Library</b>            301 Second Avenue, North            Great Falls, MT            (406) 453-0349</p>	<p>Monday            10:00 a.m. - 6:00 p.m.            Tuesday through Thursday            10:00 a.m. - 8:00 p.m.            Friday and Saturday            10:00 a.m. - 6:00 p.m.            Sunday            1:00 p.m. - 5:00 p.m.</p>
<p><b>Montana Department of Environmental Quality</b>            Permitting and Compliance Division            Waste and Underground Tank Management Bureau            Metcalf Building            1520 E. 6th Ave.            Helena, Montana            (406) 444-5300</p>	<p>Monday through Friday            8:00 am - 5:00 pm</p> <p>Website:            Fact Sheet and Draft Permit:  <a href="http://deq.mt.gov/pubcom.mcp">http://deq.mt.gov/pubcom.mcp</a>            Draft Environmental Assessment  <a href="http://deq.mt.gov/ea.mcp">http://deq.mt.gov/ea.mcp</a></p>

### Written Comments

The public has until close of business on July 13, 2012 to submit written comments. Written comments may be submitted via U.S. Mail to the address below or by email to mailbox [wutbcomments@mt.gov](mailto:wutbcomments@mt.gov).

Please address comments to:

Rebecca Holmes  
DEQ Permitting and Compliance Division,  
Waste and Underground Tank Management Bureau  
P.O. Box 200901  
Helena, MT, 59620-0901  
Phone: 406-444-2876

### **Procedures for Reaching a Final Decision on Permit Reissuance**

DEQ will prepare a Response to Comments after reviewing all comments. The Response to Comments will explain any changes to the proposed permit and respond to all significant comments.

DEQ will then make a final decision on reissuance of the MAFB hazardous waste permit. When DEQ makes a final permit decision, 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 under 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 Rebecca Holmes at the address listed above, phone 406-444-2876, or email [rholmes@mt.gov](mailto:rholmes@mt.gov).

Dated May 25, 2012



# Montana Department of ENVIRONMENTAL QUALITY

Montana Department of Environmental Quality  
Permitting and Compliance Division  
Waste and Underground Tank Management Bureau  
1520 East 6<sup>th</sup> Avenue  
P.O. Box 200901  
Helena, Montana 59620-0901

## Draft Environmental Assessment

**Montana Hazardous Waste Permit Number:** MTHWP-12-01

**Issued to:** Malmstrom Air Force Base  
39 78<sup>th</sup> Street North  
Malmstrom AFB, Montana 59402-7536

**Legal Description:** Sections 1, 2, 3, 10-15, Township 20 North, Range 4 East; and Sections 6 and 7, Township 20 North, Range 5 East, Cascade County

**Issued by:** Hazardous Waste Section  
Waste and Underground Tank Management Bureau  
Permitting and Compliance Division  
Montana Department of Environmental Quality

### Purpose of the Environmental Assessment

The Montana Department of Environmental Quality (DEQ) is required under the Montana Environmental Policy Act (MEPA) to conduct an environmental assessment (EA) on the proposed permit action described in this document. An EA details all reasonable alternatives to DEQ's action; and outlines the potential impacts to the human environment resulting from DEQ's permitting action and reasonable alternatives to that action.

Based on the impact analysis and professional judgment, DEQ makes a decision on the proposed permit action and summarizes the decision in the EA. If the decision significantly impacts the human environment, a more detailed environmental review, called an environmental impact statement, must be conducted by DEQ.

### **Public Comment Period**

The public is provided 45 days to review and comment on the draft environmental assessment and the proposed permit reissuance. **The 45-day comment period extends from May 30, 2012 to July 13, 2012.** The public has until close of business on July 13, 2012 to submit written comments. Comments may be submitted via U.S. Mail to the address below or by email to mailbox [wutbcomments@mt.gov](mailto:wutbcomments@mt.gov).

The environmental assessment, draft hazardous waste permit, and Fact Sheet are available on DEQ's website: <http://deq.mt.gov/pubcom.mcp> and <http://deq.mt.gov/ea.mcp>. They may also be reviewed at the DEQ Waste and Underground Tank Management Bureau, Metcalf Building, 1520 E. 6<sup>th</sup> Ave., Helena, and the Great Falls Public Library, 301 Second Avenue North, Great Falls. Document copies are available upon request to DEQ.

Please address comments to:

Rebecca Holmes  
DEQ Permitting and Compliance Division,  
Waste and Underground Tank Management Bureau  
P.O. Box 200901  
Helena, MT, 59620-0901  
Phone: 406-444-2876

### **Montana Hazardous Waste Regulations**

Rules administering hazardous waste management in Montana are set forth in the Administrative Rules of Montana (ARM), Title 17, Chapter 53, Sub-Chapters 1 through 12. Federal regulations for hazardous waste management are set forth in Title 40 of the Code of Federal Regulations (CFR), Parts 124 and 260 through 279, and are incorporated by reference in ARM. For ease of reading this document, when federal regulations under Title 40 of the CFR have been incorporated by reference into ARM, only the federal citation is used.

### **Description of Project**

DEQ is proposing to reissue a hazardous waste permit to Malmstrom Air Force Base (MAFB) in Great Falls, Montana. The proposed reissued permit will contain requirements for operation of an on-site hazardous waste storage facility and continued implementation of facility-wide cleanup of contaminated areas. Hazardous waste permits issued to facilities in Montana are in effect for ten years and must be re-issued or terminated at the end of that period. This proposed permit would be the third hazardous waste permit issued to MAFB.

The Malmstrom Air Force Base is located on the eastern city limits of Great Falls, Montana. The base was established in 1942 and encompasses 3,500 acres. A Minuteman Missile Complex of 150 missiles is under the control of the 341<sup>st</sup> Strategic Missile Wing at MAFB.

Various types of hazardous waste are generated by activities on the Air Force Base itself and by the missile control facilities. The State of Montana issued a hazardous waste permit to MAFB in 1989 to allow storage of hazardous waste in an on-site storage building for greater than 90 days. At that same time, the U.S. Environmental Protection Agency (EPA) issued MAFB a permit under the Hazardous and Solid Waste Amendments to the federal Resource Conservation and

Recovery Act (RCRA). The EPA permit required that MAFB conduct remedial investigation and cleanup of contaminated areas throughout the facility.

The MAFB hazardous waste permit was reissued in 2001. Because DEQ received oversight authority for facility-wide cleanup from EPA, the reissued hazardous waste permit included requirements for operation of the on-site storage building and for facility-wide cleanup.

In December 2010, MAFB submitted an application for a second reissuance of its hazardous waste permit. The application was submitted within the regulatory timeframe and, after review, deemed complete by DEQ.

### **Objectives of Proposed DEQ Action**

DEQ is charged with administering the provisions of the ARM. The objective of the proposed action is to comply with the ARM provisions pertaining to hazardous waste permits and facility-wide corrective action. DEQ must ensure conditions of a hazardous waste permit are in accordance with ARM and the portions of 40 CFR Part C which are incorporated by reference in ARM. In addition, conditions of the permit must ensure appropriate and compliant management of hazardous waste, as well as implementation of remedial activities that are protective of human health and the environment.

### **Alternatives Considered**

#### Alternative 1: No Action

The No Action alternative provides a baseline for analyzing other alternatives. Under the No Action alternative, DEQ would deny the MAFB permit application and would not issue MTHWP-12-01.

40 CFR 264.101, as incorporated by reference in ARM 17.53.1201, requires that a facility with an operating or post-closure hazardous waste permit must address releases from solid waste management units present at that facility. MAFB has completed investigation and remedial activities at all but one solid waste management unit. Corrective measures at the remaining unit are required under the current MAFB permit to remediate contaminated groundwater. The No Action alternative would not comply with the requirement of 40 CFR 264.101. In addition, MAFB has submitted a timely permit application for reissuance of its hazardous waste permit and has been in substantial compliance with Montana hazardous waste regulations throughout the 20-year duration of its two previous permits. MAFB is in compliance with regulations pertaining to a permit application and to general hazardous waste management and disposal; therefore, there is no regulatory reason to deny the MAFB permit application. DEQ has determined the No Action alternative is not reasonable and, therefore, is not considered further in this EA.

#### Alternative 2: Issuance of an administrative order for corrective action and deny the operating permit for the hazardous waste storage facility (HWSF)

Under this alternative, an administrative order would be issued and the operating permit for the HWSF denied. MAFB is required by the MHWA to implement and complete facility-wide corrective action, which may be accomplished through an alternative enforceable mechanism such as an administrative order on consent. To meet the corrective action provisions of 40 CFR

Part C, as incorporated by reference in ARM 17.53.1201, DEQ must issue a permit or administrative order to MAFB for continued implementation of corrective action. An administrative order would contain the same or similar corrective action conditions as the proposed operating and corrective action permit.

The operating permit pertains to operation and management of a greater-than-90-day storage facility. Large quantity generators of hazardous waste may not store hazardous waste on-site for more than 90 days without a permit. MAFB has operated an on-site storage facility for hazardous waste under hazardous waste permits issued in 1989 and 2001. MAFB has submitted a complete application requesting reissuance of the permit allowing storage of hazardous waste on-site for greater than 90 days.

Denial of the permit reissuance for operation of an on-site storage facility would mean MAFB must ship wastes for off-site disposal within 90 days of generation. DEQ does not have statutory or regulatory authority to issue administrative orders for storage of hazardous waste for greater than 90 days. The Malmstrom Air Force Base and its missile control facilities generate a wide variety of hazardous wastes. Quantities per month are generally small; therefore, consolidation of wastes is an economical and efficient way to dispose of hazardous wastes generated throughout a given year.

Alternative 2 will be considered further in this EA; however, the alternative is not preferred for the following reasons:

- 1) The HWSF provides an efficient and cost-effect way to manage hazardous waste at the facility;
- 2) MAFB has submitted a timely permit reissuance application;
- 3) MAFB has been in substantial compliance with Montana hazardous waste regulations throughout the duration of its two previous permits; and
- 4) An administrative order would contain the same or similar corrective action conditions as the proposed operating and corrective action permit.

Alternative 3: Proposed action - Reissuance of the hazardous waste operating and corrective action permit

Under this alternative, DEQ would reissue a hazardous waste operating and corrective action permit to MAFB, after considering all comments received during the public comment period. The HWSF would continue to accept hazardous waste generated at MAFB and other operations under its control. MAFB would be required to implement and complete facility-wide corrective action.

MAFB has submitted a timely hazardous waste permit application requesting reissuance of the permit, which DEQ determined to be adequate and complete. Use of the greater-than-90-day storage facility enhances MAFB's ability to manage hazardous waste on-site and send these wastes off-site to appropriately permitted off-site hazardous waste disposal facilities. MAFB has been in substantial compliance with hazardous waste permit conditions and hazardous waste regulations with regards to the hazardous waste storage facility during the 23-year duration of the previous two permits.

### **Stipulations and Controls**

For operation of the HWSF, the proposed hazardous waste permit contains conditions for proper management, handling, storage, and disposal of hazardous wastes generated by the MAFB facility and any other facilities controlled by MAFB. Plans for emergency preparedness and contingency plans for releases from the storage facility are also requirements and are incorporated into the permit. The HWSF is subject to at least annual inspection by staff from the Hazardous Waste Section of DEQ.

For facility-wide corrective action, the MAFB hazardous waste permit requires submission of work plans and progress reports to DEQ for all corrective action activities. Work plans must detail engineering requirements for treatment technologies and monitoring well installation, safety procedures, and quality assurance for sampling and analysis. Progress reports include evaluation of progress towards meeting cleanup standards, as well as the efficacy of any remedial action at the facility. All work plans and reports will be subject to DEQ's review and approval.

Non-compliance with permit conditions and/or hazardous waste regulations is subject to enforcement by DEQ.

### **Analysis of Regulatory Impacts on Private Property Rights**

Because MAFB is a federal facility, a Private Property Assessment Act Checklist was not completed for DEQ's proposed action on the remedy selection.

### **Summary of Impacts**

Potential human environmental impacts from implementation of Alternatives 2 and 3 are rated in Tables 1 and 2. The human environment includes those attributes, such as biological, physical, social, economic, cultural, and aesthetic factors, that interrelate to form the environment.

Impacts may be adverse, beneficial, or both. The following criteria are used to rate the impacts:

- ◆ The severity, duration, geographic extent, and frequency of occurrence;
- ◆ The probability the impact will occur if the proposed action occurs;
- ◆ Growth-inducing or growth-inhibiting aspects of the impact;
- ◆ The quantity and quality of each environmental resource or value effected;
- ◆ The importance to the State and society of each environmental resource or value effected;
- ◆ Any precedent set as a result of an impact from the proposed action that would commit DEQ to future actions with significant impacts or a decision in principle about such future actions; and
- ◆ Potential conflict with local, state, or federal laws, requirements, or formal plans.

The following are definitions for major, moderate, minor, none, and unknown impacts on the human environment:

**Major:** A significant change from the present conditions of the human environment. Major impacts are serious enough to warrant preparing an environmental impact statement (EIS).

Moderate: Not a major or minor change from the present condition of the human environment. A single moderate impact may not warrant preparing an EIS; however, when considered with other impacts, an EIS may be required.

Minor: A slight change from the present condition of the human environment. Minor impacts are not serious enough to warrant preparing an EIS.

None: No change from the present conditions of the human environment.

Unknown: An EIS must be conducted to determine the effects on the human environment if impacts are unknown.

**Table 1. Potential Impacts on Physical and Biological Environment**

Alternative 2 – ■

Alternative 3 – ★

Resources		Major	Moderate	Minor	None	Unknown	Discussion Attached
A.	Air Quality				■ ★		
B.	Water Quality, Quantity, and Distribution			■ ★			●
C.	Geology and Soil Quality, Stability, and Moisture			■ ★			●
D.	Historical and Archaeological Sites				■ ★		
E.	Aesthetics				■ ★		
F.	Terrestrial and Aquatic Life and Habitats				■ ★		
G.	Vegetation Cover, Quantity, and Quality			■ ★			●
H.	Unique, Endangered, Fragile, or Limited Environmental Resources				■ ★		
I.	Demands on Environmental Resource of Water, Air, and Energy				■ ★		
J.	Cumulative and Secondary Impacts				■ ★		

## **Description of Potential Impacts on Physical and Biological Environment**

### **B. Water Quality, Quantity, and Distribution**

One area at MAFB, a closed landfill, is undergoing corrective measures to remediate contaminated surface and ground water. The remedial technology biodegrades contaminants in shallow groundwater, which will improve water quality in both surface and groundwater. Alternatives 2 and 3 would have the same impacts on these resources.

The HWSF is an enclosed building with cement floors. Operation of the HWSF would not impact water resources.

### **C. Geology and Soil Quality, Stability, and Moisture**

A vegetative cap on the closed landfill described above must be maintained as part of the corrective measures. Impacts of Alternatives 2 and 3 to soil quality, stability and moisture would be minor.

The HWSF is an enclosed building with cement floors. Operation of the HWSF would not impact geology and soil quality, stability or moisture.

### **G. Vegetation Cover, Quantity, and Quality**

A vegetative cap on the closed landfill described above must be maintained as part of the corrective measures. Impacts of Alternatives 2 and 3 to soil quality, stability and moisture would be minor.

The HWSF is an enclosed building with cement floors. Operation of the HWSF would not impact vegetative cover quality, stability or moisture.

**Table 2. Potential Impacts on Social, Economic, and Cultural Environment**

Alternative 2 – ■

Alternative 3 – ★

Resources		Major	Moderate	Minor	None	Unknown	Discussion Attached
A.	Social Structures and Mores				■ ★		
B.	Cultural Uniqueness and Diversity				■ ★		
C.	Local and State Tax Base and Tax Revenue				■ ★		
D.	Agricultural or Industrial Production				■ ★		
E.	Human Health				■ ★		
F.	Access to and Quality of Recreational and Wilderness Activities				■ ★		
G.	Quantity and Distribution of Employment				■ ★		
H.	Distribution of Population				■ ★		
I.	Demands for Governmental Services			■ ★			●
J.	Industrial and Commercial Activity			■ ★			●
K.	Locally Adopted Environmental Plans and Goals			■ ★			●
L.	Cumulative and Secondary Impacts				■ ★		

## **Description of Potential Impacts on Social, Economic, and Cultural Environment**

### I. Demands for Governmental Services

Both a permit and administrative order would require submittal of work plans, reports and completion certification documentation for corrective action activities. These submittals would be reviewed by DEQ. In addition, staff of the DEQ Hazardous Waste Section would, at times, conduct inspections of corrective action activities. Therefore, a minor impact to government services is anticipated. Impacts would be the same for Alternatives 2 and 3.

A minimum of annual inspections of the hazardous waste storage facility by staff of the DEQ Hazardous Waste Section are required by a Performance Partnership Agreement between EPA and DEQ. The inspections would result in resources spent on staff time for inspections, report writing, and enforcement activities, if necessary. Therefore, a minor impact to government services is anticipated. Alternative 2 does not include a permit for the HWSF; therefore, this impact would only affect Alternative 3.

### J. Industrial and Commercial Activity

Alternative 2 would have minor negative impacts with regard to the hazardous waste storage facility. MAFB would be required to ship hazardous wastes to an off-site permitted treatment, storage, and disposal facility (TSDF) within 90 days of generation. This action would result in some loss of efficiency and an increase in staff time and cost resources.

Alternative 3 would have minor positive impacts with regard to the hazardous waste storage facility. The ability to store hazardous wastes for longer than 90 days prior to shipment to a TSDF would increase efficiency in transportation costs and staff time.

Impacts on industrial and commercial activity would be the same for Alternatives 2 and 3 and would be the same as impacts from the two previous MAFB hazardous waste permits. MAFB hires environmental consulting firms to implement the remedy, sampling, technical evaluations, and work plan and report development for remedial activities. Samples for analytical evaluation would continue to be sent to an external analytical laboratory for analysis.

### K. Locally Adopted Environmental Plans and Goals

Corrective action requirements in either an administrative order or permit (Alternatives 2 or 3) would require MAFB to implement institutional measures to control or prevent present and future on-base and off-base use and access to contaminated shallow groundwater. For on-base controls, MAFB's General Plan consolidates plans and programs related to management and development of Air Force lands, facilities, and resources. The plan would be updated to incorporate institutional controls to prohibit current and future use of ground and surface water, and restrict land use of contaminated areas on the MAFB facility. MAFB currently has a perpetual easement for off-base properties within 1,000 feet of the base boundary that precludes human habitation and building for human occupancy. Further off-base institutional controls may be required, including easements and administrative agreements with adjacent landowners. Changes to the MAFB General Plan and agreements with adjacent landowners are expected to have minor impacts on local environmental plans and goals.

Under Alternative 3, impacts of the HWSF to locally adopted environmental plans and goals would be minor and would occur at closure of the unit. MAFB intends to clean close the HWSF. If confirmatory sampling shows no residual contamination is present in the building or soils, no institutional measures will be necessary. However, if residual contamination is present and not able to be remediated to levels that pose no risk to human health or the environment, institutional controls to restrict use of the building or land would be required.

**Individuals or Groups Contributing to EA**  
Montana Department of Environmental Quality

**Draft EA Prepared**  
Rebecca Holmes  
May 21, 2012

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## **Recommendation**

Based on the EA analysis, impacts of Alternative 2 and 3 on Physical and Biological Environment, and Social, Economic, and Cultural Environment are minor. Alternative 3 would have positive impacts on industrial and commercial activity. Based on the EA analysis, regulatory requirements, and professional judgment, DEQ recommends Alternative 3, issuance of an operating and corrective action hazardous waste permit.

The EA analysis demonstrates that this State action will not be a major action significantly affecting the quality of the human environment. Therefore, the EA is an adequate level of environmental review and an EIS is not required.