2017 RCRA Permit Application

Hercules LLC and Pinova, Inc. - Brunswick, GA
2801 Cook Street, Brunswick, GA

Antea Group Project No. 190106854A
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www.anteagroup.com
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**PART A APPLICATION**
Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch

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<tr>
<th>HANDLER INFORMATION</th>
<th>EPA ID NUMBER: GAD004065520</th>
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<tr>
<td>FACILITY NAME:</td>
<td>Hercules LLC / Pinova, Inc.</td>
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<tr>
<td>Facility Location Address:</td>
<td>2801 Cook Street</td>
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<tr>
<td>City: Brunswick</td>
<td>State: GA</td>
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<tr>
<td>Land Type: P</td>
<td>Facility Existence Date (mmddyyyy): 03/01/1911</td>
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<tr>
<td>Facility Latitude (ddmmss):</td>
<td>31° 9' 57&quot; N</td>
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<td>Facility Longitude (ddmmss):</td>
<td>81° 28' 15&quot; W</td>
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<tr>
<td>Facility Mailing Address:</td>
<td>P.O. Box 1517</td>
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<tr>
<td>City: Brunswick</td>
<td>State: GA</td>
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**Hercules LLC**

<table>
<thead>
<tr>
<th>Contact: Last Name: Hassett</th>
<th>First Name: Timothy</th>
</tr>
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<tbody>
<tr>
<td>Title: Remediation Project Manager</td>
<td></td>
</tr>
<tr>
<td>Contact Address: Ashland Research Center, 500 Hercules Road</td>
<td></td>
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<tr>
<td>City: Wilmington</td>
<td>State: DE</td>
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**OPERATOR INFORMATION**

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<th>Name of Operator: Hercules LLC</th>
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<tr>
<td>Operator Type: P</td>
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<tr>
<td>Telephone: 302-995-3456</td>
</tr>
<tr>
<td>Street Address: 500 Hercules Road</td>
</tr>
<tr>
<td>City: Wilmington</td>
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<td>Current/Previous: CP</td>
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**OWNER INFORMATION**

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<td>Street Address: 500 Hercules Road</td>
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<td>City: Wilmington</td>
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**Pinova, Inc.**

<table>
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<tr>
<th>Contact: Last Name: Crews</th>
<th>First Name: Michael</th>
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<tr>
<td>Title: Environmental Manager</td>
<td></td>
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<td>Contact Address: 2801 Cook Street</td>
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<tr>
<td>City: Brunswick</td>
<td>State: GA</td>
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**OPERATOR INFORMATION**

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<tr>
<td>Telephone: 912-265-3550</td>
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<tr>
<td>City: Brunswick</td>
</tr>
<tr>
<td>Current/Previous: CO</td>
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BUSINESS INFORMATION

NAICS Codes: Primary: 325194 NAICS Code Description: Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing
Secondary: 

Brief Description of Business at Facility Site:

Pinova, Inc. owns a portion of the Facility and conducts chemical manufacturing operations on that portion of the Facility as described in greater detail in Section B of the permit renewal application.

Hercules LLC owns the other portion of the Facility which is currently inactive. The portion of the Facility owned by Hercules LLC includes a hazardous waste storage unit ("HWSU") that has been used to store hazardous wastes for longer than 90 days. As described in more detail in Section B of the permit renewal application, storage of hazardous wastes for longer than 90 days is no longer necessary. Accordingly, the permit renewal application does not seek continued authorization for such storage as a permitted activity. Instead, the HWSU will be used as a central accumulation area for purposes of temporarily storing hazardous wastes generated at the Facility for 90 days or less in accordance with requirements applicable to hazardous waste generators. Upon renewal of the hazardous waste permit for the Facility, the permit is expected to cover facility-wide corrective action obligations and post-closure care for five closed surface impoundments. Hercules LLC is implementing these activities. No activities involving the storage, treatment or disposal of hazardous wastes at the Facility requiring a hazardous waste permit are occurring at the Facility.

Closed Hazardous Waste Management Units:

Five closed surface impoundments are present at the facility and are subject to post-closure care as described in greater detail in Sections B and E of the permit renewal application.

Topographic Map, Scale Drawing, and Photographs are attached. The topographic map covers the area extending one mile from the boundaries of the Facility and contains the information listed in 40 C.F.R. § 270.13(l).

Provided in Part B

REGULATORY INFORMATION

Permit Type: S Permit Number: HW-052(D&S) Description: Georgia Hazardous Waste Facility Permit
Facility Indicator: N Regulatory Status: R Regulatory Status Description: 
Cross-Reference ID: 

OTHER ENVIRONMENTAL PERMITS (continue on an attachment as necessary)

Type: S - Air Number: 2861-127-0002-V-05-0 Description: Part 70 Operating Permit (Pinova)
Type: N - NPDES Number: GA0003735 Description: NPDES Discharge Permit (Pinova)
Type: POTW Number: Pinova-2017-C Description: Industrial Wastewater Discharge (Pinova)
Type: S - GW Number: 063-0008 Description: Permit to Use Groundwater (Pinova)
List of Affected Governments

(1) Mayor Cornell Harvey
   City of Brunswick
   601 Gloucester Street
   Brunswick, GA 31520

(2) Chairman Peter Murphy
    Glynn County Board of Commissioners
    W. Harold Pate Building
    1725 Reynolds Street
    Suite 302
    Brunswick, Georgia 31520

(3) Fire Chief Randy D. Mobley
    Brunswick Fire Department
    1201 Gloucester Street
    Brunswick, Georgia 31520
No hazardous wastes are being treated, disposed of, or stored for longer than 90 days at the Facility. Hazardous wastes generated at the Facility and temporarily stored for 90 days or less in accordance with requirements for hazardous waste generators are discussed in Section B of the permit renewal application and summarized in the table set forth below. The former hazardous waste storage unit described earlier in this Part A application is being used as a central accumulation area for purposes of temporarily storing hazardous wastes generated at the Facility for 90 days or less in accordance with the requirements for hazardous waste generators.

**PROCESS INFORMATION:**

<table>
<thead>
<tr>
<th>Process Code</th>
<th>Process Total Amount</th>
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**WASTE INFORMATION — GENERATION ONLY:**

<table>
<thead>
<tr>
<th>Waste Stream Number and General Description</th>
<th>Annual Quantity/UOM</th>
<th>Annual Waste Amount (Short Tons)</th>
<th>Handling Description/Process Codes</th>
<th>Hazardous Waste Codes</th>
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<tbody>
<tr>
<td>1. Waste solvent (lab)</td>
<td>30,000 J</td>
<td>15</td>
<td>N/A — Generation only</td>
<td>D001, F003</td>
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<tr>
<td>2. Waste paint/paint thinner</td>
<td>700 J</td>
<td>0.35</td>
<td>N/A — Generation only</td>
<td>D001</td>
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<td>3. Toxaphene-impacted soil and media</td>
<td>50 Y¹</td>
<td>12.5</td>
<td>N/A — Generation only</td>
<td>D015, P123</td>
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<tr>
<td>4. Trimethyl chlorosilane on carbon (vent sorb) (terpene resins)</td>
<td>800 J</td>
<td>0.40</td>
<td>N/A — Generation only</td>
<td>D003</td>
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<tr>
<td>5. Other flammable waste materials, pads, filters, rags, fuels, pine oils and solvents</td>
<td>100,000 J (MIBK tankers ship)</td>
<td>50</td>
<td>N/A — Generation only</td>
<td>D001, F003, F005</td>
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<tr>
<td></td>
<td>55,000 J (waste solvent sludge, pads, etc.)</td>
<td>27.5</td>
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<tr>
<td>6. Contaminated aluminum chloride</td>
<td>500 J</td>
<td>0.25</td>
<td>N/A — Generation only</td>
<td>D003</td>
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<tr>
<td>7. Contaminated groundwater monitoring fluids</td>
<td>300 G²</td>
<td>1.25</td>
<td>N/A — Generation only</td>
<td>D018, D021</td>
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<td>8. Waste filters</td>
<td>50,000 J</td>
<td>25</td>
<td>N/A — Generation only</td>
<td>D002</td>
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<td>9. Mercury thermometers and other contaminated debris</td>
<td>20 J (Hg Thermometers)</td>
<td>0.01</td>
<td>N/A — Generation only</td>
<td>D009</td>
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<td>300 J (Other D009 Debris / COD Vials)</td>
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<td>10. Non-Aqueous Phase Liquids - AOC-1</td>
<td>500 G³</td>
<td>1.79</td>
<td>N/A — Generation only</td>
<td>D001</td>
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Notes:
D001 = Waste flashpoint <140°F (Setaflash Closed Tester)
D002 = pH <2, or > 12.5 or liquid corrodes steel at a rate greater than 0.250 inch per year at 130°F (40 C.F.R. § 261 22)
D003 = Reactive waste (Process generated waste and MSDS knowledge)
D009 = Mercury concentration > 0.2 g/L (TCLP)
D015 = Toxaphene concentration > 0.5 mg/L (TCLP)
D018 = Benzene concentration > 0.5 mg/L (TCLP)
D021 = Chlorobenzene > 100 mg/L (TCLP)
F003 = Spent non-halogenated solvents and still bottoms
F005 = Spent non-halogenated solvents and still bottoms
P123 = Commercial chemical product toxaphene (40 CFR 261.33(e))
J = Pounds per year
TCLP = Toxicity Characteristic Leaching Procedure
1 – Density of toxaphene-impacted soil and media assumed to be 500 pounds per cubic yard (Table: Volume-to-Weight Conversions for Recyclable Materials, Massachusetts Department of Environmental Protection, listing for brush. Available at http://www.mass.gov/eea/docs/dep/recycle/approvals/dsconv.pdf.)
2 – Density of contaminated groundwater monitoring fluids assumed to be 8.34 pounds per gallon.
3 – Density of non-aqueous phase liquids assumed to be 7.17 pounds per gallon, converted from 0.86 grams per milliliter [8002-09-3 CAS MSDS (Pine Oil), available at http://www.chemicalbook.com/ChemicalProductProperty].

CERTIFICATION
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

John Hoffman, Remediation Group Manager
Typed name and title (Hercules LLC)

Date
2/27/18

CERTIFICATION
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Molly Matthews, Vice President of Operations
Typed name and title (Pinova, Inc.)

Date
2/4/2018
Prior Owner/Operator Information

Contact:  Last Name:  Hassett
          First Name:  Timothy
Title:     Remediation Project Manager  Contact Telephone:  302-995-3456
Contact Address:  Ashland Research Center, 500 Hercules Road
City:      Wilmington  State:  DE  Zip:  19808-1599

OPERATOR INFORMATION
Name of Operator:  Hercules Inc
Operator Type:  P  Telephone:  302-995-3456
Street Address:  500 Hercules Road
City:      Wilmington  State:  DE  Zip:  19808-1599
Current/Previous:  PP  Change Date (mmddyyyy):  6/1/1920

OWNER INFORMATION
Name of Owner:  Hercules Inc
Owner Type:  P  Telephone:  302-995-3456
Street Address:  Ashland Research Center, 500 Hercules Road
City:      Wilmington  State:  DE  Zip:  19808-1599
Current/Previous:  PO  Change Date (mmddyyyy):  6/1/1920

Revised 2/26/2018
2017 RCRA Permit Application

Section B – Facility Description

Hercules LLC and Pinova, Inc. - Brunswick, GA
2801 Cook Street, Brunswick, GA

Antea Group Project No. 190106854A

Prepared for:
Hercules LLC
Ashland - Research Center
500 Hercules Road
Wilmington, DE 19808-1599
USA

Pinova, Inc.
2801 Cook Street
Brunswick, GA 31520
USA

Prepared by:
Antea Group
3530 Toringdon Way, Suite 106
Charlotte, NC 28277
USA