



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

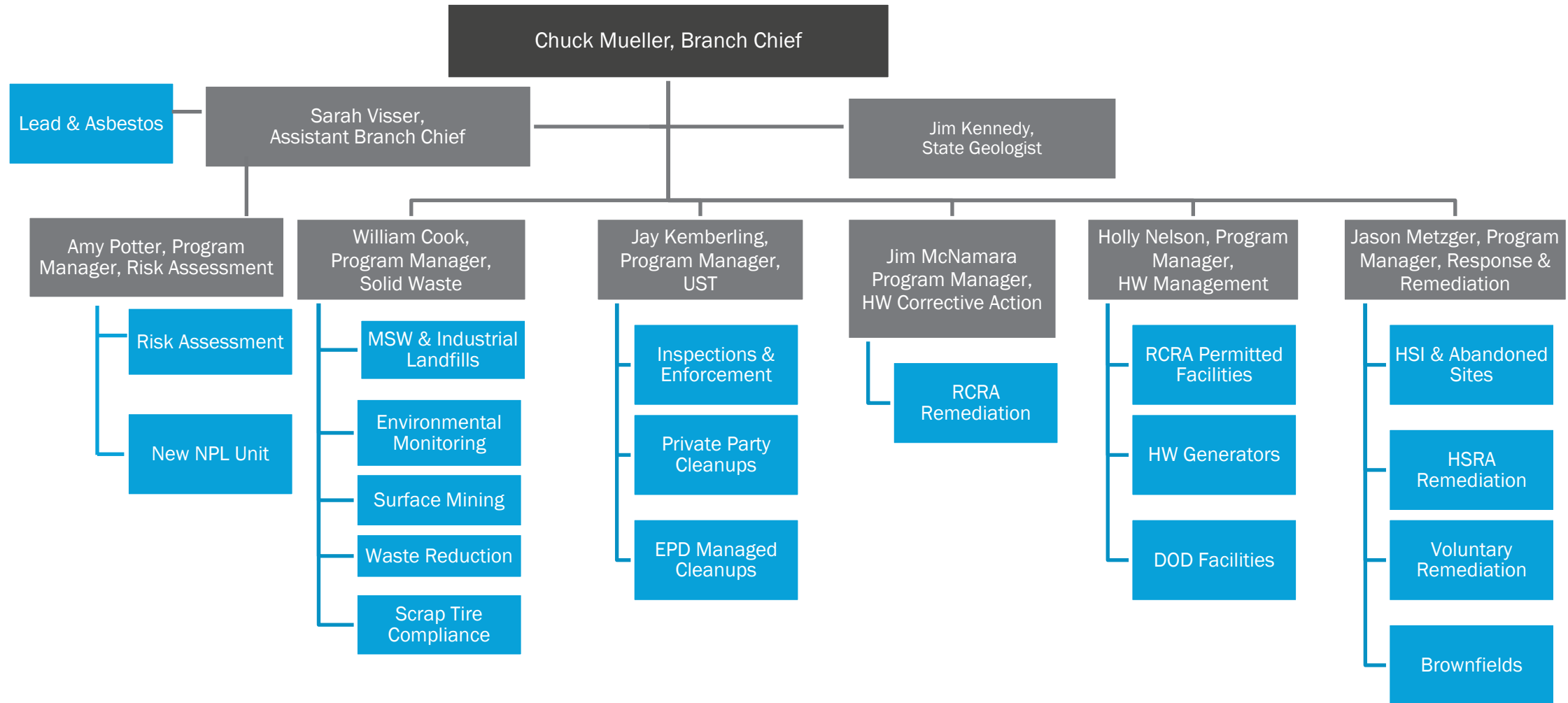
Land Protection Branch Update

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GIEC
November 2021



BRANCH ORGANIZATION





COVID-19 UPDATE

- All EPD offices are open, returning to “new normal”
- Transition to Zoom phones (see website for updated phone list)
- Virtual meetings still encouraged
- Appointments for record review – new email addresses to request appointments:
 - Towers.FileReview@dnr.ga.gov – for Hazardous Waste Sites and Programs, Brownfields, VRP
 - Tradeport.FileReview@dnr.ga.gov – for UST, Lead and Asbestos, Solid Waste files



COVID-19 UPDATE

- Inspections, complaint investigations and monitoring have returned to pre-pandemic levels. Form of inspections/investigations have been modified in some cases. Desk reviews and audits likely to continue.
- Permit issuance/formal enforcement actions have not been impacted.
- Public hearings conducted virtually rather than in-person. Public participation levels are up.

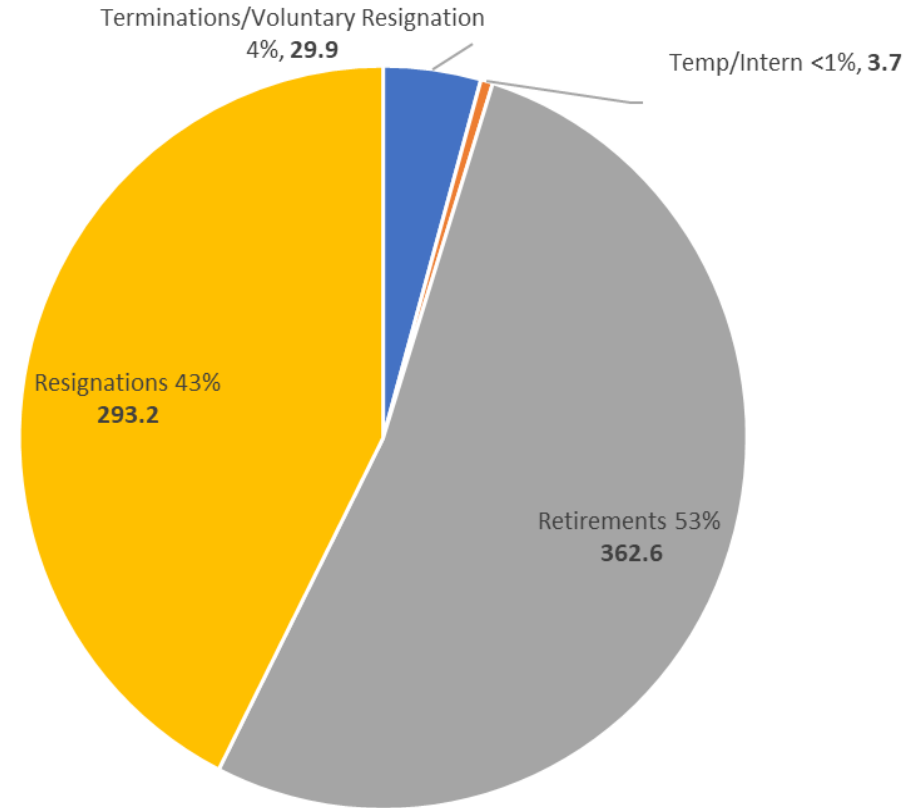


LAND BRANCH RETENTION CONCERNS

Land Branch Employees - 189
of Positions Turned Over
Since 7/1/19 - 80
Percentage of Turnover - 42%

Dismissal – 6
Retirements – 16
Resignations – 55
Intern/Temp - 3

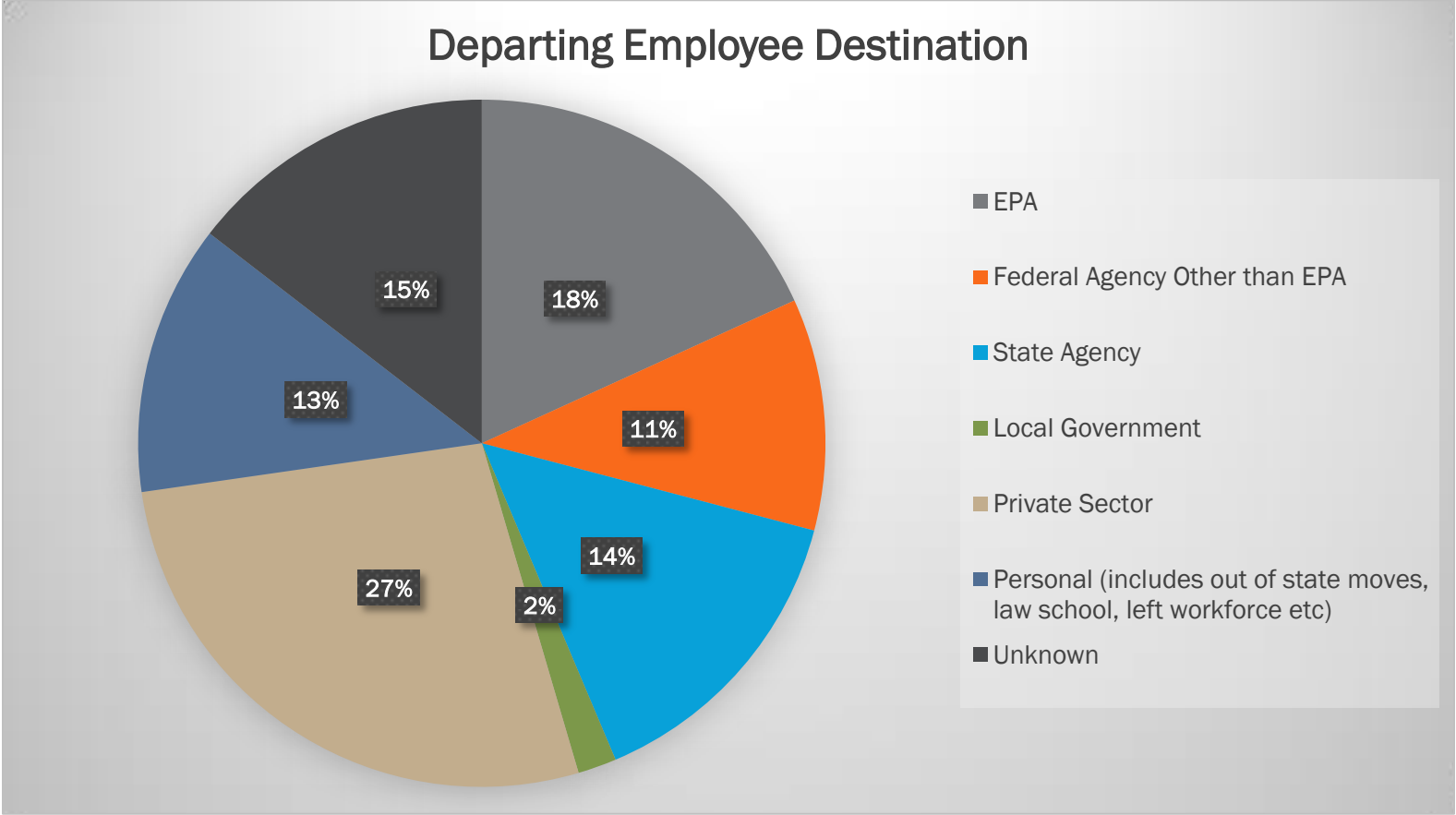
Years of Land Branch Experience Lost Since 7/1/19 - 689.4 Total





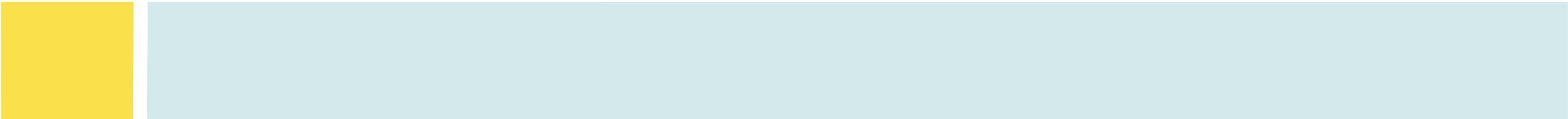
DEPARTING EMPLOYEE DESTINATION

EPA	10
Federal Agency Other than EPA	6
State Agency	8
Local Government	1
Private Sector	15
Personal (includes out of state moves, law school, left workforce etc)	7
Unknown	8
	55





PROGRAM UPDATES





FINANCING HAZARDOUS WASTE AND SOLID WASTE TRUST FUND

- Constitutional amendment and House Bill 511 passed, dedicating fees.
- Effective July 1, 2022
- Beginning initial planning for spending increase in funding
 - Staffing
 - New programs consistent with authorized uses





UNDERGROUND STORAGE TANK PROGRAM

- Implemented Risk-Based Corrective Action in January 2019
 - workbook is online
- Focus has been on getting stalled sites back to active cleanup
- Significant progress on reducing corrective action backlog
- Potential rules to increase participation by reducing barriers to subsequent election





SOLID WASTE RULE REVISION – EFFECTIVE JUNE 2021

Primary focus - address fires at mulching facilities and provide additional planning for liquids/sludge disposal to ensure slope stability.

- Requirements for mulching operations to reduce fire hazards and allow the feedstock and mulch to be considered recovered materials.
 - Stockpile maximum dimensions
 - Processing time limit
 - Speculative accumulation
 - Fire plan and guidelines
- Requirements for submittal of high moisture-content waste (HMCW) management plans by municipal solid waste and commercial industrial landfills that accept more than 5% HMCW.
- Guidance documents now on website.



COAL COMBUSTION RESIDUALS (CCR) PERMITS

- Closure by Removal Permits
 - Issued - Crisp (1), Hammond (3), McIntosh (1), McManus (1)
- Closure in Place Permits
 - Hammond AP-3 – Comment period closed, reviewing
 - Bowen – Comment period ends 11/15
- Process to continue through 2022.



PROPOSED CCR RULE CHANGE

Primary purpose:

- Update Georgia's CCR Rules to align with the most recent EPA changes
 - Adding references to additions made to the Federal CCR Regulations
 - Deleting references to sections of the Federal CCR Regulations that have been removed as a result of litigation
- Clarify deed, permit, and post-closure care requirements

Schedule:

October 26, 2021 - Brief Environmental Committee

December 2021 - Public hearing

February 2022 - Request adoption of proposed amendments





TWIN PINES MINING PERMIT APPLICATION

- Environmental Provisions Addendum
- Mining Land Use Plan
 - Reclamation
 - GW Modeling
- Public comment period after the Mining Land Use Plan and Environmental Provisions Addendum are complete.
- Public process for Air, Water & Land Permits after MLUP and Environmental Provisions Addendum are considered complete



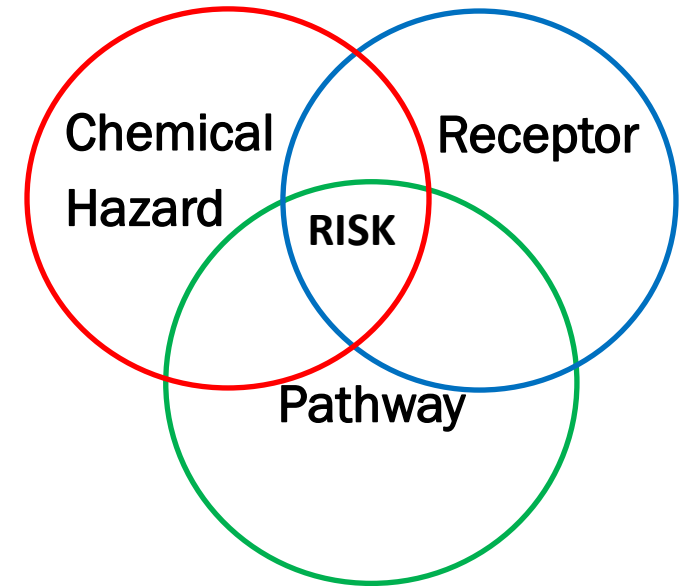
HAZARDOUS WASTE GUIDANCE

Complete and available on our website:

- Soil Leaching
- Area Averaging
- Vapor Intrusion

Georgia Risk Assessment Guidance – 2022

- Forming internal workgroup to scope
- Will use the Technical Advisory Committee Process





VRP TIMING QUESTION

October 2021 – Evaluation of VRP 5-Year Timeframe

Current checklist (2010) provides schedule including submittal of compliance status report within 5 years of enrollment, compromise for less stringent application requirements.

Average time from ENROLLMENT to INITIAL CSR SUBMITTAL is 3.0 Years

Delays beyond 5 years are mostly due to off-property access/delineation issues, ECs, EPD turn-over

Better handle on off-property delineation and confirmation that will accept ECs

More internal focus on getting CSR submitted/approved instead of waiting for all ECs to be executed



QUESTIONS?

