

FACT SHEET
Manor Timber Company
Argyle, Georgia

A draft permit has been prepared for the Manor Timber Company Hazardous Waste Facility Permit HW-047(D). 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 in order 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 Manor Timber Company (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 specifies the general permit conditions, which are applicable to all hazardous waste management facilities. Section II specifies the post closure care for the surface impoundment closed as a landfill. Section III specifies groundwater monitoring and corrective action for the regulated unit. Section IV specifies corrective action for releases from solid waste management units and other releases of hazardous wastes or constituents to the environment, which may have occurred but are not related to the unit already addressed.

III. FACILITY DESCRIPTION

Manor Timber Company is located on Black Ankle Road in Argyle, Clinch County, just off U.S. Highway 84. The facility operates as a preserver of wood products, primarily landscape timbers, fence posts, barn poles and lumber. Past activities at the facility discharged wastewater to a surface impoundment that was closed as a landfill in 1988. Hazardous wastes that were previously managed in the surface impoundment include, but are not limited to Pentachlorophenol, Creosote and CCA (Chromated Copper Arsenate).

Groundwater monitoring and a subsequent groundwater quality assessment evaluated the nature and extent of releases of hazardous constituents from the impoundment. Results from these investigations indicated the need for Manor Timber Company to be issued a hazardous waste facility permit to enable it to perform post-closure care for the impoundment. The facility was issued Hazardous Waste Facility Permit No. HW-047(D), by the Georgia EPD, on September 30, 1987, which was renewed on September 30, 1997, and July 2011, for post closure care and corrective action of the surface impoundment. Permit No. HW-047(D) requires the Permittee to conduct corrective action to remediate all groundwater that has been contaminated by releases from the impoundment and requires maintenance of the final cover.

Manor Timber Company has submitted a permit renewal application for corrective action of contaminated groundwater and to prevent the further migration of contamination. EPD has determined that the application is complete and intends to renew Permit No. HW-047(D).

As a result of the 1984 amendments to the Resource Conservation and Recovery Act (RCRA), additional provisions for assessment and possible corrective action were included in the Permit for any units where solid wastes which contain hazardous constituents have been managed. These requirements are included in accordance with Section 12-8-66(e) of the Georgia Hazardous Waste Management Act, which addresses corrective action for possible releases of hazardous wastes or hazardous constituents to the environment. The Permit provides for a RCRA Facility Investigation for releases from all solid waste management units and provides for corrective action if investigations indicate the need for such action.

The hazardous waste that has been managed at the landfill is:

<u>EPA Hazardous Waste Number</u>	<u>Material</u>	<u>Unit</u>
K001	Bottom sediment sludge from the treatment of waste waters from wood preserving processes that use creosote and /or pentachlorophenol	Surface Impoundment

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	§270.30(j)	I.C

Reporting	§270.31 §270.11	
Responsibilities	§270.30 §270.40	I.D
Definitions		I.E
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 of Surface Impoundment

<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	§264.228 §264.310	II.D

Section III – Groundwater Monitoring

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
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
Corrective Action	§264.100	III.D
Corrective Action Effectiveness	§264.97	III.E

Monitoring Program	§264.95 §264.101	
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
Inspection	§264.15	III.J

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

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Applicability	§264.101	IV.A
Remedial Investigation 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
Permit Modification	§264.101	IV.F

V. PROCEDURES FOR REACHING A FINAL DECISION

The issuance of the Hazardous Waste Facility Permit to Manor Timber Company will be administered by EPD. EPD 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 forty-five (45) day comment period for each 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. A copy of the draft permit will be available at

the Clinch County Library and the Georgia EPD Land Protection Branch – Hazardous Waste Corrective Action Program and online at <https://epd.georgia.gov/public-announcements-0/land-protection-branch-public-announcements>. All comments should be submitted in writing to EPD at 2 Martin Luther King Jr. Dr. SE, Suite 1054 East Tower, Atlanta, Georgia 30334-9000, Attention: Jim McNamara, Land Protection Branch or by e-mail at epd.comments@dnr.ga.gov. E-mailed comments should include “Manor Timber Company” in the title.

When the Director of EPD makes the 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 Manor Timber Company’s Draft Hazardous Waste Permit is:

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