

PERMIT NO. HW-081(S)  
ISSUANCE DATE:



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### HAZARDOUS WASTE FACILITY PERMIT

Facility I.D. No. GA0210020368

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Subject 391-3-11 (as amended through December 9, 2019), adopted pursuant to that Act, **Fort Gordon Military Reservation, U.S. Army Garrison** is issued a Permit for the following:

1. Storage of 19,400 gallons of hazardous waste in containers;
2. Corrective Action Process for Solid Waste Management Units and Areas of Concern; and
3. Corrective Action for Contamination from Solid Waste Management Units and Areas of Concern Investigations.

at the following location:

**Fort Gordon Military Reservation  
Fort Gordon, Georgia 30905-5040**

This Permit is conditioned upon compliance with all provisions of the Georgia Hazardous Waste Management Act, the Rules, Subject 391-3-11 (as amended through December 9, 2019), adopted pursuant to that Act, and any other condition of this Permit.

This Permit is Subject to revocation, suspension, modification, or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in the application, dated August 5, 2020, supporting data entered therein or attached thereto, or any subsequent submittals or supporting data; or for failure to disclose fully all relevant facts; or when the facility poses a threat the environment or the health of humans.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached pages, which pages are a part of this Permit.



Richard E. Dunn, Director  
Environmental Protection Division

## **SECTION I. GENERAL PERMIT CONDITIONS**

### **I.A. Scope and Effect of Permit**

1. The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited, unless such treatment, storage, or disposal is specifically authorized by the Director of the Environmental Protection Division of the Department of Natural Resources (Director). The Permittee must comply with the Georgia Hazardous Waste Management Act (Act), the Official Code of Georgia Annotated (O.C.G.A) §12-8-60 and the Georgia Rules for Hazardous Waste Management (Rules), Subject 391-3-11, which Rules incorporate certain portions of the federal hazardous waste regulations found in Title 40 of the Code of Federal Regulations (40 C.F.R.), Parts 260-266, 268, 270, 273, 279, and 124. Where a citation to the federal regulations is made in this Permit, it refers to the specific regulations adopted by the Environmental Protection Division (EPD) of the Georgia Department of Natural Resources
2. The issuance of this Permit does not convey any property rights in either real or personal property or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.
3. Compliance with this Permit does not constitute a defense to any action brought by the Director under O.C.G.A. §12-8-75, “Powers of the Director in situations involving imminent and substantial endangerment to the environment or to public health,” of the Act, as amended.
4. Nothing in this Permit shall be construed to preclude the institution of any legal action brought by the Director under Section 3008 of the federal Resource Conservation and Recovery Act (RCRA) or under O.C.G.A. §§12-8-81 through 12-8-82 of the Act, as amended.
5. This Permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11-.11(7) and 40 C.F.R. §§ 270.41, 270.42, 270.43, and 270.50(d). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability of any permit condition.
6. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

I.B. Management Requirements

1. Unless otherwise specifically authorized by the Director, or as specified by this Permit, the Permittee may not treat, store, or dispose of hazardous waste on any portion of the facility or perform corrective action not specifically authorized by this Permit until the Permittee has submitted to the Director, by certified mail or hand delivery, an application for a permit modification to do so and the Director has modified the Permit for that activity.
2. The Permittee shall maintain the following documents, and any amendments, revisions, and modifications to those documents, at the facility, in a location that is accessible for inspection, until clean closure has been completed and certified by an independent, registered professional engineer:
  - a. Complete copy of this Permit and the associated Permit Application, including all amendments, revisions and modifications;
  - b. Waste Analysis Plan;
  - c. Personnel training documents and records;
  - d. Contingency Plan;
  - e. Closure Plan;
  - f. Operating record as required by 40 C.F.R. § 264.73;
  - g. Inspection schedule log; and
  - h. Corrective Action Plan(s).
3. All amendments, revisions, and modifications to any plan required by this Permit shall be submitted to the Director for approval and for modification of the Permit, as necessary.
4. The Director may require the Permittee to establish and maintain an information repository at any time based on the factors set forth in 40 C.F.R. §124.33(b). The information repository will be governed by the provisions in 40 C.F.R. §124.33(c) through (f).

I.C. Monitoring and Reporting

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The methods used to obtain representative samples of wastes to be analyzed must be the appropriate methods from 40 C.F.R., Part 261, Appendix I. Sampling of environmental media must be performed in accordance with the most recent version of the United States Environmental Protection Agency (USEPA) *Region 4 Quality System and Technical Procedures for SESD Field Branches* (FBQSTP).

Samples of both wastes and environmental media must be analyzed using the appropriate methods from the most recent edition of the USEPA *Test Methods for Evaluating Solid Waste, EPA Publication SW-846*. Under certain circumstances, the use of alternate sampling methods or laboratory analytical methods may be appropriate. However, alternate methods must be approved by the Director prior to use.

2. The Permittee shall retain records of all monitoring information, including the following, for a period of at least three (3) years from the date of the sample, measurement, report, or record, or until corrective action is completed, whichever is later:
  - a. All calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation;
  - b. Copies of all reports, records, and certifications required by this Permit; and
  - c. Records of all data used to complete the application for this Permit, including the certification required by 40 C.F.R. § 264.73(b)(9).

These periods are automatically extended during the course of any unresolved enforcement action regarding the Facility and also may be extended at any time at the Director's discretion.

3. Records of monitoring information shall include the following:
  - a. The date, exact place, and time of sampling or measurements;
  - b. The individual(s) who performed the sampling or measurements;
  - c. The date(s) the analyses were performed;
  - d. The individual(s) who performed the analyses;
  - e. The analytical techniques or methods used, the method of sample preservation, and quality assurance procedures including method blanks;
  - f. Chain-of-custody records; and
  - g. Results of such analyses and measurements.
4. Twenty-Four Hour Reporting. Within twenty-four (24) hours from the time the Permittee becomes aware of any non-compliance that may endanger health or the environment, the Permittee shall report such non-compliance, orally, to the Director or his representative, any information concerning the release of any hazardous waste, hazardous waste constituent, or hazardous constituent that may cause an endangerment

to public and/or private drinking water supplies and any information concerning a release or discharge of any hazardous wastes, hazardous waste constituents, or hazardous constituents or concerning a fire or explosion from the Facility that could threaten the environment or human health outside the Facility.

The description of the occurrence shall include the following information:

- a. Name, address, and telephone number of the owner or operator;
  - b. Name, address, and telephone number of the facility;
  - c. Date, time, and type of incident;
  - d. Name and quantity of materials involved;
  - e. Extent of injuries, if any;
  - f. Assessment of actual or potential hazards to the environment and human health inside and outside the facility, where applicable; and
  - g. Estimated quantity and disposition of recovered material that resulted from the incident.
5. Within fifteen (15) days of becoming aware of any reportable incident as in Permit Condition I.C.4 above, the Permittee shall submit a written report to EPD of the incident including the following:
- a. Description of occurrence as in Permit Condition I.C.4 above;
  - b. Cause of occurrence;
  - c. Period of occurrence, including exact dates and times;
  - d. Time occurrence expected to continue (if not already corrected); and
  - e. Steps taken or planned to reduce, eliminate, and prevent recurrence.
6. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than fifteen (15) days following each schedule date.
7. Other Non-compliance. The Permittee shall report instances of non-compliance, other than those described in Permit Conditions I.C.4 and I.C.6, semi-annually on July 15 (covering January 1 - June 30) and January 15 (covering July 1 - December 31). The

report shall contain the information requested in Permit Condition I.C.4 for each incident.

8. Manifest Discrepancy Report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within fifteen (15) days, the Permittee must submit a letter report, including a copy of the manifest, to the Director in accordance with 40 C.F.R. § 264.72.
9. Unmanifested Waste Report. This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste in accordance with 40 C.F.R. § 264.76.
10. Biennial Report. A biennial report must be submitted covering the facility activities during odd numbered calendar years in accordance with 40 C.F.R. § 264.75.
11. Monitoring Reports. Monitoring results shall be reported at intervals specified elsewhere in this Permit.
12. Signatory Requirements. All applications, plans, reports, or other information submitted to the Director shall be signed and certified in accordance with 40 C.F.R. § 270.11.

I.D. Responsibilities

1. Right of Entry. The Permittee shall allow the Director of EPD, the Regional Administrator of the USEPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials and other documents as may be required by law, to:
  - a. Enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this Permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit.
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit.
  - d. Sample or monitor, at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location.

2. Transfer of Permits. This Permit may be transferred to a new owner or operator only after the Permittee has provided notice to the Director of such transfer and the Permit has been modified or revoked and reissued, pursuant to 40 C.F.R. § 270.40 or § 270.41(b)(2), to identify the new Permittee and incorporate such other requirements as may be necessary by the conditions of this Permit. Before transferring ownership or operation of the facility, the Permittee shall notify the new owner or operator, in writing, of the applicable requirements of 40 C.F.R., Parts 264, 268, and 270.
3. Duty to Comply. The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration of which such non-compliance is authorized by an emergency permit. Any noncompliance with this Permit, other than any noncompliance authorized by an emergency permit, constitutes a violation of the Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.
4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this Permit after the expiration date hereof, the Permittee must submit a complete application for a new permit at least one hundred eighty (180) days before this Permit expires. If the Permittee has not met the requirements of Permit Sections III.D and IV, and has not met the groundwater cleanup goals established in any approved Corrective Action Plans (CAPs) for three (3) consecutive years, the Permittee must submit a complete application for the reissuance of the Permit at least one hundred eighty (180) days before the expiration date of this Permit.
5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.
6. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on human health or the environment resulting from non-compliance with this Permit.
7. Duty to Provide Information. The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit.
8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activities that may result in non-compliance with Permit requirements.
9. Reporting Planned Changes. The Permittee shall give notice to the Director at least thirty (30) days prior to any planned physical alterations or additions to the permitted

facility, including any investigative or corrective action activities (including voluntary corrective measures) which may impact any SWMUs, Areas of Concern (AOCs), and/or regulated units.

10. Obligation for Corrective Action. The Permittee is required to continue this Permit for any period necessary to complete the corrective action requirements of this Permit.
11. Proper Operation and Maintenance. The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and all related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems, when necessary, to achieve compliance with the conditions of this Permit.
12. Other Information: When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the Permit Application or any Corrective Action Plan, or submitted incorrect information in the Permit Application, Corrective Action Plan or in any report to the Director, the Permittee shall promptly submit such facts or information.

I.E. Definitions

For the purpose of this Permit, terms used herein shall have the same meaning as those in 40 C.F.R., Parts 124, 260 through 266, 268, 270, 273 and 279, unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. In addition, the following terms have been defined:

1. Area of Concern for the purpose of this Permit includes any area having a probable release of a hazardous waste, hazardous waste constituent, or hazardous constituent which is not from a solid waste management unit (as defined below) and is determined by the Director to pose a current or potential threat to human health or the environment. Such areas of concern may require investigation and remedial action, as required under the Act, O.C.G.A. § 12-8-60, et. seq. and 40 C.F.R. § 270.32(b)(2) to ensure adequate protection of human health and the environment.
2. Contamination for the purpose of this Permit refers to the presence of any hazardous waste, hazardous waste constituent, or hazardous constituent in a concentration which exceeds the naturally occurring concentration of that waste or constituent in the immediate vicinity of the facility (in areas not affected by the facility).



3. Corrective Action for prior or continuing releases at the facility (regardless of the time at which the release occurred), for the purpose of this Permit, shall be any measure necessary to protect human health and the environment, as required under the Act, O.C.G.A. § 12-8-60, et. seq. [40 C.F.R. § 264.101]. Corrective action may address releases to air, soils, surface water, sediment, or groundwater, both on the facility and beyond the facility boundary.
4. Extent of Contamination, for the purpose of this Permit, is defined as the horizontal and vertical area in which the concentrations of hazardous waste, hazardous waste constituents or hazardous constituents in the environmental media being investigated are above estimated quantitation limits, as defined in the most recent version of the USEPA *Test Methods for Evaluating Solid Waste, EPA Publication SW-846*, or naturally occurring concentrations representative of the facility. Under certain circumstances, the use of alternative values to define the extent of contamination may be appropriate. Alternate values used for this purpose must be approved by the Director prior to use.
5. Facility for the purpose of this Permit includes all contiguous land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or a combination of them). For the purpose of implementing corrective action under 40 C.F.R. § 264.101, a facility includes all contiguous property under the control of the owner or operator seeking a permit under the Act.
6. Hazardous Constituents for the purpose of this Permit are those substances listed in 40 C.F.R., Part 261, Appendix VIII and Part 264, Appendix IX, “Groundwater Monitoring List.”
7. Interim Measures for the purpose of this Permit are actions necessary to minimize or prevent the further migration of contamination or limit actual or potential human and environmental exposure to contamination while long-term corrective action remedies are evaluated and, if necessary, implemented.
8. Land Disposal Facility for the purpose of this Permit is a facility that uses a surface impoundment, landfill, land treatment or waste pile unit to manage or dispose of hazardous waste pursuant to the Act, O.C.G.A. § 12-8-66, as amended, and Section 3004 of RCRA, as amended.
9. Landfill for the purpose of this Permit includes any disposal facility or part of a facility where hazardous waste is placed in or on the land and which is not a pile, a land treatment facility, surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, or a cave.

10. Permit Application for the purpose of this Permit refers to the Permit Application, dated March 2020, as amended, submitted to EPD for renewal of this Permit.
11. Permittee and/or Owner for the purpose of this Permit is the U.S. Army Garrison, Fort Gordon, Directorate of Public Works.
12. Qualified Groundwater Scientist for the purpose of this Permit is a scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering and has sufficient training and experience in groundwater hydrology and related fields, as demonstrated by a current State of Georgia registration and completion of accredited university courses, that enable that individual to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport.
13. Remediation Waste for the purpose of this permit includes all solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 C.F.R. § 264.101 and under the Act, O.C.G.A. § 12-8-71(b). For a given facility, remediation wastes may originate only from within the facility boundary but may include waste managed in implementing corrective action required under 40 C.F.R. § 264.101(c) for releases beyond the facility boundary.
14. Release for the purpose of this Permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste, hazardous waste constituents or hazardous constituents.
15. Solid Waste Management Unit for the purpose of this Permit is any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. SWMUs include, but are not limited to, landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, tanks (including storage, treatment, and accumulation tanks), container storage units, wastewater treatment units, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization units, transfer stations, recycling units, and miscellaneous units. Such units also include any area at a facility at which solid wastes have been routinely and systematically released.
16. Treatment for the purpose of this Permit refers to any method, technique, or process, including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

I.F. Conditions Related to Compliance with General Facility Standards (40 C.F.R., Part 264, Subparts B, C, D, E, G, and H)

1. The Permittee must follow the procedures and plans described in detail in the Permit Application, which are hereby incorporated by reference and include at least the following sections of the Permit Application:
  - a. Waste Analysis Plan – Section C;
  - b. Inspection Schedule – Section F;
  - c. Contingency Plan – Section G;
  - d. Training Program – Section H; and
  - e. Closure Plan – Section I.
  
2. The following activities must be carried out as prescribed in 40 C.F.R., Part 264, Subparts B, C, D, and E and in accordance with Sections B, F, and H of the Permit Application:
  - a. Required Notices – §264.12(a) and (b).
  - b. Security – §264.14(b) and (c).
  - c. Repairs and Inspection Log – §264.15(c) and (d).
  - d. Annual review of training – §264.16(c).
  - e. General Requirements for Ignitable, Reactive and Incompatible Wastes – §264.17.
  - f. Design and Operation – §264.31.
  - g. Testing and Maintenance of Equipment – §264.33.
  - h. Access to Communications of Alarm Systems – §264.34.
  - i. Maintain Aisle Space – §264.35.
  - j. Arrangements with Local Authorities – §264.37.
  - k. Amendment of Contingency Plan – §264.54.
  - l. Operating Record - §264.73 and Disposition of Records – §264.74.

- m. Reports – §264.75 and §264.77.
  - n. Manifest System – §264.70 through §264.72.
3. The following activities must be carried out as prescribed in 40 C.F.R., Part 264, Subpart G and Section I of the Permit Application:
- a. Closure Performance Standard – §264.111 and §264.112.
  - b. Closure in Accordance with Approved Plan – §264.113.
  - c. Amendment of Closure Plan and Notification of Closure – §264.112(b) and (c).
  - d. Disposal or Decontamination of Equipment – §264.114.
  - e. Certification of Closure – §264.115.

I.G. Special Conditions Applicable to Entire Facility

- 1. Waste Minimization. The Permittee shall be required to certify, no less than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that the Permittee generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal that is currently available to the Permittee which minimizes the present and future threat to human health and the environment in accordance with 40 C.F.R. § 264.73(b)(9).
- 2. Land Disposal Restrictions. The Permittee shall comply with all provisions of 40 CFR Part 268 “Land Disposal Restrictions” for all wastes to which they are applicable
- 3. Contingency Plan. The Permittee must submit any revisions of the contingency plan to those government agencies and local authorities listed in Section G of the Permit Application within twenty (20) days of those changes.
- 4. Closure. Within sixty (60) days of completion of final closure of the permitted container storage area, the owner or operator must submit to the Director, by registered mail, a certification that the hazardous waste management unit has been closed in accordance with the specifications in the approved closure plan. The certification must be signed by an independent, registered professional engineer. Documentation supporting the independent, registered professional engineer’s certification must additionally be furnished to the Director at that time.

**SECTION II. STORAGE IN CONTAINERS**

II.A. General:

The conditions in this section apply only to the “Hazardous Waste Storage Facility, Building 10701,” (HWSF) as described in Sections B and D and as depicted in Figures A-4, A-5, A-6, A-7, A-8, B-1, B-2, B-3, B-4, B-5, B-6, D-1 and D-2 of the Permit Application, as amended.

II.B. Conditions Related Solely to Storage in Containers

1. Storage of hazardous waste in containers is expressly limited to the HWSF. The layout of containers stored in the HWSF shall be limited to those areas indicated in Figure D-2 of the Permit Application.
2. The Permittee shall operate and maintain the HWSF in accordance with the detailed design plans and specifications contained in Section D and Appendix D-1 of the Permit Application and references made herein
3. Upon permit issuance, the Permittee is authorized to store in containers only the hazardous wastes listed below. Containers shall include, but are not limited to, DOT-approved metal and poly drums, fiber drums, and boxes.

D001	D002	D003	D004	D005	D006	D007	D008	D009
D010	D011	D012	D013	D014	D015	D016	D017	D018
D019	D020	D021	D022	D023	D024	D025	D026	D027
D028	D029	D030	D031	D032	D033	D034	D035	D036
D037	D038	D039	D040	D041	D042	D043	F001	F002
F003	F004	F005	P001	P002	P004	P005	P008	P010
P011	P012	P015	P021	P028	P037	P042	P043	P050
P051	P071	P075	P081	P089	P105	P110	P115	P118
U001	U002	U003	U010	U019	U029	U031	U032	U035
U037	U043	U044	U045	U051	U052	U058	U059	U061
U080	U089	U090	U092	U093	U094	U095	U108	U112
U113	U115	U117	U121	U122	U123	U124	U129	U136
U138	U140	U144	U145	U146	U147	U150	U151	U154
U155	U159	U160	U165	U182	U188	U200	U201	U204
U206	U207	U211	U220	U223	U226	U227	U228	U238
U239	U244	U249	U328	U359				

4. The HWSF shall not exceed a maximum of nineteen thousand four hundred (19,400) gallons of hazardous wastes at any one time.

5. If a container holding hazardous waste is not in good condition, or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition.
6. Containers must be managed according to §264.173.
7. Spilled or leaked wastes and accumulated precipitation must be managed per §264.175(b)(5).
8. Incompatible wastes and materials must be managed according to §264.177. The Permittee is prohibited from storing incompatible wastes within the same storage area without separating the incompatible wastes by means of a dike, berm, wall or other device.
9. All hazardous waste containers in storage must be clearly marked with the words, "Hazardous Waste," the EPA Hazardous Waste Number found in 40 CFR Part 261, the waste description, and the date upon which storage of the hazardous waste at the facility began.
10. The Permittee shall maintain the containment system in accordance with §264.175.
11. Storage in areas not specifically identified in this permit is strictly prohibited.
12. The Permittee shall comply with the applicable requirements in 40 CFR Part 264 Subpart CC for all containers of waste with a volatile organic concentration of greater than or equal to 500 ppm by weight, and are greater in size than 26.4 gallons.

### **SECTION III. RCRA CORRECTIVE ACTION PROCESS FOR SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN**

#### **III.A. Applicability**

The conditions of Permit Section III apply to all solid waste management units (SWMUs) and Areas of Concern (AOCs) listed in Appendix A of this Permit, and any additional SWMUs and/or AOCs discovered by any other means. The determination of the need for and subsequent implementation of corrective action is required by §264.101(a) and §12-8-66 of the Georgia Hazardous Waste Management Act for releases from all SWMUs and AOCs contained within the facility's property boundaries and, as required by §12-8-66 of the Georgia Hazardous Waste Management Act and §264.101(c), for releases extending beyond the facility property boundaries.

III.B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

1. Within fifteen (15) days of discovery, the Permittee shall notify the Director, in writing, of any additional SWMUs or AOCs discovered during groundwater monitoring, ongoing field investigations, environmental audits, or by any other means, including, but not limited to, any newly discovered releases at previously identified SWMUs or AOCs. Notification shall include, at a minimum, the location of the SWMU or AOC and all available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc...). The Permit shall be modified in accordance with 40 C.F.R., Part 270, to incorporate the newly discovered SWMUs or AOCs.
2. The Permittee shall prepare a SWMU Assessment Report (SAR) for each additional SWMU or AOC, at which releases to the environment are known or suspected to have occurred, that is discovered after the issuance of this Permit. The SAR shall be submitted within sixty (60) days of the discovery of a new SWMU or AOC. The report must include, at a minimum, the following information for each SWMU or AOC:
  - a. Type of unit;
  - b. Location of each unit in a topographic map of appropriate scale, as required by §270.14(b)(19);
  - c. General dimensions, capacities and a structural description of the unit(s) (supply any available plans and/or drawings);
  - d. Function of unit;
  - e. Dates that the unit was operated;
  - f. Description of the wastes that have been managed at or in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes; and
  - g. Description of any known releases or spills (including groundwater data, soil analyses, sediment, air, and/or surface water data). If the report is being prepared because of a newly discovered release at a previously identified SWMU or AOC, the data may be limited to the newly discovered release, as long as a brief summary of the investigative and remedial actions taken in response to previous releases at the SWMU or AOC is provided, along with the current status of the SWMU or AOC related to those releases.
3. Based on the results of the SAR, the Director shall determine the need for further investigations at the SWMUs and/or AOCs covered in the report. If the Director determines that such investigations are needed, the Permittee shall be notified to prepare a Confirmatory Sampling Work Plan, as outlined in Permit Condition III.C, or

a RCRA Facility Investigation (RFI) Work Plan, as outlined in Permit Condition III.D, for such investigations.

### III.C. Confirmatory Sampling Work Plan

1. Within forty-five (45) days of notification by the Director, the Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan to determine if a release has occurred from SWMUs and AOCs identified in Condition III.B.3. The CS Work Plan shall include schedules of implementation and completion of specific actions necessary to determine if a release has occurred.
2. The CS Work Plan must be approved by the Director, in writing, prior to implementation.
3. The Permittee shall implement the confirmatory sampling in accordance with the approved CS Work Plan.
4. The Permittee shall prepare and submit to the Director in accordance with the schedule in the approved CS Work Plan, a Confirmatory Sampling Report which includes all data (including raw data), a summary and analysis of the data, and recommendation for further investigation or No Further Action based upon the contents of the CS Report.
5. Based on the results of the CS Report, the Director shall determine the need for further investigations at the SWMUs or AOCs covered in the CS Report. If the Director determines that such investigations are needed, the Permittee shall be required to prepare a plan for such investigations as outlined in Permit Section III.D. The Director will notify the Permittee of any No Further Action decisions.

### III.D. RCRA Facility Investigation

1. The Permittee shall complete and submit a RCRA Facility Investigation (RFI) Work Plan for:
  - a. SWMUs or AOCs identified pursuant to Permit Conditions III.B.3 and III.C.5
  - b. SWMUs or AOCs referenced in Condition III.A as requiring an RFI.

The Permittee shall submit the RFI Work Plan(s) in accordance with a schedule to be determined by the Director.

2. The RFI Work Plan shall include, but is not limited to:
  - a. A schedule for implementation and report submittal;



- b. The specific actions necessary to determine the nature and extent of contamination (including releases that extend beyond the facility's property boundary);
- c. The potential migration pathways for releases (e.g., air, land, surface water, and groundwater);
- d. All actual or potential receptors; and
- e. The applicable background concentrations.

The Permittee must provide sufficient justification that migration through a potential pathway is not likely if it is not included in the plan. Such deletions are subject to the approval of the Director. As an option, the Permittee may include specific procedures in the RFI Work Plan that will be used to perform a risk assessment as well as the development of proposed risk-based media cleanup standards. The findings of the risk assessment and proposed risk-based media cleanup standards shall be provided in the RFI Report required by Permit Section III.D.4. Risk assessments and risk-based media cleanup standards at RCRA SWMUs must be prepared according to current EPD guidelines.

3. Upon the Director's approval of the RFI Work Plan(s) required by Permit Condition III.C.1, the Permittee shall conduct the RFI(s) in accordance with the schedule contained therein.

#### 4. RFI Reports

- a. The Permittee shall complete and submit the RFI Report(s) in accordance with the schedule contained in the RFI Work Plan required by Permit Condition III.D.1. The report(s) shall:
  - i. Provide a summary of all activities undertaken during the RFI(s) to implement the approved work plan(s).
  - ii. Provide a complete description of the nature and extent of contamination identified during the RFI(s) including sources, migration pathways, actual or potential receptors, and applicable background concentrations.
  - iii. Address all releases which extend beyond the facility property boundary unless the Permittee demonstrates to the Director's satisfaction that, despite the Permittee's best efforts, the Permittee was unable to obtain permission to undertake action required by the plan(s).
- b. If the time required to conduct the RFI(s) is greater than one hundred eighty (180) calendar days, the Permittee may be required to provide the Director with quarterly RFI Progress Reports at 90-day intervals, beginning one hundred eighty (180)

calendar days from the initiation of the RFI(s), as specified in the approved RFI Work Plan(s). The progress reports, at a minimum, shall address the following:

- i. A description of the portion of the RFI completed;
  - ii. Summaries of findings;
  - iii. Summaries of any deviations from the approved RFI Work Plan during the reporting period;
  - iv. Summaries of all contacts with local community public interest groups or State government regarding RFI Investigations;
  - v. Summaries of any problems or potential problems encountered during the reporting period;
  - vi. Actions taken to rectify problems;
  - vii. Changes in relevant personnel; and
  - viii. Projected work for the next reporting period.
5. The Director shall review the RFI Report(s) required by Permit Condition III.D.4, and upon determination that each report is complete, shall notify the Permittee of the need for further investigative actions and/or the need for corrective action as required under §§264.101(a) and 264.101(c) of the Georgia Rules for Hazardous Waste Management and §12-8-71(b) of the Georgia Hazardous Waste Management Act.

### III.E. Corrective Action Plan

1. The Permittee shall submit a Corrective Action Plan (CAP) in accordance with a schedule to be determined by the Director. The Permittee will be notified of that schedule by written notice. The CAP must include a description of the remedial measures to be taken at each SWMU or AOC, a schedule of implementation and completion, and a cost estimate for completion of corrective action, as required by 40 C.F.R. § 264.101(b).
2. If the Permittee is required to develop a CAP under Permit Section III.E, the Permittee shall apply for a permit modification pursuant to §270.42(c) to incorporate the CAP into the permit.
3. Upon approval by the Director of any CAP required by Permit Section III.E, the Permittee shall implement any required corrective action in accordance with the schedule in the approved CAP.

4. Upon completion of corrective action per an approved CAP, the Permittee shall request a permit modification to reflect the corrective action status of the SWMUs and/or AOCs pursuant to §270.42.

### III.F. Interim Measures

1. Requirement for Interim Measures. The Permittee shall conduct Interim Measures (IM) for SWMUs and/or AOCs either upon notification by the Director that IM are necessary or if the Permittee wishes to implement IM at a SWMU and/or AOC to stabilize a release.
2. IM Work Plan
  - a. If the Permittee is notified by the Director that IM are necessary, an IM Work Plan shall be submitted within forty-five (45) days of such notification. However, if additional time is required, the Permittee may petition the Director for up to an additional forty-five (45) days to submit the IM Work Plan. If the Permittee chooses to conduct IM prior to notification by the Director, the Permittee shall submit a work plan for that activity. IM may be conducted concurrently with investigations required under the terms of this permit.
  - b. An IM Work Plan submitted pursuant to Permit Condition III.F.2.a shall be consistent with and, if required by the Director, integrated into any long-term corrective action at the facility. The IM Work Plan shall include:
    - i. IM objectives;
    - ii. Procedures for implementation (including any designs, plans, or specifications);
    - iii. Schedules for implementation and completion; and
    - iv. Schedules for submittal of progress reports.
  - c. The IM Work Plan must be approved by the Director, in writing, prior to implementation.
3. IM Implementation
  - a. The Permittee shall implement the IM in accordance with the schedule contained in the approved IM Work Plan.
  - b. At least fifteen (15) days prior to implementation of any changes, the Permittee shall submit to the Director for approval any planned changes, reductions, or additions to the IM Work Plan.

- c. If corrective action required by §264.101 and/or Permit Section III.E is achieved through IM, the Permittee shall apply for a permit modification pursuant to §270.42(c) to incorporate the IM into the Permit as the final corrective action.

#### 4. IM Reports

- a. Within forty-five (45) days of the completion of IM, the Permittee shall complete and submit to the Director an IM Report. However, if additional time is required, the Permittee may petition the Director for up to an additional forty-five (45) days to submit the IM Report. The report shall include, but shall not be limited to, the following information:
  - i. A description of IM implemented;
  - ii. A summary of all data or other information obtained during implementation of IM;
  - iii. A summary of the effectiveness of the IM in achieving the objective of containing, removing, and/or treating contamination resulting from a release from a SWMU and/or AOC in order to protect human health and the environment;
  - iv. A summary of all problems encountered during the IM implementation and the solutions to those problems; and
  - v. Copies of all relevant laboratory/monitoring data.
- b. If the time required for completion of IM is greater than one year, the Permittee shall provide the Director with progress reports at intervals specified in the approved IM Work Plan. The progress reports shall contain the following information at a minimum:
  - i. A description of the portion of IM completed;
  - ii. Summaries of any deviations from the IM Work Plan during the reporting period;
  - iii. Summaries of any problems or potential problems encountered during the reporting period and the solutions to those problems;
  - iv. Projected work for the next reporting period; and
  - v. Copies of laboratory/monitoring data.

III.G. Reporting, Recordkeeping, and Response

1. All work plans and schedules shall be subject to approval by the Director prior to implementation. Upon approval, the Permittee shall implement all work plans and schedules as written, or as specified by the Director.
2. All work plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.
3. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to the conditions of this Permit into the operating record, as required by §264.73(b)(6).
4. The Permittee shall have all work plans and reports, which involve installation of groundwater monitoring wells or systems and/or interpretation of data gathered from those wells or systems, prepared and certified by a Qualified Groundwater Scientist.
5. In the event of the Director's disapproval (in whole or in part) of any document required by Permit Section III, the Director shall specify any deficiencies in writing. In the event of disagreement, the Permittee shall revise all submittals as specified by the Director.
6. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and any other supporting information gathered and generated during activities undertaken pursuant to Permit Section III shall be maintained at the facility during the term of this Permit, including any reissued permits.
7. All plans and schedules required by the conditions of Permit Section III are, upon approval by the Director, incorporated into this section by reference and become an enforceable part of this permit. Any non-compliance with such approved plans and schedules shall be termed non-compliance with this Permit.
8. The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Director required in Permit Section III are signed and certified in accordance with 40 C.F.R. §270.11.
9. If the Director or the Permittee at any time determines that any reports or activities conducted pursuant to any plan required by Permit Section III no longer satisfies the requirements of 40 C.F.R. §264.101, this Permit, or the intent of that plan or report for prior or continuing releases, the Permittee must submit an amended plan to the Director within sixty (60) days of such determination.

**SECTION IV. CORRECTIVE ACTION FOR CONTAMINATION FROM SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN.**

IV.A. Applicability

This section applies to corrective action for releases of hazardous wastes, hazardous waste constituents, and hazardous constituents to environmental media (soils, sediment, surface water and groundwater) at the SWMUs and AOCs at the Facility listed in Appendix A of this Permit. The approved CAPs listed in Appendix A are hereby incorporated into this Permit.

IV.B. Corrective Action Program

1. The Permittee shall conduct, for the duration of the compliance period (defined in Permit Section IV.E), corrective action for releases of hazardous waste, hazardous waste constituents, and hazardous constituents at the SWMUs and AOCs for which corrective action is required, in accordance with the approved CAPs listed in Appendix A, as required under s 40 C.F.R. § 264.101.
2. The Permittee shall inspect and maintain the corrective action treatment systems described in the approved CAPs listed in Appendix A of this Permit. Inspections of the systems shall be performed on a quarterly basis while the corrective action is implemented. All inspections shall be documented and shall include descriptions of any problems found and the remedial actions taken to correct those problems.
3. The Permittee shall maintain all elements of CAPs listed in Appendix A of this Permit and shall adhere to the schedules approved therein.
4. The Permittee shall expand the corrective action treatment systems as necessary to treat all contaminants in the groundwater above the groundwater cleanup goals established in the approved CAPs. Any plan for changes in the corrective action treatment systems shall be submitted thirty (30) days prior to commencement of said changes. A CAP Addendum may be required where significant changes to the corrective action system are proposed.
5. The Permittee shall dispose of all contaminated media generated from the installation and operation of the corrective action system in accordance with §262.11 and all applicable federal, state, and local laws.

IV.C. Groundwater Monitoring

1. The Permittee shall conduct groundwater monitoring in accordance with the monitoring plans established in the approved CAPs, as amended, and documented in the annual Corrective Action Plan Progress Reports (CAPPRs). Any amendments to the groundwater monitoring plans must be submitted to EPD for

approval prior to implementation. All approved amendments shall be documented in the annual CAPPRs.

2. The Permittee shall maintain, well-marked and in good working order, all monitoring wells whose locations are identified in the approved CAPs, as amended. All groundwater monitoring wells shall be maintained as follows:
  - a. All wells shall be clearly labeled with a permanently affixed, legible label;
  - b. All wells shall have a measuring point clearly marked on the inner protective casing; wells shall be clearly
  - c. All wells shall be locked when not in use to prevent unauthorized entry;
  - d. All wells shall be maintained such that surface water and contaminants are prevented from entering the wells.
3. The Permittee shall inspect the monitoring wells each time the wells are sampled or gauged in accordance with the approved CAPs, but no less frequently than annually, to determine if the wells are being maintained as required by Permit Condition IV.C.2. All inspections shall be documented and shall include descriptions of any problems identified and the remedial actions taken to address those problems.
4. If the Permittee believes that a sample result from a well is anomalous, the Permittee may resample the well(s). The Permittee must submit to the Director written notification of their plan to resample the well(s) within thirty (30) days of the discovery of an anomalous result. The written notification shall include an explanation for the belief that the sampling results were anomalous and the date upon which the resampling will take place.

#### IV.D. Compliance Period

1. The compliance period shall be defined as beginning on the issuance date of this Permit and continuing until the concentrations of hazardous constituents in the groundwater have not exceeded the groundwater cleanup goals established in the approved CAPs for a period of three (3) consecutive years at a sampling frequency to be determined by the Director. Anomalous sampling results, as provided for in Permit Condition IV.C.4, shall not be counted as a sampling event.
2. If the groundwater cleanup goals established in the approved CAPs are met during the compliance period, the Permittee may petition the Director, and if approved, may cease corrective action but must continue to monitor the Facility's groundwater quality until the groundwater cleanup goals established in the approved CAPs have been met pursuant to Permit Condition IV.D.1. If the groundwater cleanup goals are exceeded after the date on which they were first achieved and corrective action has ceased, the Permittee may be required to resume

corrective action as described in the approved CAP, or to submit a new CAP, subject to approval by the Director, to address the exceedances. The Permittee must obtain EPD approval to discontinue corrective action monitoring pursuant to this section.

IV.E. Reporting, Recordkeeping and Response

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the groundwater must be the appropriate method from 40 CFR Part 261 Appendix I. Laboratory Methods must be those specified in the most recent edition of *Test Methods for Evaluating Solid Waste Physical/Chemical Methods SW-846*.
2. The Permittee shall have all reports, which involve installation of groundwater monitoring wells or systems and/or interpretation of data gathered from those wells or systems, prepared and certified by a qualified groundwater scientist.
3. The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Director required in Permit Section IV are signed and certified in accordance with 40 C.F.R. §270.11.
4. The results of all plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.
5. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to the conditions of Permit Section IV in the operating record, as required by §264.73(b)(6).
6. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and any other supporting information gathered and generated during activities undertaken pursuant to Permit Section IV shall be maintained at the facility during the term of this Permit, including any reissued permits.
7. All plans and schedules required by the conditions of Permit Section IV are, upon approval by the Director, incorporated into this Permit by reference and become an enforceable part of this Permit. Any non-compliance with such approved plans and schedules shall be termed non-compliance with this Permit.

IV.F. Permit Modification

1. If the Director or the Permittee at any time determines that the corrective action program no longer satisfies the requirements of §264.101 or Permit Section IV for releases of hazardous waste, hazardous waste constituents, or hazardous



constituents, the Permittee must submit an application requesting a permit modification, within ninety (90) days of such determination to make any appropriate changes to the program.

2. If the Director determines that further actions beyond those provided in Permit Section IV or changes to that which is stated herein are warranted, the Permittee shall submit a modification to the Permit according to the modification procedures found in 40 C.F.R. § 270.41.

#### IV.G. Effectiveness of Corrective Action

1. The Permittee shall document the effectiveness of the corrective action required in this Permit Section IV and as described in the approved CAPs and shall submit this information in an annual progress report which is due on or before July 1 each year during the compliance period. The report shall include, but is not limited to the following:
  - a. An evaluation of the data and the corrective action program in accordance with the approved CAPs, including a discussion of any changes in environmental conditions (i.e., geochemical, hydrogeologic, microbial, or other changes), the detection of any toxic or mobile transformation products, the effectiveness of land use controls, whether the plume is expanding or is stable, and any recommendations and/or conclusions;
  - b. Copies of all laboratory data packages and the associated chain-of-custody forms;
  - c. Copies of all field notes, including any forms documenting sample collections and/or field measurements;
  - d. Tabulation of all data collected during the corrective action program, including laboratory analytical data, groundwater elevation data, and field parameters;
  - e. Maps depicting all sample locations with isoconcentration lines showing the extent of contamination in groundwater in both the overburden and bedrock aquifers;
  - f. Maps depicting groundwater flow in the overburden and bedrock aquifers for each sampling/gauging event conducted under the corrective action program;
  - g. Groundwater elevation tables and maps depicting groundwater flow in the shallow and deep zones of the Upper Cretaceous aquifer each time water level data is collected; and
  - h. Reports and discussions of anomalies, problems, and anticipated problems with the data, and any deviations or modifications to the approved CAPs.

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**APPENDIX A:  
 FORT GORDON MILITARY RESERVATION  
 HAZARDOUS WASTE FACILITY PERMIT HW-081(S)  
 SOLID WASTE MANAGEMENT UNITS**

<b>SWMU NUMBER</b>	<b>SWMU NAME</b>	<b>STATUS OF SWMU</b>
006	DRMO Storage Area Drum Storage	Received NFA determination July 13, 2004.
006A	Area North of SWMUs 006 and 031	Received NFA determination May 2, 2006.
009	Building 955, Leach Field	Corrective Action (Addressed through Section IV of this Permit)
010	Building 952, Leach Field	Received NFA determination June 30, 2004.
011	Building 310, incinerator Ash	Received NFA determination April 6, 2004.
014	Former PCB Storage Building	Received NFA determination August 12, 2003.
019	Building 21801, Wash Racks	Received NFA determination August 18, 2006.
020	Building 961, Leach Field	Received NFA determination November 19, 2004.
020A	Building 950s and 960s, Storm Sewer	Received NFA determination November 19, 2004.
021	Small Arms Impact, Ammo Burning Ground	Received NFA determination July 6, 2005.
022	Artillery Impact Area, Open Detonation Ground	Received NFA determination December 19, 1995.
024	17 <sup>th</sup> Street Landfill (Closed)	Received NFA determination May 2, 2006.
024A	Area Upgradient of SWMU 24	Received NFA determination November 28, 2005.
025	25 <sup>th</sup> Street Landfill (Closed)	Received NFA determination April 26, 2005.
026	19 <sup>th</sup> Street Landfill (Closed)	Received NFA determination January 29, 2007.
027	3rd Avenue Landfill (Closed)	Corrective Action (Addressed through Section IV of this Permit)

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<b>SWMU NUMBER</b>	<b>SWMU NAME</b>	<b>STATUS OF SWMU</b>
027A	Area Upgradient of SWMU 27	Received NFA determination September 12, 2006.
028	8 <sup>th</sup> Avenue Landfill (Closed)	Received NFA determination July 28, 2006.
031	Building 984, Wastewater Sump	Received NFA determination October 15, 2004.
032	Training Site 17, Sludge Pile	Received NFA determination November 10, 2004.
032A	Wastewater Sludge	Received NFA determination November 10, 2004.
032B	Wastewater Sludge	Received NFA determination December 20, 2004.
035	Pesticide Mixing Building #D2030	Received NFA determination October 31, 2005.
036	Small Arms Impact, Ammo Burning Ground	Received NFA determination November 30, 2006.
037	Defoliant Testing Area	Received NFA determination December 19, 1995.
038	Magazine Area	Received NFA determination September 12, 2005.
039	Gas Chamber Grounds, Building 81102	Received NFA determination March 8, 2005.
040	POL Maintenance Building 22305	Received NFA determination May 4, 2004.
041	Motor Pool Area	Received NFA determination May 4, 2004.
042	Motor Pool Area	Received NFA determination May 4, 2004.
043	Motor Pool Area	Received NFA determination February 15, 2005.
044	Maintenance Repair Storage Yard	Final Interim Measures Work Plan. (Addressed through Section III of this Permit). September 2009
045	Main Drum Staging Area	Received NFA determination March 30, 2004.

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<b>SWMU NUMBER</b>	<b>SWMU NAME</b>	<b>STATUS OF SWMU</b>
046	Former Skeet Range	SRFI Report received May 7, 2019 (Addressed through Section III of this Permit).
047	Former POL Storage Building 13802	Received tentative NFA determination September 11, 2018
048	Former POL Storage Building 13805	Received tentative NFA determination July 16, 2019
049	Former POL Storage Building 11813	RFI Report received June 12, 2019 (Addressed through Section III of this Permit).
050	Former POL Storage Building 10306	RFI Report received August 05, 2019 (Addressed through Section III of this Permit).
051	Former POL Storage Building 985	Received tentative NFA determination May 29, 2018
054	Former POL Storage Building 91701	Received tentative NFA determination September 11, 2018
055	Fire Debris Disposal Site	Received request to merge site with SWMU 057. June 24, 2021
056	11 <sup>th</sup> Avenue Water Standpipe	RFI Report received May 15, 2019 (Addressed through Section III of this Permit).
057	Installation Railhead Area Near Gate 3	RFI Report received May 23, 2019 (Addressed through Section III of this Permit).
058	Former Vietnam Tracked Vehicle Maintenance Site	RFI Report received May 20, 2019 (Addressed through Section III of this Permit).
CA – Corrective Action NFA – No Further Action at this time RFI – RCRA Facility Investigation		