

2017 RCRA Permit Application

*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

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PART A APPLICATION

Revised September 3, 2004

Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch

EPD USE ONLY
RECEIPT DATE:

HANDLER INFORMATION

EPA ID NUMBER: GAD004065520

FACILITY NAME: Hercules LLC / Pinova, Inc.

Facility Location Address: 2801 Cook Street

City: Brunswick State: GA Zip: 31520 County: Glynn

Land Type: P Facility Existence Date (mmddyyyy): 03/01/1911

Facility Latitude (ddmmss): 31° 9' 57" N Longitude (ddmmss): 81° 28' 15" W

Facility Mailing Address: P.O. Box 1517

City: Brunswick State: GA Zip: 31521

Hercules LLC

Contact: Last Name: Hassett First Name: Timothy

Title: Remediation Project Manager Contact Telephone: 302-995-3456 Mailing location/other address?

Contact Address: Ashland Research Center, 500 Hercules Road

City: Wilmington State: DE Zip: 19808-1599

OPERATOR INFORMATION

Name of Operator: Hercules LLC

Operator Type: P Telephone: 302-995-3456

Street Address: 500 Hercules Road

City: Wilmington State: DE Zip: 19808-1599

Current/Previous: CP Change Date (mmddyyyy): 8/16/2016

OWNER INFORMATION

Name of Owner: Hercules LLC

Owner Type: P Telephone: 302-995-3456

Street Address: 500 Hercules Road

City: Wilmington State: DE Zip: 19808-1599

Current/Previous: CO Change Date (mmddyyyy): 8/16/2016

Pinova, Inc.

Contact: Last Name: Crews First Name: Michael

Title: Environmental Manager Contact Telephone: 912-602-6492 Mailing location/other address?

Contact Address: 2801 Cook Street

City: Brunswick State: GA Zip: 31520

OPERATOR INFORMATION

Name of Owner: Pinova, Inc.

Operator Type: P Telephone: 912-265-3550

Street Address: 2801 Cook Street

City: Brunswick State: GA Zip: 31520

Current/Previous: CP Change Date (mmddyyyy): 1/28/2010

OWNER INFORMATION

Name of Owner: Pinova, Inc.

Owner Type: P Telephone: 912-265-3550

Street Address: 2801 Cook Street

City: Brunswick State: GA Zip: 31520

Current/Previous: CO Change Date (mmddyyyy): 1/28/2010

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:

	Process Total			
<u>Process Code:</u>	<u>Amount:</u>	<u>UOM:</u>	<u>Process Units:</u>	<u>Description:</u>
N/A	N/A	N/A	N/A	N/A

WASTE INFORMATION – GENERATION ONLY:

Waste Stream Number and General Description	Annual Quantity/UOM	Annual Waste Amount (Short Tons)	Handling Description/Process Codes	Hazardous Waste Codes
1. Waste solvent (lab)	30,000 J	15	N/A – Generation only	D001, F003
2. Waste paint/paint thinner	700 J	0.35	N/A – Generation only	D001
3. Toxaphene-impacted soil and media	50 Y ¹	12.5	N/A – Generation only	D015, P123
4. Trimethyl chlorosilane on carbon (ventsorb) (terpene resins)	800 J	0.40	N/A – Generation only	D003
5. Other flammable waste materials, pads, filters, rags, fuels, pine oils and solvents	100,000 J (MIBK tankers ship)	50	N/A – Generation only	D001, F003, F005
	55,000 J (waste solvent sludge, pads, etc.)	27.5		
6. Contaminated aluminum chloride	500 J	0.25	N/A – Generation only	D003
7. Contaminated groundwater monitoring fluids	300 G ²	1.25	N/A – Generation only	D018, D021
8. Waste filters	50,000 J	25	N/A – Generation only	D002
9. Mercury thermometers and other contaminated debris	20 J (Hg Thermometers)	0.01	N/A – Generation only	D009
	800 J (Other D009 Debris / COD Vials)	0.40		
10. Non-Aqueous Phase Liquids - AOC-1	500 G ³	1.79	N/A – Generation only	D001

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.



 Signature

John Hoffman, Remediation Group Manager

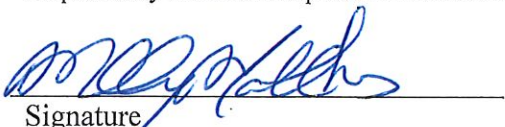
 Typed name and title (Hercules LLC)

2/27/18

 Date

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.



 Signature

Molly Matthews, Vice President of Operations

 Typed name and title (Pinova, Inc.)

26Feb2018

 Date

Hercules LLC/Pinova Inc.
2801 Cook Street
Brunswick GA 31520
GAD001065520

Prior Owner/Operator Information

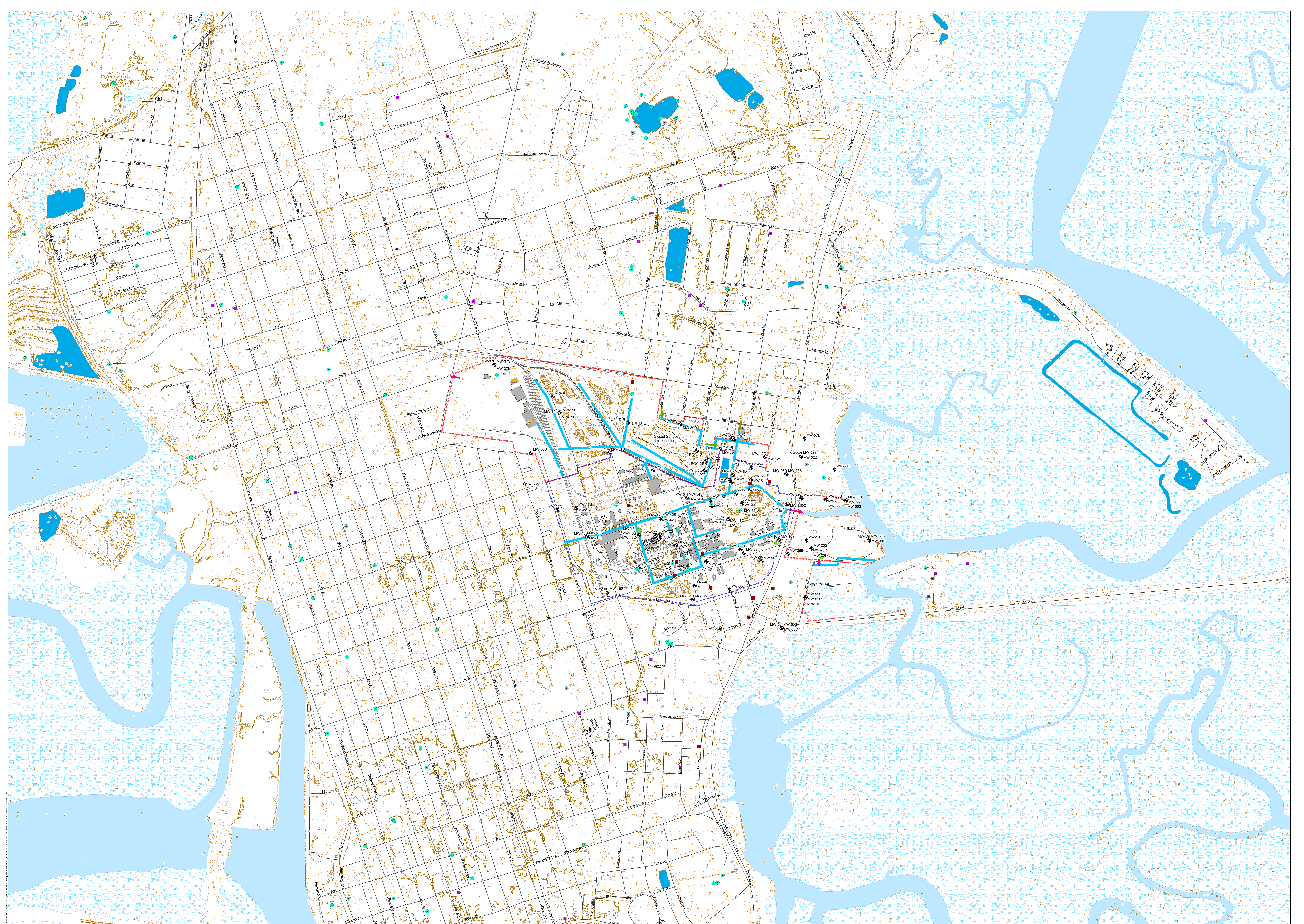
Contact: Last Name: Hassett First Name: Timothy
Title: Remediation Project Manager Contact Telephone: 302-995-3456 Mailing location/other address?
Contact Address: Ashland Research Center, 500 Hercules Road
City: Wilmington State: DE Zip: 19808-1599

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



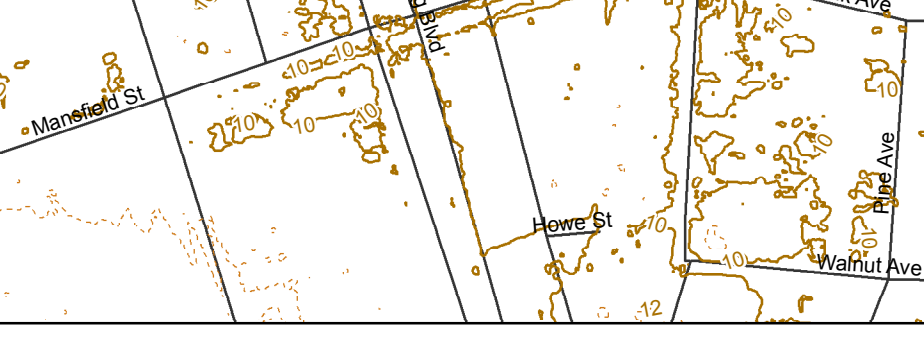
PART A APPLICATION
 TOPOGRAPHIC MAP
 FORMER HERCULES BRUNSWICK FACILITY
 3901 COOK STREET
 BRUNSWICK, GWINN COUNTY, GEORGIA

Legend
 Commercial Lots (Red square)
 Residential Lots (Purple square)
 SSSS Lots (Blue circle)
 Sewerage Lots (Green circle)
 Catching Wells (Black circle)
 Contour Line (DR Interval) (Dashed line)
 Indicator Contour Line (10' Interval) (Dotted line)

Roads (Black line)
 Discharge Structure (Blue line with T)
 Water Structure (Blue line with T)
 Ditches and Intersecting Stream (Blue line with T)
 Escalator Accumulation Area (Green shaded area)
 Central Accumulation Area (Orange shaded area)

Potential Leak/Pond (Blue shaded area)
 Stormwater (Blue shaded area)
 Closed Surface Impoundments (Blue shaded area)
 Private Property (Red dashed line)
 Wetland Property (Purple dashed line)

Sources:
 National Hydrological Database
 SAGIS
 Gwin County GIS
 FEMA
 NOAA



PROJECT NO: 10000001
 DATE: 04/11/2017
 REVISION: 01
 DRAWN BY: CH
 CHECKED BY: CH
 PROJECT SCALE: 1" = 400' HOR
 MAP SCALE: 1" = 400' HOR
 antea group

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:

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Ashland - Research Center
500 Hercules Road
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