FACT SHEET

Bonnell Aluminum Inc. (Bonnell)
Hazardous Waste Facility Permit No. HW-087(D)
Newnan, Coweta County Georgia

A draft permit has been prepared to renew the Hazardous Waste Facility Permit HW-087(D) issued to Bonnell Aluminum Inc., (Bonnell). 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 Bonnell (the Permittee) to comply with the applicable hazardous waste management requirements promulgated under the Georgia Hazardous Waste Management Act. The Hazardous Waste Facility Permit HW-087(D) 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 sections. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I then specifies the general permit conditions, which are applicable to all hazardous waste management facilities. Section II specifies the conditions for post-closure care. Section III specifies the conditions for corrective action for the remediation of any contamination resulting from the operation of the regulated units. Section IV specifies a program for assessing and remediating all releases of hazardous waste or constituents to the environment, which may have occurred but are not related to the regulated units already addressed.

III. FACILITY DESCRIPTION

Bonnell is located at 25 Bonnell Street in Newnan, Coweta County. The facility is an operational manufacturer of extruded aluminum parts for use in residential and commercial construction materials, vehicle manufacturing and recreational products. Bonnell melts aluminum ingots and scrap aluminum and casts them into logs, which are then cut into smaller 30-inch-long billets for extrusion. Once extruded into the desired shape, parts are finished by either anodizing, or chemical conversion and painting. The facility is located on an approximately 37-acre and includes a 363,066-square-foot production building along with several canopies and auxiliary buildings, including maintenance, warehousing, and wastewater treatment. The facility was issued Hazardous Waste Facility Permit HW-087(D) on September 28, 1992, for post closure care of five regulated units: the Aluminum Hydroxide Land Treatment Unit, the Chromium Hydroxide Landfill, the Tank Farm Unit, and the Hazardous Waste Management Area, which includes the Chromium Hydroxide Sand Drying Beds and the Surface Impoundment Unit. The permit was amended on September 30, 1997, for the fiveyear regulatory completeness review, to incorporate a closure and post-closure plan and a revised corrective action plan for the Tank Farm Unit, to revise the facility corrective action plan, and to revise Section E of the Part B permit application. The corrective action system at the facility consisted of a groundwater recovery and treatment system, an air injection system, and an in-situ chemical

oxidation (ISCO) system to address chromium and PCE releases at the site. Bonnell closed these units with waste in place, beginning in 1992 through 1998. The Closure dates for each unit are:

- Chromium Hydroxide Sand Drying Beds (1992)
- Chromium Hydroxide Landfill (1993)
- Aluminum Hydroxide Land Treatment Unit (1994)
- Surface Impoundment Unit (1996)
- Tank Farm Unit (1998)

On February 22, 2004, and then again on September 19, 2014, the permit was renewed, for post-closure care of the five closed hazardous waste management units. On April 19, 2019, the permit was modified to include changes to the corrective action plan in addition to the following: incorporating remedial goal options from the approved groundwater risk assessment as groundwater protection standards within the property line, incorporating the updated SWMU 49 Corrective Action Plan (i.e. discontinue the extraction, treatment, and discharge of site groundwater and enhanced in-situ bioremediation), modifying monitoring parameters based upon source of impacts, the abandonment of recovery well RW-1, shutdown criteria for the bioventing system and extending the post-closure care period. Besides the permitted units, 48 Solid Waste Management Units (SWMUs) have been identified; 47 of the SWMUs require no further action. The remaining SWMU, which requires corrective action, is the PCE Degreaser (SWMU-49).

Requested changes to the permit include:

- SWMU 49 Corrective Action Plan revise the monitoring frequency for the Zone 2 effectiveness wells to annual sampling for all wells.
- Request permanent shut down and decommissioning of the Tank Farm Unit bioventing system. Bonnell requests to abandon the associated wells (test wells, vent wells, & shallow vapor points). Mechanical equipment and above ground piping is expected to be removed and disposed of properly. Monitoring well MW-51S and MW-52S will remain in place for continued monitoring in the Tank Farm Unit area.
- Move to annual reporting from semi-annual reporting.

Other Environmental Permits at the facility include the following: Underground Injection Control (GAW000548), Stormwater General Permit (GAR050000), Air Permit Title V (33540770010V040) and City of Newnan Industrial Use Wastewater Discharge Permit (NU-002).

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 <u>et seq.</u>, as amended, announces its intent to renew Hazardous Waste Facility Permit number HW-087(D), issued to Bonnell. The draft renewal permit will require Bonnell to conduct post-closure care of five closed waste management units.

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

Subject	Regulation	Permit Condition
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
General Facility Standards	§ Part 264 subparts B, C, D, E, G, H	I.F
Special Conditions	§264.73(b)(9) §268	I.G

Section II - Conditions Post Closure Care

Subject	Regulation	Permit Condition
Unit Identification		II.A
Waste Identification		II.B
Monitoring and Inspection	§264.15 §264.310	II.C
Post-Closure	§264.310	II.D

Section III - Groundwater Monitoring

Subject	Regulation	Permit Condition
Well Location and Construction	§264.95 §264.97 §264.100	III.A
Sampling and Analysis Procedures	§264.97	III.B
Groundwater Protection	\$264.92 \$264.93 \$264.94	III.C.1
Compliance Period	§264.96	III.C.2
Groundwater Monitoring Program	§264.95 §264.97	III.C.3
Reporting	\$264.73(b)(6) \$264.100(g)	III.C.4
Corrective Action Program	§264.100	III.C.5
Permit Modification	§270.41 §270.42	III.C.6
Duty of Permittee	§264.92	III.C.7

Section IV - Corrective Action for Solid Waste Management Units and areas of concern

Subject	Regulation	Permit Condition
Corrective Action Applicability	§264.101	IV.A
Notification Requirements for Discovered Releases at SWMUs and AOCs	§264.101	IV.B, IV.C
Verification Investigation	§264.101	IV.D
Interim Measures	§264.101	IV.E
RCRA Facility Investigation	§264.101	IV.F
Corrective Action	§264.101	IV.G
Schedule of Compliance	§264.101	IV.H
Permit Modification	§270.42	IV.I

V. PROCEDURES FOR REACHING A FINAL DECISION

The renewal of Bonnell 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 (December 17, 2025, to February 05, 2026). 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 1058 East Tower, Atlanta, Georgia 30334-9000, Attention: Scarlett Kastner, Land Protection Branch. Emailed comments can be sent to epd.comments@dnr.ga.gov. If you choose to email your comments, please be sure to include the words "Bonnell Aluminum Inc. Permit Renewal HW-087(D)" 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 will be final 30 days after issuance.

Contact person for Bonnell Aluminum Inc., Draft Hazardous Waste Permit HW-087(D) is:

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