

FACT SHEET
DELTA AIR LINES
HARTSFIELD-JACKSON ATLANTA INTERNATIONAL AIRPORT
ATLANTA, GEORGIA

A draft permit has been prepared for Delta Air Lines to renew Hazardous Waste Facility Permit No. HW-036(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 Delta Air Lines (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 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 post-closure care for the former Varsol tank system closed as a landfill. Section III specifies a program for groundwater monitoring. Section IV specifies conditions for post-closure care and corrective action for solid waste management units and areas of concern for all releases of hazardous wastes or constituents to the environment, which may have occurred.

III. FACILITY DESCRIPTION

Delta Air Lines Technical Operations Center (TOC) is located at 1775 MH Jackson Service Road in Atlanta. The TOC is an aircraft maintenance and repair facility where Delta conducts overhaul, service, and repairs of aircraft. Hazardous waste is generated from degreasing, painting, paint stripping, engine cleaning, and electroplating processes conducted at the facility. The Hazardous Waste Facility Permit (HW-036(D)) includes post-closure care and corrective action of the former Varsol tank system.

The Georgia Hazardous Waste Management Act requires that such units undergo post-closure care under conditions specified in the permit issued to the facility. The Hazardous Waste Facility Permit provides for continued monitoring and maintenance of the closed regulated unit to minimize factors that would contribute to a possible release of hazardous constituents to the environment. The permit will also ensure the proper operation and maintenance of the corrective action and groundwater monitoring systems that are designed to address releases of hazardous constituents into the groundwater at the closed unit or solid waste management units.

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 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, F, G, H	I.F

Section II – Post-Closure Care For Closed Varsol Regulated Unit

<u>Subject 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 §264.310	II.D

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	§264.95 §264.97 §264.100 §264.101	III.D

Sampling and Analysis Procedures	§264.97	III.E
Duty of Permittee	§264.92	III.F

Section IV – Post Closure Care and 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	§264.101	IV.B
Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs	§264.101	IV.C
Verification Investigation	§264.101	IV.D
Interim Measures		IV.E
RCRA Facility Investigation	§264.101	IV.F
Corrective Action: General	§264.101	IV.G
Post Closure Care Corrective Action Program for CVR Unit, SWMUs and AOCs	§264.101	IV.H
Schedule of Compliance	§264.101	IV.I
Permit Modification	§270.42	IV.J

V. PROCEDURES FOR REACHING A FINAL DECISION

The reissuance of Hazardous Waste Facility Permit No. HW-036(D)-3 to Delta Air Lines 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, or 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 renewal, 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 provided a forty-five (45) day comment period for this draft permit. The comment period will begin on July 6, 2023, and end on August 22, 2023. Any person interested in commenting on the draft permit must do so within the forty-five (45) day comment period. All comments should be submitted in writing to:

Mr. Jim Sliwinski
Georgia Environmental Protection Division
Land Protection Branch
2 Martin Luther King Jr. Dr. SE
Suite 1054, Floyd Towers East
Atlanta, Georgia 30334
(404) 657-8600

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.