

2017 RCRA Permit Application

Section D – Security

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Table of Contents

- D. PROCEDURES TO PREVENT HAZARDS 1
- D.1 SECURITY 1
 - D.1.a Security Procedures and Equipment [40 C.F.R. §§ 270.14(b)(4) and 264.14] 1
 - D.1.a.1 24-Hour Surveillance System [40 C.F.R. § 264.14(b)(1)] 1
 - D.1.a.2 Barrier and Means to Control Entry 2
 - D.1.a.3 Warning Signs [40 C.F.R. § 264.14(c)] 2
 - D.2 INSPECTION SCHEDULE [40 C.F.R. §§ 270.14(b)(5) AND 264.15] 3
 - D.2.a General Inspection Requirements [40 C.F.R. §§ 264.15(a) and (b)] 4
 - D.2.a.1 Types of Problems [40 C.F.R. § 264.15(b)(3)] 4
 - D.2.a.2 Frequency of Inspection [40 C.F.R. § 264.15(b)(4)] 4
 - D.2.a.3 Schedule for Remedial Action [40 C.F.R. § 264.15(c)] 5
 - D.2.a.4 Inspection Log [40 C.F.R. § 264.15(d)] 5
 - D.2.b Specific Process Inspection Requirements [40 C.F.R. § 264.174] 5
- D.3 WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS [40 C.F.R. § 270.14(b)(6)] 6

Figures

- Figure D-1 Visitor Pass
- Figure D-2 Hercules Central Accumulation Area Inspection Form
- Figure D-3 Pinova - Hazardous Waste Less Than 90-Day Pad Inspection Form
- Figure D-4 Hercules Surface Impoundment Area Inspection
- Figure D-5 Inspection Schedules

D. PROCEDURES TO PREVENT HAZARDS

This section of the permit renewal application addresses requirements contained in 40 C.F.R. §§ 270.14(b)(4), (5) and (6) relating to security procedures and equipment, inspection schedules, and requests for waivers of preparedness and prevention requirements. These requirements are referenced in 40 C.F.R. § 270.28 (relating to information requirements for applications for post-closure permits).

D.1 SECURITY

D.1.a Security Procedures and Equipment [40 C.F.R. §§ 270.14(b)(4) and 264.14]

Under 40 C.F.R. § 270.14(b)(4), a permit application is to include a description of the security procedures and equipment required by 40 C.F.R. § 264.14 or a justification for seeking a waiver of such requirements. In this particular case, neither Hercules nor Pinova have sought a waiver of the requirements in 40 C.F.R. § 264.14. Instead, the security requirements specified in 40 C.F.R. § 264.14 are being met at the Facility as described below.

Security at the Facility is maintained by monitoring personnel and vehicles in and out of the plant, patrolling the remote areas of the plant, and monitoring plant radio and pager communications. Plant security is under the direction of the Pinova Plant Safety Department.

D.1.a.1 24-Hour Surveillance System [40 C.F.R. § 264.14(b)(1)]

The Hercules owned portion of the Facility is fenced and locked when no personnel are present. Pinova personnel would notify Hercules immediately if unidentified activity is observed when Hercules personnel are not present.

A guard is stationed at the main entrance to the Pinova owned portion of the Facility 24-hours a day, seven days a week. The guard monitors all vehicles and personnel entering or leaving the Facility. Operating areas of the Pinova plant are monitored constantly by operational and maintenance personnel. There are also numerous surveillance cameras located around the Facility, including three at the main gate and one at the back gate at US Highway 17.

The gate guard has an emergency “power failure” telephone and emergency lighting in the event of a power failure. Remote smoke and fire alarm indicators for the telephone equipment room are installed in the Main Gate House.

D.1.a.2 Barrier and Means to Control Entry

D.1.a.2.a Barrier [40 C.F.R. § 264.14(b)(2)(i)]

The perimeter of the Hercules owned portion of the Facility is surrounded by a seven-foot high chain link fence. The majority of the chain link fence also includes a barbed wire top guard. Likewise, the entirety of the perimeter of the Pinova owned portion of the Facility is surrounded by a seven-foot high chain link fence. The majority of the chain link fence also includes a barbed wire top guard. All culverts and drains entering or leaving the Facility are protected with physical guards to prevent access to the Facility through the culverts and drains.

D.1.a.2.b Means to Control Entry [40 C.F.R. § 264.14(b)(2)(ii)]

There is one primary entrance to the Hercules owned portion of the Facility from Altama Avenue on the west side of the Facility. This entrance is for customers of Golden Isles Wood Products ("GIWP") who leases a portion of the Facility from Hercules. GIWP personnel control entrance to the remainder of the Hercules owned portion of the Facility site during business hours. The gate is locked during all other times.

There are three gates which connect the Hercules and Pinova owned portions of the Facility. They are generally open during GIWP business hours to facilitate contracted services onsite. The gates are generally locked afterwards, except in emergency situations. There is also a gate at the railroad track entry on the north side of the Hercules owned portion. This is kept locked except when a railcar is scheduled. The gates are supervised when open. Both Hercules and Pinova share keys to these gates.

There is one main entrance to the Pinova owned portion of the Facility located off "L" Street at Cook Street. Lighting is installed at the entrances and several locations around the perimeter of the fence surrounding the active portion of the Facility.

All visitors entering the Pinova portion of the Facility must have in his/her possession a Pinova visitor's badge (**Figure D-1**). All delivery vehicles entering the Pinova Plant stop at the Pinova main gate where they are logged in and are subject to inspection on both entering and leaving the secured area. Contractors participate in an annual training on safe work practices and are issued a contractor's badge granting access to the Pinova owned portion of the Facility. Note that Hercules personnel and their contractors are issued badges granting access to the Pinova owned portion of the Facility as needed.

D.1.a.3 Warning Signs [40 C.F.R. § 264.14(c)]

Signs are posted at all external entrances to the Hercules owned portion of the Facility. Signs posted state “Danger – Unauthorized Personnel Keep Out”. The signs can be read from a distance of at least 25 feet (ft.).

Signs are posted at all entrances to the Pinova owned portion of the Facility warning personnel that they are entering a controlled access area and informing visitors of plant safety rules and that smoking and flame producing devices are prohibited.

There are no signs on the gates between the Hercules and Pinova owned portions of the Facility.

D.2 INSPECTION SCHEDULE [40 C.F.R. §§ 270.14(b)(5) AND 264.15]

Under 40 C.F.R. § 270.14(b)(5), a permit application is to include a copy of the general inspection schedule required by 40 C.F.R. § 264.15(b) along with elements to satisfy specific inspection requirements as applicable for items or units such as hazardous waste containers, hazardous waste storage tanks, surface impoundments, waste piles, land treatment areas, and landfills. Of the references to specific inspection requirements in 40 C.F.R. § 270.14(b)(5), only the requirements set forth at 40 C.F.R. § 264.174 (relating to inspections of hazardous waste container storage areas) are potentially applicable to the less than 90 day storage areas located at the Hercules and Pinova owned portions of the Facility.

Regular inspections are performed at the Hercules and Pinova owned portions of the Facility to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste to air, soil, or surface water.

An inspection form for the central accumulation area (“CAA”) (i.e., the converted hazardous waste storage unit (“HWSU”)) where containers of hazardous waste generated by Hercules’ activities are temporarily stored for 90 days or less is included in **Figure D-2**.

Pinova conducts weekly inspections of the two locations where Pinova temporarily stores containers of hazardous wastes that it generates (i.e., the less than 90-day storage area behind the Quality Control Laboratory and the less than 90-day storage pad within the plant area). An inspection form used by Pinova for such inspections is included in **Figure D-3**.

Hercules conducts inspections of the closed surface impoundment area on a quarterly basis and after major storm events. An inspection form used for such purposes is included in **Figure D-4**. **Figure D-5** is a list of inspections conducted at the Hercules owned portion of the Facility and their frequencies.

D.2.a General Inspection Requirements [40 C.F.R. §§ 264.15(a) and (b)]

Authorized personnel, on behalf of Hercules, inspect the CAA (i.e., the converted HWSU) on a weekly basis when hazardous wastes are being stored at the CAA located on the Hercules owned portion of the Facility.

The post-closure program for the closed surface impoundments located on the Hercules owned portion of the Facility includes inspections of the closed surface impoundment area on a quarterly basis and after major storm events. The inspections include monitoring wells, security, surface features, and vegetation cover associated with the post-closure activities.

Pinova conducts weekly inspections of the two less than 90-day container storage areas and the associated safety, emergency, and security equipment.

Equipment in regular use at both sites such as radios, safety and fire apparatus, pH monitors, scales, vehicles, respirators, alarms, decontamination supplies, eyewash stations, and pumps are on an inspection schedule to comply with applicable requirements imposed by the United States Occupational Safety and Health Administration (“OSHA”), the United States Environmental Protection Agency (“EPA”), and the National Fire Protection Association (“NFPA”).

D.2.a.1 Types of Problems [40 C.F.R. § 264.15(b)(3)]

The inspections of the locations where containers of hazardous wastes are temporarily stored (i.e., the CAA used by Hercules and the two 90-day storage areas used by Pinova) look for deteriorating or leaking containers, roof leaks (as applicable), cracks in the concrete slabs, water or liquid in secondary containment areas, security problems and housekeeping issues. These inspections are conducted by authorized personnel on behalf of Hercules at the CAA (the converted HWSU) and by Pinova personnel at the two 90-day storage areas used by Pinova.

D.2.a.2 Frequency of Inspection [40 C.F.R. § 264.15(b)(4)]

The CAA (the converted HWSU) located on the Hercules owned portion of the Facility is inspected on weekly basis when hazardous wastes are present at the CAA. The closed surface impoundment area is inspected quarterly and after major storm events. More frequent inspections are conducted when there is activity in either the CAA or the closed surface impoundment area. Testing of all critical monitoring systems is part of a preventive maintenance program done by Instrument Technicians. A schedule of the inspections that are conducted on behalf of Hercules is presented in **Figure D-5**.

Likewise, the two 90-day storage areas located on the Pinova owned portion of the Facility and used by Pinova are inspected on a weekly basis when hazardous wastes are present.

Plant operating areas are manned 24 hours per day, seven days a week. Regular inspections for spills, leaks and mechanical problems are conducted.

D.2.a.3 Schedule for Remedial Action [40 C.F.R. § 264.15(c)]

Any defects found during an inspection conducted on behalf of Hercules or Pinova are either corrected at the time or reported for remedial action. The date that remedial action is completed is recorded on the inspection form. The original of each inspection form is retained on-site by the Permittees for a minimum of three years.

If an inspection reveals that an immediate emergency exists, the inspector will notify supervisory personnel who will initiate immediate corrective action appropriate to the nature of the emergency and may initiate actions under the Contingency Plan for the Facility. If the problem is not of an emergency nature, maintenance personnel will take necessary remedial action as soon as practicable in concert with the degree of hazard.

D.2.a.4 Inspection Log [40 C.F.R. § 264.15(d)]

The forms shown in **Figures D-2** through **D-4** are used to log the findings of the inspections that are conducted. Copies of the completed inspection forms are retained by a Hercules or Pinova representative or other responsible supervisor for a minimum of three years. These logs include the inspector's name, date and time of the inspection, a notation of the observations made, and the nature and date of any repairs or remedial actions.

D.2.b Specific Process Inspection Requirements [40 C.F.R. § 264.174]

A visual inspection of containers holding hazardous wastes is performed by each Permittee on a weekly basis when such containers are temporarily stored. The results are recorded on the relevant inspection form (**Figures D-2 and D-3**). Any defects in the drums or pails are corrected, if minor. If the defects require remedial action, they are reported to supervisory personnel.

A visual inspection of secondary containment is also performed when hazardous wastes are present at the CAA (the converted HWSU) located on the Hercules owned portion of the Facility and the

results are recorded on the appropriate forms included in **Figure D-2**. The steel secondary containment of sump of the CAA is integral to the CAA building structure. The visible aspects of the sump exterior is inspected for corrosion, and/or holes. The interior of the CAA containment sump is also inspected for corrosion, and/or holes. Any liquids accumulated in secondary containment are removed. Any defects in secondary containment are corrected, if minor. If the defects require remediation action, they are reported to supervisory personnel.

The date that remedial action is completed is recorded on the inspection form. The original of each inspection form is retained by the Hercules, a digital copy is saved to a central file server, and original forms are retained in on-site files for a minimum of three years.

Pinova also conducts weekly inspections of all containers in storage, along with secondary containment and paved surfaces. Any defects are immediately corrected and documented on the relevant inspection form, **Figure D-3**, along with the date identified and the date completed. All inspections are maintained onsite for a minimum of three years.

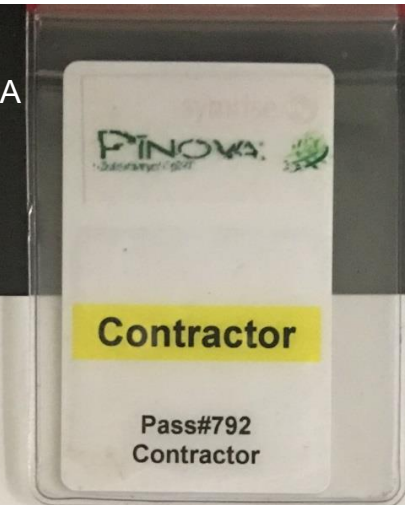
D.3 WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS [40 C.F.R. § 270.14(b)(6)]

Under 40 C.F.R. § 270.14(b)(6), a permit application is to include a justification for any request for a waiver of the preparedness and prevention requirements of 40 C.F.R. Part 264, Subpart C. Hercules and Pinova do not wish to request a waiver of preparedness and prevention requirements. Those requirements are not applicable to the activities at the Facility that will be covered by the hazardous waste permit upon renewal because the permit renewal application is not seeking authorization to store hazardous wastes for greater than 90 days. Instead, as discussed in Section B of the permit renewal application, hazardous wastes generated at the Facility will be temporarily stored for 90 days or less in accordance with requirements applicable to large quantity generators of hazardous wastes. Those requirements include provisions set forth in 40 C.F.R. Part 262, Subpart M (relating to preparedness, prevention and emergency procedures for large quantity generators) that substantially parallel the requirements in 40 C.F.R. Part 264, Subpart C (relating to preparedness and prevention).

Figures

Figure D-1	Visitor Pass
Figure D-2	Hercules Central Accumulation Area Inspection Form
Figure D-3	Pinova - Hazardous Waste 90-Day Pad Inspection Form
Figure D-4	Hercules Surface Impoundment Area Inspection
Figure D-5	Inspection Schedules

Figure D-1
Hercules LLC and Pinova, Inc. - Brunswick, GA
Pinova, Inc. Visitor Pass



PINOVA®
Subsidiary of DRT



VISITOR 1

Figure D-2
Hercules LLC and Pinova, Inc. - Brunswick, GA
Hercules Central Accumulation Area Inspection Form

Storage Area Location:

Number of Containers:

Date: _____ Time: _____

Week of: _____

Inspected by: _____

Signature: _____

Yes No

Container Condition

Containers show no signs of leaks or spills

Containers are not damaged (no dents, punctures, etc.)

Containers are closed (bung/bolt)

Labeling

Containers are labelled (Yellow - Hazardous Green - Non-hazardous)

Accumulation start date is on all hazardous waste containers

Labels are legible and facing outward

Housekeeping

Warning signs are posted and visible

Chains/ gate are in place and secured with lock

Drums are inside containment. No cracks in berm or floor

Sufficient aisle space is present (~1 drum width)

Storage area is free of debris, pallets, etc.

Emergency response equipment is present and in good condition

Eyewash and safety shower functional

Comments (Describe any problems and corrective actions taken):

Figure D-3
Hercules LLC and Pinova, Inc. - Brunswick, GA
Pinova - Hazardous Waste Less Than 90-Day Pad Inspection Form
FM-021-0017-100, Revision 0

Date: _____ **Inspected by:** _____

Time: _____ **Signature:** _____

Week of: _____ **to** _____

Any items marked as "No" must be detailed in the "Comments" section below.

Container Condition	Laboratory Drum Pad		Drum Storage Bldg Pad	
Number of containers?				
Containers are in good condition and show no signs of leaks or spills?	Y	N	Y	N
Containers are in good condition (no dents, punctures, etc.)?	Y	N	Y	N
Containers are closed (bung tight, bolt tight)?	Y	N	Y	N
Containers are compatible with waste and acceptable for shipment?	Y	N	Y	N
Corrosive containers stored on containment pallets and kept separate from flammables?	NA		Y	N
Labeling				
Containers are labeled (yellow hazardous waste)	Y	N	Y	N
Accumulation start date is on all hazardous waste containers?	Y	N	Y	N
Labels are legible and facing outward?	Y	N	Y	N
Are all containers (with accumulation start dates) included in Waste Container Inventory?	Y	N	Y	N
No containers greater than 60 days old?	Y	N	Y	N
Housekeeping				
Warning signs are posted and visible?	Y	N	Y	N
Containers are inside containment (where provided)?	Y	N	Y	N
Containment area free of standing water?	Y	N	Y	N
Sufficient aisle space is present (~1 drum width)?	Y	N	Y	N
Storage area is free of debris, pallets, etc.?	Y	N	Y	N
Emergency response equipment is present and in good condition (telephone, fire extinguishers, spill response materials, etc.)?	Y	N	Y	N
Eyewash and safety shower functional?	Y	N	Y	N

Comments (describe any problems and corrective actions taken):

FIGURE D-4

HERCULES LLC AND PINOVA, INC. - BRUNSWICK, GA
HERCULES SURFACE IMPOUNDMENT AREA INSPECTION

(Quarterly)

Date: _____

Monitoring Well Inspection:

UP-1 S & D Up-gradient (West end) Locks in place: _____ Site Condition? _____ _____ _____ _____	POC-1 S & D (Northeast end) Locks in place: _____ Site Condition? _____ _____ _____ _____
POC-2 S & D (East end on Berm) Locks in place: _____ Site Condition _____ _____ _____ _____	POC-3 S & D (Southeast corner) Locks in place: _____ Site Condition? _____ _____ _____ _____

Security:

Fence condition north of the area: _____

Other: _____

Erosion?:

Grass/Vegetation: Mowing Needed?

Other problems or conditions: _____

Inspected by: _____

Figure D-5 - Inspection Schedule
 2017 RCRA Permit Application
 Hercules LLC and Pinova, Inc. - Brunswick, GA
 2801 Cook Street

Location Inspected	Responsible Party	Frequency
Pinova Hazardous Waste 90-Day Pad	Pinova, Inc.	Weekly when hazardous waste is stored in the 90-Day Pad
Hercules Central Accumulation Area	Hercules LLC	Weekly when hazardous waste is stored in the CAA
Former Toxaphene Surface Impoundments	Hercules LLC	Quarterly
Monitoring Well Network	Hercules LLC	Monthly, with an annual EPD inspection