ATTACHMENT J

AA SYDCOL, LLC

SOLID WASTE MANAGEMENT UNITS

[40 CFR 270.14(D)]

November 11, 2021

1.0 Solid Waste Management Units

This description of SWMUs at the Facility has been prepared in support of the Sydcol RCRA Part B permit application. A list of all acronyms and a definition of key terms used in this description is provided with General Information provided in Appendix A of Attachment A of the RCRA Part B permit application.

40 CFR 264/264 Subpart S defines SWMUs as "any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. In addition to the three HWMUs that are the subject of this application, SWMUs are used at the Facility to store and bulk solid wastes received at the Facility for transfer to an approved solid waste treatment or disposal facility. The SWMUs store roll-off containers, liquid totes, and mobile containers with non-hazardous wastes. The SWMUs are currently operational, having begun operations in January 2018.

There are two separate areas at the Facility operated as SWMUs. The largest SWMU is located in an open area located at the north end and along the west side of the property, covering approximately 1.93 acres. The concrete pad at the north end of the Facility property is included in the SWMU. Solid wastes will be separated from hazardous wastes on the pad using a portable fence partition. Solid wastes are also stored within the warehouse building as a separate SWMU covering approximately 7,000 square feet. The warehouse floor operated as a SWMU covers approximately 7,000 square feet.

The Site Plan provided in the Container Management Plan as Figure 2 in Attachment D of this application illustrates the SWMUs.

2.0 Historical releases

There are no known historical releases from the existing solid waste transfer operations or from pre-existing activities at the site. This determination is based on operational records, working knowledge of existing solid waste operations, and from background information determined during the acquisition of the property.