

## **SECTION I. GENERAL PERMIT CONDITIONS**

### **I.A. Scope and Effect of Permit**

- I.A.1. The Permittee is allowed to treat, store, and dispose of hazardous waste only in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited. The Permittee must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR Parts 260 268, 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.
- I.A.2. The issuance of this permit does not convey any property rights in either real or personal property, nor any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement(s) of Federal, State or local laws or regulations.
- I.A.3. Compliance with the permit does not constitute a defense to any action brought by the Director under Section 18, Emergency Powers, of the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-75, as amended.
- I.A.4. Nothing in this permit shall be construed to preclude the institution of any legal action under Section 3008 of the Federal Resource Conservation and Recovery Act (RCRA) or under the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-81 - §12-8-82, as amended.
- I.A.5. This Permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11-.11(7) and 40 CFR 270.41, 270.42, 270.43, 270.50(d) and 270.51(a). The filing of a request for a permit modification, revocation and reissuance, or termination; or the notification of planned changes or anticipated non-compliance on the part of the Permittee, does not stay the applicability of any permit condition.
- I.A.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 circumstances 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**

- I.B.1. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility, or any planned changes

in the process generating the hazardous waste, which changes might affect the performance of the permitted facility with respect to any regulated activities.

I.B.2. The Permittee shall maintain at the facility, the following documents and amendments, revisions and modifications to these documents:

I.B.2.a Complete copy of this permit and permit application, including all amendments, revisions and modifications;

I.B.2.b. Post-Closure Care Plan;

I.B.2.c. Operating record as required by 40 CFR 264.73;

I.B.2.d. Inspection schedule and log(s);

I.B.2.e. Revised Corrective Action Plan (RCAP) dated June 10, 2023, revised June 29, 2024;

I.B.2.f. Field Sampling and Analysis Plan;

I.B.2.g. Institutional and/or engineering control instruments/plans (including hazardous waste-related deed notices and environmental covenants);

I.B.2.h Cost estimate for post-closure care and corrective action; and

I.B.2.i. Proof of financial assurance for post-closure care and corrective action as required by the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-68, as amended.

I.B.3. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification, as necessary.

I.B.4. When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall promptly submit corrected facts or information.

I.B.5. The Permittee shall at all times properly operate and maintain all facilities which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes 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 a back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

I.B.6. The Permittee may not commence treatment, storage or disposal of hazardous waste at any new or modified portion of the facility or corrective action for contaminated groundwater or soil until the Permittee has submitted to the Director by certified mail, or hand delivery, a letter signed by the Permittee and a registered professional engineer or, when appropriate, registered professional geologist, stating that the facility has been constructed or modified in compliance with the permit where appropriate; and the Director has inspected the modified or

newly constructed facility and finds it is in compliance with the conditions of the permit; or the Director has either waived the inspection, or within fifteen (15) days has not notified the Permittee of his or her intent to inspect.

I.C. Monitoring and Reporting

- I.C.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 waste/media to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste; Physical/Chemical Methods, SW 846 or Standard Methods for the Examination of Water and Wastewater (or an equivalent method as specified in the Waste Analysis Plan). Sampling and analyses of soil, sediment, surface water and groundwater samples shall be conducted in accordance with methods and procedures in Appendix A6 of the Field Sampling and Analysis Plan of the RCAP, as amended, and the USEPD Region IV Field Branches Quality System & Technical Procedures, as revised, or in accordance with those methods and procedures otherwise acceptable to the Director.
- I.C.2. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by Condition I.G.1 and 40 CFR 264.73(b)(9), and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, record, or application. These periods are automatically extended during the course of any unresolved enforcement action regarding this facility and also may be extended at any time at the Director's discretion.
- I.C.3. The Permittee shall maintain onsite records for all groundwater monitoring wells and associated groundwater surface elevations, including groundwater flow rate and direction throughout the post-closure period.
- I.C.4. Records of monitoring information shall include:
- I.C.4.a. The date, exact place, and time of sampling or measurements;
  - I.C.4.b. The individual(s) who performed the sampling or measurements;
  - I.C.4.c. The date(s) analyses were performed;
  - I.C.4.d. The individual(s) who performed the analyses;
  - I.C.4.e. The analytical techniques or methods used, the method of sample preservation, and quality assurance methods;
  - I.C.4.f. The flow directions and flow rates in the uppermost aquifer; and
  - I.C.4.g. The results of such analyses and measurements presented in a table and/or figure format.

- I.C.5. The Permittee shall report to the Director or his representative orally within twenty-four (24) hours from the time the Permittee becomes aware of any circumstances resulting from the operation and/or maintenance of the hazardous waste management facility (including periods of non-compliance) which may endanger human health or the environment, including but not limited to:
- I.C.5.a. Release of any hazardous waste, hazardous waste constituent(s), or hazardous constituent(s) that may cause an endangerment to public drinking water supplies;
  - I.C.5.b. Release or discharge of hazardous waste, hazardous waste constituent(s), or hazardous constituent(s) or a fire or explosion which could threaten human health or the environment outside the facility. The description of the occurrence shall include:
    - I.C.5.b.i. Name, address and telephone number of the owner or operator;
    - I.C.5.b.ii. Name, address, and telephone number of facility;
    - I.C.5.b.iii. Date, time, and type of incident;
    - I.C.5.b.iv. Name and quantity of materials involved;
    - I.C.5.b.v. The extent of injuries, if any;
    - I.C.5.b.vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
    - I.C.5.b.vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- I.C.6. Within fifteen (15) days of becoming aware of any reportable incident as in Condition I.C.5 above which may endanger human health or the environment, the Permittee shall submit a written report of the incident covering the following:
- I.C.6.a. Description of occurrence as in Condition I.C.5 above;
  - I.C.6.b. Cause of occurrence;
  - I.C.6.c. Period of occurrence, including exact dates and times;
  - I.C.6.d. Time occurrence expected to continue (if not already corrected); and
  - I.C.6.e. Steps taken or planned to reduce, eliminate, and prevent recurrence.
- I.C.7. Reports of compliance and 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 fourteen (14) days following each schedule date.
- I.C.8. The Permittee shall report instances of non-compliance, other than those described in conditions I.C.5 and I.C.7, semi-annually on July 15 (covering

January 1- June 30) and January 15 (covering July 1 – December 31). The report shall cover the information requested in Condition I.C.5 for each incident.

I.C.9. All reports or other information requested by the Director shall be signed and certified according to the requirements in 40 CFR 270.11.

I.C.10. All geologic and engineering reports required by this permit shall be signed and sealed by the appropriate Georgia registered professional as defined by state law. Additionally, the following certification statement shall accompany reports containing groundwater data or interpretation:

I certify that I am a qualified groundwater scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction.

I.C.11. The Permittee shall immediately notify EPD through the Department of Natural Resources Emergency Operations Center of any spill or release of oil or a hazardous substance as soon as the Permittee knows of the spill or release, as required by O.C.G.A. §12-14-3.

I.D. Responsibilities

I.D.1. Right of Entry. The Permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials and other documents as may be required by law to:

I.D.1.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;

I.D.1.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

I.D.1.c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.D.1.d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Georgia Hazardous Waste Management Act, any substances or parameters at any locations.

- I.D.2. Transfer of Permits. This permit is not transferable to any persons except after notice to the Director. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.40(b) or 270.41(b)(2). Before transferring ownership or operation of the facility during its operating life or during its post-closure care period, the Permittee shall notify the new owner or operator in writing of the applicable requirements of 40 CFR 264 and 270.
- I.D.3. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any other non-compliance with this permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.
- I.D.4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must submit a complete application for a new permit at least one hundred eighty (180) days before this permit expires. Pursuant to 40 CFR 270.51, this permit and all conditions herein will remain in effect beyond the permit's 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.
- I.D.5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a 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.
- I.D.6. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment or human health resulting from non-compliance with this permit.
- I.D.7. Duty to Provide Information. 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 the permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.
- I.D.8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in non-compliance with the permit requirements.
- I.D.9. Reporting Planned Changes. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions which impact

any SWMU's, AOC's or the areas contaminated by them, including voluntary corrective measures.

I.E. Definitions

For the purpose of this permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124, 260 through 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.

- I.E.1. Area of Concern (AOC) 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 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 investigations and remedial action as required under the Georgia Hazardous Waste Management Act, §12-8-60, et.seq. and 40 CFR 270.32(b)(2) in order to ensure adequate protection of human health and the environment.
- I.E.2. Contamination 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).
- I.E.3. Corrective Action for prior or continuing releases from solid waste management units, as well as for other releases as described in Condition I.E.14, for the purpose of this permit shall be as specified in 40 CFR 264.101 and may include "corrective action" as provided for in 40 CFR 264.100, and other remedial actions for any environmental media as deemed appropriate by the Director to protect human health or the environment. The terms "releases" and "other releases", when used in reference to corrective action requirements of this permit, shall not include releases that the Permittee can satisfactorily demonstrate to the Director have been fully remediated within thirty (30) days of discovery.
- I.E.4. Corrective Action Management Unit (CAMU) for the purpose of this permit includes any area within a facility that is designated by the Director under 40 CFR Part 264.552 for the purpose of implementing corrective action requirements under 40 CFR 264.101. A CAMU shall only be used for the management of remediation waste pursuant to implementing such corrective action requirements at the facility.
- I.E.5. Director shall mean the director of the EPD or his/her authorized representative.

- I.E.6. EPA shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.
- I.E.7. EPD shall mean the Georgia Environmental Protection Division of the Department of Natural Resources and any successor departments or agencies of the State of Georgia.
- I.E.8. Extent of Contamination for the purpose of this permit is defined as the horizontal and vertical area/volume in which the concentrations of hazardous waste, hazardous waste constituent(s) or hazardous constituent(s) in the environmental media being investigated are above estimated quantitation limits, as defined in the most recent version of SW-846 or naturally occurring concentrations representative of areas not affected by the facility.
- I.E.9. Hazardous Constituents for the purpose of this permit are those substances listed in 40 CFR Part 261 Appendix VIII and 40 CFR Part 264 Appendix IX, as revised or superseded.
- I.E.10. Institutional Controls for the purpose of this permit are non-engineered instruments, such as administrative and legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of the corrective measures.
- I.E.11. Interim Measures for the purpose of this permit are actions necessary to minimize or prevent the 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.
- I.E.12. Land Disposal Facility for the purpose of this permit is a facility (and all contiguous property under control of the owner or operator) that uses a surface impoundment, landfill, land treatment, waste pile, or miscellaneous unit to manage or dispose of hazardous waste pursuant to §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and §3004 of RCRA, as amended.
- I.E.13. Qualified Groundwater Scientist for the purpose of this permit means 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 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.
- I.E.14. 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 constituent(s) or hazardous constituent(s).

- I.E.15. Remediation Waste for the purpose of this permit includes all solid and hazardous wastes, and all media (including groundwater, surface water, soil, and sediment) and debris, which contain listed hazardous waste(s) or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 CFR 264.101 and §3008(h) of RCRA. For a given facility, remediation waste(s) may originate only from within the facility boundary, but may include waste managed in implementing corrective action requirements under 40 CFR 264.101 and §3004(v) or §3008(h) of RCRA for releases beyond the facility boundary.
- I.E.16. Solid Waste Management Unit (SWMU) for the purpose of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment, and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste, hazardous waste constituent(s) or hazardous constituent(s) might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous waste. SWMUs include, but are not limited to, areas that have been contaminated by routine and systematic releases of hazardous waste, hazardous waste constituent(s), or hazardous constituent(s).
- I.E.17. Staging Pile for the purpose of this permit includes temporary storage for mixing, sizing, blending, or other similar physical operations as long as they are intended to prepare the waste for subsequent management or treatment as defined in 40 CFR 264.554.
- I.E.18. Temporary Unit (TU) for the purpose of this permit includes any temporary tank and/or container storage area used solely for treatment or storage of hazardous remediation waste during remediation activities required under 40 CFR 264.101. Designated by the Director, such units must conform to specific standards as defined in 40 CFR 264.553, and may only be in operation for a period of time as specified in this permit.
- I.F. Conditions Related to Compliance General Facility Standards  
(40 CFR 264 Subparts B, C, D, E, G, and H)
- I.F.1. The Permittee must follow the procedures and plans described in detail in the permit application dated April 10, 2025, which are hereby incorporated by reference and include at least the following:

I.F.1.a. Post-Closure Care Plan

Section I

I.F.1.b. Revised Corrective Action Plan      dated June 10, 2023, revised June 29, 2024

I.F.1.c. Field Sampling and Analysis Plan      Appendix A6 of the RCAP

I.F.2. The following activities must be carried out as prescribed in 40 CFR 264 Subparts B, C, D and E and in accordance with Sections E, F, and I of the permit application:

I.F.2.a. Security – 40 CFR 264.14(b) and (c)

I.F.2.b. Repair and Inspection Log – 40 CFR 264.15(c) and (d)

I.F.2.c. Personnel Training – 40 CFR 264.16

I.F.2.d. Operating Record – 40 CFR 264.73

I.F.2.e. Retention and Disposition of Records – 40 CFR 264.74

I.F.2.f. Reports – 40 CFR 264.73, 264.74, 264.75, and 264.77

I.F.3. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts G and H and in accordance with Section I of the permit application, as revised or amended, O.C.G.A. §12-8-68, Rule 391-3-11-.05 and Rule 391-3-11-.10:

I.F.3.a. Post-Closure Care and Use of Property – 40 CFR 264.117

I.F.3.b. Post-Closure Plan, Amendment of Plan – 40 CFR 264.118

I.F.3.c. Notices to Local Land Authority and in Deed to Property – 40 CFR 264.119 and 264.120

I.F.3.d. Financial Assurance for Post-Closure and Corrective Action. Continuous compliance with 40 CFR 264.145 must be maintained by the Permittee for the amount of the cost estimate for post-closure and corrective action as required by 40 CFR 264.144 until released by the Director as provided in 40 CFR 264.145(i). Continuous compliance with O.C.G.A. §12-8-68, and Rule 391-3-11-.05 is also required.

I.F.4. The Permittee must comply with 40 CFR 264.148 whenever necessary.

I.G. Special Conditions Applicable to Entire Facility

I.G.1. Waste Minimization: The Permittee shall be required to certify no less often than annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that is generated to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment in accordance with 40 CFR 264.73(b)(9).

I.G.2. Land Disposal Restrictions: 40 CFR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land

treatment, storage or disposal unit. The Permittee shall maintain compliance with the requirements of 40 CFR Part 268. Where the Permittee has applied for an extension, waiver or variance under this Part, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such application.

## **SECTION II. CONDITIONS RELATED TO POST CLOSURE CARE**

### **II.A. Unit Identification**

The Permittee shall provide post-closure care in accordance with 40 CFR 264.310 for a surface impoundment unit closed as a landfill with wastes in-place, which is identified as the Closed Surface Impoundment. The unit is also known as the RCRA hazardous waste regulated unit. The location of the closed unit is identified on Figure B-1 of the permit application.

### **II.B. Waste Identification**

The Permittee managed K001 hazardous waste in the Closed Surface Impoundment identified in II.A. The Closed Surface Impoundment unit and its associated waste streams are described in the permit application dated April 10, 2025.

### **II.C. Monitoring and Inspection**

The Permittee shall follow the inspection schedule and document inspections performed in accordance with Sections E, F, and I of the permit application, as revised and as required by 40 CFR 264.15 and 264.310. Inspections shall include the operation and maintenance of all corrective action equipment at the facility.

### **II.D. Post-Closure Care**

II.D.1 The Permittee shall perform post-closure care for the Closed Surface Impoundment identified in II.A in accordance with the post-closure plan in Section I of the permit application, and as required by 40 CFR 264.117 through 264.120 and 264.310.

II.D.2 The facility's post-closure care period will continue until an adequate site specific demonstration can be made that the contamination no longer poses a threat to human health and the environment, pursuant to 40 CFR 264.117(a)(2)(ii).

## **SECTION III. GROUNDWATER MONITORING**

### **III.A. Well Location and Construction**

The Permittee shall install and/or maintain a groundwater monitoring system to comply with the requirements of 40 CFR 264.95, 264.97 and 264.100 as specified below:

III.A.1. The Permittee shall maintain the following groundwater monitoring wells and withdrawal wells at the locations specified on Figure E-3, and in accordance with Section E of the permit application, and any other groundwater monitoring wells or withdrawal wells deemed appropriate by the Director to monitor groundwater conditions within and adjacent to all plumes of contamination associated with the facility:

MW-1	MW-2	MW-3	MW-3A	MW-4
MW-5R	MW-6R	MW-7	MW-7A	MW-7B
MW-8	MW-9	MW-10	MW-11	MW-12
MW-12A	MW-13	MW-14	PW-1	MW-5A
MW-7B2				

III.A.2. The following groundwater monitoring well shall define the background monitoring well for the facility:

MW-1

If the groundwater in this well no longer represents background water conditions for the facility, the Permittee shall submit a plan to install a new background well(s).

III.A.3. The following groundwater monitoring wells shall define the point of compliance (POC) for the Closed Surface Impoundment:

MW-5R      MW-6R      MW-11

III.A.4. The Permittee shall install and maintain additional groundwater monitoring wells as necessary, to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with 40 CFR 264.95, 264.97 and 264.100. A plan specifying the design, location and installation of any additional monitoring wells shall be submitted no later than thirty (30) days prior to installation (unless it is deemed appropriate by the Director and the Permittee that the wells should be installed on an accelerated schedule), which at a minimum, shall include:

III.A.4.a. Well construction techniques including casing depths and proposed total depth of well(s);

III.A.4.b. Well development method(s);

III.A.4.c. A complete analysis of well construction materials;

III.A.4.d. A schedule of implementation for construction; and

III.A.4.e. Provisions for determining the lithologic character, hydraulic conductivity and grain size distribution for the applicable aquifer unit(s) at the location of the new wells(s).

III.B. Groundwater Protection Standard

III.B.1. The groundwater protection standard, as required under 40 CFR 264.92, shall consist of Table I, which lists the hazardous constituents and their respective concentration limits required under 40 CFR 264.93 and 264.94.

III.B.2. The groundwater protection standard further applies to all hazardous waste, hazardous waste constituent, or hazardous constituent releases as deemed appropriate by the Director to protect human health and the environment.

III.C. Compliance Period

III.C.1. The compliance period under 40 CFR 264.96 shall continue until the end of the post-closure period established by Condition II.D.2. and defined in 40 CFR 264.117.

III.C.2. If the Permittee is engaged in a corrective action program at the end of the compliance period as defined in Condition III.C.1., the compliance period is extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded for a period of three (3) consecutive years, and corrective action as required under 40 CFR 264.100 has been terminated as required by 40 CFR 264.96(c).

III.D. Monitoring Program to Demonstrate Effectiveness of Corrective Action Program

The Permittee shall implement and maintain a groundwater monitoring program to demonstrate the effectiveness of the corrective action program required under 40 CFR 264.100 (and 40 CFR 264.101 as related to other releases of hazardous waste, hazardous waste constituents, or hazardous constituents). Groundwater monitoring shall be conducted in conformance with the requirements of 40 CFR 264.100(d) and as specified below:

III.D.1. The Permittee shall collect, preserve and analyze all groundwater samples as required by Condition III.F.

III.D.2. The Permittee shall determine the concentration of all constituents specified in Table I by collecting and analyzing samples according to Appendix A6 of the Field Sampling and Analysis Plan of the RCAP.

III.D.3. The groundwater monitoring program must include a determination of the groundwater surface elevation in all monitoring and extraction wells identified in Condition III.A.1. each time groundwater is sampled.

III.D.4. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least semi-annually.

III.D.5. Background concentrations for Table I parameters shall be based on analysis of samples taken from background monitoring well MW-1. The Permittee shall maintain all monitoring data from the wells pursuant to 40 CFR 264.97(j) and shall submit the data for purposes of background determination upon the Director's request. The acceptable demonstration of a lack of statistically significant difference between a background concentration and the concentrations at compliance point wells shall consist of application of the statistical method per 40 CFR 264.97(h) to a minimum of six (6) sets of sampling events from the above listed background monitoring well.

III.D.6. The Permittee must obtain samples from one of the three POC wells specified in Condition III.A.3. at least annually and on a rotating basis such that each POC well is sampled every three years, plus any additional wells specified by the Director, for all constituents in Appendix IX of 40 CFR Part 264 to determine whether additional hazardous constituents are present in the uppermost aquifer and, if so, at what concentrations. The Appendix IX results must be submitted within 120 days of the sampling.

If the Permittee finds Appendix IX constituent(s) in the groundwater that are not identified on Table I, then the Permittee may resample within one (1) month of receiving the results of the initial analysis and repeat the analysis. If the second analysis confirms the presence of new hazardous constituent(s), then the Permittee must report the concentrations of these additional hazardous constituents to the Director within seven (7) days of the second analysis and submit a permit modification requesting these hazardous constituent(s) be added to Table I.

Alternatively, if the second analysis confirms the presence of new Appendix IX constituents, the Permittee may, at the time of the next sampling required by Condition III.D.2, sample the well that the new Appendix IX constituents were detected in, the nearest down-gradient well, and any additional down-gradient wells to which groundwater may have traveled (based upon the evaluation required by Conditions III.D.3 and III.D.4) and analyze for the new Appendix IX constituents. If the new Appendix IX constituents are not identified in any of these wells, the Permittee is relieved of the requirement to add the new constituents to Table I.

If the Permittee chooses not to resample under either of the above regimes, then the Permittee must report the concentrations of those additional hazardous constituents to the Director within seven (7) days after completion of the initial analysis and submit a permit modification requesting these hazardous constituents be added to Table I.

III.D.7. Compliance with the groundwater protection standard, as defined under Condition III.B., will be based upon groundwater monitoring data obtained under Condition III.D.2. that indicate that all constituents listed in Table I no longer exceed the

groundwater protection standard at the point of compliance or any other monitoring point within or adjacent to the plume(s) of contamination. Comparisons for the purpose of determining compliance shall be made utilizing the statistical procedure described in 40 CFR 264.97(h) and (i).

III.E. Corrective Action Program

- III.E.1. The Permittee shall continue the corrective action program for releases of hazardous constituents to groundwater from the unit identified in Condition II.A. as required under 40 CFR 264.100, and as described in the RCAP dated June 10, 2023, revised June 29, 2024, for those hazardous constituents that exceed the groundwater protection standard in Table I.
- III.E.2. The Permittee shall conduct a corrective action program to remove or treat in place any hazardous constituents that exceed concentration limits in Table I in groundwater between the point of compliance and the downgradient facility property boundary as required under 40 CFR 264.100(e)(1), and beyond the facility boundary as required under 40 CFR 264.100(e)(2), unless the Permittee can demonstrate to the satisfaction of the Director that:
- III.E.2.a. Despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action beyond the facility property boundary, or
- III.E.2.b Such action is not necessary to protect human health or the environment.
- III.E.3. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility's boundary where off-site access is denied as required under 40 CFR 264.100(e)(2).
- III.E.4. The corrective action system must be installed and operated in such a manner as to mitigate the release of any hazardous waste, hazardous constituent(s) or hazardous waste constituent(s) to the environment.
- III.E.5. The corrective action system must be installed and operated in a manner so as to preclude further migration of the contaminant plume.
- III.E.6. The Permittee shall treat, store and dispose of all contaminated groundwater in accordance with all applicable federal, state and local laws.
- III.E.7. If the groundwater protection standard is met during the compliance period, the Permittee must continue corrective action to the extent necessary to ensure that the groundwater protection standard is not exceeded. The Permittee may request EPD to allow the corrective action program to be terminated if the groundwater protection standard is not exceeded for three (3) consecutive years as provided in 40 CFR 264.100(f).

### III.F. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.A. to provide a reliable indication of the quality of the groundwater as required under 40 CFR 264.97(d) and (e);

III.F.1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in Section E-6(b) of the permit application and the EPA's Region IV Science and Ecosystem Support Division (SESD) Procedures found in its Field Branches Quality System and Technical Procedures. This includes sampling of groundwater and management of samples prior to analysis, pump operation, groundwater level and well depth measurement, and field measurement procedures.

III.F.2. Samples shall be analyzed according to the procedures specified in Section E-6(b) of the permit application, or as specified in the current Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846 using whichever procedure is more recent at the time of analysis.

III.F.3. Samples shall be tracked and controlled using the chain of custody procedures specified in Section E-6(b) of the permit application.

### III.G. Reporting, Recordkeeping, and Response

III.G.1. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Condition III in the operating record, as required by 40 CFR 264.73(b)(6).

III.G.2. The Permittee shall submit a report to the Director on the effectiveness of the corrective action program semi-annually to include all monitoring, testing and analytical data obtained under Condition III. The report shall be submitted within sixty (60) days after receiving the laboratory analytical data. The following information must be provided in the report:

III.G.2.a A clear indication of those hazardous constituents which exceed the groundwater protection standard established under Condition III.B.;

III.G.2.b A comparison with previous monitoring data;

III.G.2.c A discussion of trends toward improvement or degradation of groundwater quality;

III.G.2.d Updated calculation(s) and a discussion regarding the estimated time remaining to complete corrective action; and

III.G.2.e The assessment of groundwater flow rate and direction required under Condition III.D.4.



### III.H. Permit Modification

III.H.1. If the Permittee or the Director at any time determines that the corrective action program no longer satisfies the requirements of 40 CFR 264.100 or Condition III.E. for releases of hazardous waste, hazardous waste constituent(s), or hazardous constituent(s) that originate from the Closed Surface Impoundment, the Permittee must within ninety (90) days submit an application for a permit modification to make any appropriate changes in the program.

III.H.2. If the Permittee meets or exceeds the requirements of 40 CFR 264.100 and meets the groundwater protection standard at the point of compliance and throughout the contaminant plume for three (3) consecutive years, the Permittee may submit an application for a permit modification pursuant to 40 CFR 270.41 or 40 CFR 270.42 to terminate corrective action and establish an alternate groundwater monitoring program.

### III.I. Duty of Permittee

The Permittee shall assure that groundwater monitoring and corrective action measures necessary to achieve compliance with 40 CFR 264.100 and the groundwater protection standard under 40 CFR 264.92 are taken during the compliance period.

## **SECTION IV. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN**

### IV.A. Applicability

The requirements of this Section apply to the determination of the need for and subsequent implementation of corrective action for releases from all solid waste management units (SWMUs) and areas of concern (AOCs) contained within the facility property boundary as required by 40 CFR 264.101(a), and those extending beyond the facility property boundary, as required by 40 CFR 264.101(c) and §12-8-66 of the Georgia Hazardous Waste Management Act. The requirements of this Section apply, but are not limited to, the following SWMUs and AOCs:

IV.A.1. The SWMUs and AOCs identified in Appendix A.

IV.A.2. Any additional SWMUs or AOCs discovered after the date of issuance of this permit due to groundwater monitoring, on-going field investigations, environmental audits, or other means.

### IV.B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

IV.B.1. Within fifteen (15) days of the Permittee's discovery of any SWMU or AOC under Condition IV.A.2., the Permittee shall notify the Director in writing of such discovery.

- IV.B.2. The Director shall notify the Permittee in writing of the discovery of any SWMU or AOC under Condition IV.A.2.
- IV.B.3. Within sixty (60) days of the Permittee's discovery pursuant to Condition IV.B.1. or within sixty (60) days of receipt of the Director's notification under Condition IV.B.2., the Permittee shall submit to the Director the following information for each SWMU or AOC:
- IV.B.3.a. Location on a topographic map of appropriate scale as required under 40 CFR 270.14(b)(19);
  - IV.B.3.b. Designation of type and function of SWMU/AOC;
  - IV.B.3.c. General dimensions, capacities and structural description (supply any available plans/drawings);
  - IV.B.3.d. Dates of SWMU/AOC operation;
  - IV.B.3.e. Specification of all wastes that have been managed at/in the SWMU or AOC to the extent available; and
  - IV.B.3.f. All available information pertaining to any release of hazardous waste, hazardous constituent(s) or hazardous waste constituent(s) (to include soil analyses, sediment, air, groundwater, and/or surface water data).
- IV.B.4. The Director shall review the information submitted pursuant to Condition IV.B.3. and notify the Permittee in writing as to the need for further investigation, interim measures/stabilization requirements and/or corrective action as required by Condition IV.D., IV.E., IV.F., or IV.G.
- IV.C. Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs and AOCs
- IV.C.1. Within thirty (30) days of the Permittee's discovery of (a) previously unidentified release(s) from any SWMU or AOC identified under IV.A, the Permittee shall notify the Director in writing of such discovery.
- IV.C.2. The Director shall notify the Permittee in writing of the discovery of any previously unidentified release(s) from any SWMU or AOC identified in Condition IV.A.
- IV.C.3. Within ninety (90) days of the Permittee's discovery under Condition IV.C.1. or within ninety (90) days of the date of receipt of the Director's notification under Condition IV.C.2., the Permittee shall submit to the Director, a RCRA Facility Investigation (RFI) Workplan pursuant to Condition IV.F.
- IV.D. Verification Investigation
- IV.D.1. The Director may require the Permittee to submit a Verification Investigation (VI) Workplan for any SWMU or AOC discovered under Condition IV.A.2. in a

schedule to be determined by the Director. The VI Workplan shall describe all actions necessary to verify the presence or absence of a release for any SWMU or AOC. The VI Workplan shall include a schedule of implementation which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the VI Workplan continuing through submission of the VI Report required by Condition IV.D.3.

IV.D.2. Upon receipt of the Director's written approval of the VI Workplan, the Permittee shall implement the Workplan in accordance with the schedule of implementation contained therein.

IV.D.3. The Permittee shall submit a VI Report in accordance with the schedule of implementation contained within the approved VI Workplan. The VI Report shall describe all actions taken to verify the presence or absence of releases including all data collected during the VI. The Director shall review the VI Report and notify the Permittee in writing of the need for further investigation, interim measures and/or corrective action pursuant to Condition IV.E., IV.F., and/or IV.G., or of a finding of no further action required.

IV.E. Interim Measures (IM)

IV.E.1. Upon the Director's concurrence, the Permittee may conduct interim measures to contain, remove or treat contamination resulting from releases from any SWMU or AOC as necessary to protect human health and the environment. Such interim measures may be conducted concurrently with any investigations required by this permit.

IV.E.2. Within thirty (30) days of the Permittee's determination that interim measures are necessary, or within thirty (30) days of receipt of the Director's written notice that interim measures are necessary, the Permittee shall submit to the Director an Interim Measures (IM) Workplan. The IM Workplan shall describe all measures necessary to contain, remove or treat contamination resulting from releases from any SWMU or AOC. The IM Workplan shall include a schedule of implementation which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the IM Workplan and continuing through submission of the IM Report required by Condition IV.E.5.

IV.E.3. Upon receipt of the Director's written approval of the IM Workplan, the Permittee shall implement the Workplan in accordance with the schedule of implementation contained therein.

IV.E.4. The Permittee shall provide written notice to the Director as soon as possible of any planned changes, reductions or additions to the interim measures described in the IM Workplan.

- IV.E.5. The Permittee shall submit an IM Report in accordance with the schedule of implementation contained in the approved IM Workplan. The IM Report shall describe all interim measures taken to contain, remove or treat contamination resulting from releases from any SWMU or AOC. The IM Report shall also provide a summary of all data or other information obtained during implementation of the IM Workplan and a summary of the effectiveness of the interim measures in achieving the objective of Condition IV.G.

IV.F. RCRA Facility Investigation

- IV.F.1. Within ninety (90) days of the date of receipt of the Director's written notice pursuant to Condition IV.B.4., IV.C.3., and/or IV.D.3., the Permittee shall submit to the Director an RFI Workplan.
- IV.F.2. The RFI Workplan shall provide a description of the specific actions necessary to determine the full nature and extent of contamination associated with releases from any SWMU and AOC identified by Condition IV.A., IV.B., IV.C., and IV.D., including potential migration pathways for those releases (e.g. air, land, surface water, and groundwater), actual or potential receptors and applicable background concentrations. The Permittee must provide sufficient justification that migration through a potential pathway is not likely if a potential migration pathway associated with a release is not included in the Workplan. Such deletions are subject to the approval of the Director.
- IV.F.3. The RFI Workplan shall include a schedule of implementation, which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the RFI Workplan and continuing through submission of the RFI Report required by Condition IV.F.5.
- IV.F.4. The Permittee shall implement the RFI in accordance with the approved RFI Workplan required by Condition IV.F.2. and IV.F.3.
- IV.F.5. The Permittee shall submit a RFI Report in accordance with the schedule of implementation contained in the approved RFI Workplan. The Report shall provide a summary of all activities undertaken during the RFI to implement the approved Workplan. The Report shall provide a complete description of the nature and extent of contamination associated with all releases evaluated during the RFI including sources, migration pathways, actual or potential receptors, and applicable background concentrations. The RFI Report shall 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 actions required by the Workplan, or such action is not necessary to protect human health or the environment.

IV.F.6. The Director shall review the RFI Report required under Condition IV.F.5. and notify the Permittee in writing of the need for further investigation and/or corrective action as required by Condition IV.G., 40 CFR 264.101(a) and 40 CFR 264.101(c), or of a finding of no further action required.

IV.F.7. Within thirty (30) days of the Permittee's receipt of the Director's written notice for further investigation referenced in Condition IV.F.6., the Permittee must address, to the Director's satisfaction, all comments and concerns included in the Director's written notice referenced in Condition IV.F.6.

#### IV.G.1 Corrective Action

IV.G.1. Within ninety (90) days of the Permittee's receipt of the Director's written notice referenced in Condition IV.D.3. and/or IV.F.6., the Permittee shall submit a Corrective Action Plan (CAP) to the Director. The CAP shall provide a description of the corrective measures to be taken with regard to releases from any SWMU and AOC identified in Condition IV.D.3. and/or IV.F.1. The CAP shall be submitted as a request for permit modification in accordance with 40 CFR 270.41 and 270.42. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility's boundary where offsite access is denied as required under 40 CFR 264.101(c).

IV.G.2. The CAP shall include a schedule of implementation with intermediate milestones beginning with the issuance of the permit modification requested pursuant to Condition IV.G.1. and continuing through the compliance period.

IV.G.3. The CAP shall include a cost estimate and demonstration of financial responsibility for completing such corrective action as required by 40 CFR 264.101(b), O.C.G.A. §12-8-68, and Rule 391-3-11-.05.

IV.G.4. The Director shall review the CAP required under Condition IV.G.1. and notify the Permittee in writing of the need for further corrective measures as required by 40 CFR 264.101(a) and 40 CFR 264.101(c), or of an approval of the CAP.

IV.G.5. Within thirty (30) days of Permittee's receipt of Director's written notice for further corrective measures referenced in Condition IV.G.4., the Permittee must address, to the Director's satisfaction, all comments and concerns included in the Director's written notice referenced in Condition IV.G.4.

IV.G.6. The RCAP dated June 10, 2023, revised June 29, 2024, is incorporated by reference.

#### IV.H. Schedule of Compliance

IV.H.1. All plans and reports required by this Section are subject to the approval of the Director prior to implementation. The Director shall specify in writing any

deficiencies of any plan and/or report submitted by the Permittee pursuant to this Section, including a schedule for resubmission of revised documents to address said deficiencies. The Permittee shall revise all submittals as specified by the Director, and must address, to the Director's satisfaction, all comments and concerns included in the Director's written notice.

- IV.H.2. For any schedule of implementation required by this Section, if the time required to complete any interim activity is more than one year, the schedule shall specify interim dates for the submission of reports of progress toward satisfaction of the interim requirements.
- IV.H.3. The results of all plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for the submittal of any plan or report may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists. Extensions of over thirty (30) days must be requested in writing.
- IV.H.4. Upon approval by the Director, all plans, reports and schedules shall be enforceable as conditions of this permit.
- IV.H.5. If at any time the Permittee determines that any plan, report or schedule required under this Section no longer satisfies the requirements of this permit or 40 CFR 264.101, the Permittee must submit an amended plan, report or schedule to the Director within thirty (30) days of such determination.
- IV.H.6. If at any time the Director determines that any plan, report or schedule required under this Section no longer satisfies the requirements of this permit or 40 CFR 264.101, the Director will so notify the Permittee in writing and request that an amended plan, report or schedule be submitted in accordance with a schedule to be specified.

IV.I. Permit Modification

If required to develop a CAP under Condition IV.G. and 40 CFR 264.101, or amend/modify a CAP, the Permittee shall apply for a permit modification pursuant to 40 CFR 270.41.

**Table I**

<b>Hazardous Constituent</b>	<b>Concentration</b>
<b>VOCs</b>	
1, 1 – Dichloroethene	Background <sup>1</sup>
Acetone	Background <sup>1</sup>
2-Butanone (Methyl Ethyl Ketone)	Background <sup>1</sup>
1,1,1 – Trichloroethane	Background <sup>1</sup>
Benzene	Background <sup>1</sup>
1,2-Dichloroethane	Background <sup>1</sup>
Trichloroethene	Background <sup>1</sup>
Toluene	Background <sup>1</sup>
Tetrachloroethene	Background <sup>1</sup>
Ethylbenzene	Background <sup>1</sup>
Xylenes (m & o)	Background <sup>1</sup>
Xylenes (p)	Background <sup>1</sup>
Styrene	Background <sup>1</sup>
1,3,5 – Trimethylbenzene	Background <sup>1</sup>
1,2,4-Trimethylbenzene	Background <sup>1</sup>
<b>SVOCs</b>	
2-Chlorophenol	Background <sup>1</sup>
Acenaphthene	Background <sup>1</sup>
2-Methylnaphthalene	Background <sup>1</sup>
2-Methylphenol (o-Cresol)	Background <sup>1</sup>
3,4-Methylphenol	Background <sup>1</sup>
Acenaphthylene	Background <sup>1</sup>
2,4-Dimethylphenol	Background <sup>1</sup>
Anthracene	Background <sup>1</sup>
2,4-Dinitrophenol	Background <sup>1</sup>
Benzo(a)anthracene	Background <sup>1</sup>
Benzo(a)pyrene	Background <sup>1</sup>
Benzo(b)fluoranthene	Background <sup>1</sup>
2,3,4,6 Tetrachlorophenol	Background <sup>1</sup>
Pentachlorophenol	Background <sup>1</sup>
Benzo(k)fluoranthene	Background <sup>1</sup>
Phenol	Background <sup>1</sup>
2,4,6-Trichlorophenol	Background <sup>1</sup>
Chrysene	Background <sup>1</sup>
Creosote <sup>4</sup>	
Dibenzo(a,h)anthracene	Background <sup>1</sup>
Fluoranthene	Background <sup>1</sup>
Fluorene	Background <sup>1</sup>
Indeno(1,2,3-cd)pyrene	Background <sup>1</sup>
Naphthalene	Background <sup>1</sup>

<b>Hazardous Constituent</b>	<b>Concentration</b>
Carbazole	Background <sup>1</sup>
Dibenzofuran	Background <sup>1</sup>
Phenanthrene	Background <sup>1</sup>
Pyrene	Background <sup>1</sup>
4-Chloro-3-methylphenol	Background <sup>1</sup>
Dioxins/furans <sup>3</sup>	
<b>Metals</b>	
Arsenic	0.05 mg/L <sup>2</sup>
Barium	1.0 mg/L <sup>2</sup>
Cadmium	0.01 mg/L <sup>2</sup>
Chromium	0.05 mg /L <sup>2</sup>
Cobalt	Background <sup>1</sup>
Copper	Background <sup>1</sup>
Lead	0.05 mg/L <sup>2</sup>
Nickel	Background <sup>1</sup>
Selenium	0.01 mg/L <sup>2</sup>
Vanadium	Background <sup>1</sup>
Zinc	Background <sup>1</sup>

<sup>1</sup> To be determined according to procedures specified in Condition III.D.5

<sup>2</sup> Concentration limit derived from 40 CFR 264.94 Table 1

<sup>3</sup> The dioxins & furans listed in Appendix IX of 40 CFR 264 will be analyzed during annual sampling of the point of compliance wells and well MW-7B. The Permittee will analyze all wells in Condition III.A.1 for dioxins and furans when making the demonstration pursuant to Conditions III.E.7, III.H.2 and 40 CFR 264.100(f).

<sup>4</sup> Creosote is composed of many distinct indicator compounds. Many of these indicator compounds have been included on this table.



**APPENDIX A****SOLID WASTE MANAGEMENT UNIT AND AREA OF CONCERN SUMMARY**

SWMU or AOC	40 CFR 264.90(a)(2) Regulated Unit?	Verification Investigation Required?	RFI Required?	RFI Complete?	Corrective Action Required?	No Further Action
SWMU 1 – Process Tank Field Area Including Creosote Truck Unloading Area	No	N/A	Yes	No	Yes	N/A
SWMU 2 – Treating Room Under Roof	No	N/A	Yes	No	Yes	N/A
SWMU 3 – Soil Areas Between the Concrete Pad Under #0 Treating Cylinder and the Concrete Foundations Under #1 Cylinder	No	N/A	Yes	No	Yes	N/A
SWMU 4 – Railroad Track “Kickback” Drillage Area	No	N/A	Yes	No	Yes	N/A
SWMU 5 – Old Creosote Storage Tank	No	N/A	Yes	No	Yes	N/A
SWMU 6 – Cooling Water Pond	No	N/A	Yes	No	Yes	N/A
SWMU 7 – Foundation Retaining Wall Under #1 Cylinder	No	N/A	Yes	No	Yes	N/A
SWMU 8 – Oil Shed	No	N/A	Yes	No	Yes	N/A
SWMU 9 – Old Goldfish Pond	No	N/A	Yes	No	Yes	N/A
SWMU 10 – Stream and Culvert Area	No	N/A	Yes	No	Yes	N/A
SWMU 11 – Closed Surface Impoundment	Yes	N/A	Yes	No	Yes	N/A