

SECTION I. GENERAL PERMIT CONDITIONS

I.A. Scope and Effect of Permit

- I.A.1. The Permittee is allowed to treat, store, and dispose of hazardous waste only in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited. The Permittee must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR 260-279 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.
- I.A.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.
- I.A.3. Compliance with this permit does not constitute a defense to any action brought by the Director under Section 18, Emergency Powers, of the Georgia Hazardous Waste Management Act, O.C.G.A. § 12-8-75, as amended.
- I.A.4. Nothing in this permit shall be construed to preclude the institution of any legal action under Section 3008 of the Federal Resource Conservation and Recovery Act (RCRA) or under the Georgia Hazardous Waste Management Act, O.C.G.A. §§ 12-8-81 through 12-8-82, as amended.
- I.A.5. This permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11.11(7) and 40 CFR 270.41, 270.42, 270.43, 270.50(d) and 270.51(a). The filing of a request for a permit modification, revocation and reissuance, or termination; or the notification of planned changes or anticipated non-compliance on the part of the Permittee, does not stay the applicability of any permit condition.
- I.A.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

- I.B.1. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility or of any planned changes in the process generating the hazardous waste which changes might affect the performance of the permitted facility with respect to any regulated activities.
- I.B.2. The Permittee shall maintain at the facility the following documents and amendments, revisions and modifications to these documents:

- a. Complete copy of this permit and permit application, including all amendments, revisions and modifications;
 - b. Post-closure care plans;
 - c. Operating record as required by 40 CFR 264.73;
 - d. Inspection log;
 - e. Corrective action plan;
 - f. Soil and groundwater sampling and analysis plan;
 - g. Cost estimate for facility post-closure care and corrective action as required by 40 CFR 264.144; and
 - h. Proof of financial assurance for post-closure care and corrective action as required by 40 CFR 264.145 and the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-68, as amended.
- I.B.3. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification as necessary.
- I.B.4. When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall promptly submit corrected facts or information.
- I.B.5. The Permittee shall at all times properly operate and maintain all facilities which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes 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 back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.
- I.B.6. The Permittee may not commence treatment, storage or disposal of hazardous waste at any new or modified portion of the facility or corrective action for contaminated groundwater or soil until the Permittee has submitted to the Director by certified mail, or hand delivery, a letter signed by the Permittee and an independent registered professional engineer or, when appropriate, registered professional geologist, stating that the facility has been constructed or modified in compliance with the permit where appropriate; and the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or the Director has either waived the inspection or has not within fifteen (15) days notified the Permittee of his or her intent to inspect.
- I.C. Monitoring and Reporting
 - I.C.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 waste/groundwater to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste: Physical/ Chemical Methods, SW 846 or Standard Methods for the Examination of Water and Wastewater; or an equivalent method as specified in the Waste Analysis Plan. Sampling and analyses of

soil, sediment, surface water, and groundwater shall be conducted in accordance with methods and procedures acceptable to the Director.

- I.C.2. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by Condition I.G.1. and 40 CFR 264.73(b)(9), and records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the sample, measurement, report, certification, record, or application, or until corrective action is completed, whichever date is later. These periods are automatically extended during the course of any unresolved enforcement action regarding this facility and also may be extended at any time at the Director's discretion.
- I.C.3. The Permittee shall maintain records on site for all groundwater monitoring wells and associated groundwater surface elevations, including the groundwater flow rate and direction, throughout the post-closure period.
- I.C.4. Records of monitoring information shall include:
- 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) 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 methods;
 - f. The flow rates and directions in the uppermost aquifer; and
 - g. The results of such analyses and measurements presented in table and/or graphic format.
- I.C.5. The Permittee shall report to the Director or his/her representative orally within twenty-four (24) hours from the time the Permittee becomes aware of any circumstances resulting from the operation and/or maintenance of the hazardous waste management facility (including periods of non-compliance) which may endanger human health or the environment, including but not limited to:
- a. Release of any hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) that may cause an endangerment to public drinking water supplies.
 - b. Release or discharge of hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) or a fire or explosion, which could threaten human health or the environment outside the facility.

The description of the occurrence shall include:

- i. Name, address, and telephone number of the owner or operator;
- ii. Name, address, and telephone number of facility;
- iii. Date, time and type of incident;
- iv. Name and quantity of material(s) involved;
- v. The extent of injuries, if any;

- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- I.C.6. Within fifteen (15) days of becoming aware of any reportable incident as in Condition I.C.5. which may endanger human health or the environment, the Permittee shall submit a written report of the incident covering the following:
 - a. Description of occurrence as in Condition I.C.5. 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.
- I.C.7. Reports of compliance or non-compliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date.
- I.C.8. The Permittee shall report incidents of non-compliance, other than those described in Conditions I.C.5. and I.C.7., semi-annually on July 15 (covering January 1 through June 30) and January 15 (covering July 1 through December 31). The report shall cover the information requested in Condition I.C.5. for each incident.
- I.C.9. All reports or other information requested by the Director shall be signed and certified according to the requirements in 40 CFR 270.11.
- I.C.10. All geologic and engineering reports required by this permit shall be signed and sealed by the appropriate Georgia registered professional as defined by State law. Additionally, the following certification statement shall accompany reports containing ground water data or interpretation:

I certify that I am a qualified ground-water scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in ground-water hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding ground-water monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction.
- I.C.11. The Permittee shall immediately notify the Division through the Department of Natural Resources Emergency Operations Center of any spill or release of oil or a hazardous substance as soon as the Permittee knows of the spill or release, as required by O.C.G.A. § 12-14-3.

I.D. Responsibilities

- I.D.1. Right of Entry. The Permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon 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; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Georgia Hazardous Waste Management Act, any substances or parameters at any location.
- I.D.2. Transfer of Permits. This permit is not transferable to any person(s) except after notice to the Director. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.40(b) or 40 CFR 270.41(b)(2). Before transferring ownership or operational control of the facility during operating life or during its post-closure period, the Permittee shall notify the new owner or operator in writing of the applicable requirements of 40 CFR Parts 264 and 270.
- I.D.3. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any other non-compliance with this permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.
- I.D.4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must submit a completed application for a new permit at least one hundred eighty (180) days before this permit expires. Pursuant to 40 CFR 270.51, this permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely and complete application for a new permit and, through no fault of the Permittee, the Director has not issued a new permit on or before the expiration date of this permit.
- I.D.5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a 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.
- I.D.6. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment or human health resulting from non-compliance with this permit.
- I.D.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.

I.D.8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity, which may result in non-compliance with permit requirements.

I.D.9. Reporting Planned Changes. The Permittee shall give notice to the Director of any planned physical alterations or additions, which impact any Solid Waste Management Units (SWMUs), Areas of Concern or the areas contaminated by them, including voluntary corrective measures.

I.E. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124 and 260-279, 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.

I.E.1. Area of Concern (AOC) for the purpose of this permit includes any area having a probable release of a hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s), which is not from a solid waste management unit 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 investigations and remedial action as required under the Georgia Hazardous Waste Management Act, §12-8-60, *et seq.* and 40 CFR 270.32(b)(2) in order to ensure adequate protection of human health and the environment.

I.E.2. Contamination for the purposes of this permit refers to the presence of any hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) 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).

I.E.3. Corrective Action for prior or continuing releases from solid waste management units as well as for other releases as described in Condition I.E.14., for the purposes of this permit, shall be as specified in 40 CFR 264.101 and may include "corrective action" as provided for in 40 CFR 264.100, and other remedial actions for any environmental media as deemed appropriate by the Director to protect human health or the environment. The terms "releases" and "other releases", when used in reference to corrective action requirements of this permit, shall not include releases that the Permittee can satisfactorily demonstrate to the Director have been fully remediated within thirty (30) days of discovery.

I.E.4. Corrective Action Management Unit (CAMU) for the purposes of this permit, includes any area within a facility that is designated by the Director under 40 CFR 264.552, for the purpose of implementing corrective action requirements under 40 CFR 264.101. A

CAMU shall only be used for the management of remediation waste pursuant to implementing such corrective action requirements at the facility.

- I.E.5. Director shall mean the director of the EPD or his/her authorized representative.
- I.E.6. EPA shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.
- I.E.7. EPD shall mean the Georgia Environmental Protection Division of the Department of Natural Resources and any successor departments or agencies of the State of Georgia.
- I.E.8. Extent of Contamination for the purposes of this permit is defined as the horizontal and vertical area/volume in which the concentrations of hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) in the environmental media being investigated are above estimated quantitation limits or naturally occurring concentrations representative of areas not affected by the facility or other appropriate delineation approved by the Director.
- I.E.9. Hazardous Constituents for the purpose of this permit are those substances listed in 40 CFR Part 261 Appendix VIII and 40 CFR Part 264 Appendix IX, as revised or superseded.
- I.E.10. Institutional Controls for the purpose of this permit are non-engineered instruments, such as administrative and legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of the corrective measures.
- I.E.11. Interim Measures for purposes of this permit are actions necessary to contain, remove or treat contamination resulting from a release from a SWMU or AOC to prevent further contaminant migration that poses an imminent danger to health or the environment or to mitigate a condition that will likely deteriorate if not acted upon immediately, and are actions which may be consistent with the likely long-term remedy and undertaken while long-term corrective action remedies are evaluated and, if necessary, implemented.
- I.E.12. Land Disposal Facility for the purposes of this permit is a facility, and all contiguous property under control of the owner or operator, that uses a surface impoundment, landfill, land treatment, waste pile, or miscellaneous unit to manage or dispose of hazardous waste pursuant to §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and Section 3004 of RCRA, as amended.
- I.E.13. Qualified Groundwater Scientist for the purposes of this permit means 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 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.
- I.E.14. Release for the purposes 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(s), hazardous waste constituent(s) or hazardous constituent(s).

- I.E.15. Remediation Waste for the purposes 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 waste(s) or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 CFR 264.101 and Section 3008(h) of RCRA. For a given facility, remediation wastes may originate only from within the facility property boundary, but may include waste managed in implementing corrective action under 40 CFR 264.101 and Sections 3004(v) and 3008(h) of RCRA for releases beyond the facility property boundary.
- I.E.16. Solid Waste Management Unit (SWMU) for the purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous waste. SWMUs include areas that have been contaminated by routine and systemic releases of hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s).
- I.E.17. Staging Pile for the purposes of this permit includes temporary storage for mixing, sizing, blending, or other similar physical operations as long as they are intended to prepare the waste for subsequent management or treatment as defined in 40 CFR 264.554.
- I.E.18. Temporary Units (TU) for the purposes of this permit includes any temporary tank and/or container storage areas used solely for treatment or storage of hazardous remediation waste during specific remediation activities required under 40 CFR 264.101. Designated by the Director, such units must conform to specific standards as defined in 40 CFR 264.553, and may only be in operation for a period of time as specified in this permit.
- I.F. Conditions Related to Compliance with General Facility Standards (40 CFR Part 264 Subparts B, C, D, E, G, H)
- I.F.1. The Permittee must follow the procedures and plans described in detail in the permit application dated May 16, 2025 (revision 2), as revised or amended, which are hereby incorporated by reference and include at least the following:
- a. Post-Closure Plans:
 - i. The Aluminum Hydroxide Land Treatment Unit – Appendix 4-F;
 - ii. The Chromium Hydroxide Landfill – Appendix 4-C;
 - iii. The Chromium Hydroxide Sand Drying Beds – Appendix 4-D;
 - iv. The Surface Impoundment Unit – Appendix 4-E; and
 - v. The Tank Farm Unit – Appendix 4-G.

b. Groundwater Monitoring, Section 9

I.F.2. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts B, C, D and E, and in accordance with the appropriate sections of the permit application:

- a. Security – 40 CFR 264.14(b) and (c)
- b. Repairs and Inspection Log – 40 CFR 264.15 (c) and (d)
- c. Operating Record – 40 CFR 264.73
- d. Retention and Disposition of Records – 40 CFR 264.74
- e. Reports – 40 CFR 264.75 and 40 CFR 264.77
- f. Personnel Training – 40 CFR 264.16

I.F.3. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts G and the appropriate sections of the permit application, as revised or amended, and Rules 391-3-11-.05 and .10:

- a. Post-Closure Care and Use of Property – 40 CFR 264.117
- b. Post-Closure Plans, Amendment of Plans – 40 CFR 264.118
- c. Notice to Local Land Authority and in deed to property – 40 CFR 264.119
- d. Certification of Post-Closure Care – 40 CFR 264.120
- e. Financial Assurance for Post-Closure and Corrective Action. Continuous compliance with 40 CFR 264.145 must be maintained by the Permittee for the amount of the cost estimate for post-closure care and corrective action as required by 40 CFR 264.144 until released by the Director as provided in 40 CFR 264.145(i). Continuous compliance with Rule 391-3-11-.05 is also required.

I.F.4. The Permittee must comply with 40 CFR 264.148 whenever necessary.

I.G. Special Conditions Applicable to Entire Facility

I.G.1. Waste Minimization:

The Permittee shall be required to certify no less often than annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment in accordance with 40 CFR 264.73(b)(9).

I.G.2. Land Disposal Restrictions:

40 CFR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage or disposal unit. The Permittee shall maintain compliance with the requirements of 40 CFR Part 268. Where the Permittee has applied for an extension, waiver or variance under this Part, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such application.

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II. **CONDITIONS RELATED TO POST-CLOSURE CARE [Aluminum Hydroxide Land Treatment Unit, Chromium Hydroxide Landfill, Chromium Hydroxide Sand Drying Beds, Surface Impoundment Unit, and Tank Farm Unit]**

II.A. **Unit Identifications:**

- II.A.1. The Permittee shall provide post-closure care for the hazardous waste land treatment unit at the site identified as "Aluminum Hydroxide Land Treatment Unit" on Figure 4-2 of the permit application.
- II.A.2. The Permittee shall provide post-closure care for the hazardous waste landfill at the site identified as "Chromium Hydroxide Landfill" on Figure 4-2 of the permit application.
- II.A.3. The Permittee shall provide post-closure care for the closed hazardous waste surface impoundment at the site identified as "Chromium Hydroxide Sand Drying Beds" on Figure 4-2 of the permit application.
- II.A.4. The Permittee shall provide post-closure care for the hazardous waste surface impoundment at the site identified as "Surface Impoundment Unit" on Figure 4-2 of the permit application.
 - a. The Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit may be collectively addressed as the Hazardous Waste Management Area.
- II.A.5. The Permittee shall provide post-closure care for the tank system closed as a landfill at the site identified as "Tank Farm Unit" on Figure 4-2 of the permit application.
- II.A.6. The Permittee must maintain permanent and readily identifiable benchmarks showing the boundaries of the regulated units as established by in the closure certification for each unit. Such benchmarks must be initially placed by a registered surveyor.

II.B. **Waste Identification**

The Permittee has disposed of listed hazardous waste F019 in the Aluminum Hydroxide Land Treatment Unit, Chromium Hydroxide Landfill, Chromium Hydroxide Sand Drying Beds, and the Surface Impoundment Unit as described in the permit application dated May 16, 2025 (revision 2), as revised or amended. The Permittee has disposed of listed hazardous wastes F003, F005, U220 and U239 in the Tank Farm Unit as described in the permit application dated May 16, 2025 (revision 2), as revised or amended.

II.C. **Monitoring and Inspection**

- II.C.1. The Permittee shall follow the inspection schedule for each regulated unit as described in the appropriate sections of the permit application and as required by 40 CFR 264.15(a) and 40 CFR 264.310. The inspection schedule for each unit is found in the permit application as follows:
 - a. The Aluminum Hydroxide Land Treatment Unit – Section IE-2a(1), Appendix 4-F;

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- b. The Chromium Hydroxide Landfill – Section IA-2a(1), Appendix 4-C;
- c. The Chromium Hydroxide Sand Drying Beds – Section II-1a, Appendix 4-D;
- d. The Surface Impoundment Unit – Section IC-2a(6), Appendix 4-E; and
- e. The Tank Farm Unit – Section I-F-2.2, Appendix 4-G.

II.C.2. The Permittee shall inspect all regulated units quarterly and within 72-hours after significant storm events to detect any evidence of deterioration or improper operation as described in Appendices 4-C through 4-G of the permit application and as required by 40 CFR 264.15, 40 CFR 264.197, 40 CFR 264.228, 40 CFR 264.280 and 40 CFR 264.310.

II.D. Post-Closure

II.D.1. The Permittee shall perform post-closure for the Aluminum Hydroxide Land Treatment Unit in accordance with the post-closure plan in Appendix 4-F of the permit application and as required by 40 CFR 264.117 through 264.120 and 40 CFR 264.280(c).

II.D.2. The Permittee shall perform post-closure for the Chromium Hydroxide Landfill in accordance with the post-closure plan in Appendix 4-C of the permit application and as required by 40 CFR 264.117 through 264.120 and 40 CFR 264.310.

II.D.3. The Permittee shall perform post-closure for the Hazardous Waste Management Area (Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit) in accordance with the post-closure plans in Appendices 4-D and 4-E of the permit application, respectively, and as required by 40 CFR 264.117 through 264.120 and 40 CFR 264.228.

II.D.4. The Permittee shall perform post-closure for the Tank Farm Unit in accordance with the post-closure plan in Appendix 4-G of the permit application, and as required by 40 CFR 264.117 through 264.120 and 40 CFR 264.197(b).

II.D.5. The facility's post-closure care period will continue until an adequate site-specific demonstration can be made that the contamination no longer poses a threat to human health and the environment, pursuant to 40 CFR 264.117(a)(2)(ii).

III. GROUNDWATER MONITORING

III.A. Well Location and Construction

The Permittee shall install and/or maintain a groundwater monitoring system to comply with the requirements of 40 CFR 264.95, 264.97, and 264.100 as specified below:

III.A.1. The Permittee shall maintain groundwater monitoring wells

MW-2DR	MW-27D	MW-44D	MW-78S	MW-93D	BR-6
MW-2SR	MW-27S	MW-44S	MW-79S	OS-1D	
MW-4SR	MW-28D	MW-45S	MW-80S	OS-1S	
MW-7D	MW-28S	MW-48S	MW-81S	OS-2D	
MW-13S	MW-31D	MW-49S	MW-82S	OS-2S	
MW-17D	MW-32D	MW-50S	MW-82D	OS-3D	
MW-18D	MW-32S	MW-51S	MW-83S	OS-3S	
MW-18S	MW-35D	MW-52S	MW-83D	OS-4D	
MW-19D	MW-36D	MW-53S	MW-85D	OS-4S	
MW-19S	MW-36S	MW-54S	MW-86D	OS-5D	
MW-20D	MW-37D	MW-73S	MW-87D	OS-6D	
MW-20S	MW-39D	MW-75S	MW-88D	OS-7D	
MW-21D	MW-40D	MW-76S	MW-89D	OS-8D	
MW-24D	MW-41D	MW-76D	MW-90D	BR-1	
MW-26D	MW-42S	MW-77S	MW-91D	BR-3	
MW-26S	MW-43S	MW-77D	MW-92D	BR-5	

at the locations on Figure 4-2 of the permit application and any additional wells as deemed appropriate by the Director to monitor groundwater conditions within and adjacent to all plumes of contamination.

III.A.2. The Permittee shall maintain MW-13S as the background groundwater monitoring well for the entire facility as specified in Section 9 of the permit application. If the groundwater in this well no longer represents background groundwater conditions for the facility, the Permittee shall submit a plan to install a new background well(s).

III.A.3. Monitoring wells MW-42S, MW-43S, MW-44D, MW-44S, and MW-45S shall define the point of compliance for the Aluminum Hydroxide Land Treatment Unit.

- III.A.4. Monitoring wells MW-4SR, MW-17D, and MW-19S shall define the point of compliance for the Chromium Hydroxide Landfill.
- III.A.5. Monitoring wells MW-2SR, MW-48S, MW-49S, and MW-50S shall define the point of compliance for the Hazardous Waste Management Area (Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit).
- III.A.6. Monitoring wells MW-51S, and MW-52S shall define the point of compliance for the Tank Farm Unit.
- III.A.7. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with 40 CFR 264.95, 264.97 and 264.100.

A plan specifying the design, location and installation of any additional monitoring wells shall be submitted no later than thirty (30) days prior to installation (unless it is deemed appropriate by the Director and the Permittee that the wells should be installed on an accelerated schedule), which, at a minimum, shall include:

- a. Well construction techniques including casing depths and proposed total depth of well(s);
- b. Well development method(s);
- c. A complete analysis of well construction materials;
- d. A schedule of implementation for construction; and
- e. Provisions for determining the lithologic character, hydraulic conductivity and grain size distribution for the applicable aquifer unit(s) at the location of the new well(s).

III.B. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells to provide a reliable indication of the quality of the groundwater as required under 40 CFR 264.97(d) and (e):

- III.B.1. Groundwater sampling must be performed in accordance with the EPA's Region IV Laboratory Services and Applied Science Division (LSASD) Procedures found in its Field Branches Quality System and Technical Procedures. This includes sampling of groundwater and management of samples prior to analysis, pump operation, groundwater level and well depth measurement, and field measurement procedures.
- III.B.2. Samples shall be analyzed in accordance with Condition I.C.1. and Section 9 of the permit application.
- III.B.3. Samples shall be tracked and controlled using the chain of custody procedures specified in Section 9 of the permit application.

III.C. Groundwater Monitoring – Aluminum Hydroxide Land Treatment Unit, Chromium Hydroxide Landfill, Tank Farm Unit, and Hazardous Waste Management Area (Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit)

III.C.1. Groundwater Protection Standard

- a. The groundwater protection standard, as required under 40 CFR 264.92, shall consist of Table I for the Interior Monitoring Wells, Table II for the Perimeter Monitoring Wells, Table III for the Tank Farm Unit Perimeter Monitoring Wells, and Table IV for Special Conditions Monitoring Wells which list the hazardous constituents and their respective concentration limits as required under 40 CFR 264.93 and 40 CFR 264.94, respectively. Furthermore, the Remedial Goal Options for selected constituents from the approved groundwater risk assessment can be used as groundwater protection standards within the property line.
- b. The groundwater protection standard applies to all release(s) of hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) as deemed appropriate by the Director to protect human health and the environment.

III.C.2. Compliance Period

The compliance period shall be defined as continuing until the groundwater protection standard has not been exceeded for a period of three (3) consecutive years and corrective action as required under 40 CFR 264.100 has been terminated, as specified in Condition III.C.6.b. and as required by 40 CFR 264.96(c). The compliance period shall begin with the effective date of the permit.

III.C.3. Groundwater Monitoring

The Permittee shall conduct a groundwater monitoring program to evaluate the quality of groundwater at the facility to demonstrate the effectiveness of the corrective action program required under 40 CFR 264.100 [and 40 CFR 264.101 as related to other releases of hazardous waste(s), hazardous waste constituent(s) or hazardous constituent(s) from a solid waste management unit]. Groundwater monitoring shall be conducted in conformance with the requirements of 40 CFR 264.100(d), and as specified below:

- a. The Permittee shall collect, preserve and analyze all groundwater samples in accordance with Condition III.B.
- b. Beginning no later than six (6) months from the effective date of this permit and continuing through the compliance period specified by Condition III.C.2., and in accordance with the schedule in Table V of this permit, the Permittee shall determine the concentration of each hazardous constituent specified in Table I for the Interior Monitoring Wells, Table II for the Perimeter Monitoring Wells, Table III for the Tank Farm Unit Perimeter Monitoring Wells and Table IV for the Special Conditions Monitoring Wells by collecting and analyzing samples from each compliance point monitoring well identified in Condition III.A.3., III.A.4.,

III.A.5., and III.A.6 in accordance with the sampling frequency identified in Table V of the Permit.

- c. Beginning no later than six (6) months from the effective date of this permit and continuing through the compliance period specified by Condition III.C.2., samples shall be collected and analyzed according to the schedule contained in Table V to monitor the plumes of groundwater contamination.
- d. The groundwater monitoring program must include a determination of groundwater surface elevation each time groundwater is sampled pursuant to III.C.3.b., and III.C.3.c.
- e. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least annually.
- f. Pursuant to 40 CFR 264.100(d) the Permittee shall analyze samples from at least two of the compliance point wells identified in Conditions III.A.3., at least one of the compliance point wells identified in Conditions III.A.4., at least two of the compliance point wells identified in Conditions III.A.5., and at least one of the compliance point wells identified in Conditions III.A.6., plus any additional wells specified by the Director, for all constituent(s) in Appendix IX of 40 CFR Part 264 at least **once every four years, beginning on or before June 2021**, to determine whether additional hazardous constituent(s) are present in the uppermost aquifer and, if so, at what concentrations. The Appendix IX sampling will be rotated among the compliance point wells for each unit so that each well is sampled at least once every eight years. The Appendix IX results must be submitted within 120 days of the sampling. If the Permittee finds Appendix IX constituents in the groundwater that are not identified in Table I for the Interior Monitoring Wells, Table II for the Perimeter Monitoring Wells), Table III for the Tank Farm Unit Perimeter Monitoring Wells, and Table IV for the Special Conditions Monitoring Well, then the Permittee may resample within one (1) month of receiving the results of the initial analysis, repeating the analysis. If the second analysis confirms the presence of new hazardous constituent(s), then the Permittee must report those additional concentrations to the Director within seven (7) days of receiving the results of the second analysis, and request that these additional hazardous constituent(s) be added to Table I, II, III and/or IV. If the Permittee chooses not to resample, then the Permittee must report those additional concentrations to the Director within seven (7) days after receiving the results of the initial analysis and request that these hazardous constituent(s) be added to Table I, II, III and/or IV.
- i. If additional Appendix IX constituents must be added to Table I, II, III and/or IV as a result of the sampling and analysis required under Condition III.C.3.f., the Permittee shall analyze samples from at least one of the compliance point wells from each unit (Conditions III.A.3, III.A.4, III.A.5, and III.A.6) plus any additional wells specified by Director, for all constituent(s) in Appendix IX of 40 CFR Part 264 at least **once every year**, to determine whether additional hazardous constituent(s) are present in the uppermost aquifer and, if so, at what concentrations. If no additional Appendix IX constituents are detected for a period of three years, the Appendix IX sampling schedule will return to the

schedule described in Condition III.C.3.f. Thereafter, Appendix IX sampling will be rotated among the compliance point wells as referenced in Condition III.C.3.f, until no hazardous waste constituents have been detected for a period of three years.

Compliance with the groundwater protection standard, as defined under Condition III.C.1., will be based upon groundwater monitoring data obtained under Conditions III.C.2. and III.C.3. that indicate that all constituents listed in Table I, Table II, Table III and Table IV no longer exceed the groundwater protection standard at the point of compliance or any other monitoring point within or adjacent to the plume(s) of contamination. Comparisons for the purpose of determining compliance shall be made utilizing the statistical procedure described in 40 CFR 264.97 (h) and (i).

III.C.4. Groundwater Data Evaluation and Reporting

- a. The Permittee shall evaluate data collected under Condition III.C.3.b., and III.C.3.c. above for compliance with the groundwater protection standard established under Condition III.C.1.
- b. The Permittee shall submit a report to the Director on the effectiveness of the corrective action program annually, including all monitoring, testing and analytical data obtained under Conditions III. and IV.
- c. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Condition III.C. in the operating record, as required by 40 CFR 264.73(b)(6).

III.C.5. Corrective Action Program

The Permittee shall continue implementation of the corrective action program, as required under 40 CFR 264.100 and as described in Section 8 of the permit application, for those hazardous constituent(s) that exceed the groundwater protection standard in Table I, Table II, Table III or Table IV, respectively. Furthermore, implement the updated corrective action detailed in the SWMU 49 CAP described in Appendix 7D of the permit application to address groundwater impacts associated with the SWMU 49 plume as provided for in Condition III.C.1.

- a. The Permittee shall conduct a corrective action program to remove or treat in place any hazardous constituents (Condition III.C.1.) that exceed concentration limits in Table I, Table II, Table III or Table IV in groundwater, between the point of compliance and the down-gradient facility property boundary as required under 40 CFR 264.100(e)(1), and beyond the facility property boundary as required under 40 CFR 264.100(e)(2), unless the Permittee can demonstrate to the satisfaction of the Director that:
 - i. Despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action; or
 - ii. Such action is not necessary to protect human health or the environment.

- b. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility's property boundary where off-site access is denied, as required under 40 CFR 264.100(e)(2).
- c. The Permittee shall ensure that the corrective action program will function as designed and planned in Section 8 of the permit application and in accordance with any subsequent revisions, modifications, or changes to the original plans. Any measures taken to meet this Condition shall be reported in the annual report required by Condition III.C.4.b.
- d. The corrective action must be conducted in such a manner as to preclude migration of the contaminant plume(s) offsite.
- e. The corrective action must be conducted in such a manner as to mitigate the release of any hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) to the environment.
- f. The Permittee shall treat, store, and dispose of all contaminated groundwater and soil materials in accordance with all applicable federal, state and local laws.
- g. The Permittee shall include a demonstration of financial responsibility for the corrective action program conforming to Condition I.F.3.e.
- h. If the groundwater protection standard(s) are met during the compliance period, the Permittee must continue corrective action to the extent necessary to ensure that the groundwater protection standard is not exceeded. Corrective action must continue until the groundwater protection standard has not been exceeded for three (3) consecutive years as required under 40 CFR 264.100(f).

III.C.6. Permit Modification

- a. If the Permittee at any time determines that the corrective action program no longer satisfies the requirements of 40 CFR 264.100 or Condition III.C. for releases of hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) that originate from a regulated unit, the Permittee must within ninety (90) days submit an application for a permit modification to make any appropriate changes in the program.
- b. If the Permittee meets or exceeds the requirements of 40 CFR 264.100 and meets the groundwater protection standard at the point of compliance and all points within the contaminant plume(s) for three (3) consecutive years, the Permittee may submit an application for a permit modification pursuant to 40 CFR 270.42 to terminate corrective action and establish an alternate groundwater monitoring program.

III.C.7. Duty of Permittee

The Permittee shall assure that groundwater monitoring and corrective action measures necessary to achieve compliance with 40 CFR 264.100 and the Groundwater Protection Standard under 40 CFR 264.92 are taken during the compliance period.

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

IV.A. **Applicability**

The requirements of this Section apply to the determination of the need for subsequent implementation of corrective action for releases from all solid waste management units (SWMUs) and areas of concern (AOCs) contained within the facility property boundary, as required by 40 CFR 264.101(a), and those extending beyond the facility property boundary, as required by 40 CFR 264.101(c) and the Georgia Hazardous Waste Management Act, O.C.G.A. § 12-8-66(e), as amended. The requirements of this Section apply, but are not limited to, the following SWMUs and AOCs:

- IV.A.1. The SWMUs and AOCs identified in Appendix A-1 which require further investigation through a Verification Investigation and/or a RCRA Facility Investigation.
- IV.A.2. The SWMUs and AOCs identified in Appendix A-2 which require no further action at this time.
- IV.A.3. The SWMUs and AOCs identified in Appendix A-3 which require corrective action at this time.
- IV.A.4. The SWMUs identified in Appendix A-4 which are regulated units as defined by 40 CFR 264.90(a)(2).
- IV.A.5. Any additional SWMUs or AOCs discovered after the date of issuance of this permit due to groundwater monitoring, on-going field investigations, environmental audits, or other means.

IV.B. **Notification and Assessment Requirements for Newly Identified SWMUs and AOCs**

- IV.B.1. Within fifteen (15) days of the Permittee's discovery of any SWMUs or AOCs under Condition IV.A.5., the Permittee shall notify the Director in writing of such discovery.
- IV.B.2. The Director shall notify the Permittee in writing of the discovery of any SWMUs or AOCs under Condition IV.A.5.
- IV.B.3. Within sixty (60) days of the Permittee's discovery pursuant to Condition IV.B.1. or within sixty (60) days of receipt of the Director's notification under Condition IV.B.2., the Permittee shall submit to the Director the following information for each SWMU or AOC:
 - a. Location on a topographic map of appropriate scale such as required under 40 CFR 270.14(b)(19);
 - b. Designation of type and function;
 - c. General dimensions, capacities and structural description [supply any available plan(s)/drawing(s)];
 - d. Dates of operation;

- e. Specification of all wastes that have been managed at/in the SWMU or AOC to the extent available; and
- f. All available information pertaining to any release of hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) to include groundwater data, soil analyses, air, and/or surface water data.

IV.B.4. The Director shall review the information submitted pursuant to Condition IV.B.3. and notify the Permittee in writing as to the need for further investigation, interim measures/stabilization requirements, and/or corrective action as required by Condition IV.D., IV.E., IV.F., or IV.G. below.

IV.C. Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs and AOCs

IV.C.1. Within thirty (30) days of the Permittee's discovery of a previously unidentified release(s) from any SWMU or AOC identified under IV.A., the Permittee shall notify the Director in writing of such discovery.

IV.C.2. The Director shall notify the Permittee in writing of the discovery of any previously unidentified release(s) from any SWMU or AOC previously discovered under Condition IV.A.

IV.C.3. Within ninety (90) days of the date of the Permittee's discovery under Condition IV.C.1., or within ninety (90) days of the date of the Director's notification under Condition IV.C.2., the Permittee shall submit to the Director an RFI Workplan pursuant to Condition IV.F.

IV.D. Verification Investigation (VI)

IV.D.1. The Director may require the Permittee to submit a VI Workplan for any SWMU or AOC discovered under Condition IV.A.5. in a schedule to be determined by the Director. The VI Workplan shall describe all actions necessary to verify the presence or absence of a release from any SWMU or AOC identified pursuant to Conditions IV.A. or IV.C. The VI Workplan shall include a schedule of implementation that includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the VI Workplan continuing through submission of the VI Report required by Condition IV.D.3.

IV.D.2. Upon receipt of the Director's written approval of the VI Workplan, the Permittee shall implement the Workplan in accordance with the schedule of implementation contained therein.

IV.D.3. The Permittee shall submit a VI Report in accordance with the schedule of implementation contained within the approved VI Workplan. The VI Report shall describe all actions taken to verify the presence or absence of releases including all data collected during the VI. The Director shall review the VI Report and notify the Permittee in writing of the need for further investigation, interim measures and/or corrective action pursuant to Condition IV.E., IV. F. and/or IV.G. below, or of a finding of no further action required.

IV.E. Interim Measures (IM)

- IV.E.1. The Permittee may conduct interim measures to contain, remove or treat contamination resulting from releases from any SWMU or AOC as necessary to protect human health and the environment. Such interim measures may be conducted concurrently with any investigations required by this permit.
- IV.E.2. Within thirty (30) days of the Permittee's determination that interim measures are necessary, or within thirty (30) days of receipt of the Director's written notice that interim measures are necessary, the Permittee shall submit to the Director an Interim Measures (IM) Workplan. The IM Workplan shall describe all measures necessary to contain, remove or treat contamination resulting from releases from any SWMU or AOC. The IM Workplan shall include a schedule of implementation, which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the IM Workplan and continuing through submission of the IM Report required by Condition IV.E.5.
- IV.E.3. Upon receipt of the Director's written approval of the IM Workplan, the Permittee shall implement the Workplan in accordance with the schedule of implementation contained therein.
- IV.E.4. The Permittee shall provide written notice to the Director as soon as possible of any planned changes, reductions or additions to the interim measures described in the IM Workplan.
- IV.E.5. The Permittee shall submit an IM Report in accordance with the schedule of implementation contained in the approved IM Workplan. The IM Report shall describe all interim measures taken to contain, remove or treat contamination resulting from releases from any SWMU or AOC. The IM Report shall also provide a summary of all data or other information obtained during implementation of the IM Workplan and a summary of the effectiveness of the interim measures in achieving the objective of Condition IV.G.

IV.F. RCRA Facility Investigation (RFI)

- IV.F.1. Within ninety (90) days of the date of receipt of the Director's written notice pursuant to Condition IV.B.4. and/or IV.C.3., the Permittee shall submit to the Director a RCRA Facility Investigation (RFI) Workplan.
- IV.F.2. The RFI Workplan shall provide a description of the specific actions necessary to determine the full nature and extent of releases from any SWMU and AOC identified by Condition IV.A., IV.B., IV.C. and IV.D., including potential migration pathways for those releases (e.g. air, land, surface water, and groundwater), actual or potential receptors and applicable background concentrations. The Permittee must provide sufficient justification that migration through a potential pathway is not likely if a potential migration pathway associated with a release is not included in the Workplan. Such deletions are subject to the approval of the Director.

- IV.F.3. The RFI Workplan shall include a schedule of implementation, which includes intermediate milestones beginning with the Respondent's receipt of the Director's written approval of the RFI Workplan and continuing through submission of the RFI Report required by Condition IV.F.4. Upon approval by the Director, the Permittee shall implement the RFI Workplan in accordance with the schedule contained in the approved Workplan.
- IV.F.4. The Permittee shall submit a RFI Report in accordance with the schedule of implementation contained in the approved RFI Workplan. The Report shall provide a summary of all activities undertaken during the RFI to implement the approved Workplan. The Report shall provide a complete description of the nature and extent of all releases evaluated during the RFI including sources, migration pathways, actual or potential receptors and applicable background concentrations. The RFI Report shall 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 actions required by the Workplan, or such action is not necessary to protect human health or the environment.
- IV.F.5. The Director shall review the RFI Report required under Condition IV.F.4. and notify the Permittee in writing of the need for further investigation and/or corrective action as required by Condition IV.G., 40 CFR 264.101(a) and 40 CFR 264.101(c).
- IV.F.6. Within ninety (90) days of the Permittee's receipt of the Director's written notice for further investigation, referenced in Condition IV.F.5., the Permittee shall submit an addendum to the RFI Workplan to the Director. The addendum shall provide a description of the investigation activities that will be conducted to further define the nature and extent of releases from any SWMU and/or AOC.

IV.G. Corrective Action

- IV.G.1. Within ninety (90) days of the Permittee's receipt of the Director's written notice for corrective action referenced in Condition IV.D.3. and/or IV.F.5., the Permittee shall submit a Corrective Action Plan (CAP) to the Director. The CAP shall provide a description of the corrective measures to be taken with regard to releases from any SWMU or AOC identified in Condition IV.B.4., IV.D.3. and/or IV.F.5. The CAP shall be submitted as a request for permit modification in accordance with 40 CFR 270.42.
- IV.G.2. The CAP shall include a schedule of implementation with intermediate milestones beginning with the issuance of the permit modification requested pursuant to Condition IV.G.1. and continuing through the post-closure period.
- IV.G.3. The CAP shall include a demonstration of financial responsibility conforming to Condition I.F.3.e.
- IV.G.4. The Permittee shall conduct corrective action at any SWMU and/or AOC referenced in Condition IV.F.5. in accordance with the CAP(s) listed in Appendix A-3 of this permit.

IV.G.5. The Permittee shall identify media remediation levels for corrective action based upon the Georgia EPD Guidance for Selecting Media Remediation Levels at RCRA SWMUs.

- a. Media remediation levels for the hazardous constituents associated with SWMU-49 that have been released to groundwater are identified in Table I and Table II.
- i. The following monitoring wells shall be used along with additional groundwater monitoring wells, as necessary, to assess changes in the rate and extent of the plume of contamination associated with SWMU49 or as otherwise deemed necessary to meet the requirements of 40 CFR 264.97 and 264.101:

MW-2SR	MW-4SR	MW-17D	MW-19S
MW-2DR	MW-27S	OS-1S	MW-31D
MW-7D	MW-36D	OS-3D	MW-32S
MW-19D	MW-37D	OS-5D	MW-49S
MW-20D	MW-39D	OS-6D	MW-50S
MW-21D	MW-40D	OS-7D	BR-3
MW-24D	MW-54S	OS-8D	BR-6
MW-51S	MW-52S	MW-28D	

IV.G.6. The Permittee shall conduct a corrective action program as to remove or treat in place any hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) that have been released to groundwater, surface water and/or soils that exceed the remediation levels identified per Condition IV.G.5.

- a. Within the facility property boundary; and
- b. Beyond the facility property boundary, unless the Permittee can demonstrate to the satisfaction of the Director that:
- i. despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action; or
- ii. such action is not necessary for the protection of human health or the environment.

IV.G.7. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility property boundary where off-site access is denied.

- IV.G.8. The Permittee shall ensure that the corrective action program(s) listed in Appendix A-3 function as designed and planned.
- IV.G.9. The corrective action must be conducted in such a manner as to preclude contaminant migration offsite.
- IV.G.10. The corrective action must be conducted in such a manner as to mitigate the release of any hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) to the environment.
- IV.G.11. The Permittee shall treat, store, and dispose of all contaminated groundwater, surface water, sediments, and soil materials in accordance with all applicable federal, state and local laws.

IV.H. Schedule of Compliance

- IV.H.1. All plans and reports required by this Section are subject to the approval of the Director prior to implementation. The Permittee shall revise all submittals as specified by the Director.
- IV.H.2. For any schedule of implementation required by this Section, if the time required to complete any interim activity is more than one year, the schedule shall specify interim dates for the submission of reports of progress towards satisfaction of the interim requirements.
- IV.H.3. Extensions of the due date for the submittal of any plan or report may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists. Extensions of over thirty (30) days must be requested in writing.
- IV.H.4. Upon approval by the Director, all plans and reports shall be enforceable as conditions of this permit.
- IV.H.5. If at any time the Permittee determines that any plan or report required under this Section no longer satisfies the requirements of this permit or 40 CFR 264.101, the Permittee must submit an amended plan or report to the Director within thirty (30) days of such determination.
- IV.H.6. If at any time the Director determines that any plan or report required under this Section no longer satisfies the requirements of this permit or 40 CFR 264.101, the Director will so notify the Permittee in writing and request that an amended plan or report be submitted in accordance with a schedule to be specified.

IV.I. Permit Modification

- IV.I.1. If the Permittee at any time determines that the corrective action plan(s) listed in Appendix A-3 no longer satisfies the requirements of 40 CFR 264.101 or Condition IV.G. for releases of hazardous waste(s), hazardous waste constituent(s), or hazardous constituent(s) that originate from a SWMU or AOC, the Permittee must within ninety (90) days of such determination submit an application for permit modification pursuant

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to 40 CFR 270.42, to the Director, in order to make any appropriate changes to the plan(s).

- IV.I.2. If the Permittee meets or exceeds the requirements of 40 CFR 264.101 and Condition IV.G.6. for three consecutive years for any SWMU or AOC, the Permittee may submit an application for permit modification pursuant to 40 CFR 270.42 to the Director to discontinue the active portion of the corrective action and to establish an alternate groundwater monitoring program for that unit.

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APPENDIX A-1

List of Solid Waste Management Units and Areas of Concern requiring an RFI.

<u>SWMU/AOC No.</u>	<u>Description</u>
(A RFI has been performed for all SWMUs and AOCs known at this time)	

APPENDIX A-2

List of Solid Waste Management Units or Areas of Concern that require no further action at this time.

<u>SWMU No.</u>	<u>Description</u>	<u>SWMU No.</u>	<u>Description</u>
SWMU-1	Calcium Aluminate Landfill	SWMU-31	Paintline Spill Area
SWMU-8	Temporary Drum and Roll-Off Container Storage Area	SWMU-32	Old Melter Areas
SWMU-9	Roll-Off Container Storage Area, Sludge Tank and Filter Press	SWMU-33	Forklift Shop Oil Sump
SWMU-10	Paintline Wastewater Treatment System and All Piping	SWMU-34	Exterior Trash Containers
SWMU-11	Anodizing Wastewater Treatment System and Piping Upstream of Settling Pond	SWMU-35	Sink Frame Building Area
SWMU-12	Truck Shop Sump plus Piping and Trench	SWMU-36	Sump Below Paint Booths
SWMU-13	Truck Shop Pipe Discharge	SWMU-37	Fabrication Building Cooling Tower Discharge Ditch
SWMU-14	Truck Shop Parking Area	SWMU-38	Discharge Areas from Sinks
SWMU-15	Area Under Truck Shop Oil/Water Separator	SWMU-39	Former Employee Parking Lot
SWMU-16	Storage Yard Behind Maintenance plus Ditch and Drum Storage	SWMU-40	Buffing Dust Area in Fabrication Building
SWMU-17	Drum Crusher Area	SWMU-41	Paint Hook Burn-Off Oven
SWMU-18	Storm Sewer System that Conducted Hydraulic Oils, Acids, Caustics, Solvents, including Ditches	SWMU-42	Cooling Tower Areas
SWMU-19	Area West of Die Shop	SWMU-43	Former Die Shop Waste Oil/Solvent Area
SWMU-20	Discharges from Fabrication Building	SWMU-44	Chromium Hydroxide Sandbed Closure Stockpile Area
SWMU-21	Former Oil/Water Separator	SWMU-45	Container Cleaner Unit
SWMU-22	Active Oil/Water Separator	SWMU-47	Underground Storage Tank
SWMU-23	Inactive Oil/Water Separator	SWMU-48	Paintline Pit
SWMU-24	Reported Trash Dump	SWMU-50	F019 Spill Area
SWMU-25	Reported Trash Dump near Chromium Hydroxide Landfill	SWMU-51	Oil Changing Area
SWMU-26	Demolition/Construction Debris Disposal Area	SWMU-52	Pipe Disposal Area
SWMU-27	Acid Spill Area near Phosphoric Acid Storage	SWMU-53	Furnace Foundation in Casting
SWMU-28	Scrubbers Serving Fabrication Building	SWMU-54	Hydraulic Oil Storage Tank Area

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SWMU-29 Steam Cleaner Area

SWMU-55 Die Repair Process

SWMU-30 Battery Recharge Stations

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APPENDIX A-3

List of Solid Waste Management Units or Areas of Concern that require corrective action at this time.

<u>SWMU(s) / AOC(s) No.</u>	<u>Corrective Action Plan</u>
SWMU-49	PCE Degreaser CAP as described in Section 8 and Appendix 7D of the permit application.

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APPENDIX A-4

Solid Waste Management Units which are regulated units as defined by 40 CFR 264.90(a)(2).

Aluminum Hydroxide Land Treatment Unit

Chromium Hydroxide Landfill

Tank Farm Unit

Hazardous Waste Management Area (Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit).

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TABLE I: GROUNDWATER PROTECTION STANDARD

Interior Monitoring Wells

HAZARDOUS CONSTITUENTS

CONCENTRATION LIMITS (mg/l)

VOCs

tetrachloroethylene (PCE)	0.31
Cis- 1,2- Dichloroethene	0.16
trichloroethylene (TCE)	0.014
vinyl chloride	0.002

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TABLE II: GROUNDWATER PROTECTION STANDARD

Perimeter Monitoring Wells

<u>HAZARDOUS CONSTITUENTS</u>	<u>CONCENTRATION LIMITS (mg/l)</u>
VOCs	
tetrachloroethylene (PCE)	0.005
trichloroethylene (TCE)	0.005
Cis-1,2-Dichloroethene	0.07
Vinyl Chloride	0.002
1,1-dichloroethene (1,1-DCE)	0.007

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Bonnell Aluminum, Inc. - Newnan, Coweta County (hereinafter "Permittee")

TABLE III: GROUNDWATER PROTECTION STANDARD

Tank Farm Unit (Perimeter Monitoring Wells)

<u>HAZARDOUS CONSTITUENTS</u>	<u>CONCENTRATION LIMITS (mg/l)</u>
VOCs	
Ethylbenzene	0.002
Tetrachloroethene (PCE)	0.005
Toluene	0.002
Trichloroethene (TCE)	0.005
Total Xylene	0.005

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TABLE IV: GROUNDWATER PROTECTION STANDARDS

Special Conditions Monitoring Wells

HAZARDOUS CONSTITUENTS

CONCENTRATION LIMITS (mg/l)

Metals

Chromium

0.05

Nickel

0.02

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TABLE V: MONITORING WELL SAMPLING AND ANALYSIS

Monitoring Well	Sampling Frequency			Analyses				
	Annual	Semi-Annual	Maintenance	Appendix IX	Table I	Table II	Table III	Table IV
MW13 S		X		X		X	X	
*MW2SR		X		X	X			X
MW4SR		X		X	X			
*MW17D		X		X		X		X
MW19S		X		X	X			
MW42S	X			X				X
MW43S				X				
MW44D				X				
MW44S				X				
MW45S	X			X				X
MW48S				X				
MW49S		X		X	X			
MW50S		X		X	X			
MW51S		X		X			X	
MW52S		X		X			X	
MW28D		X			X			
MW2DR	X				X			
MW7D	X				X			
MW19D		X			X			
MW20D	X					X		
MW21D	X					X		
MW24D	X					X		
MW27S		X			X			
MW31D		X			X			
MW32S		X			X			
MW36D	X					X		
MW37D	X					X		
MW39D	X					X		
MW40D		X			X			
MW54S	X				X			
MWOS1S		X				X		
MWOS3D		X			X			
MWOS5D		X				X		
MWOS6D		X				X		
MWOS7D	X					X		
MWOS8D	X					X		
MWBR3	X				X			
MWBR6	X					X		

*Table IV - Constituents for metals will be sampled annually for the following monitoring wells: MW2SR, MW17D, MW42S and MW45S.

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TABLE V: MONITORING WELL SAMPLING AND ANALYSIS

Monitoring Well								
	Sampling Frequency			Analyses				
	Annual	Semi-Annual	Maintenance	Appendix IX	Table I	Table II	Table III	Table IV
MW18D			X					
MW18S			X					
MW20S			X					
MW26D			X					
MW26S			X					
MW27D			X					
MW28S			X					
MW32D			X					
MW35D			X					
MW36S			X					
MW41D			X					
MW53S			X					
MW73S			X					
MW75S			X					
MW76D			X					
MW76S			X					
MW77D			X					
MW77S			X					
MW78S			X					
MW79S			X					
MW80S			X					
MW81S			X					
MW82D			X					
MW82S			X					
MW83D			X					
MW83S			X					
MW85D			X					
MW86D			X					
MW87D			X					
MW88D			X					
MW89D			X					
MW90D			X					
MW91D			X					
MW92D			X					
MW93D			X					
MWOS1D			X					
MWOS2D			X					
MWOS2S			X					
MWOS3S			X					
MWOS4S			X					
MWOS4D			X					
MWBR1			X					
MWBR5			X					