PUBLIC NOTICE NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Division (EPD) of the Georgia Department of Natural Resources, under the authority of the Georgia Hazardous Waste Management Act, O.C.G.A. Section 12-8-60, et. seq., as amended, announces its intent to renew Hazardous Waste Facility Permit No. HW-077(CA) issued to Moody Air Force Base, an active U.S. Air Force Base located at 3485 Georgia Street, Valdosta, Georgia. If renewed, the permit will continue to require Moody Air Force Base to conduct corrective action to remediate releases of hazardous constituents into the environment from historic operations at the facility.

An application for the Moody Air Force Base permit renewal was submitted to EPD on February 26, 2024. The application requests the renewal of the hazardous waste permit pursuant to the provisions of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11.

A draft permit has been prepared in accordance with the provisions of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11, which contains the conditions for the investigation and corrective action of releases of hazardous constituents into the environment from previous operations at the facility. The draft permit does not allow for disposal of hazardous waste on-site.

Before making a final decision on whether to issue the renewal permit, state and federal regulations require that the EPD provide an opportunity for public comment. Accordingly, a 45-day public comment period has been arranged for July 19, 2024, to September 2, 2024. During the public comment period, an electronic copy of the draft permit and supporting documents will be available for public review online at https://epd.georgia.gov/public-announcements-0/land-protection-branch-public-announcements. In addition, a hard copy of the draft permit and supporting documents will be available for public review at the following locations during regular business hours:

Georgia Environmental Protection Division

2 Martin Luther King Jr. Drive, SW West Tower – Suite 420 Atlanta, Georgia 30334

and

Willis L. Miller Library 2906 Julia Drive Valdosta, Georgia, 31602

EPD will schedule a public hearing on the draft renewal permit if a request for one is received by the Director of EPD before the close of the public comment period.

EPD invites comments during the public comment period to be made in writing or by email at EPDComments@dnr.state.ga.us. If emailing comments, please include the words "Moody Air Force Base Draft Permit" in the subject line to help ensure your comments will be forwarded to the correct staff. Written comments, or a request to be added to the facility mailing list, should be forwarded to the attention of Kim Hembree at the following address:

Georgia Environmental Protection Division Hazardous Waste Management Program

2 Martin Luther King, Jr. Drive SE East Tower – Suite 1052 Atlanta, Georgia 30334 All comments received on or before September 2, 2024, will be considered before a decision is made to issue or deny the permit. Any questions regarding the draft permit or the public participation process should be addressed to Kim Hembree at 470-524-0501.

PERMIT NO. HW-077(CA) ISSUANCE DATE:



ENVIRONMENTAL PROTECTION DIVISION

HAZARDOUS WASTE FACILITY PERMIT

Permit No. HW-077(CA)

Facility I.D. No. GA0570024109

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Subject 391-3-11 (as amended through December 9, 2019), adopted pursuant to that Act,

Moody Air Force Base, Valdosta

is issued a Permit for the following:

- 1. Investigations of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs); and
- 2. Corrective Actions to Remediate Releases of Hazardous Constituents from SWMUs.

at the following location:

Moody Air Force Base Valdosta, Georgia 31699

This Permit is conditioned upon compliance with all provisions of the Georgia Hazardous Waste Management Act, the Rules, Subject 391-3-11 (as amended through December 9, 2019), adopted pursuant to that Act, and any other condition of this Permit.

This Permit is Subject to revocation, suspension, modification, or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in the application, dated February 26, 2024, supporting data entered therein or attached thereto, or any subsequent submittals or supporting data; or for failure to disclose fully all relevant fats; or when the facility poses a threat the environment or the health of humans.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached pages, which pages are a part of this Permit. This Permit expires ten years from the Issuance Date above.



Jeffery W. Cown, Director Environmental Protection Division

SECTION I. GENERAL PERMIT CONDITIONS

I.A. Scope and Effect of Permit

- 1. The Permittee is required to investigate contamination at Solid Waste Management Units (SWMUs) and perform corrective action to remediate contamination in accordance with the conditions of this Permit. Any hazardous waste treatment, storage, or disposal not authorized in this Permit is prohibited, unless such treatment, storage, or disposal is specifically authorized by the Director. The Permittee must comply with the Georgia Hazardous Waste Management Act (Act) and the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR 260-266, 268, 270, 273, 279, and 124). Where a citation to the Federal Regulations is made in this Permit, it refers to the specific regulations adopted by the Environmental Protection Division (EPD) of the Georgia Department of Natural Resources.
- 2. The issuance of this Permit does not convey any property rights in either real or personal property or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.
- 3. Compliance with this Permit does not constitute a defense to any action brought by the Director under O.C.G.A. §12-8-75, "Powers of the Director in situations involving imminent and substantial endangerment to the environment or to public health," of the Act, as amended.
- 4. Nothing in this Permit shall be construed to preclude the institution of any legal action brought by the Director under Section 3008 of the federal Resource Conservation and Recovery Act (RCRA) or under O.C.G.A. §§12-8-81 through 12-8-82 of the Act, as amended.
- 5. This Permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11-.11(7) and 40 C.F.R. §§ 270.41, 270.42, 270.43, and 270.50(d). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability of any permit condition.
- 6. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

I.B. Management Requirements

- 1. Unless otherwise specifically authorized by the Director, or as specified by this Permit, the Permittee may not treat, store, or dispose of hazardous waste on any portion of the facility or perform corrective action not specifically authorized by this Permit until the Permittee has submitted to the Director, by certified mail or hand delivery, an application for a permit modification to do so and the Director has modified the Permit for that activity.
- 2. The Permittee shall maintain the following documents, and any amendments, revisions, and modifications to those documents, at the facility, in a location that is accessible for inspection, for the duration of the Permit:
 - a. Complete copy of this Permit and the associated Permit Application, including all amendments, revisions and modifications;
 - b. Groundwater Sampling and Analysis Plan, and;
 - c. Corrective Action Plan(s).
- 3. All amendments, revisions, and modifications to any plan required by this Permit shall be submitted to the Director for approval and for modification of the Permit, as necessary.
- 4. The Director may require the Permittee to establish and maintain an information repository at any time based on the factors set forth in 40 C.F.R. §124.33(b). The information repository will be governed by the provisions in 40 C.F.R. §124.33(c) through (f).

I.C. Monitoring and Reporting

- 1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Sampling of environmental media must be performed in accordance with the most recent version of the United States Environmental Protection Agency (USEPA) Region 4 Quality System and Technical Procedures for LSASD Field Branches (QSTP). Samples of both wastes and environmental media must be analyzed using the appropriate methods from the most recent edition of the USEPA Test Methods for Evaluating Solid Waste, EPA Publication SW-846. Under certain circumstances, the use of alternate sampling methods or laboratory analytical methods may be appropriate. However, alternate methods must be approved by the Director prior to use.
- 2. The Permittee shall retain records of all monitoring information, including the following, for a period of at least three (3) years from the date of the sample,

measurement, report, or record, or until corrective action is completed, whichever is later:

- a. All calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation;
- b. Copies of all reports, records, and certifications required by this Permit; and
- c. Records of all data used to complete the application for this Permit, including the certification required by 40 C.F.R. § 264.73(b)(9).

These periods are automatically extended during the course of any unresolved enforcement action regarding the Facility and also may be extended at any time at the Director's discretion.

- 3. Records of monitoring information shall include the following:
 - a. The date, exact place, and time of sampling or measurements;
 - b. The individual(s) who performed the sampling or measurements;
 - c. The date(s) the analyses were performed;
 - d. The individual(s) who performed the analyses;
 - e. The analytical techniques or methods used, the method of sample preservation, and quality assurance procedures including method blanks;
 - f. Chain-of-custody records; and
 - g. Results of such analyses and measurements.
- 4. Twenty-Four Hour Reporting. Within twenty-four (24) hours from the time the Permittee becomes aware of any non-compliance that may endanger health or the environment, the Permittee shall report such non-compliance, orally, to the Director or his representative, any information concerning the release of any hazardous waste, hazardous waste constituent, or hazardous constituent that may cause an endangerment to public and/or private drinking water supplies and any information concerning a release or discharge of any hazardous wastes, hazardous waste constituents, or hazardous constituents or concerning a fire or explosion from the Facility that could threaten the environment or human health outside the Facility.

The description of the occurrence shall include the following information:

a. Name, address, and telephone number of the owner or operator;

- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident;
- d. Name and quantity of materials involved;
- e. Extent of injuries, if any;
- f. Assessment of actual or potential hazards to the environment and human health inside and outside the facility, where applicable; and
- g. Estimated quantity and disposition of recovered material that resulted from the incident.
- 5. Within fifteen (15) days of becoming aware of any reportable incident as in Permit Condition I.C.4 above, the Permittee shall submit a written report to EPD of the incident including the following:
 - a. Description of occurrence as in Permit Condition I.C.4 above;
 - b. Cause of occurrence;
 - c. Period of occurrence, including exact dates and times;
 - d. Time occurrence expected to continue (if not already corrected); and
 - e. Steps taken or planned to reduce, eliminate, and prevent recurrence.
- 6. <u>Compliance Schedules.</u> Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than fifteen (15) days following each schedule date.
- 7. Other Non-compliance. The Permittee shall report instances of non-compliance, other than those described in Permit Conditions I.C.4 through I.C.6, semi-annually on July 15 (covering January 1 June 30) and January 15 (covering July 1 December 31). The report shall contain the information requested as in Permit Condition I.C.4 for each incident.
- 8. <u>Manifest Discrepancy Report.</u> If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within fifteen (15) days, the Permittee must submit a letter report, including a copy of the manifest, to the Director in accordance with 40 C.F.R. § 264.72.

- 9. <u>Unmanifested Waste Report.</u> This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste in accordance with 40 C.F.R. § 264.76.
- 10. <u>Biennial Report.</u> A biennial report must be submitted covering the facility activities during odd numbered calendar years in accordance with 40 C.F.R. § 264.75.
- 11. <u>Monitoring Reports.</u> Monitoring results shall be reported at intervals specified elsewhere in this Permit.
- 12. <u>Signatory Requirements</u>. All applications, plans, reports, or other information submitted to the Director shall be signed and certified in accordance with 40 C.F.R. § 270.11.

I.D. Responsibilities

- 1. <u>Right of Entry</u>. The Permittee shall allow the Director of EPD, the Regional Administrator of the US-EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this Permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit.
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit.
 - d. Sample or monitor, at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location.
- 2. <u>Transfer of Permits</u>. This Permit may be transferred to a new owner or operator only after the Permittee has provided notice to the Director of such transfer and the Permit has been modified or revoked and reissued, pursuant to 40 C.F.R. § 270.40 or § 270.41(b)(2), to identify the new Permittee and incorporate such other requirements as may be necessary by the Georgia Rules for Hazardous Waste Management or conditions of this Permit. Before transferring ownership or operation of the facility, the Permittee shall notify the new owner or operator, in writing, of the applicable requirements of 40 C.F.R., Parts 264, 268, and 270.

- 3. <u>Duty to Comply.</u> The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration of which such non-compliance is authorized by an emergency permit. Any noncompliance with this Permit, other than any noncompliance authorized by an emergency permit, constitutes a violation of the Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.
- 4. <u>Duty to Reapply</u>. If the Permittee wishes to continue an activity regulated by this Permit after the expiration date hereof, the Permittee must submit a complete application for a new permit at least one hundred eighty (180) days before this Permit expires. If the Permittee has not met the requirements of Permit Sections II and III, and has not met the groundwater cleanup goals established in any approved Corrective Action Plans (CAPs) for three (3) consecutive years, the Permittee must submit a complete application for the reissuance of the Permit at least one hundred eighty (180) days before the expiration date of this Permit. Pursuant to 40 CFR 270.51, this permit and all conditions herein will remain in effect beyond the permit expiration date if the Permittee has submitted a timely and complete application for a new permit and, through no fault of the Permittee, the Director has not issued a new permit on or before the expiration date of this permit.
- 5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.
- 6. <u>Duty to Mitigate</u>. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on human health or the environment resulting from non-compliance with this Permit.
- 7. <u>Duty to Provide Information</u>. The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit.
- 8. <u>Anticipated Non-Compliance</u>. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activities that may result in non-compliance with Permit requirements.
- 9. Reporting Planned Changes. The Permittee shall give notice to the Director at least thirty (30) days prior to any planned physical alterations or additions to the permitted facility, including any investigative or corrective action activities (including voluntary corrective measures) which may impact any Solid Waste Management Units (SWMUs), Areas of Concern (AOCs), and/or regulated units.

- 10. <u>Obligation for Corrective Action</u>. The Permittee is required to continue this Permit for any period necessary to complete the corrective action requirements of this Permit.
- 11. Proper Operation and Maintenance. The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and all related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems, when necessary, to achieve compliance with the conditions of this Permit.
- 12. Other Information: When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the Permit Application or any Corrective Action Plan, or submitted incorrect information in the Permit Application, Corrective Action Plan or in any report to the Director, the Permittee shall promptly submit such facts or information.

I.E. <u>Definitions</u>

For the purpose of this Permit, terms used herein shall have the same meaning as those in 40 C.F.R., Parts 124, 260 through 266, 268, 270, 273 and 279, unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. In addition, the following terms have been defined:

- 1. Area of Concern for the purpose of this Permit includes any area having a probable release of a hazardous waste, hazardous waste constituent, or hazardous constituent which is not from a solid waste management unit (as defined below) and is determined by the Director to pose a current or potential threat to human health or the environment. Such areas of concern may require investigation and remedial action, as required under the Act, O.C.G.A. § 12-8-60, et. seq. and 40 C.F.R. § 270.32(b)(2) to ensure adequate protection of human health and the environment.
- 2. <u>Contamination</u> for the purpose of this Permit refers to the presence of any hazardous waste, hazardous waste constituent, or hazardous constituent in a concentration which exceeds the naturally occurring concentration of that waste or constituent in the immediate vicinity of the facility (in areas not affected by the facility).
- 3. <u>Corrective Action</u> for prior or continuing releases at the facility (regardless of the time at which the release occurred), for the purpose of this Permit, shall be any measure necessary to protect human health and the environment, as required under

the Act, O.C.G.A § 12-8-60, et. seq. [40 C.F.R. § 264.101]. Corrective action may address releases to air, soils, surface water, sediment, or groundwater, both on the facility and beyond the facility boundary.

- 4. <u>Director</u> shall mean the Director of the Georgia Environmental Protection Division of the Department of Natural Resources or his/her delegated representative.
- 5. Extent of Contamination, for the purpose of this Permit, is defined as the horizontal and vertical area in which the concentrations of hazardous waste, hazardous waste constituents or hazardous constituents in the environmental media being investigated are above estimated quantitation limits, as defined in the most recent version of the USEPA *Test Methods for Evaluating Solid Waste*, *EPA Publication SW-846*, or naturally occurring concentrations representative of the facility. Under certain circumstances, the use of alternative values to define the extent of contamination may be appropriate. Alternate values used for this purpose must be approved by the Director prior to use.
- 6. Facility for the purpose of this Permit includes all contiguous land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or a combination of them). For the purpose of implementing corrective action under 40 C.F.R. § 264.101, a facility includes all contiguous property under the control of the owner or operator seeking a permit under the Act.
- 7. <u>Hazardous Constituents</u> for the purpose of this Permit are those substances listed in 40 C.F.R., Part 261, Appendix VIII and Part 264, Appendix IX, "Groundwater Monitoring List."
- 8. <u>Interim Measures</u> for the purpose of this Permit are actions necessary to minimize or prevent the further migration of contamination or limit actual or potential human and environmental exposure to contamination while long-term corrective action remedies are evaluated and, if necessary, implemented.
- 9. <u>Land Disposal Facility</u> for the purpose of this Permit is a facility that uses a surface impoundment, landfill, land treatment or waste pile unit to manage or dispose of hazardous waste pursuant to the Act, O.C.G.A. § 12-8-66, as amended, and Section 3004 of RCRA, as amended.
- 10. <u>Landfill</u> for the purpose of this Permit includes any disposal facility or part of a facility where hazardous waste is placed in or on the land and which is not a pile, a land treatment facility, surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, or a cave.

- 11. <u>Permit Application</u> for the purpose of this Permit refers to the Permit Application, dated February 2024, as amended, submitted to EPD for renewal of this Permit.
- 12. <u>Permittee</u> and/or <u>Owner</u> for the purpose of this Permit is the U.S. Air Force, Moody Air Force Base, Environmental Restoration Program.
- 13. Qualified Groundwater Scientist for the purpose of this Permit is a scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering and has sufficient training and experience in groundwater hydrology and related fields, as demonstrated by a current State of Georgia registration and completion of accredited university courses, that enable that individual to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport.
- 14. Remediation Waste for the purpose of this permit includes all solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 C.F.R. § 264.101 and under the Act, O.C.G.A. § 12-8-71(b). For a given facility, remediation wastes may originate only from within the facility boundary but may include waste managed in implementing corrective action required under 40 C.F.R. § 264.101(c) for releases beyond the facility boundary.
- 15. Release for the purpose of this Permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste, hazardous waste constituents or hazardous constituents.
- 16. Solid Waste Management Unit (SWMU) for the purpose of this Permit is any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. SWMUs include, but are not limited to, landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, tanks (including storage, treatment, and accumulation tanks), container storage units, wastewater treatment units, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization units, transfer stations, recycling units, and miscellaneous units.

17. <u>Treatment</u> for the purpose of this Permit refers to any method, technique, or process, including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

SECTION II. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS AND OTHER RELEASES

II.A. Applicability

The conditions of Permit Section II apply to all solid waste management units (SWMUs) and Areas of Concern (AOCs) listed in Appendix A of this Permit, and any additional SWMUs and/or AOCs discovered by any other means. The determination of the need for and subsequent implementation of corrective action is required by §264.101(a) and §12-8-66 of the Georgia Hazardous Waste Management Act for releases from all SWMUs and AOCs contained within the facility's property boundaries and, as required by §12-8-66 of the Georgia Hazardous Waste Management Act and §264.101(c), for releases extending beyond the facility property boundaries.

II.B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

- 1. Within fifteen calendar (15) days of discovery, the Permittee shall notify the Director, in writing, of any additional SWMUs or AOCs discovered during groundwater monitoring, on-going field investigations, environmental audits, or by any other means, including, but not limited to, any newly discovered releases at previously identified SWMUs or AOCs. Notification shall include, at a minimum, the location of the SWMU or AOC and all available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc...). The Permit shall be modified in accordance with 40 C.F.R., Part 270, to incorporate the newly discovered SWMUs or AOCs.
- 2. The Permittee shall prepare a SWMU Assessment Report (SAR) for each additional SWMU or AOC, at which releases to the environment are known or suspected to have occurred, that is discovered after the issuance of this Permit. The SAR shall be submitted within sixty (60) days of the discovery of a new SWMU or AOC. The report must include, at a minimum, the following information for each SWMU or AOC:
 - a. Type of unit;
 - b. Location of each unit in a topographic map of appropriate scale, as required by §270.14(b)(19);

- c. General dimensions, capacities and a structural description of the unit(s) (supply any available plans and/or drawings);
- d. Function of unit;
- e. Dates that the unit was operated;
- f. Description of the wastes that have been managed at or in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes; and
- g. Description of any known releases or spills (including groundwater data, soil analyses, sediment, air, and/or surface water data). If the report is being prepared because of a newly discovered release at a previously identified SWMU or AOC, the data may be limited to the newly discovered release, as long as a brief summary of the investigative and remedial actions taken in response to previous releases at the SWMU or AOC is provided, along with the current status of the SWMU or AOC related to those releases.
- h. An application for a permit modification pursuant to §270.42 to incorporate any newly identified SWMU or AOC into the Permit.
- 3. Based on the results of the SAR, the Director shall determine the need for further investigations at the SWMUs and/or AOCs covered in the report. If the Director determines that such investigations are needed, the Permittee shall be notified to prepare an RCRA Facility Investigation (RFI) Work Plan, as outlined in Permit Condition II.C, for such investigations.

II.C. RCRA Facility Investigation

- 1. The Permittee shall complete and submit a RCRA Facility Investigation (RFI) Work Plan for:
 - a. SWMUs or AOCs identified pursuant to Permit Conditions II.B.3 and II.C.5
 - b. SWMUs or AOCs referenced in Condition II.A as requiring an RFI.

The Permittee shall submit the RFI Work Plan(s) in accordance with a schedule to be determined by the Director.

- 2. The RFI Work Plan shall include, but is not limited to:
 - a. A schedule for implementation and report submittal;
 - b. The specific actions necessary to determine the nature and extent of contamination (including releases that extend beyond the facility's property boundary);

- c. The potential migration pathways for releases (e.g., air, land, surface water, and groundwater);
- d. All actual or potential receptors; and
- e. The applicable background concentrations.

The Permittee must provide sufficient justification that migration through a potential pathway is not likely if it is not included in the plan. Such deletions are subject to the approval of the Director. As an option, the Permittee may include specific procedures in the RFI Work Plan that will be used to perform a risk assessment as well as the development of proposed risk-based media cleanup standards. The findings of the risk assessment and proposed risk-based media cleanup standards shall be provided in the RFI Report required by Permit Section II.C.4. Risk assessments and risk-based media cleanup standards at RCRA SWMUs must be prepared according to current EPD guidelines.

3. Upon the Director's approval of the RFI Work Plan(s) required by Permit Condition II.C.1, the Permittee shall conduct the RFI(s) in accordance with the schedule contained therein.

4. <u>RFI Reports</u>

- a. The Permittee shall complete and submit the RFI Report(s) in accordance with the schedule contained in the RFI Work Plan required by Permit Condition II.C.1. The report(s) shall:
 - i. Provide a summary of all activities undertaken during the RFI(s) to implement the approved work plan(s).
 - ii. Provide a complete description of the nature and extent of contamination identified during the RFI(s) including sources, migration pathways, actual or potential receptors, and applicable background concentrations.
 - iii. Address all releases which extend beyond the facility property boundary unless the Permittee demonstrates to the Director's satisfaction that, despite the Permittee's best efforts, the Permittee was unable to obtain permission to undertake action required by the plan(s).
- b. If the time required to conduct the RFI(s) is greater than one hundred eighty (180) calendar days, the Permittee may be required to provide the Director with quarterly RFI Progress Reports at 90-day intervals, beginning one hundred eighty (180) calendar days from the initiation of the RFI(s), as specified in the approved RFI Work Plan(s). The progress reports, at a minimum, shall address the following:

- i. A description of the portion of the RFI completed;
- ii. Summaries of findings;
- iii. Summaries of any deviations from the approved RFI Work Plan during the reporting period;
- iv. Summaries of all contacts with local community public interest groups or State government regarding RFI Investigations;
- v. Summaries of any problems or potential problems encountered during the reporting period;
- vi. Actions taken to rectify problems;
- vii. Changes in relevant personnel; and
- viii. Projected work for the next reporting period.
- 5. The Director shall review the RFI Report(s) required by Permit Condition II.C.4, and upon determination that each report is complete, shall notify the Permittee of the need for further investigative actions and/or the need for corrective action as required under §§264.101(a) and 264.101(c) of the Georgia Rules for Hazardous Waste Management and §12-8-71(b) of the Georgia Hazardous Waste Management Act.

II.D. Corrective Action Plan

- 1. The Permittee shall submit a Corrective Action Plan (CAP) in accordance with a schedule to be determined by the Director. The Permittee will be notified of that schedule by written notice. The CAP must include a description of the remedial measures to be taken at each SWMU or AOC and a schedule of implementation and completion.
- 2. If the Permittee is required to develop a CAP under Permit Section II.D, the Permittee shall apply for a permit modification pursuant to §270.42(c) to incorporate the CAP into the permit.
- 3. Upon approval by the Director of any CAP required by Permit Section II.D, the Permittee shall implement any required corrective action in accordance with the schedule in the approved CAP.
- 4. Upon completion of corrective action per an approved CAP, the Permittee shall request a permit modification to reflect the corrective action status of the SWMUs and/or AOCs pursuant to §270.42.

II.E. <u>Interim Measures</u>

1. Requirement for Interim Measures. The Permittee shall conduct Interim Measures (IM) for SWMUs and/or AOCs either upon notification by the Director that IM are necessary or if the Permittee wishes to implement IM at a SWMU and/or AOC to stabilize a release.

2. IM Work Plan

- a. If the Permittee is notified by the Director that IM are necessary, an IM Work Plan shall be submitted within forty-five (45) days of such notification. However, if additional time is required, the Permittee may petition the Director for up to an additional forty-five (45) days to submit the IM Work Plan. If the Permittee chooses to conduct IM prior to notification by the Director, the Permittee shall submit a work plan for that activity. IM may be conducted concurrently with investigations required under the terms of this permit.
- b. An IM Work Plan submitted pursuant to Permit Condition II.E.2.a shall be consistent with and, if required by the Director, integrated into any long-term corrective action at the facility. The IM Work Plan shall include:
 - i. IM objectives;
 - ii. Procedures for implementation (including any designs, plans, or specifications);
 - iii. Schedules for implementation and completion; and
 - iv. Schedules for submittal of progress reports.
- c. The IM Work Plan must be approved by the Director, in writing, prior to implementation.

3. <u>IM Implementation</u>

- a. The Permittee shall implement the IM in accordance with the schedule contained in the approved IM Work Plan.
- b. At least fifteen (15) days prior to implementation of any changes, the Permittee shall submit to the Director for approval any planned changes, reductions, or additions to the IM Work Plan.
- c. If corrective action required by §264.101 and/or Permit Section II.D is achieved through IM, the Permittee shall apply for a permit modification

pursuant to §270.42(c) to incorporate the IM into the Permit as the final corrective action.

4. <u>IM Reports</u>

- a. Within forty-five (45) days of the completion of IM, the Permittee shall complete and submit to the Director an IM Report. However, if additional time is required, the Permittee may petition the Director for up to an additional forty-five (45) days to submit the IM Report. The report shall include, but shall not be limited to, the following information:
 - i. A description of IM implemented;
 - ii. A summary of all data or other information obtained during implementation of IM;
 - iii. A summary of the effectiveness of the IM in achieving the objective of containing, removing, and/or treating contamination resulting from a release from a SWMU and/or AOC in order to protect human health and the environment;
 - iv. A summary of all problems encountered during the IM implementation and the solutions to those problems; and
 - v. Copies of all relevant laboratory/monitoring data.
- b. If the time required for completion of IM is greater than one year, the Permittee shall provide the Director with progress reports at intervals specified in the approved IM Work Plan. The progress reports shall contain the following information at a minimum:
 - iv. A description of the portion of IM completed;
 - v. Summaries of any deviations from the IM Work Plan during the reporting period;
 - vi. Summaries of any problems or potential problems encountered during the reporting period and the solutions to those problems;
 - vii. Projected work for the next reporting period; and
 - viii. Copies of laboratory/monitoring data.

II.F. Reporting, Recordkeeping, and Response

- 1. All work plans and schedules shall be subject to approval by the Director prior to implementation. Upon approval, the Permittee shall implement all work plans and schedules as written, or as specified by the Director.
- 2. All work plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.
- 3. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to the conditions of this Permit into the operating record, as required by §264.73(b)(6).
- 4. The Permittee shall have all work plans and reports, which involve installation of groundwater monitoring wells or systems and/or interpretation of data gathered from those wells or systems, prepared and certified by a Qualified Groundwater Scientist.
- 5. In the event of the Director's disapproval (in whole or in part) of any document required by Permit Section II, the Director shall specify any deficiencies in writing. In the event of disagreement, the Permittee shall revise all submittals as specified by the Director.
- 6. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and any other supporting information gathered and generated during activities undertaken pursuant to Permit Section II shall be maintained at the facility during the term of this Permit, including any reissued permits.
- 7. All plans and schedules required by the conditions of Permit Section II are, upon approval by the Director, incorporated into this section by reference and become an enforceable part of this permit. Any non-compliance with such approved plans and schedules shall be termed non-compliance with this Permit.
- 8. The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Director required in Permit Section II are signed and certified in accordance with 40 C.F.R. §270.11.
- 9. If the Director or the Permittee at any time determines that any reports or activities conducted pursuant to any plan required by Permit Section II no longer satisfies the requirements of 40 C.F.R. §264.101, this Permit, or the intent of that plan or report for prior or continuing releases, the Permittee must submit an amended plan to the Director within sixty (60) days of such determination.

SECTION III. CORRECTIVE ACTION OF CONTAMINATION FROM SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

III.A. Applicability

- 1. This section applies to corrective action for releases of hazardous wastes, hazardous waste constituents, and hazardous constituents to environmental media (soils, sediment, surface water and groundwater) at the SWMUs and AOCs at the Facility listed in Appendix A of this Permit. The approved Corrective Action Plans (CAPs) listed in Appendix A are hereby incorporated into this Permit.
- 2. Any unauthorized corrective action which further exacerbates, or spreads contaminant releases shall be considered a violation of this Permit.

III.B. Compliance Period

- 1. The compliance period shall be defined as beginning on the issuance date of this Permit and continuing until the concentrations of hazardous constituents in the groundwater have not exceeded the groundwater cleanup goals established in the approved CAPs for a period of three (3) consecutive years at a sampling frequency to be determined by the Director. Anomalous sampling results, as provided for in Permit Condition III.D.4, shall not be counted as a sampling event.
- 2. If the groundwater cleanup goals established in the approved CAPs are met during the compliance period, the Permittee may petition the Director, and if approved, may cease corrective action but must continue to monitor the Facility's groundwater quality until the groundwater cleanup goals established in the approved CAPs have been met pursuant to Permit Condition II.D. If the groundwater cleanup goals are exceeded after the date on which they were first achieved and corrective action has ceased, the Permittee may be required to resume corrective action as described in the approved CAP, or to submit a new CAP, subject to approval by the Director, to address the exceedances. The Permittee must obtain EPD approval to discontinue corrective action monitoring pursuant to this section.

III.C. Corrective Action Program

- 1. The Permittee shall conduct, for the duration of the Compliance Period, corrective action for releases of hazardous waste, hazardous waste constituents and hazardous constituents at all SWMUs and AOCs, which require corrective action as indicated in Table 1 of the Permit, in accordance with §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, §264.101, and the approved CAPs.
- 2. The Permittee shall inspect and maintain the corrective action treatment systems described in the approved CAPs listed in Appendix A of the Permit. Inspections of

the systems shall be performed on a monthly basis while the corrective action is implemented. All inspections shall be documented and shall include descriptions of any problems found and the remedial actions taken to correct those problems.

- 3. The Permittee shall maintain all elements of CAPs, as amended, and shall adhere to the schedules approved therein.
- 4. The Permittee shall expand the corrective action treatment systems as necessary to treat all contaminants in the groundwater above the groundwater cleanup goals established in the approved CAPs. Any plan for changes in the corrective action treatment systems shall be submitted thirty (30) days prior to commencement of said changes. A CAP Addendum may be required where significant changes to the corrective action system are proposed.
- 5. The Permittee shall dispose of all contaminated media generated from the installation and operation of the corrective action systems in accordance with §262.11 and all applicable federal, state, and local laws.
- 6. The Permittee shall complete corrective action within a reasonable time frame for all SWMUs and AOCs in Appendix A that require such corrective action.
- 7. The Permittee is not relieved of responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis.
- 8. The Permittee shall maintain air emission controls on all corrective action systems for which such controls are necessary to prevent the transfer of contamination from groundwater to air.

III.D. Groundwater Monitoring

- 1. The Permittee shall conduct groundwater monitoring in accordance with the monitoring plans established in the approved CAPs, as amended, and documented in the annual Corrective Action Plan Progress Reports (CAPPRs). Any amendments to the groundwater monitoring plans must be submitted to EPD for approval prior to implementation. All approved amendments shall be documented in the annual CAPPRs.
- 2. The Permittee shall maintain, well-marked and in good working order, all groundwater monitoring wells identified in the approved CAPs, as amended, which maintenance shall include, but shall not be limited to, the following:
 - a. All wells shall be clearly labeled with a permanently affixed, legible label;

- b. All wells shall have a measuring point clearly marked on the inner protective casing;
- c. All wells shall be locked when not in use to prevent unauthorized entry;
- d. All wells shall be maintained such that surface water and contaminants are prevented from entering the wells.
- 3. The Permittee shall inspect the monitoring wells each time the wells are sampled or gauged in accordance with the *Base-Wide Performance Monitoring Plan*, as amended, but no less frequently than annually, to determine if the wells are being maintained as required by Permit Condition IIIC.2. All inspections shall be documented and shall include descriptions of any problems identified and the remedial actions taken to address those problems.
- 4. If the Permittee believes that a sample result from a well is anomalous, the Permittee may resample the well(s). The Permittee must submit to the Director written notification of their plan to resample the well(s) within thirty (30) days of the discovery of an anomalous result. The written notification shall include an explanation for the belief that the sampling results were anomalous and the date upon which the resampling will take place.

III.E. Reporting, Recordkeeping and Response

- 1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the groundwater must be the appropriate method from most recent version of the United States Environmental Protection Agency (USEPA) Region 4 Quality System and Technical Procedures for LSASD Field Branches (QSTP) Laboratory Methods must be those specified in the most recent edition of Test Methods for Evaluating Solid Waste Physical/Chemical Methods SW-846.
- 2. The Permittee shall have all reports, which involve installation of groundwater monitoring wells or systems and/or interpretation of data gathered from those wells or systems, prepared and certified by a qualified groundwater scientist.
- 3. The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Director required in Permit Section III are signed and certified in accordance with 40 C.F.R. §270.11.
- 4. The results of all plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.

- 5. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to the conditions of Permit Section III in the operating record, as required by §264.73(b)(6).
- 6. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and any other supporting information gathered and generated during activities undertaken pursuant to Permit Section III shall be maintained at the facility during the term of this Permit, including any reissued permits.
- 7. All plans and schedules required by the conditions of Permit Section III are, upon approval by the Director, incorporated into this Permit by reference and become an enforceable part of this Permit. Any non-compliance with such approved plans and schedules shall be termed non-compliance with this Permit.

III.F. Permit Modification

- 1. If the Director or the Permittee at any time determines that the corrective action program no longer satisfies the requirements of §264.101 or Permit Section III for releases of hazardous waste, hazardous waste constituents, or hazardous constituents, the Permittee must submit an application requesting a permit modification, within ninety (90) days of such determination to make any appropriate changes to the program.
- 2. If the Director determines that further actions beyond those provided in Permit Section III or changes to that which is stated herein are warranted, the Permittee shall submit a modification to the Permit according to the modification procedures found in 40 C.F.R. § 270.42.

III.G. Effectiveness of Corrective Action

- 1. The Permittee shall document the effectiveness of the corrective action required in this Permit Section III and as described in the approved CAPs and shall submit this information in an annual progress report which is due on or before July 1 each year during the compliance period. The report shall include, but is not limited to the following:
 - a. An evaluation of the data and the corrective action program in accordance with the approved CAPs, including a discussion of any changes in environmental conditions (i.e., geochemical, hydrogeologic, microbial, or other changes), the detection of any toxic or mobile transformation products, the effectiveness of land use controls, whether the plume is expanding or is stable, and any recommendations and/or conclusions;
 - b. Tabulation of all data collected during the corrective action program, including laboratory analytical data, groundwater elevation data, and field parameters;

- c. Graphical representation of all data collected during the corrective action program, including trend graphs and maps of sample locations with isoconcentration lines showing the extent of contamination;
- d. Groundwater elevation tables and maps depicting groundwater flow each time water level data is collected; and
- e. Reports and discussions of anomalies, problems, and anticipated problems with the data, and any deviations or modifications to the approved CAPs.



Appendix A

Moody Air Force Base, Valdosta, Georgia Hazardous Waste Facility Permit HW-077(CA) Solid Waste Management Units

ERP/SWMU Number	SWMU/AOC Description	Status of SWMU/AOC	Applicable Documents and Approval Dates
LF-01	Burma Road Landfill	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Burma Road Landfill (LF-01). Approved by EPD in February 2004. Corrective Action Plan
1 5 02	N. d.	N. F. d.	Addendum for the Burma Road Landfill. Approved by EPD in October 2021.
LF-02	Northwest Landfill	No Further Action determined.	Approved by EPD in October 2005.
LF-03	Southwest Landfill	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Southwest Landfill (LF-03) and Unnamed Creek Debris Site (LF-36). Approved by EPD in April 2003.
			Corrective Action Plan Addendum for the Southwest Landfill (LF-03). Approved by EPD in January 2016.
LF-04	Northeast Landfill	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Northeast Landfill (LF-04). Approved by EPD in May 2004 Work Plan for Optimization of In Situ Enhanced Bioremediation at the Northeast Landfill (LF-04). Approved by EPD in March 2009
LF-05	DDT Burial Site	No Further Action determined.	Approved by EPD in July 2002.
FT-06	Burma Road Fire Training Area	No Further Action determined.	Approved by EPD in November 2004.

ERP/SWMU	SWMU/AOC	Status of	Approval Date
Number	Description	SWMU/AOC	
FT-07	Former Fire	Further action	Corrective Action Plan for the
	Training Area	required. Currently in	Former Fire
		Corrective Action	Training Area (FT-07).
		Phase.	Approved by EPD in
			December 2003.
			Corrective Action Plan
			Addendum for the Former
			Fire Training Area (FT-07).
			Approved by EPD in January
			2016.
WP-08	Lily Pad Pond Fill	Site removed from the	Approved by EPD in October
	Site (Current EOD	Permit.	2001.
	Area)		
OT-09	South Runway Fill	No Further Action	Approved by EPD in April
	Site	determined.	1995.
OT-10	South Crash Trail	No Further Action	Approved by EPD in April
	Fill Site	determined.	1995.
OT-11	North Crash Trail	No Further Action	Approved by EPD in April
	Fill Site	determined.	1995.
ST-12	North POL Area-	No Further Action	Approved by EPD in
	Beatty Mill	determined.	February 2006.
OT 10	Creek	27 72 4 4 4	
OT-13	Parts Burial Site	No Further Action	Approved by EPD in April
****	T 101 1	determined.	1995.
WP-14	Lead Sludge Area	No Further Action	Approved by EPD in October
OFF 1.5	(Industrial Area)	determined.	2000.
ST-15	Underground	No Further Action	Approved by EPD in
	Waste Fuel Storage	determined.	November 2004.
	Area (Industrial		
CD 16	Area)	C'.	A 1
SD-16	Flightline Storm	Site administratively	Administratively managed
	Drain Outfall and	closed and assessed	under SS-38 per May 2014
OT 17	Mission Lake	under site SS-38.	corrective action plan.
OT-17	Corrosion Control	No Further Action	Approved by EPD in
	Facility (Industrial	determined.	November 2004.
ST-18	Area)	No Example on A stiers	Ammoved by EDD in Amil
31-18	Bulk Fuel Storage	No Further Action determined.	Approved by EPD in April 2006.
	Area (Industrial	ucteriiiilea.	2000.
	Area)		

ERP/SWMU	SWMU/AOC Description	Status of	Approval Date
Number	_	SWMU/AOC	
SS-19	Grassy Pond Annex	No Further Action	Approved by EPD in
		determined.	February 2006.
SS-20	Wingtip Underground Storage	No Further Action	Approved by EPD in
	Tank Area (Industrial Area)	determined.	November 2004.
SS-21	BX Service Station	No Further Action	Approved by EPD in
		determined.	May 2005.
OT-22	Dudley's Hammock (Old EOD)	No Further Action	Approved by EPD in
	Area	determined.	April 2006.
SS-23	Old Entomology Shop (Bldg.	No Further Action	Approved by EPD in
	803)	determined.	January 2003.
SS-24	Engine Maintenance Shop	Further action	Corrective Action Plan
	(Bldg. 785 - Industrial Area)	required. Currently	for the Industrial Area
		in Corrective Action	(SS-24), Approved by
		Phase.	EPD in November 2003.
SS-25	Engine Repair Shop (Building	No Further Action	Approved by EPD in
33-23	758) and Former Base Engine	determined.	April 2006.
	Shop Annex (Former Bldg. 722	determined.	Aprii 2000.
	- Industrial Area)		
SS-26	Old Auto Hobby Shop (Bldg.	No Further Action	Approved by EPD in
20 20	841)	determined.	April 2003.
SS-27A	Former Jet Engine Test Stands	No Further Action	Approved by EPD in
	(Bldgs. 1702/789)	determined.	March 2003.
SS-27B	Former Jet Engine Test Stands	No Further Action	Approved by EPD in
	(Bldgs. 1700/1701/1703)	determined.	March 2003.
SS-28	Former Avionics Repair Shop	No Further Action	Approved by EPD in
	(Bldg. 609)	determined.	January 2000.
SS-29	Small Gas Turbine Repair	No Further Action	Approved by EPD in
	Shop (Bldg. 609)	determined.	May 2003.
SS-30	Former Small Gas Turbine	No Further Action	Approved by EPD in
	Repair Shop (Bldg. 718) and	determined.	June 2003.
	Base Engine Shop Areas (Bldg.		
~~~	719/725 - Industrial Area)		
SS-31	Vehicle Maintenance (Bldgs.	No Further Action	Approved by EPD in
1.5.22	967/976/977/903)	determined.	June 2018.
LF-32	Stone Road Debris Site	No Further Action	Approved by EPD in
		determined.	March 2003.

ERP/SWMU	SWMU/AOC	Status of SWMU/AOC	Approval Date
Number	Description		
SS-33	IA-Former Building 720 Sheet Metal Shop	No Further Action determined.	Approved by EPD in March 2003.
SS-34	Hot Pit Refueling Area	No Further Action determined.	Approved by EPD in May 2001.
SS-35	Current Entomology Building (Bldg. 965 - Industrial Area)	No Further Action determined.	Approved by EPD in December 2001.
LF-36	Unnamed Creek Debris Site	No Further Action determined.	Approved by EPD in April 2007.
LF-37	Munitions Debris Site	No Further Action determined.	Approved by EPD in September 2005.
SS-38	Flightline Area (Apron A/B)	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Flightline Area (Apron A/B). Approved by EPD in May 2003.  Final Corrective Action Plan Optimization Work Plan for the Flightline Area (Apron A/B) (SS-38) and the Flightline Storm Drain Outfall and Mission Lake (SD-16). Approved by EPD in April 2014.
(Compliance)	Former Permitted Storage Area (Bldg. 1709)	No Further Action determined.	Clean closed in 1999 as part of permit reissuance.
SS-39	Golf Course Area Plume	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Golf Course Area. Approved by EPD in February 2004.  Corrective Action Plan Addendum for the Golf Course Area Plume. Approved by EPD in June 2014.
LF-40	Old Homestead Debris Site	No Further Action determined.	Approved by EPD in April 2003.

ERP/SWMU Number	SWMU/AOC Description	Status of SWMU/AOC	Approval Date
LF-41	Crash Trail #2 Fill Site	No Further Action determined.	Approved by EPD in January 2006.
LF-42	South Gate Fill Site	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the South Gate Fill Site. Approved by EPD in August 2005.  Corrective Action Plan Addendum for the South Gate Fill Site. Approved by EPD in June 2009.  Final Corrective Action Plan Optimization Work Plan for the South Gate Fill Site (LF-42). Approved by EPD in January 2014.
SD-43	Southeast Surface Disposal Area	Further action required. Currently in Corrective Action Phase.	Corrective Action Plan for the Southeast Surface Disposal Area (SD-43). Approved by EPD in April 2009  Final Corrective Action Plan Optimization Work Plan for the Southeast Surface Disposal Area (SD-43). Approved by EPD in June 2014

#### **FACT SHEET**

# Moody Air Force Base, Valdosta, Georgia Hazardous Waste Facility Permit Renewal Public Comment Period: July 19, 2024 – September 2, 2024

- 1. The Environmental Protection Division (EPD) of the Georgia Department of Natural Resources, under the authority of the Georgia Hazardous Waste Management Act, (O.C.G.A.) § 12-8-60 *et seq.*, announces its intent to renew Hazardous Waste Facility Permit No. HW-077(CA) issued to Moody Air Force Base located in Valdosta, Georgia, herein referred to as the Permittee. The facility's identification number is GA0570024109. If renewed, the permit will require corrective action and investigations, as necessary, of Solid Waste Management Units and Areas of Concern.
- 2. A draft permit has been prepared to renew Hazardous Waste Facility Permit No. HW-077(CA). This fact sheet has been prepared in accordance with the Georgia Rules for Hazardous Waste Management, Section 391-3-11-.11(5)(h) in order to advise the public of the principal facts and the significant, factual, legal, methodological and policy considerations made in preparing the draft permit. The purpose of the permitting process is to afford the Environmental Protection Division (EPD), interested citizens, and other government agencies the opportunity to evaluate the ability of the Permittee to comply with the applicable hazardous waste management requirements promulgated under the Georgia Hazardous Waste Management Act; and to have a site-specific enforceable document, based on their demonstration of that ability to comply. The permit is that enforceable document. Permit conditions are set forth in one concise document, which describes all the applicable requirements with which the Permittee must comply for the permit's duration, and incorporates the permit application, and other significant documents (such as the corrective action plans) by reference.
- 3. Moody Air Force Base is an active Department of Defense facility located approximately 10 miles northeast of the City of Valdosta, Georgia in northeast Lowndes County. The primary activities at Moody Air Force Base are to organize, train, equip, and rapidly deploy aircraft. Moody Air Force Base is a large quantity hazardous waste generator. Hazardous and non-hazardous wastes previously and/or currently generated at the base include petroleum fuels, lubricants, solvents, explosives, herbicides, pesticides, paints, paint strippers, fire-fighting agents, and general refuse. Moody Air Force Base was initially issued Hazardous Waste Facility Permit No. HW-077 on September 29, 1989, for the storage of hazardous waste in containers for more than ninety (90) days, and the investigation of potential releases of hazardous constituents into the environment at Solid Waste Management Units (SWMUs) or Areas of Concern (AOC) from operations at the base. The facility chose to close its permitted hazardous waste container storage area in 1999. Closure of the storage unit was approved by EPD when the permit was renewed on June 26, 2001. The renewed permit, renamed to, Hazardous Waste Facility Permit No. HW-077(CA), maintained the requirement for the investigation of potential releases of hazardous constituents into the environment from SWMUs or from operations at the base. Moody Air Force Base currently accumulates hazardous wastes generated at the base for less than ninety (90) days in accordance with 40 CFR 262. The permit was subsequently renewed or modified on October 15, 2004, September 27, 2010, September 24, 2014, and June 8, 2018, to incorporate approved Corrective Action Plans for additional SWMUs and

to update the corrective action status of SWMUs to No Further Action status. Moody Air Force Base submitted an application to EPD on February 26, 2024, requesting the renewal of its hazardous waste facility permit to require the corrective action and investigations, as necessary, of SWMUs and AOCs pursuant to the provisions of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11.

- 4. The draft renewal permit has been prepared in accordance with the provisions of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11. The draft permit contains requirements for the permitted corrective action of contaminated groundwater, and investigation and subsequent correction action (if warranted) of solid waste management units at the facility. The permit requirements are based on regulations found in Section 391-3-11-.10 of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division, for Hazardous Waste Management. The draft permit does not allow for disposal of hazardous waste on-site.
- 5. A public comment period has been arranged from July 19, 2024, through September 2, 2024. During the comment period, a copy of the draft renewal permit and supporting documents are available for review and comment during regular business hours at the following locations:

#### **Georgia Environmental Protection Division**

2 Martin Luther King Jr. Drive, SW West Tower – Suite 420 Atlanta, Georgia 30334

and

Willis L. Miller Library 2906 Julia Drive Valdosta, Georgia, 31602

6. During the public comment period, written comments concerning the draft permit renewal may be submitted by email to <u>EPDComments@dnr.state.ga.us</u> or in writing to the following address:

# **Georgia Environmental Protection Division**

Attn: Kim Hembree, Unit Manager Hazardous Waste Management Program 2 Martin Luther King, Jr. Drive SE East Tower – Suite 1052 Atlanta, Georgia 30334

- 7. All comments received on or before September 2, 2024, will be considered when the final decision is made whether to issue the permit renewal. Those persons who submit written comments or request notice of the final permit decision will be notified of the final determination made by the Director of EPD. EPD will announce any substantial changes in the final determination by public notice.
- 8. For additional information on the permitting process, including procedures for comments,

please contact Kim Hembree at (470) 524-0501.