

**FACT SHEET
TRANE TECHNOLOGIES COMPANY LLC
SYLVANIA, GEORGIA**

A draft permit has been prepared to renew Trane Technologies Company LLC's Hazardous Waste Facility Permit HW-056(D)-2. 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 Trane Technologies Company LLC 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 Permittees must comply for the permit's duration.

II. PERMIT STRUCTURE

The permit is divided into five parts. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I specifies the general permit conditions, which are applicable to all hazardous waste management facilities. Section II specifies the conditions for the hazardous waste central accumulation area. Section III specifies the conditions for post-closure care for the former toxaphene surface impoundments. Section IV specifies a program for ground water monitoring for the remediation of any contamination resulting from the operation of the former toxaphene surface impoundments. Section V specifies conditions of corrective action for solid waste management units and areas of concern from all releases of hazardous wastes or constituents to the environment, which may have occurred but are not related to the units already addressed.

III. FACILITY DESCRIPTION

Trane Technologies Company LLC is located at 400 Friendship Road in Sylvania, Screven County, Georgia. The main Sylvania Georgia Plant (SGP) production facility was constructed in 1974, with a major addition in 1979, and covers approximately 87 acres. SGP manufactures drawn-cup needle bearings, precision pins, rolls, and shafts for the automotive and industrial market. The facility was originally assigned EPA I.D. Number GAD065344301. When Ingersoll Rand sold the facility in 2003 EPA I.D. Number GAD065344301 remained with the Ingersoll Rand-Sylvania Remediation and the new owner was assigned a new EPA I.D. Number, GAR000036152.

As part of the transaction, Ingersoll Rand retained responsibility for Resource Conservation and Recovery Act (RCRA) post-closure care at SGP. Therefore, Ingersoll Rand is the "operator" of the closed RCRA units and is responsible for activities and inspections required for post-closure care at SGP. On March 2, 2020, Ingersoll Rand changed its name to Trane Technologies Company LLC pursuant to a Reverse Morris Trust Agreement entered into between Ingersoll Rand and Gardner Denver. Since March 2020, Trane Technologies Company LLC has been the "operator" of the closed RCRA Units and is responsible for the post-closure care at SGP. Koyo is the "owner" of the SGP facility. Post-closure care activities have been designated as the Ingersoll Rand-Sylvania Remediation to differentiate RCRA remediation activities from Koyo production activities at the facility.

From 1974 to 1996, the bearings production process involved a copper-plating and cyanide stripping operation that resulted in a hazardous waste stream containing cyanide and various heavy metals. By EPA definition, the waste plating solutions were listed hazardous wastes, F007, which were listed because of the presence of cadmium, hexavalent chromium, nickel, and cyanide (complexed). Sludges from the treatment of the waste plating solutions were also listed hazardous wastes, F006, which were also listed because of the

presence of cadmium, hexavalent chromium, nickel, and cyanide (complexed). The facility also previously used chlorinated solvents for metal-cleaning purposes. Process changes and waste minimization efforts have eliminated the use of cyanide and chlorinated solvents at the plant. Cyanide has not been used at the plant since 1996 and chlorinated solvents have not been used at the plant since 1992. Prior to 1996 the facility also produced a nonhazardous waste stream that was combined with the hazardous waste stream in the former wastewater treatment system (WWTS). The Ingersoll Rand–Sylvania Remediation is currently classified as a Treatment, Storage, and Disposal Facility (TSDF) in accordance with Georgia Environmental Protection Division (EPD) regulations for the management of RCRA regulated wastes in closed surface impoundments. The facility is also classified as a RCRA small quantity generator because it generates and stores hazardous waste in drums.

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

IV. PERMIT CONDITIONS

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	§264 Subparts B,C,D,E,F,G and H	I.F
Special Conditions Applicable to Entire Facility	§264.73(b)(9) §268	I.G

Section II – Post Closure Care

<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	§264.310	IID
Post Closure Care Period	§264.117 §264.310	II.E

Section III – Groundwater Monitoring

<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 §264.101	III.D
Implementation of Corrective Action	§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	

Section IV – Corrective Action for Solid Waste Management Units and Areas of Concern

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Applicability	§264.101	IV.A
Notification and Assessment Requirements for Newly Identified SWMUs and AOCs	§264.101	IV.B

Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs and AOCs	§264.101	IV.C
Verification Investigation	§264.101	IV.D
Interim Measures	§264.101	IV.E
RCRA Facility Investigation (RFI)	§264.101	IV.F
Corrective Action for SWMUs and/or AOCs	§264.101	IV.G
Schedule of Compliance	§264.101	IV.H
Permit Modification	§270.41 §270.42	IV.I

V. PROCEDURES FOR REACHING A FINAL DECISION

The issuance of a renewed hazardous waste permit to Trane Technologies Company LLC will be administered by EPD. EPD has rules which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste and facilities that require post-closure care and corrective action.

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 forty-five (45) day comment period for each draft permit prepared. EPD has extended the comment period to sixty (60) days. The comment period will begin on February 28, 2024 and end on April 16, 2024. Any person interested in commenting on the draft permit must do so within the sixty (60) day comment period. All comments should be submitted in writing to:

Jim Sliwinski
Georgia Environmental Protection Division
Hazardous Waste Corrective Action Program
2 Martin Luther King Jr. Dr., SE
Suite 1054, Floyd Towers East
Atlanta, Georgia 30334-9000

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