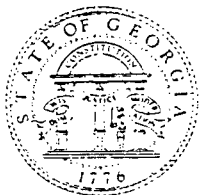


FLD 980-559-728

State of Georgia



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION



Copy of the  
Chemcon-Valdosta  
Permit  
we received while  
visiting  
12/16/97

### HAZARDOUS WASTE FACILITY PERMIT

Permit No. HW-020(S&T)

Facility I.D. No. GAD093380814

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Chapter 391-3-11, (as amended through December 26, 1994 ), adopted pursuant to that Act,

CHEMICAL CONSERVATION OF GEORGIA, INC.

is issued a Permit for the following:

1. Storage of 81,440 gallons of solvents in containers.
2. Treatment in tanks of 18,000 gallons per day of hazardous waste.
3. Treatment in containers of 20,500 gallons per day of hazardous waste.

at the following location:

Azalea Industrial Park  
1612 James P. Rodgers Circle  
Valdosta, Georgia 31601

This Permit is conditioned upon compliance with all provisions of the Georgia Hazardous Waste Management Act, the Rules, Chapter 391-3-11 (as amended through December 26, 1994 ) 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(s) dated May 14, 1995 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 to 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  
27 page(s), which page(s) are a part of this Permit.

Permit Issuance Date: July 26, 1995  
Permit Termination Date: July 26, 2005

Director  
Environmental Protection Division

Permit Number HW-020(S&T)

Chemical Conservation of Georgia, Inc. (EPA ID. No. GAD093380814) is hereinafter referred to as the Permittee.

## SECTION I. GENERAL PERMIT CONDITIONS

### 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. 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 260-268, 270, 124 and 279). Where a citation to the Federal Regulations is made in this permit, it refers to the specific regulations adopted by EPD.
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 Section § 12-8-75, "Powers of Director in situations involving imminent and substantial endangerment to the environment or to public health", of the Georgia Hazardous Waste Management Act, as amended.
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 or under the Georgia Hazardous Waste Management Act, O.C.G.A. §§ 12-8-81 through 12-8-82, 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 § 270.41, 270.42, and 270.43. The filing of a request for a permit modification, variation 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.

B. Management Requirements

1. 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 or of any planned changes in the process generating the hazardous waste which changes might affect the performance of the permitted facility.
2. The Permittee shall maintain at the facility until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:
  - (a) Complete copy of this permit and permit application.
  - (b) Waste Analysis Plan.
  - (c) Personnel training documents and records.
  - (d) Contingency plan.
  - (e) Closure Plan.
  - (f) Cost estimate for facility closure and closure assurance instrument.
  - (g) Liability Coverage Instrument pursuant to Part 264, Subpart H of the Rules
  - (h) Operating record.
  - (i) Inspection schedule log.
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.
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 such facts or information.
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 a back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

C. Monitoring and Reporting

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 to be analyzed must be the appropriate method from 40 CFR Part 261 Appendix I. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste:

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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).

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 and records of all data used to complete the application for this permit including the certification required by §264.73(b)(9) for a period of at least 3 years from the date of the sample, measurement, report or record. 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.
3. 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.
  - (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; and
  - (f) The results of such analyses.
4. The Permittee shall report to the Director or his representative orally within 24 hours from the time the Permittee becomes aware of any circumstances resulting from the operation of the hazardous waste management facility which may endanger human health or the environment, or any unauthorized releases (including fires and explosions) from the operation of the facility (including periods of noncompliance).

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 the facility;
- (iii) Date, time and type of incident;
- (iv) Name and quantity of materials involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazards to the environment and human health inside and outside the facility, where this is applicable; and

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- (vii) 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 C-4 above, the Permittee shall submit a written report of the incident covering the following:
  - (a) Description of occurrence as in 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).
  - (e) Steps taken or planned to reduce, eliminate, and prevent recurrence.
- 6. 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 fourteen (14) days following each schedule date.
- 7. The Permittee shall report instances of non-compliance, other than those described in Section I.C.4. and C.6., semi-annually on July 15 (covering January 1 - June 30) and January 15 (covering July 1 - December 31). The report shall cover the information requested in Section I.C.4. for each incident.
- 8. All reports or other information requested by the Director shall be signed and certified according to the requirements in §270.11.

D. Responsibilities

- 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 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; and

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- (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.
- 2. Transfer of Permits. This permit may be transferred to a new owner or operator only after notice to the Director and if it is modified or revoked and reissued pursuant to §270.40(b) or §270.41(b)(2) to identify the new Permittee and incorporate such other requirements as may be necessary under the appropriate Act. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR 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 such non-compliance is authorized by an emergency permit. Any noncompliance 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 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 of this permit, the Permittee must submit a complete application for a new permit at least 180 days before this permit expires.
- 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 the 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 activity which may result in non-compliance with permit requirements.

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9. Reporting Planned Changes. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions which impact any SWMUs, AOCs or the areas contaminated by them, including voluntary corrective measures, or to the SWMUs referenced in Sections VI.A. and/or VI.C at the permitted facility as defined in 40 CFR 260.10 and 270.2.
10. Obligation for Corrective Action. The Permittee is required to continue this permit for any period necessary to comply with the corrective action requirements of this permit.

E. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124, 260 through 268, 270 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.

1. Area of Concern (AOC) for purposes of this permit includes any area having a probable release of a hazardous waste or hazardous constituent 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 § 270.32 (b)(2) in order to ensure adequate protection of human health and the environment.
2. Contamination for the purposes of this permit refers to the presence of any hazardous waste or hazardous constituents in a concentration which exceeds the naturally occurring concentration of that waste or constituent in that geographical region (in areas not affected by the facility).
3. Corrective Action for prior or continuing releases from any solid waste management units at the facility, as well as for other releases, for the purposes of this permit shall be any measure necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents from said solid waste management units at the facility, regardless of the time at which waste was placed in the unit, as required under 40 CFR 264.101 and/or 40 CFR 264.100. Corrective action may address releases to air, soils, surface water or groundwater.
4. Extent of contamination for the purposes of this permit is defined as the horizontal and vertical area in which the concentrations of hazardous constituents in the environmental media being investigated are above detection limits or

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background concentrations indicative of the region, whichever is appropriate as determined by the Director.

5. Facility for purposes 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 combination of them). For the purposes of implementing corrective action under §264.101, a facility includes all contiguous property under the control of the owner or operator seeking a permit under the Georgia Hazardous Waste Management Act.
6. Hazardous Constituent for the purposes of this permit are those substances listed in 40 CFR Part 261 Appendix VIII and Part 264 Appendix IX.
7. Interim Measures for purposes of this permit are actions necessary to minimize or prevent the further migration of contaminants and limit actual or potential human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented.
8. Land Disposal Facility: A facility that uses a surface impoundment, landfill, land treatment or waste pile unit to manage or dispose of hazardous waste pursuant to §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and §3004 of RCRA, as amended.
9. 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 state registration and completion of accredited university courses, that enable that individual to make sound professional judgements regarding groundwater monitoring and contaminant fate and transport.
10. 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 or hazardous constituents.
11. Remediation waste for the purposes of this permit includes all solid and hazardous wastes, and all media (including ground water, 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 §264.101 and Section 12-8-71(b) of the



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Georgia Hazardous Waste Management Act. 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 §264.101(c) for releases beyond the facility boundary.

13. 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, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste or hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous waste.
14. 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.

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

1. The Permittee must follow the procedures and plans described in detail in the permit application dated May 14, 1995, as amended, which are hereby incorporated by reference and include at least the following:
  - Waste Analysis Plan                      Section C
  - Contingency Plan                        Section G
  - Inspection Activities                    Section F
  - Closure Plan                              Section I
  - Training Program                        Section H
2. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts B, C, D, and E.
  - Required Notices - §264.12(a) and (b)
  - Security - §264.14(b) and (c)
  - Repairs and Inspection Log - §264.15(c) and (d)
  - Annual Review of Training - §264.16(c)
  - General Requirements for Ignitable, Reactive and Incompatible Wastes - §264.17

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- Design and Operation - §264.31
  - Testing and Maintenance of Equipment - §264.33
  - Access to Communications or Alarm System - §264.34
  - Maintain Aisle Space - §264.35
  - Arrangements with Local Authorities - §264.37
  - Amendment of Contingency Plan - §264.54
  - Operating Record - §264.73 and Disposition of Records §264.74
  - Reports - §264.75 and §264.77
  - Manifest System - §264.70 through §264.77
3. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts G & H, and Section I of the permit application.
- Closure Performance Standard - §264.111 and §264.112
  - Closure in Accordance with Approved Plan - §264.113
  - Amendment of Closure Plan and Notification of Closure - §264.112(b) and (c)
  - Disposal or Decontamination of Equipment - §264.114
  - Certification of Closure - §264.115
  - Revision of Cost Estimate - §264.142
  - Financial Assurance for Closure. Continuous compliance with §264.143 must be maintained by the Permittee for the amount of the cost estimate for closure as revised by §264.142 until released by the Director as provided in §264.143(i).
4. The Permittee must maintain sudden liability coverage of \$1,000,000 each occurrence and \$2,000,000 annual aggregate until certifications of closure as specified in §264.115 are received by the Director. Liability coverage must be in effect before the Permittee is authorized to manage hazardous waste under this permit. The Permittee must carry out the activities as specified in §264.147.
5. The Permittee must comply with §264.148 whenever necessary.

G. Special Conditions Applicable to Entire Facility

1. 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 § 264.73(b)(9).

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2. Land Disposal Restrictions: The Permittee shall comply with all provisions of 40 CFR 268 (Land Disposal Restrictions) for all wastes to which they are applicable.
3. The Permittee must submit any revisions of the contingency plan to those government agencies and local authorities listed in Section G of the application within five days of approval of the revision by the Director.
4. The Permittee is prohibited from receiving any waste which is not consistent with generator profiles and the accompanying manifest. The waste must be rejected and sent back to the generator or sent to the alternate assigned facility as specified on the manifest.
5. The Permittee must obtain a detailed chemical and physical analysis and description of the generator process of each waste stream for each new customer's wastes prior to the first shipment of those wastes to the facility to determine its acceptability and to use for comparison purposes for future shipments.
6. The only hazardous wastes to be stored by the Permittee are listed in Table A-1 which is referenced in the Part A permit application signed May 14, 1995, by the vice-president, Mr. William Labadie. Before receiving any hazardous wastes other than those described above, the Permittee must seek a permit modification in accordance with § 270.42 (a).
7. The Permittee must notify the Director, in writing, at least 30 days before initiation of closure of all areas, including but not limited to the following:
  - All areas where hazardous waste have been managed
  - Loading docks
  - Ramps
  - Equipment Storage & Decontamination Area

and must close those units following the procedures set forth in the Closure Plan in the permit application.

8. Upon completion of the installation of the air emissions control equipment as required by Permit Condition I.H.2., the Permittee shall comply with all operational monitoring, recordkeeping and reporting requirements set forth in Part 264 Subparts AA and BB.

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H. Compliance Schedule

1. Within thirty (30) days of the issuance date of this permit, the Permittee shall notify the generators from whom he receives hazardous wastes that he has the appropriate permit for, and will accept the waste the generator is shipping [as required by §264.12(b)].
2. Within sixty (60) days of the date of issuance of this permit, the Permittee shall complete installation of all air emissions control equipment described in Section D of the permit application pursuant to Part 264 Subparts AA and BB.

SECTION II. STORAGE IN CONTAINERS

A. General

The conditions in this section apply only to the Drum Storage and Process Area, the Solvent Recovery Area, the Waste Bulking & Trailer Unloading Area, and the Drum Sampling and Inspection Pad. Those areas are depicted in the drawing labeled "Figure D-1, Container Storage Plan" which is located in Section D of the permit application, dated May 14, 1995. Hereinafter, these areas shall be collectively referred to as the container storage areas.

B. Conditions Related Solely to Storage in Containers

1. Storage of hazardous waste in containers is expressly limited to Container Storage Areas shown on the drawing labeled "Figure D-1, Container Storage Plan".
2. The Permittee is restricted from receiving incompatible hazardous waste until the internal incompatible segregation berms in the Drum Storage and Processing Area have been certified pursuant to Permit Condition II.C.3.
3. Prior to the application, pursuant to the manufacturer's recommendation, of one of the protective coatings listed in the permit application, for three (3) months, the Permittee shall store only the waste codes listed below in the Drum Sampling and Inspection pad:

D001	U002	U161
D004-D011	U031	U220
D018-D043	U112	U226
F001-F003	U140	U228
F005	U154	U239
	U159	

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4. The Permittee shall design, construct, operate, and maintain the container storage areas in accordance with the detailed design plans and specifications contained in Section D of the permit application and references made therein.
5. The Permittee is authorized to store only the following hazardous waste in containers at the facility (not to exceed 81,440 gallons) as identified in Part A of the permit application, subject to the terms of this Permit and as follows:

Area Name		EPA Hazardous Waste Code	Maximum Storage Capacity	Maximum Container Size
Drum Sampling and Inspection Area		D001, D002, D004-D043, F001-F006, F012, F019, F032, F034, F035, F037-F039, K048-K052, K061, K062, K086, P001-P005, P007, P008, P010-P016, P018, P020, P021, P023, P024, P026-P030, P034, P036-P041, P043-P051, P054, P057-P060, P062, P064, P066-P068, P070-P072, P074, P075, P077, P082, P084, P085, P087-P089, P099, P092-P094, P097, P098, P101-P106, P108-P111, P113-P116, P118-P121, P123, U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041, U042, U044-U053, U055-U064, U066-U074, U076-U095, U097-U099, U101-U103, U105-U132, U134, U136-U138, U140-U152, U154-U159, U161, U162, U164-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U216, U218-U222, U226-U228, U230-U233, U235-U240, U242-U244, U246-U248, U328, U353, U359	6,600 Gallons	220 gallon
Drum Storage and Process Area		Same as Above	53,240 Gallons	220 gallon
Waste Bulking and Unloading Area	Tankers/ Liquid	Same as Above	15,000 Gallons	5,000 gallons
	Bulk Containers/ Non-Liquids	Same as Above		4,850
Solvent Recovery Area		Same as Above	6,600 Gallons	250 gallon

6. The Permittee is prohibited from storing hazardous waste east of the line painted on the floor which depicts the 50 ft. buffer in the Drum Storage and Process Area as required in Section D of the application.
7. The Permittee must store hazardous waste in containers that are in good condition. If a container holding hazardous waste is not in good condition, or if it begins to leak, the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition.
8. All hazardous waste containers in storage must be clearly marked with the words "Hazardous Waste", the EPA Hazardous Waste No. found in Part 261, both the commercial or chemical name, and the date upon which the storage of hazardous waste at the facility began.

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commercial or chemical name, and the date upon which the storage of hazardous waste at the facility began.

9. Containers must be managed according to §264.173.
10. Spilled or leaked waste and accumulated precipitation must be managed pursuant §264.175(b)(5).
11. When stacking containers, the Permittee must place the containers stably on pallets, which are in good condition and stack the containers no more than two vertical layers.
12. The Permittee shall maintain the containment system in accordance with §264.175.
13. Incompatible wastes and materials must be managed according to the permit application and §264.177. Management of incompatible waste in the Waste Bulking and Unloading Area and the Solvent Recovery Area is specifically prohibited.
14. The Permittee must store hazardous waste with the appropriate DOT Hazardous Class in the appropriate cell of the Drum Storage and Process Area as indicated in the following chart:

CELL ID.	DOT HAZARD CLASS
Cell I	3, 4.1, 9
Cell C	2.1, 2.2, 3, 8, 9
Cell P	2.2, 2.3, 6.1, 9
Cell D	4.2, 4.3, 5.1, 5.2, 9

15. The Permittee shall store only ignitable wastes in Cell I in the Drum Storage and Process Area as indicated in Figure D-1 of the permit application.
16. Containers received at the facility must be unloaded onto the Drum Sampling and Inspection Pad for inspection before they are placed in an appropriate storage area, except for bulk containers authorized for storage in the Waste Bulking & Unloading Area.

C. Compliance Schedule

1. All construction which is required in the Solvent Recovery Area, the Waste Bulking and Unloading Area; the Drum Sampling and Inspection Pad; and the construction of internal incompatible segregation berms in the Drum Storage and Process Area, must be completed within six (6) months after issuance date of this permit.

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2. After three (3) months from the issuance date of this permit, the Permittee is prohibited from storing hazardous waste in the Drum Sampling and Inspection Pad until the Director approves the submittals required in Permit Conditions II.C.5, and II.C.3 and one of the protective coatings listed in the permit application has been applied. During that period, containers received at the facility must be unloaded into the Drum Storage and Process area, which must be in compliance with Condition II.C.3, for inspection before they are placed in an appropriate storage area, except for the bulk containers authorized for storage in the Waste Bulking and Unloading Area.
3. Before storage of any hazardous waste in the container storage areas listed in II.C.1 above, except as provided in II.B.3. above, the Permittee shall apply one of the protective coatings listed in the permit application and submit to the Director a written evaluation that the container storage areas have been designed and constructed in accordance with the designs and specifications contained in Section D of the application, which includes an evaluation of the structural integrity of the base of each area. This evaluation must be certified by an independent, qualified, registered professional engineer.
4. Within three (3) months of application of the protective coating material to any container storage area, the Permittee must notify the Director of the protective coating chosen for each area.
5. Prior to hazardous waste storage operations in the Drum Sampling and Inspection Area, the Permittee shall submit to the Director for approval an evaluation of the Drum Sampling and Inspection Pad which meets all the requirements pursuant to §270.15(a)(1-4). The evaluation must be performed and certified by a registered professional engineer in the State of Georgia.
6. After the Director has approved the submittals required by II.C.3 as it applies to the Drum Sampling and Inspection Pad and II.C.5. and one of the protective coatings listed in the permit application has been applied, the Permittee shall comply with Condition II.B.16. for unloading hazardous waste containers.

### SECTION III. TREATMENT IN CONTAINERS

#### A. General

The conditions in this section apply only to the Waste Bulking and Trailer Unloading Area and the Drum Storage and Process Area as depicted in Section D of the permit application dated May 14, 1995.

#### B. Conditions Related Solely to Treatment in Containers

1. Treatment in containers is expressly limited to the Waste Bulk and Unloading Area, which consists of transferring solid and liquid hazardous wastes from containers into bulk containers and tankers; in the Drum Storage and Process Area which consists of container consolidation and container packing as identified in Section D of the permit application.

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2. Prior to the application, pursuant to the manufacturer's recommendation, of one of the protective coatings listed in the permit application, the Permittee can treat only the waste codes listed below in the Drum Storage and Process Area. The Permittee must apply one of the protective coatings listed in the permit application to the Drum Storage and Process Area within three (3) months of issuance of this permit.

D001	U002	U161
D004-D011	U031	U220
D018-D043	U112	U226
F001-F003	U140	U228
F005	U154	U239
	U159	

3. The Permittee is authorized to treat only the following hazardous waste in containers at the facility (not to exceed 15,000 gallons per day) as identified in Part A of the permit application, subject to the terms of this Permit and as follows:

Area Name		EPA Hazardous Waste Code	Treatment Capacity (gal/day)	Type of Treatment	Maximum Container Size
Waste Bulking and Unloading Area	Tankers/ Liquid	D001, D002, D004-D043, F001-F006, F012, F019, F032, F034, F035, F037-F039, K048-K052, K061, K062, K086, P001-P005, P007, P008, P010-P016, P018, P020, P021, P023, P024, P026-P030, P034, P036-P041, P043-P051, P054, P057-P060, P062, P064, P066-P068, P070-P072, P074, P075, P077, P082, P084, P085, P087-P089, P099, P092-P094, P097, P098, P101-P106, P108-P111, P113-P116, P118-P121, P123, U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041, U042, U044-U053, U055-U064, U066-U074, U076-U095, U097-U099, U101-U103, U105-U132, U134, U136-U138, U140-U152, U154-U159, U161, U162, U164-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U216, U218-U222, U226-U228, U230-U233, U235-U240, U242-U244, U246-U248, U328, U353, U359	15,000	Bulking	5,000 gal.
	Bulk Containers/ Non-Liquid	Same as Above		Bulking	4,850 gal.
Drum Storage and Process Area		Same as Above	2,750	Container Consolidation	55 gallon
			2,750	Container Packing	55 gallon

4. 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.
5. The container must be managed according to §264.173.



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6. Spilled or leaked waste and accumulated precipitation must be managed per §264.175(b)(5).
7. Incompatible wastes and materials must be managed according to §264.177.

#### SECTION IV. STORAGE IN TANKS

*Reserved*

#### SECTION V. TREATMENT IN TANKS

##### A. General

The conditions in this section apply only to the fuel blending treatment tank systems located in the Drum Storage and Process Area and as depicted and described in Section D of the permit application dated May 14, 1995.

##### B. Conditions Related Solely to Treatment in Tanks

1. Treatment in tanks is expressly limited to the Drum Storage and Process Area, which consist of blending compatible flammable and ignitable wastes into a composite liquid fuel, as identified in Section D of the permit application.
2. The Permittee is authorized to treat only the following hazardous waste in tanks at the facility (not to exceed 18,000 gallons per day) as identified in Part A of the permit application, subject to the terms of this Permit and as follows:

Area Name		EPA Hazardous Waste Codes	Treatment Capacity (gal./day)	Type of Treatment	Tank Size
Drum Storage and Process Area	Tank F1	D001, D002, D004-D043, F001-F006, F012, F019, F032, F034, F035, F037-F039, K048-K052, K061, K062, K086, P001-P005, P007, P008, P010-P016, P018, P020, P021, P023, P024, P026-P030, P034, P036-P041, P043-P051, P054, P057-P060, P062, P064, P066-P068, P070-P072, P074, P075, P077, P082, P084, P085, P087-P089, P099, P092-P094, P097, P098, P101-P106, P108-P111, P113-P116, P118-P121, P123, U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041, U042, U044-U053, U055-U064, U066-U074, U076-U095, U097-U099, U101-U103, U105-U132, U134, U136-U138, U140-U152, U154-U159, U161, U162, U164-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U216, U218-U222, U226-U228, U230-U233, U235-U240, U242-U244, U246-U248, U328, U353, U359	18,000	Solid Separation	500 gallon
	Tank F2			Blend Tanks	500 gallon
	Tank F3				700 gallon
	Tank F4				700 gallon

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3. Incompatible wastes and materials must be managed according to the permit application and §264.177. Management of incompatible wastes in the treatment tanks is prohibited.

C. Secondary Containment And Integrity Assessments

1. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and specifications contained in Section D of the application and references therein and § 264.193.
2. The Permittee shall conduct assessments of the tank pursuant to Section D of the application.

D. Operating Requirements

1. The Permittee shall not place hazardous waste in the tank system if the waste could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode or otherwise fail.
2. The Permittee shall operate the tank and containment system in a manner designed to prevent spills and overflows from the tank or containment systems.

E. Response to Leaks or Spills

In the event of a leak or a spill from the tank system or from a secondary containment system, or if a system becomes unfit for use, the Permittee shall remove the system from service immediately and complete the following actions:

1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause the release.
2. Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Director and demonstrate the longer time period is required.

The collected material must be managed in accordance with all applicable requirements of 40 CFR Parts 262-264.

3. Contain releases to the environment. The Permittee shall immediately conduct an inspection of all releases to the environment and based on that inspection; (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water. Samples must be taken to confirm the success of any remedial action.

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4. Close the system in accordance with the Closure Plan, unless the following actions are taken:
  - a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
  - b. For a release caused by a leak from the primary system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.
  - c. If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in 40 CFR §264.192 and §264.193.
5. For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of the secondary containment system.

F. Inspection Schedules and Procedures

1. The Permittee shall inspect the tank system, in accordance with §264.195 and the Inspection Schedule in the application, and shall complete the items in Permit Conditions V.F.2. as part of those inspections.
2. The Permittee shall inspect the following components of the tank system once each operating day:
  - a. Above ground portions of the tank system to detect corrosion or releases of waste;
  - b. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including associated piping and the secondary containment system, to detect erosion or signs of releases of hazardous waste.
3. The Permittee shall document compliance with Permit Condition V.F.1. and V.F.2. and keep this documentation on file at the facility.

G. Recordkeeping and Reporting

1. The Permittee shall keep on file at the facility the written assessment of the tank system's integrity.

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2. The Permittee shall maintain at the facility a record of the results of leak tests and integrity tests conducted, in accordance with Permit Conditions.
3. The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days from returning the tank system to use.

H. Special Tank Provisions For Ignitable or Reactive Wastes

1. The Permitted shall not place ignitable or reactive waste in the tank system or in the secondary containment system unless the procedures specified in 40 CFR 264.198(a) are followed.
2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981).

I. Closure and Post-Closure Care

At closure of the tank system, the Permittee shall follow the procedures in the Closure Plan in the application and in accordance with 40 CFR §264.197.

J. Compliance Schedule

Within thirty (30) days of notification by EPD, the Permittee shall submit a plan which identifies the additional measures to be taken to prevent releases from the fuels blending tank systems (systems F1 through F4) during fuel blending operations, based on EPD's evaluation of the need for additional measures. Upon approval by EPD, the Permittee shall implement the approved plan in accordance with the schedules contained in that plan.

SECTION VI. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS (SWMUs)  
AND OTHER RELEASES

A. Applicability

1. The conditions of this Section apply to the solid waste management units listed below, as identified during the RCRA Facility Assessment (RFA) Investigation on July 22, 1994:
  - Miscellaneous Solid Waste Management Area
    - a. Stormwater Discharge Area
    - b. Area West of the Tank Farm
    - c. Cooling Pond (Grassy Area near Cooling Tower)
    - d. Parking Area
    - e. Miscellaneous Unpermitted Hazardous Waste Storage Areas
  - Existing Drum Storage Area
  - Bulk Storage Tank Farm
  - Drum Storage and Process Area
  - Waste Bulking and Unloading Area

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- Solvent Recovery Area
  - Equipment Storage and Decontamination Area
2. The conditions of this section apply to any additional Solid Waste Management Units or Areas of Concern discovered during the course of future groundwater monitoring, on-going field investigations, environmental audits, or other means:
- B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs
1. The Permittee shall notify the Director in writing, within fifteen (15) calendar days of discovery, of any additional SWMUs and/or AOCs as discovered under Section VI.A.2. Notification shall include, at a minimum, the location of the SWMU and/or AOC and all available information pertaining to the nature of the release (e.g., media affected, hazardous constituents released, magnitude of release, etc.). If the Director determines that further investigation of the AOC is required, the Permittee will conduct an assessment as detailed in Section VI.B.3. below.
- 2.a. The Permittee shall prepare a RFA Plan for each additional SWMU or AOC discovered subsequent to issuance of this permit which is known or suspected to have releases of hazardous waste, hazardous waste constituents or hazardous constituents to the environment. The assessment plan shall be submitted within sixty (60) days of discovery of a new SWMU or AOC. The plan shall include methods and specifications as necessary to determine whether a prior or continuing release of hazardous waste, hazardous waste constituent or hazardous constituent has occurred at each SWMU or AOC and a schedule for implementation and completion of the plan for each SWMU or AOC. The plan must also include, at a minimum, the following information for each unit:
- (i) Type of unit
  - (ii) Location of each unit on a topographic map of appropriate scale such as required under § 270.14(b)(19)
  - (iii) General dimensions, capacities and structural description of the unit(s) (supply any available plans/drawings)
  - (iv) Function of unit
  - (v) Dates that the unit was operated
  - (vi) Description of the wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes.
  - (vii) Description of any known releases or spills (to include groundwater data, soil analyses, and/or surface-water data).
- b. Following revision, as necessary to obtain approval by the Director, the plan required by Section VI.B.2.a. shall be implemented in accordance with the approved schedule contained therein.
- c. The Permittee shall prepare and submit to the Director a report describing the implementation of the plan required by Section VI.B.2.a. and the results of the determination of whether a prior or continuing release of hazardous waste,

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hazardous waste constituent or hazardous constituent has occurred at each SWMU or AOC.

3. Based on the results of the RFA Report, the Director shall determine the need for further investigations at the SWMUs or AOCs covered in the 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 Section VI.D.1.

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

1. The Permittee shall notify the Director in writing of any newly discovered release(s) of hazardous waste or hazardous constituents discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, within fifteen (15) calendar days of discovery. Such newly discovered releases may be from SWMUs or AOCs identified in Section VI.A.1.
2. If the Director determines that further investigation of the SWMUs or AOCs is needed, the Permittee shall be required to prepare a plan for such investigations as outlined in Section VI.B.2.a.

D. RCRA FACILITY INVESTIGATION (RFI)

1. a. The Permittee shall complete and submit an RFI Workplan for those SWMUs listed in Section VI.A.1 as detailed in Corrective Action Order EPD-HW-1150.
- b. The Permittee shall complete and submit an RFI Workplan for those SWMUs or releases discovered subsequent to issuance of this permit which are known or suspected to have releases of hazardous waste, hazardous waste constituents or hazardous constituents to the environment not later than sixty (60) days after EPD approval of the report required in Section VI.B.2.
2. The RFI Workplan(s) shall include, but is not limited to, a schedule of implementation and report submittal; a description of the specific actions necessary to determine the nature and extent of releases; 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 it is not included in the plan. Such deletions are subject to the approval of the Director. In addition, the scope of the RFI Work Plan(s) shall include all investigations necessary to ensure compliance with § 264.101(c).
3. Upon approval by the Director of the RFI Workplan(s) required by Section VI.D.1., the Permittee shall conduct the RFI in accordance with the schedule contained in the approved Workplan(s).

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4. RFI Reports

- a. The Permittee shall complete and submit the RFI report(s) in accordance with the schedule contained in the RFI Workplan required by Section VI.D.1. The reports shall provide a summary of all activities undertaken during the RFI(s) to implement the approved plans. The reports shall provide a complete description of the nature and extent of all releases identified during the RFIs including sources, migration pathways, actual or potential receptors and applicable background concentrations. The RFI reports 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 plans.
- b. If the time required to conduct the RFI(s) is greater than one hundred eighty (180) calendar days, the Permittee shall provide the Director with quarterly RFI Progress Reports (90 day intervals) beginning ninety (90) calendar days from the start date specified in the approved RFI Work Plan. The Progress Reports shall contain the following information at a minimum:
  - 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 Permittee shall have all workplans and reports, which involve installation of groundwater monitoring wells and/or interpretation of data gathered from a groundwater monitoring system, prepared and certified by a qualified groundwater scientist.

E. Corrective Action Plan

1. The Director shall review the final RFI reports required by Section VI.D.4., and upon determination that each report is complete, shall notify the Permittee of the

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need for further investigative actions and/or the need for corrective action as required under 40 CFR 264.101(a).

2. Upon determination by the Director that corrective action is needed, the Permittee shall submit a corrective action plan in accordance with a schedule to be determined by the Director. The corrective action plan must include a description of the corrective measures to be taken at each unit, a schedule of implementation and completion, and a cost estimate for completion of corrective action.
3. Upon approval by the Director of any corrective action plan required by Section VI.E.2., the Permittee shall implement any required corrective action in accordance with the schedule in the approved plan.
4. If the Director or the Permittee at any time determine that any SWMU or AOC investigation, corrective action plan or interim measure required under Sections VI.D., VI.E.2 or VI.F.1. no longer satisfy the requirements of 40 CFR 264.101 or this permit for prior or continuing releases of hazardous waste, hazardous constituents or hazardous waste constituents from SWMUs or AOCs, the Permittee must submit an amended plan to the Director within sixty (60) days of such determination.
5. If the Permittee is required to develop a corrective action under Section VI.E., the Permittee shall apply for a permit modification pursuant to 40 CFR 270.42 to incorporate the plan into the permit.

F. INTERIM MEASURES (IM)

1. IM Work Plan

- a. Upon notification by the Director, the Permittee shall prepare and submit an Interim Measures (IM) Work Plan for any SWMU or AOC which the Director determines is necessary. IM are necessary in order to minimize or prevent the further migration of contaminants and limit human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented. The IM Work Plan shall be submitted within thirty (30) calendar days of such notification and shall include the elements listed in VI.F.1.b. Such interim measures may be conducted concurrently with investigations required under the terms of this permit.
- b. The IM Work Plan shall ensure that the interim measures are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with and integrated into any long-term solution at the facility. The IM Work Plan shall include: the interim measures objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.
- c. The IM Work Plan must be approved by the Director, in writing, prior to implementation.



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2. IM Implementation

- a. The Permittee shall implement the interim measures in accordance with the schedule contained in the approved IM Work Plan.
- b. The Permittee shall give notice to the Director at least fifteen (15) days prior to any planned changes, reductions or additions to the IM Work Plan.
- c. Incorporation of Interim Measures into the corrective action plan shall be done in accordance with §270.42.

3. IM Reports

- a. Within forty-five (45) days of completion of interim measures, the Permittee shall complete and submit to the Director an interim measures report. The report shall provide the following information:
  - i. A description of interim measures implemented;
  - ii. A summary of all data or other information obtained during implementation of interim measures; and
  - iii. A summary of the effectiveness of the interim measures in achieving the objective of containing, removing and/or treating contamination resulting from the release of hazardous constituents from a SWMU in order to protect human health and the environment.
  - iv. A summary of all problems encountered during the interim measures implementation.
  - v. Copies of all relevant laboratory/monitoring data.
- b. If the time required for completion of interim measures is greater than one year, the Permittee shall provide the Director with progress reports at intervals specified in the approved Work Plan. The Progress Reports shall contain the following information at a minimum:
  - i. A description of the portion of the interim measures 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;

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- iv. Projected work for the next reporting period; and
- v. Copies of laboratory/monitoring data.

G. Reporting, Recordkeeping and Response

1. All work plans and schedules shall be subject to approval by the Director prior to implementation to assure that such work plans and schedules are consistent with the requirements of this Permit and with applicable regulations and guidance. The Permittee shall revise all submittals and schedules as specified by the Director. Upon approval the Permittee shall implement all work plans and schedules as written.
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. Three (3) copies of all reports and work plans shall be provided by the Permittee to the Director.
4. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to the conditions of this permit in the operating record, as required by 40 CFR 264.73(b)(6).
5. The Permittee shall have all workplans and reports, which involve installation of groundwater monitoring wells or systems and/or the interpretation of data gathered from those wells or systems, prepared and certified by a qualified groundwater scientist.
6. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Section 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 this Section 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 this Section are signed and certified in accordance with 40 CFR 270.11.
9. If the Permittee or the Director, at any time, determine that any plan or report required under Section IV of this permit no longer satisfies the requirements of §264.101 or this permit for prior or continuing releases of hazardous waste, hazardous waste constituents, or hazardous constituents, the Permittee must

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submit an amended plan or report to the Director within ninety (90) days of such determination.

H. Groundwater Monitoring System

1. The Permittee shall maintain the a groundwater monitoring system as described in the Permit Application dated October 25, 1994.
2. The Permittee shall maintain, well marked and in good working order, the following groundwater monitoring wells:

MW-1	MW-1D
MW-2	MW-2D
MW-3	MW-4
MW-4D	

3. The Permittee shall install additional wells as necessary to assess changes in the rate and extent of any plum of contamination. Any plan for the design, location and installation of any additional monitoring wells shall be submitted, for approval, thirty (30) days prior to installation.
4. The Permittee shall determine the concentrations of constituents listed in Section VI.H.6. quarterly for all wells listed in Section VI.H.2.
5. The groundwater monitoring program must include a determination of groundwater surface elevations at all monitoring well identified in Section VI.I.2. each time groundwater is sampled.
6. Groundwater Monitoring Parameters

The concentration of the following compounds shall be determined as detailed in Section IV.H.4:

1,1-Dichloroethylene	Methylene Chloride
1,2-Dichloroethane	1,1-Dichloroethane
Chloroethane	Benzene
Toluene	Xylene
Vinyl Chloride	Ethylbenzene
Trichloroethylene	Tetrachloroethylene
1,1,1-Trichloroethane	

7. Reporting, Recordkeeping and Response

- a. The Permittee shall enter all monitoring, testing and analytical data obtained pursuant to Section VI.G.4. in the operating record, as required by § 264.73(b)(6).
- b. The Permittee shall report the findings of the monitoring program annually to EPD. The first annual report shall be due one (1) year

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following the effective date of this permit. Each subsequent annual report shall be made by the same date in each successive year.

- c. The Permittee shall submit analytical results of the quarterly groundwater sampling as required in Section VI.H.4. within sixty (60) days of the collection of the samples.
- d. Records of groundwater monitoring information shall include:
  - i. The date, exact place and time of sampling or measurement,
  - ii. The individual(s) who performed the sampling,
  - iii. The depth to the groundwater surface measured to the nearest 0.01 foot,
  - iv. The depth to the well bottom measured to the nearest 0.01 foot,
  - v. The amount of water purged from the well,
  - vi. The temperature, ph and specific conductance of the sampled groundwater at each well,
  - vii. Completed chain-of-custody forms,
  - viii. The date(s) analyses were performed,
  - ix. The individual(s) who performed the analyses,
  - x. The analytical techniques or methods used; the method of sample preservation; and quality assurance methods,
  - xi. The results of such analyses.

Georgia Department of  
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# GEORGIA

A Monthly Survey of  
Environmental Law  
Developments in Georgia

## Environmental Law Letter

### DIRECTORY OF GEORGIA ENVIRONMENTAL AGENCIES

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January 1996

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Will D. (Billy) Herrin  
Post Office Box 1383  
Savannah, Georgia 31402  
Business: (912) 236-4446  
Residence: (912) 352-4158

### Member-at-Large

James Griffin, Jr.  
Post Office Box 602  
Albany, Georgia 31702  
Business: (912) 436-3615  
Residence: (912) 435-6734

### Member-at-Large

J.D. Caswell  
6267 Oakwood Circle  
Norcross, Georgia 30093

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### Member-at-Large

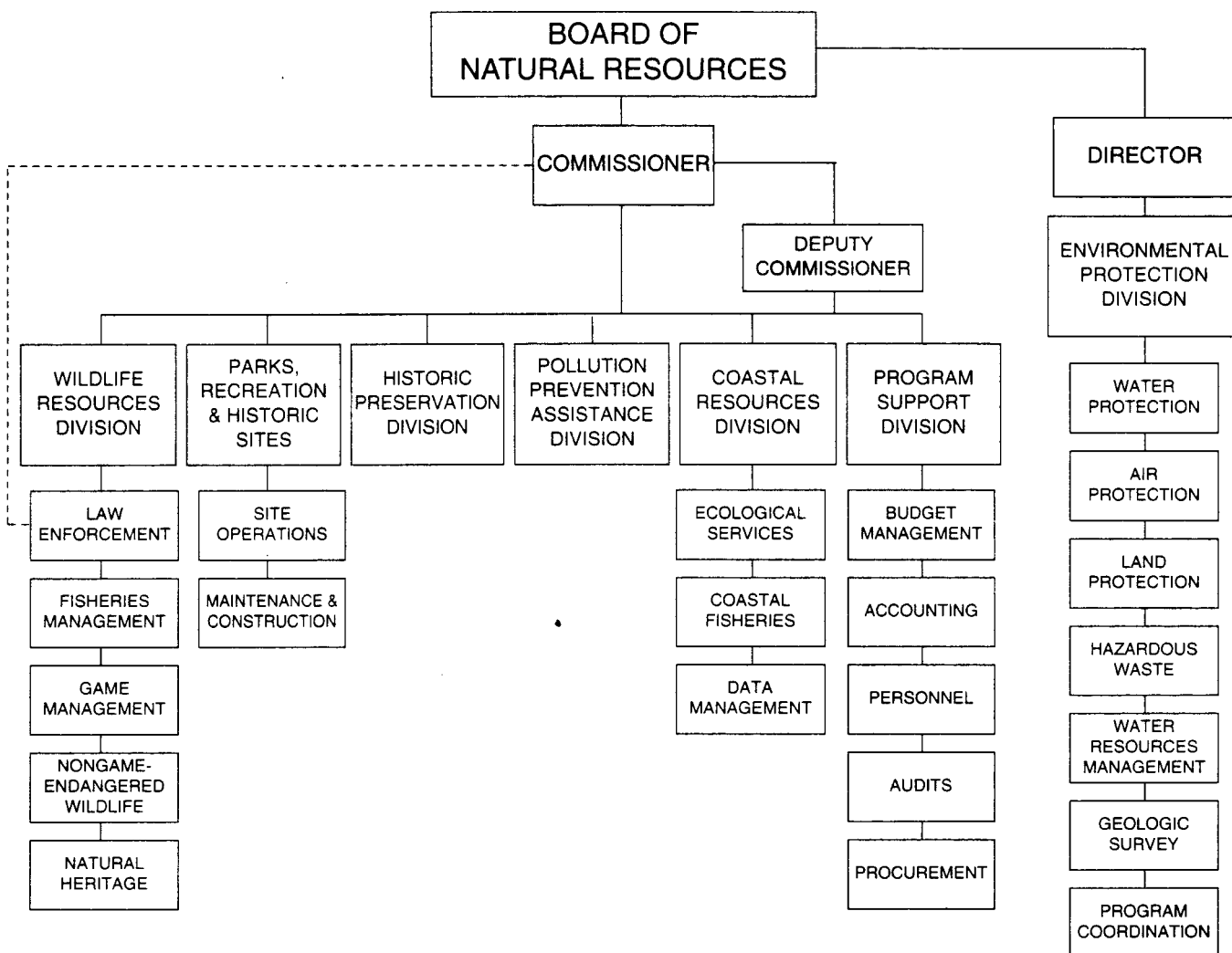
Glenn E. Taylor  
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### Member-at-Large

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Residence: (912) 477-5107  
Residence: (912) 832-2787

\*Through 2/96

## DEPARTMENT OF NATURAL RESOURCES ORGANIZATION CHART



# ENVIRONMENTAL PROTECTION DIVISION

**Environmental Protection Division**  
 Harold Reheis - Director  
 David Word - Assistant Director, Programs  
 Bruce Osborn, Assistant Director,  
 Administration  
 205 Butler Street, S.E.  
 Floyd Towers East, Suite 1152  
 Atlanta, Georgia 30334  
 (404) 656-4713

Administration - Bertha Turner - 656-7416  
 Customer Assistance - Doralyn Kirkland - 656-4713  
 Personnel - Rosalind Cade - 651-7981  
 Lead Paint Cert. - Dane Screws - 362-2692  
 Media Relations - Pamela Earl - 656-4713  
 Criminal Investigations - Steve Black - 244-2566

## New Industry Team

Nolton Johnson - Water Res. - 651-5168  
 Marvin Lowry - Air Protection - 363-7020  
 Jennifer Kaduck - Haz. Waste - 656-7802  
 Larry Hedges - Water Quality - 656-4887

## Land Protection John Taylor - 362-2637

Underground Storage Tanks - 362-2687  
 Surface Mining/Land Reclaim - 362-2696  
 Solid Waste City/County - 362-2696  
 Solid Waste Commercial/Private - 362-2692  
 Scrap Tire Program - 362-2696  
 Planning and Waste Reduction - 362-2537

## Air Protection Ronald Methier - 363-7008

Air Branch Main No. - 363-7000  
 Ambient Monitoring - 363-7006  
 Title V & Toxics - 363-7022  
 Planning & Support - 363-7012  
 Stationary Source - 363-7018  
 Asbestos Licensing & Removal - 363-7026  
 Mobile & Area Sources - 363-7028  
 Industrial Source Monitoring - 363-7053  
 Small Business Technical Asst. - 363-4842

## Hazardous Waste Management Jennifer Kaduck - 656-7802

Corrective Action - 656-7802  
 Generator Compliance - 657-8831  
 Facilities Compliance - 656-2833  
 State Superfund - 657-8600

## Program Coordination - Region Operations Jim Setser - 656-4713

Northwest Region - (404) 362-2671 (Atlanta)  
 Northeast Region - (706) 369-6376 (Athens)  
 Middle Region - (912) 751-6612 (Macon)  
 Southeast Region - (912) 264-7284 (Brunswick)  
 Southwest Region - (912) 430-4144 (Albany)  
 Savannah Office - (912) 353-3225

## Water Resource Management Nolton Johnson - 651-5168

Safe Dams Regulation - 362-2678  
 Water Resources Mgt - 656-3094  
 Water Allocation - 656-3094  
 Floodplain Mgt - 656-6382  
 Public Drinking Water - 656-2750  
 Laboratory Certification - 651-5164  
 Fluoridation - 651-8427  
 Drinking Water Fees - 651-8591

## Program Coordination Branch Jim Setser - 656-4713

Laboratory Operations - 853-7979  
 Emergency Response - 656-6905  
 SARA Title III - 656-6905  
 Radioactive Materials - 362-2675  
 Environmental Radiation - 362-2675  
 Toxicology - 656-4713 (Atlanta)  
 (706) 369-6376 (Athens)  
 GA Environmental Policy Act - 656-4713  
 Information Management - 656-6593  
 Training Coordinator - 362-2673  
 WAN Coordinator - 362-2673

## Water Protection Alan Hallum - 656-4708

Municipal Engineering - 656-4769  
 Industrial Wastewater - 656-4887  
 Municipal Permitting - 362-2680  
 Water Quality Management - 656-4905  
 Construction Grants and Loans - 656-4769  
 Non-point Source Management - 656-4905  
 Erosion and Sedimentation - 656-4708  
 Operator Training - 656-4708  
 Stormwater Permitting - 656-4887  
 Adopt-A-Stream - 656-4988

## Geologic Survey William McLemore - 656-3214

Geologic Investigations - 656-3214  
 Oil, Gas, Deep Well Drilling - 656-3214  
 Coop Water Resource Studies - 656-3214  
 Topographic Map Sales - 656-3214  
 Groundwater Management - 656-3214  
 Underground Injection Control - 656-3214  
 Water Well Drilling Licenses - 656-3214  
 Economic Minerals - 656-3214  
 Wetlands Mapping - 656-3214  
 Mountain Protection - 656-3214  
 Environmentally Sensitive Lands - 656-3214



## PROGRAM COORDINATION BRANCH

### Central Office:

205 Butler Street, S.E.  
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### Key Personnel:

James L. Setser, BC  
Louise Mathis, S

### EMERGENCY RESPONSE & RIGHT TO KNOW PROGRAM

(404) 656-6905  
Bert Langley, PM  
JoFay Mackey, S

### Emergency Response Team

Gary Andrew  
Mike Derrick  
Scott Robertson  
Roberta Runge  
Mary Smiley

### SARA/Title III Unit

Louella Gorham  
Kirby Olson  
Kent Howell

### ENVIRONMENTAL TOXICOLOGY PROGRAM

(404) 656-4713  
Randall O. Manning, PM

### INFORMATION MANAGEMENT PROGRAM

(404) 656-6593  
Ted Jackson, PM  
Bill Quarterman

### ENVIRONMENTAL RADIATION SURVEILLANCE PROGRAM\*

James C. Hardeman, PM  
Cliff Blackman, S  
Art Crumbley  
Richard Jacklel  
Barty Simonton  
Bill Slocumb

### RADIOACTIVE MATERIALS PROGRAM\*

Tom Hill, PM  
Lynn Collier  
Henry Copeland  
Rod Harrell  
Lauren McGaughey  
Neil Maryland  
Cynthia Townsend  
Jerry Morris  
Elizabeth Drinnon

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Doris Shaw, S  
Harold Lanford

### AIR LABORATORY

Robbie Bussey, UM  
Yolanda Christian, S  
David Orokunle  
Rose Samuals  
Vijay Udeshi  
Dorretha Hollman  
June Li

### INORGANIC LABORATORY

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David Heath  
Jeanne Milner  
Robert Price  
Michael Basmajian  
Kristy Entreklin  
Katie Gibbs  
Gwen Harford  
Jaynae Jackson  
Eugene Moye  
Bill Staak  
Lewis Zellner

\*located at

4244 International Parkway, Suite 114,  
Atlanta, Georgia 30354  
(404) 362-2675

### ORGANIC LABORATORY

Danny Reed, UM  
Frances Childs, S  
Ana Bird  
Mary Bowman  
Steve Bryan  
Carmen Fox  
Bob Kunkle  
Scott Abbott  
Jeff Allen  
Kevin Barnes  
Deborah Bruno  
Charles Clark  
Heather Dewberry  
Orette Ferdinand  
Tamara Frank  
John Gall  
Charles Hoefer  
Bruce Ingram  
Myrick Walker  
Jourline Jenkins  
Michele Leary  
Luis Medina  
Ralph Shulz  
Ercila Scott  
Jesse Sewell

### WATER SUPPLY LABORATORY

Claudine Middlebrooks, S  
Gordon Schuchardt  
Matthew Clark  
Donna Koenig  
Mary Lewis  
Beverly Myles  
Carol Moody  
Ben Niebel  
Larry Peterson  
Monique Prather  
Annie Stembridge  
Myrna Robinson  
Marilyn Thornton  
William Christian  
Margaret Crawl  
C. Leigh Cureton  
Doris Jackson

#### ABBREVIATIONS USED:

AA Assessment Analyst  
ASC Administrative Services Coordinator  
BC Branch Chief  
Clk Clerk  
D Driller  
DBC Database Coordinator  
DC Dam Classifier  
DEC Data Entry Clerk

EE Environmental Engineer  
ES Environmental Specialist  
ET Environmental Technician  
G Geologist  
GA Grants Administrator  
IG Information Geologist  
NA Network Administrator  
PC Publication Coordinator

PM Program Manager  
RA Research Associate  
RL Research Lawyer  
RM Regional Manager  
S Secretary  
TFC Trust Fund Coordinator  
UC Unit Coordinator  
UM Unit Manager

## **GEOLOGIC SURVEY BRANCH (CONTINUED)**

### **Drilling**

Mark Hall, G  
Donald Cannon, D  
Harold Baker, D  
Tim Segrist, D

### **Information**

Alan Giles, IG

### **Investigations**

Mark Cocker, G  
Michael Friddell, G  
Paul Huddleston, G  
Robin McDowell, G  
Will Steele, G  
Joe Summerour, G

### **REGULATORY SUPPORT PROGRAM**

Roger Carter

### **Site Assessments**

Dennis Perriello, G  
Jim Guentert, G

### **Underground Injection Control**

Bruce O'Connor, G

### **Water Well Standards**

John Hetrick, G

### **Oil & Gas Regulatory**

Tony McCook

### **Non-point Source**

Bob Barget, UC  
Don Shellenberger, G

### **Groundwater Management**

Sandra Robertson, G  
John Donahue, G  
Sue Grunwald, G

### **Geographic Information Systems**

Alan Sandercock, G  
Vickie Trent, G  
Dave Hipple, G  
My linda Lewis,  
Cartographer - Editor

---

## **HAZARDOUS WASTE MANAGEMENT BRANCH**

### **Central Office:**

205 Butler Street, S.E.  
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Atlanta, Georgia 30334  
(404) 656-7802

### **Central Office Personnel:**

Jennifer R. Kaduck, BC  
Deborah Moore, ASC

### **Criminal Investigation Unit:**

Steve Black,  
Chief Investigative Officer  
Wayne Hutcheson,  
Investigative Officer

### **CORRECTIVE ACTION PROGRAM**

(404) 656-7802

Bill Mundy, PM  
Cheryl Matthews, S  
Shirley Maxwell, Chemist

### **Land Disposal Unit**

Derrick Williams, UC  
Karla Battle, S  
Martha Pierce, ES  
Norma Woodburn, ES  
Andrew Taft, ES  
Sarah Barr, G  
Mary Lou Winn, G

### **Remedial Sites Unit**

Susan Eason, UC  
C. Holmes, S  
Jim McNamara, EE  
K. Grall, EE  
J. Fonk, EE

J. Sliwinski, EE  
Ned Emrich, G  
Bob Ringer, G

### **Risk Assessment Unit**

Ken Mitchell, UC  
Cliff Opdyke, AA  
Rod Stafford, AA

### **Hazardous Waste Support Unit**

Verona Barnes, UC  
Jack Booker, Network Associate  
Shirley Dutton,  
Information Specialist  
Shelly Stroud, ET  
Paul Kocsis, Network Associate  
Valerie Sikes, ES  
Roderick Holmes, ET

### **GENERATOR COMPLIANCE PROGRAM**

(404) 657-8831  
Renee H. Goodley, PM  
Naomi Daniel, S

### **Hazardous Waste Compliance Unit**

Freddie Dunn, Jr., UC  
T. Davis, S  
John Williams, ES  
Betty Burns, ES  
Bonnie Jackson, ES  
David Reuland, ES  
Tonja Williams, ES

### **Generator Compliance Unit**

Jack Dempsey, UC

Kim Owens, S  
Bob Green, ES  
Irene Bennett, ES  
Marcus Mincey, ES  
Greg Thomas, ES  
Clayton Bennett, ES

### **FACILITIES COMPLIANCE PROGRAM**

(404) 656-2833

Jim Ussery, PM  
Deadre Embrey, ET

### **Commercial Facilities Unit**

Jan Simmons, UC  
Sherry Payton, S  
Mike Laney, G  
Amy Potter, EE  
LaVern Ajanaku, EE  
Ben Rucker, ES  
Steve White, ES  
Gigi Steele, ES

### **Government Facilities Unit**

Bruce Khaleghi, UC  
Debi Adams, S  
D. Heater, EE  
Madeleine Kellam, G  
Eddie Williams, G  
Lee Grall, ES  
Billy Hendricks, ES

### **Combustion and Treatment Unit**

David Yardumian, UC  
Mary Crawford, S  
Terri Crosby, EE  
Thomas Williams, EE

## HAZARDOUS WASTE MANAGEMENT BRANCH (CONTINUED)

Jane Hendricks, ES  
Bob Pierce, G  
Penny Graynor, G

### HAZARDOUS SITES RESPONSE PROGRAM (404) 657-8600

Tim Cash, PM  
Karen Williams, S

### Response Administration Unit Sandra Blunt, UC

Darren Meadows, RL  
Pat Curley, Geol. Info. Spec.  
Jim Coots, Contract Spec.  
Cindy Wilbanks, ET

### Response Development Unit Steve Woodall, UC L. Baker, S S. Frazier, ES P. DeGolian, ES David Brownlee, ES

Nicole Long, EE  
Jerry German, G

### Response Notification Unit

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J. Brown, EE  
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Merrill Meek, ES  
Gretchen Wagenseller, EE

## LAND PROTECTION BRANCH

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**Central Office Personnel:**  
John D. Taylor, Jr., BC

### PLANNING & ADMINISTRATIVE SUPPORT PROGRAM (404) 362-2537

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Andrea Jones, Clk  
Jennifer Patch, Clk  
Julie Reno, Clk  
Jan Russell, S  
Xavier Smith, Clk

**Computer Management Unit**  
Jesus Coutinho, NA  
Charles Evans, ES

**Trust Fund Coordination Unit**  
Dick Swanson, UC/Legal Asst.  
Betty Jones, TFC  
Antoinette Norfleet, TFC  
Kristi Osburn, TFC

### MUNICIPAL SOLID WASTE MANAGEMENT PROGRAM (404) 362-2696

Lewis Tinley, PM  
Gladys Turner, S

**Environmental Monitoring  
Compliance Unit**  
Don McCarty, UC  
Pete Dasher, G

Christy Easter, G  
Cathy Kerrigan, G  
Roger Patrick, G  
Dean Schaeffer, ES  
Jan Sherrer, G  
Susan Wagner, ES  
Carole Wintle, G

### Permitting/Surface Mining Unit

Jeff Cown, UC  
Ahmad (Mike) Almasi, EE  
Diane Clover-Evans, EE  
David Gibbons, EE  
William Mullis, EE  
Jim Raymond, G  
Gurdial Singh, EE

### COMMERCIAL & INDUSTRIAL SOLID WASTE PROGRAM (404) 362-2692

Jim Dunbar, PM  
Shawn Rush, S

### Industrial Solid Waste Unit

Harold Gillespie, UC  
Meredith Byars, EE  
Barbara Howard, EE  
Steven Johnson, EE  
Mickey Smith, EE  
Brian Wright, EE

### Lead Paint Abatement Unit

Michele Dibble, RA  
Dane Screws, RA

### Scrap Tire Unit

Denny Jackson, UC  
Jill Fallin, ET  
Charles McDaniel, ES  
Tom Shillock, ES

### UNDERGROUND STORAGE TANK MGMT PROGRAM (404) 362-2687

Randy Williams, PM  
Bruce Brumbalow, S  
Kim Cain, S  
Judy Entrabartolo, S

### Database Team

Robin Freeman, DBC  
Felicia Jones, DEC  
Debbie McClanahan, DT  
Gail Morris, DEC

### Corrective Action Unit I

Mark Smith, UC  
Gina Brook, G  
Tracy Heard, ES  
Rusty Kestle, G  
Darnell Manning, EE  
Ken Perry, G  
Sean Rhett, ES  
Anita Vinson-Britman, EE

### Corrective Action Unit II

Peggy McGee, UC  
Debby Cooper, ES  
Joe Frick, EE  
Chifeng Gu, G  
Lisa Lewis, G  
Nancy Troup, ES

### Regulatory Compliance Unit

Howard Barefoot, UC  
Cindy Hart, ES  
Robert Hawkins, ES  
Patricia Kitchens, ES  
Shaheer Muhanna, ES  
Isabelle Revell-Robinson, EE  
Lilia Romero, ES  
Steve Tribble, RA  
Arnicey Tyson, ES

**CHEMICAL CONSERVATION CORPORATION**

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