

## **FACT SHEET**

Georgia Atlantic Port, LLC (GAP)  
Hazardous Waste Facility Permit No. HW-055(D)  
Port Wentworth, GA

A draft permit has been prepared to modify the Hazardous Waste Facility Permit HW-055(D) issued to Georgia Atlantic Port, LLC (GAP) to include a Corrective Action Plan for the Georgia Ports Authority Connector Road Construction. This fact sheet has been prepared in accordance with Section 391-3-11-.11(5)(h) (40 CFR Part 124) of Georgia's Rules for Hazardous Waste Management to briefly advise the public of the principal facts and the significant factual, legal, methodological and policy questions considered in preparing the draft permit.

### **I. PERMIT PROCESS**

The purpose of the permitting process is to afford the Environmental Protection Division (EPD), interested citizens and other governmental agencies the opportunity to evaluate the ability of GAP (the Permittee) to comply with the applicable hazardous waste management requirements promulgated under the Georgia Hazardous Waste Management Act. The 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.

### **II. PERMIT STRUCTURE**

The permit is divided into four parts. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I then specifies the standard conditions, which are applicable to all hazardous waste management facilities. Section II specifies the conditions for post-closure care for a surface impoundment closed as a landfill. Section III contains corrective action requirements for contaminated groundwater on-site. Section IV specifies a program for assessing and remediating all releases of hazardous wastes or constituents to the environment, which may have occurred but are not related to the landfill already addressed.

### **III. FACILITY DESCRIPTION**

The GAP facility is in Port Wentworth, Chatham County. The facility was formerly owned and operated by Atlantic Wood Industries, Inc. (AWII). In October 2014, GAP purchased the facility, and effective March 2015, the facility's Hazardous Waste Facility Permit No. HW-055(D) was transferred from AWII to GAP. The GAP property is rectangular in shape, with dimensions of approximately 3,000 feet in the east-west direction and 800 feet in the north-south direction. The main features of the facility include a closed RCRA landfill (former surface impoundment) and a two-acre former Process Area.

From 1919 until 2008, AWII treated wood telephone poles, pilings, cross-ties, structural lumber, and timber with creosote and pentachlorophenol preservatives along the western bank of the Savannah River. During this period, up to 3,000 gallons of wastewater per day was generated in its "conditioning operation" because of moisture extracted from the green wood and from steam condensate. Because the cylinder was not cleaned between cycles, any water that contacted the interior surface of the cylinder became contaminated with wood preserving chemicals.

Prior to 1971, the process wastewater generated by the facility was discharged directly to the county canal through ditches, with the county canal discharging into the Savannah River at the northeastern

corner of the facility. In 1971, a surface impoundment (SI) was constructed for the collection of the process wastewater, and it received wastewater until 1985. Sludge containing creosote and pentachlorophenol constituents, a listed hazardous waste (K001), accumulated on the bottom of the impoundment. Because it was not feasible to remove all the hazardous waste from the SI prior to closure, the SI was closed as a landfill in 1988. A groundwater extraction and treatment system was installed to address contamination from the closed SI and pumping began on January 20, 1989. The extraction system recovers groundwater and dense non-aqueous phase liquid (DNAPL) from five extraction wells situated on the east side of the closed SI. A 450-foot x 30-foot covered drip pad was constructed in 1992. The drip pad has a 40 mil HDPE liner beneath it and was built to detect/contain spills and prevent run-on/run-off.

All wood treating operations ended in February 2008. The RCRA permit for the facility was renewed on June 16, 2009, to authorize the post closure care and corrective action for a hazardous waste SI (closed as a landfill) with stabilized waste, contaminated subsoil, and contaminated groundwater remaining in place. GAP submitted a Final Interim Work Plan to EPD in April 2016. The purpose of the Final Interim Work Plan was to remove structures at the Site and perform interim remedial measures and investigative work within the former Process Area so that a final corrective action plan can be developed.

In the summer of 2016, GAP began the process of dismantling and removing former wood treating structures and holding tanks from the Former Process Area to support site redevelopment and complete the remaining RCRA permit obligations. EPD granted GAP temporary authorization (TA), per 40 CFR 270.42(e), to allow up to 950 cubic yards of remediation waste to be stored on the covered drip pad. The approval allowed the remediation waste to be managed as a staging pile for a period of 180 days while a Permit Modification Request was being prepared. GAP requested an amendment to the TA to allow approximately 4,000 cubic yards of impacted soil to be stored on the covered drip pad structure. On October 26, 2016, EPD granted GAP an amendment to the TA to account for the increased amount of impacted soil. The RCRA permit for the facility was modified on February 14, 2018, by adding a newly regulated unit (staging pile) and extend the post closure care period to a rolling 30 years.

The staging pile closure work was completed between September 2020 and January 2021 and included containing about 3500 cubic yards of remediation wastes impacted by wood-treating chemicals into a Corrective Action Management Unit (CAMU) in accordance with the provisions of 40 Code of Federal Regulations (CFR) 264.552, over the existing RCRA Part B landfill area.

The Environmental Protection Division (EPD) of the Georgia Department of Natural Resources, in accordance with the Georgia Hazardous Waste Management Act, O.C.G.A. §§12-8-60 *et seq.*, as amended, announces its intent to modify Hazardous Waste Facility Permit number HW-055(D), issued to Georgia Atlantic Port, LLC (GAP) to incorporate a Corrective Action Plan for Georgia Ports Authority Connector Road Construction, reflect the closure of the staging pile and monitoring well abandonments and replacement. The draft modified permit will require GAP to conduct post-closure care of, and corrective action for, a hazardous waste surface impoundment closed as a landfill with stabilized waste, contaminated subsoil, and contaminated groundwater remaining in place. GAP is located at 202 Oxnard Drive, Port Wentworth, GA, 31407 and is identified by EPA ID number GAD084914787.

**THIS PERMIT DOES NOT AUTHORIZE ANY ADDITIONAL DISPOSAL OF HAZARDOUS WASTE AT THE FACILITY.**

#### IV. PERMIT CONDITION

The following is a list of the major permit conditions and the authority for each condition. Regulatory citations are for the 40 CFR section as referenced in Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management.

##### **Section I - General Permit Conditions**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Scope and Effect of Permit	§270.4 §270.41 §270.42 §270.43	I.A
Management Requirements	§270.30	I.B
Monitoring and Reporting	§270.30(j) §270.31 §270.11	I.C
Responsibilities	§270.30 §270.40	I.D
Definitions		I.E
Conditions Related to Compliance with General Facility Standards	§ Part 264 subparts B, C, D, E, G, H	I.F
Special Conditions Applicable to Entire Facility	§264.73(b)(9) §268	I.G

##### **Section II - Post Closure Care for a Surface Impoundment Closed as a Landfill**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Unit Identification		II.A
Waste Identification		II.B
Monitoring and Inspection	§264.15 §264.310	II.C
Post-Closure Care	§264.117 §264.120	II.D

### **Section III – Groundwater Monitoring and Corrective Action for the Regulated Unit**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Monitoring Well Location and Construction	§264.95 §264.97 §264.100	III.A
Groundwater Protection Standard	§264.92 §264.93 §264.94	III.B
Compliance Period	§264.96	III.C
Monitoring Program to Demonstrate Effectiveness of Corrective Action Program	§264.95 §264.97 §264.100	III.D
Corrective Action Program	§264.100	III.E
Sampling and Analysis Procedures	§264.97	III.F
Reporting, Recordkeeping and Response	§264.73(b)(6) §264.100(g)	III.G
Permit Modification	§270.41 §270.42	III.H
Duty of Permittee	§264.92	III.I

### **Section IV - Corrective Action for Solid Waste Management Units and Other Releases**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
RCRA Facility Assessment (RFA) Report	§264.101	IV.A
RCRA Facility Investigation (RFI) Plan	§264.101	IV.B
Corrective Action Plan	§264.101	IV.C
Interim Measures	§264.101	IV.D
Schedule of Compliance	§264.101	IV.E

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Permit Modification	§264.101	IV.F
Dispute Resolution	§264.101	IV.G

## **V. PROCEDURES FOR REACHING A FINAL DECISION**

The modification of GAP’s Hazardous Waste Facility Permit will be administered by EPD. The Division has rules, which require a permit to be issued for all facilities that treat, store, or dispose of hazardous waste.

The State of Georgia received final authorization for the 1984 amendments to the Resource Conservation and Recovery Act (RCRA), as amended, on September 18, 1986. Therefore, upon issuance, this permit will constitute a full RCRA permit as required by the Georgia Hazardous Waste Management Act and RCRA.

Georgia's Rules for Hazardous Waste Management Section 391-3-11-.11(4)(a) (40 CFR 124.10) require that the public be given a minimum of forty-five (45) days to comment on the draft permit prepared. The comment period will begin on the date of publication of the public notice in a major newspaper of general circulation. Any person interested in commenting on the application or draft permit must do so within the forty-five (45) day comment period (November 09, 2022, to December 28, 2022). All comments should be submitted in writing or by email. If submitting written comments please send to EPD at 2 Martin Luther King Jr. Dr., S.E., Suite 1054 East Tower, Atlanta, Georgia 30334-9000, Attention: John Sayer, Land Protection Branch. Emailed comments can be sent to [epd.comments@dnr.ga.gov](mailto:epd.comments@dnr.ga.gov). If you choose to email your comments, please be sure to include the words “GAP LLC Permit Modification” in the subject line to help ensure your comments will be forwarded to the correct staff.

When the Director of EPD makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The permit is final 30 days after issuance.

Contact person for the GAP, LLC Draft Hazardous Waste Permit is:

John W.W. Sayer, P.G.  
Land Protection Branch  
2 Martin Luther King Jr. Dr., SE  
Suite 1054 East Tower  
Atlanta, Georgia 30334-9000  
(404) 657-8600