

RCRA Inspection Report

1) Inspectors and Authors of the Report

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2) Facility Information

Facility Street Address:
Georgia Atlantic Port, LLC.
202 Oxnard Dr.
Port Wentworth, Georgia 31407

Mailing Address:
Georgia Atlantic Port, LLC.
1515 Des Peres Road, Suite 300
St. Louis, Missouri 63131

Chatham County
EPA ID # GAD084914787
NAICS Code: 531312 – Nonresidential Property Managers

3) Responsible Official

Mr. Timothy Biggs
Project Manager
(314) 835-2824
Tbiggs@enviroanalyticsgroup.com

4) Inspection Participants

Mr. Timothy Biggs - Georgia Atlantic Port, Project Manager
Mr. David Champagne - U.S. EPA Region 4, Inspector
Mr. Jim McNamara - Georgia Environmental Protection Division (GAEPD), Inspector
Ms. Cherona Levy - GAEPD, Inspector

5) Date of Inspection

June 3, 2021, 09:00 hours

6) Applicable Regulations

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 CFR Parts 260 - 266, 268, 270, 273 & 279. The Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, et seq. as amended (Act), Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management (Rules), and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a generator of greater than 100 kilograms (220 lbs) but less than 1,000 kilograms (2200 lbs) of hazardous waste in a calendar month is a Small Quantity Generator (SQG).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16)], SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66[Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of the inspection was to conduct an announced hazardous waste compliance evaluation inspection (CEI) to determine the facility’s compliance with applicable RCRA regulations.

8) Facility Description

Georgia Atlantic Port, LLC. (GAP or facility) is located at 202 Oxnard Drive in Port Wentworth, Georgia. The property consists of approximately 57.75 acres of land located along the Savannah River in an industrial area of Chatham County (Photographs 1-4 of 4). The facility has a hazardous waste permit (Permit No. HW-055(D)) issued by the Georgia Department of Natural Resources (GADNR) for the post-closure care and corrective action of the closed surface impoundment (SI) and for the continued authorization and management of the regulated unit

(staging pile). Currently, GAP generates hazardous waste streams which includes EPA Waste Codes F001, F034, and K001. The site was formally operated by Atlantic Wood Industries (AWII) where it conducted the pressure treatment of wood products. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated October 11, 2019, characterized the facility as a small quantity generator (SQG) of hazardous waste.

9) Previous Inspection/Compliance History

This facility September 20, 2017 by GAEPD and two violations were found.

- PCR - Violation of a permit condition or requirement
- 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators

10) Findings

Opening Conference

On June 3, 2021, at approximately 9:00 AM, David Champagne, EPA Inspector, Jim McNamara, GAEPD Inspector, and Cherona Levy, GAEPD Inspector, met with Timothy Biggs, GAP Project Manager at GAP located at 202 Oxnard Drive, Port Wentworth, Georgia to conduct a RCRA Compliance Evaluation Inspection (CEI). The inspectors explained the purpose of the inspection, presented credentials, and requested permission to walk the site.

A groundwater extraction and treatment system are in operation in accordance with the Corrective Action Program defined in the RCRA permit (Photographs 3, 4 of 4). The treatment system recovers dense non-aqueous phase liquids (DNAPL) and treats impacted groundwater extracted from 5 recovery wells installed along the east perimeter of the closed landfill and recovers and treats leachate collected from 3 collection sumps. A groundwater monitoring well network is utilized to track the contaminated plumes. At the time of the inspection, there was one 55-gallon container of K001 hazardous waste. This container was closed, labeled hazardous waste, labeled with the indication of the hazardous contents, and dated May 26, 2021.

Records

The facility maintains an operating record within the office, which includes a copy of the RCRA Permit, copy of the Contingency Plan, and reports from the implementation of the contingency plan. The emergency coordinator contact information was available and up to date. Sampling and inspection records were available for review on site.

11. Summary

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. GAP was inspected as a small quantity generator of hazardous waste. At the time of the inspection, the facility appeared to be in compliance with requirements of RCRA.

12) Signed

**Champagne,
David**

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Champagne, David
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David Champagne
Physical Scientist/Inspector
RCRA Enforcement Section

Date

13) Concurrence

**ARACELI
CHAVEZ**

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ARACELI CHAVEZ
Date: 2021.07.01
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Photographs of Georgia Atlantic Port
202 Oxnard Dr.
Port Wentworth, Georgia 31407
Chatham County
EPA ID # GAD084914787
Photographs taken by: David Champagne on June 3, 2021
Camera Model: Google Pixel 3XL



Photograph 1 of 4: GAP Property



Photograph 2 of 4: Track for previous wood treatment operations



Photograph 3 of 4: Groundwater extraction and treatment system



Photograph 4 of 4: Groundwater extraction and treatment system