

FACT SHEET
WILLIAM C. MEREDITH COMPANY
EAST POINT, GEORGIA

A draft permit has been prepared for the above-referenced hazardous waste facility. 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 William C. Meredith Company (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 four parts. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I specifies the standard 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 wastes or constituents to the environment, which may have occurred but are not related to the units already addressed.

III. FACILITY DESCRIPTION

The Permittee's facility, located at 2335 Lawrence Street in East Point, Georgia, has been in operation since 1927. The facility is identified by EPA I.D. No. GAD003323805. Its primary operations include the pressure treatment of wood utility poles with pentachlorophenol. The Permittee is phasing out pentachlorophenol and transitioning to DCOI as the only wood preservative. In the past, creosote had been used at the facility to treat utility poles, utility conduit, cross arms, and groundwire molding. In the application of the wood treating chemicals, releases to the soil and groundwater underlying the site have occurred. Some of the contaminated soils have been excavated and disposed of off-site and the surface impoundment that formerly managed K001 hazardous waste sludge was closed in December 1989 pursuant to the hazardous waste landfill requirements.

Hazardous Waste Facility Permit HW-062(D) provides for continued maintenance, monitoring and corrective action of the former surface impoundment to address releases and reduce threats to human health and the environment. The existing on-site groundwater treatment system utilizes biological organisms and activated carbon to remove concentrated pentachlorophenol and creosote from extracted groundwater.

The hazardous waste that is being managed in the surface impoundment closed as a landfill is:

<u>EPA Hazardous Waste Numbers</u>	<u>Materials</u>	<u>Units</u>
K001	Bottom sediment sludge/ contaminated soil from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol	Soils/Sludges in the Closed Surface Impoundment

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 units 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 detect, contain, and remove any release of hazardous constituents into the groundwater at the closed units or solid waste management units. DISPOSAL OF ADDITIONAL HAZARDOUS WASTE AT THE FACILITY IS NOT ALLOWED.

IV. Permit Condition

The following is a list of the major permit conditions and the authority for each condition. Regulatory citations are for 40 CFR sections 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) §270.30 §270.11	I.C
Responsibilities	§270.30 §270.40	I.D
Definitions	--	I.E

General Facility Standards	§264 Subparts B, C, D, E, F, G, and H	I.F
Special Conditions	§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 Care	§264.117 through 264.120 §264.310	II.D

Section III – Groundwater Monitoring and Corrective Action

<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 Effectiveness Monitoring Program	§264.97 §264.100 §264.101	III.D
Corrective Action Program	§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 the Permittee	§264.92	III.I
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Section IV – Corrective Action for Solid Waste Management Units and Areas of Concern

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Corrective Action Applicability	§264.101	IV.A
Notification and Assessment Requirements for Newly Identified SWMUs and AOCs	§264.101	IV.B
Notification Requirements for Discovered Releases at SWMUs and AOCs	§264.101	IV.C
Verification Investigation Interim Measures	§264.101	IV.D IV.E
RCRA Facility Investigation	§264.101	IV.F
Corrective Action	§264.101	IV.G
Schedule of Compliance	§264.101	IV.H
Permit Modification	§270.41 §270.42	IV.I

V. PROCEDURES FOR REACHING A FINAL DECISION

The reissuance of Hazardous Waste Facility Permit No. HW-062(D) to William C. Meredith Company 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. The comment period will begin on June 4, 2025, and end on July 22, 2025. Any person interested in commenting on the draft permit must do so within the forty-five (45) day comment period. Comments may be emailed to EPD.Comments@dnr.ga.gov. If you choose to email your comments, please be sure to include the words “Meredith Permit Renewal” in the

subject line to help ensure your comments are forwarded to the correct staff. Written comments may be mailed to the following address:

Mr. Brian Koehler
Georgia Environmental Protection Division
Land Protection Branch
2 Martin Luther King, Jr. Drive S.E.
Suite 1058
Atlanta, Georgia 30334-9000
(470) 524-1576

When the Director of EPD makes his decision with respect to the permit issuance, 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 30 days after issuance.