

Appendix A

Part A Application and Corresponding Figures

INSTRUCTIONS FOR GEORGIA PART A APPLICATION

This is Part A, the first part of an application for a hazardous waste permit for a Georgia facility to perform treatment, storage, or disposal of hazardous waste; post-closure care at a closed regulated unit; or RCRA corrective action. If you have questions not addressed by these instructions, or if you are a new or proposed facility preparing its initial application, please contact the Land Protection Branch at 404-656-2833 or 404-656-7802 (also refer to EPA's Part A guidance website:

<https://www.epa.gov/hwpermitting/resource-conservation-and-recovery-act-hazardous-waste-part-permit-application-form>).

Please provide answers to all questions included on the form; if a question does not apply, please indicate with "N/A" or other appropriate response. The form may not be filed electronically – an original document with an original signature is required. Unless you have been specifically instructed otherwise, please return the completed application to:

Chuck Mueller, Chief
Land Protection Branch
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive, SE, Suite 1054
Atlanta, Georgia 30334

Line-By-Line Instructions For Completing The Application:

EPA ID Number: Please copy carefully – there must be twelve characters. The first two must be the letters GA, which is the postal code for Georgia. If you do not have an EPA ID Number, please contact the Land Protection Branch for instructions.

- 1) Facility Name: Include "Inc.," "Chemical Division," etc., as appropriate, including all foreign-language punctuation.
- 2) Reason for Submittal: Check the appropriate category based on the type of submittal.
- 3) Facility Existence Date: Enter the appropriate date that hazardous waste operations at the facility commenced, construction for the facility commenced, or the date operation is expected to begin.
- 4) Facility Status: Identify whether the facility is an operating treatment, storage or disposal facility; post-closure/corrective action facility; and/or HSWA corrective action facility.
- 5) Facility Location Address: The physical location of the facility, using the official county Emergency Management Agency address for your location. Be descriptive – state, for example, "East end of Example Road" not "near town," if no street address is available. County Road numbers are acceptable. For facility Latitude and Longitude, use the best information available, from a site survey if possible, from Global Positioning System data, or from interpolation of latitude and longitude from USGS topographic maps. Use those values which correspond to the center of the permitted unit; if more than one exists, choose one and note which unit is used as the center. If you select "Other" for land type, a narrative explanation must be included in the Comments section.

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6) Facility Mailing Address: Include the mailing address if different from the facility location address.

7&8) Facility Permit Contact and Contact Mailing Address: The facility plant manager or environmental manager, as appropriate. Contact need not be the same as facility emergency coordinator.

9) A) Name, Address, Etc., of Facility's Legal Owner: Legal name(s), address(es), etc. of the person(s), firm(s), public organization(s), or other entity(ies) that own(s) the facility; usually the parent corporate name(s). For Department of Defense or Coast Guard facilities, the base commander is the owner and may be identified by title, such as "Commanding Officer."

B) Name of Facility's Legal Operator: Legal name(s) of the person(s), firm(s), public organization(s), or other entity(ies) that operate(s) the facility; usually the corporate name(s) at the facility. For Department of Defense or Coast Guard facilities, the base commander is the operator and may be identified by title, such as "Commanding Officer."

10) NAICS Code Information: Choose one North American Industry Classification System (NAICS) code as primary, and provide its narrative description. Add all secondary codes as appropriate. (Ref. <https://www.census.gov/eos/www/naics>)

11) Nature of Business/Brief Description of Business at Facility: Provide a short narrative outlining the nature of the primary business at the facility. For example, a paper mill might provide "Production of linerboard and corrugated cardboard by the Kraft process; direct printing of customer packaging." It is not necessary to include the permitted hazardous waste activity unless you are a commercial or captive off-site handler of hazardous waste.

12) Other Environmental Permits: Permit Type, Number and Description: Enter all existing permits issued to the facility. Continue in the Comments section of the application, as necessary. Choices for Permit Type are:

S – State, including Georgia Hazardous Waste Facility Permits

N – NPDES (whether Federal or State issues)

P – Federal Air Quality Permits

R – Federal RCRA

U – Underground Injection Control

F – EPA 404 Dredge and Fill

D – Department of Energy, including radioactive materials or source licenses

T – Federal DOT, including transporter licenses

13) Process Information: Refer to EPA Part A internet guidance document Item #6.

14) Description of Hazardous Wastes: Refer to EPA Part A internet guidance document Item #7.

15) Clean Closed Hazardous Waste Management Units: Please complete the table for all hazardous waste units (i.e. regulated units) **not** currently subject to an operating, post-closure care or corrective action only permit.

16-18) Topographic Map, Scale Drawing, and Photographs: See Part A Application Form for more information.

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- 19) List of Affected Governments: Provide a list of contact names and addresses for each county in which the facility is located, each city government located wholly or partially within that county, and the government of each county and city having territorial boundaries within two miles of the hazardous waste facility. Contact persons should be the chair of each county commission and the mayor or city manager for each city. Include in the list a notation of the municipal fire district responsible for the facility, even if the facility has its own standalone fire department.
- 20) Comments: Use for supplemental facility information, as applicable.
- 21) Certification: Certification must be made in accordance with 40 CFR 270.11, by a corporate officer, owner, or other such person. For Department of Defense or Coast Guard facilities, the base commander. If there is more than one owner or operator, each must provide certification.

HAZARDOUS WASTE PERMIT PART A FORM

EPA ID Number

G	A	D	9	8	1	2	3	5	2	9	4
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1. Facility Name

Union Carbide Corporation - Woodbine Property

2. Reason for Submittal

☐ First-Time Applicant

☐ Modification (Check one)

☐ Class 1 not requiring approval

☐ Class 1 requiring approval

☐ Class 2

☐ Class 3

☒ Renewal

3. Facility Existence Date (mm/dd/yyyy)

0	1	/	0	1	/	1	9	6	3
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4. Facility Status (Check all that apply)

☐ Operating TSD

☒ Post-Closure

☒ HSWA Corrective Action

5. Facility Location Address

Street Address 5954 Union Carbide Road			
City Woodbine	County Camden	State GA	Zip Code 31569
Latitude 30.95200		Longitude -81.54000	
Land Type:			
<input checked="" type="radio"/> Private	<input type="radio"/> Municipal	<input type="radio"/> County	<input type="radio"/> State
<input type="radio"/> Federal	<input type="radio"/> Other		

6. Facility Mailing Address

☐ Same as Location Address

Street Address 2301 Brazosport Blvd B-122		
City Freeport	State TX	Zip Code 77541

7. Facility Permit Contact

Full Name Meredith Harris		Title Remediation Leader	
Phone 936-548-9341	Fax	Email mharris8@dow.com	

8. Facility Permit Contact Mailing Address

☐ Same as Location Address

Street Address 2301 Brazosport Blvd B-122		
City Freeport	State TX	Zip Code 77541

9. Legal Owner and Operator of the Facility

Does the Facility have multiple owners and/or operators? If yes, please use Attachment 1.

☐ Yes ☒ No

A. Name of Facility's Legal Owner

☐ Same as Location Address

Full Name Union Carbide Corporation		Date Became Owner 0 1 / 0 1 / 1 9 7 6	
Are there any previous owners of this Facility? If yes, please list in an attachment.		<input type="radio"/> Yes <input checked="" type="radio"/> No	
Owner Type <input checked="" type="radio"/> Private <input type="radio"/> Municipal <input type="radio"/> County <input type="radio"/> State <input type="radio"/> Federal <input type="radio"/> Other			
Street Address 2301 Brazosport Blvd B-122			
City Freeport			
State TX	Country US	Zip Code 77541	
Phone 936-548-9341	Fax	Email mharris8@dow.com	

B. Name of Facility's Legal Operator

☒ Same as Facility's Legal Owner

Full Name Union Carbide Corporation		Date Became Operator 0 1 / 0 1 / 1 9 7 6	
Are there any previous operators of this Facility? If yes, please list in an attachment.		<input type="radio"/> Yes <input checked="" type="radio"/> No	
Operator Type <input checked="" type="radio"/> Private <input type="radio"/> Municipal <input type="radio"/> County <input type="radio"/> State <input type="radio"/> Federal <input type="radio"/> Other			
Street Address 2301 Brazosport Blvd B-122			
City Freeport			
State TX	Country US	Zip Code 77541	
Phone 936-548-9341	Fax	Email mharris8@dow.com	

10. North American Industry Classification System (NAICS) Code(s) for the Facility (at least 5-digit codes)

A. (Primary) 325311	C.
B. 325199	D.

11. Nature of Business

The Union Carbide Corporation (UCC) Woodbine Facility (facility) has no active manufacturing capability. The facility no longer generates, treats, stores, or disposes of hazardous wastes. Industrial use of the overall property began with Thiokol Corporation (Thiokol) in 1963. Thiokol, which operated the facility until 1976, manufactured and tested solid rocket motors, illuminating ordnance devices, riot control agents (tear gas), and assorted chemicals. Before UCC's acquisition of the facility, Thiokol manufactured the pesticide aldicarb (trade name TEMIK) for UCC at the facility from 1976 to 1986. In December 1986, UCC sold the manufacturing plant and some adjacent land to Rhone Poulenc, Inc., which was later renamed Aventis CropScience (Aventis). In 2001, Bayer bought Aventis and operated the plant. Operations at the Bayer plant have ceased, and several structures previously associated with operations have been demolished. Bayer sold the property in 2022. The manufacturing and production operations were located on the property formerly owned by Bayer and are not on the current UCC facility subject to this permit.

Currently, no Resource Conservation and Recovery Act-permitted units are operating at the facility. Nine solid waste management units (SWMUs) have been identified at the facility, six of which have been closed with No Further Action status. The remaining 3 consist of the closed landfill (SWMU 1) that is in post-closure care and SWMUs 8 and 9. A Corrective Action Plan (CAP) addressing munitions and explosives of concern (MEC) for SWMUs 8 and 9 is included in the permit renewal application submitted to GA EPD for review. Buried drums were identified within SWMU 8 during investigation and removal operations for potential MEC in 2020. Investigations completed in 2021 and 2022 indicated that 2-chlorobenzalmononitrile (CS), CS degradation products, and polychlorinated biphenyls (PCBs) are present in soil. A PCB Cleanup Plan for the Drum Removal Area was submitted to EPA on November 29, 2023 and approved by EPA on December 22, 2023. A CS CAP is included in the permit renewal application submitted to GA EPD for review. The PCB Cleanup Plan and CS CAP propose removal and offsite disposal of PCB and CS-impacted soil. Also located within SWMU 8 is the former Rocket Test Pit (RTP) which was constructed circa 1964 to facilitate the testing of rocket motors. Based on investigations at the former RTP, PCBs are present in water that has accumulated within the former RTP at levels above the maximum contaminant level for drinking water listed at 40 CFR 141.61(c)(15). However, PCBs are not present in the surrounding soil or groundwater. A PCB Cleanup Plan was submitted to EPA and approved August 3, 2023.

12. Other Environmental Permits

A. Permit Type		B. Permit Number														C. Description	
S		H	W	-	0	6	3	D								Georgia Hazardous Waste Facility Permit	
U		G	A	W	0	0	0	7	3	0						Underground Injection Control Well Operating Permit (for Corrective Action Program), expires April 30, 2029	
S		7	7	0												Georgia Coastal Marshlands Protection Act Permit, expires April 17, 2025	

13. Process Information

Line No.		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	D	8	0	314	A	1	Closed Landfill

14. Description of Hazardous Wastes

Line No.		A. EPA Hazardous Waste Code				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes											
								(1) Process Codes								(2) Process Description (if code is not entered in 14.D1)			
																			N/A

15. Clean Closed Hazardous Waste Management Units (Do not include current Post-Closure Units)

Unit Name				Dates of Operation			Date of Clean Closure Certification, if applicable	Date of Clean Closure Equivalency Demonstration, if applicable
N/A					to			
					to			
					to			
					to			

16. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the entire facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids under- ground. Include all springs, rivers, and other surface water bodies in this map area. Include drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. USGS 7.5-minute series topographic or orthophotographic maps are available for all areas of the state.

17. Facility Drawing

All existing facilities must include a scale drawing of the facility showing the location of all past, present, and proposed treatment, storage, and disposal areas, including but not limited to solid waste management units and areas of concern.

18. Photographs

All existing facilities must include dated photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. Use the process codes listed in item 14 to indicate the location of all storage, treatment, and disposal areas.

19. List of Affected Governments

Full Name Trevor Readdick		Title District 3 Commissioner Camden County
Street Address 200 East 4th Street P.O. Box 99		
City Woodbine	State GA	Zip Code 31569

Full Name Kizzi Knight		Title Mayor of Woodbine
Street Address 310 Bedell Ave P.O. Box 26		
City Woodbine	State GA	Zip Code 31569

Full Name John F. Morrissey		Title Mayor of St. Marys
Street Address 418 Osborne Street		
City St. Marys	State GA	Zip Code 31558

Full Name C. Grayson Day Jr.		Title Mayor of Kingsland
Street Address 107 South Lee Street P.O. Box 250		
City Kingsland	State GA	Zip Code 31548

Full Name Camden County Fire Rescue		Title Fire Station 16
Street Address 7261 Harrietts Bluff Road		
City Woodbine	State GA	Zip Code 31569

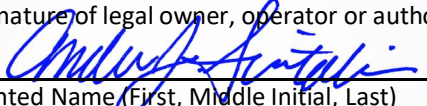
Full Name		Title
Street Address		
City	State	Zip Code

20. Comments (include item number for each comment)

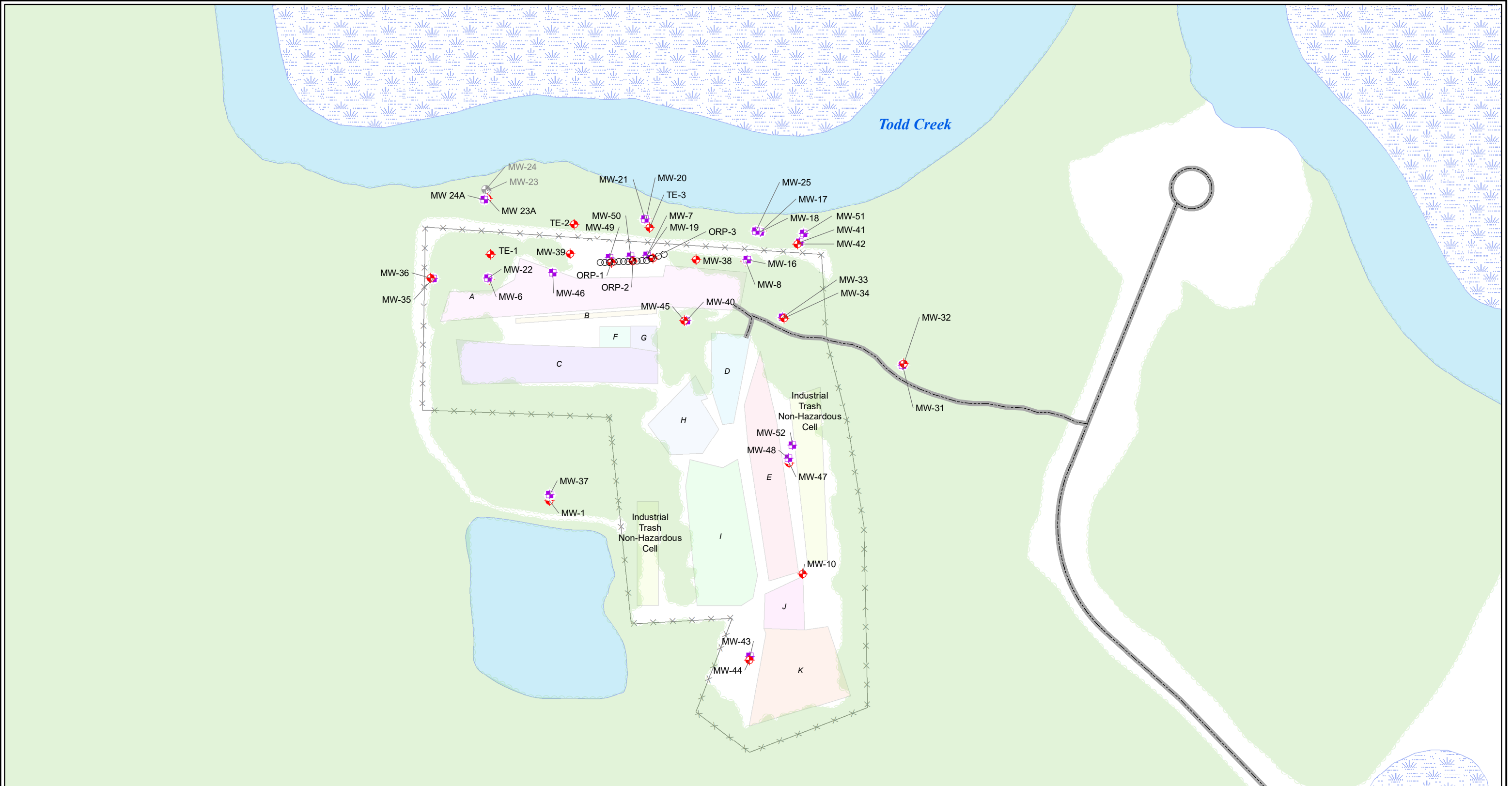
Section 14.D(2) has "N/A" entered because the landfill is closed and no longer accepts waste. No additional waste will be placed in the landfill.

Section 15 has "N/A" entered because the Union Carbide Corporation - Woodbine Facility has no Closed Hazardous Waste Management Units that are not subject to post-closure care.

21. 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 fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40CFR 270.10(b) and 270.11).**

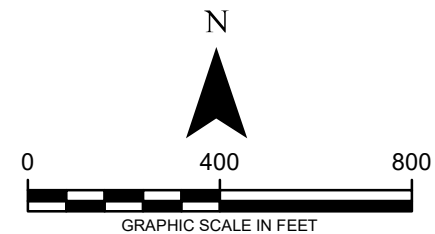
Signature of legal owner, operator or authorized representative 	Date (mm/dd/yyyy) 6/19/24
Printed Name (First, Middle Initial, Last) Andrew J. Switalski	Title VP, General Counsel, Corporate Secretary
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title





- Legend**
- Shallow Monitoring Well
 - Deep Monitoring Well
 - Oxygen Diffusion Well
 - Abandoned Monitoring Well
 - Road
 - Treeline
 - Water
 - Swamp/Marsh
 - Fence
 - Cell A
 - Cell B
 - Cell C
 - Cell D
 - Cell E
 - Cell F
 - Cell G
 - Cell H
 - Cell I
 - Cell J
 - Cell K
 - Industrial Trash Non-Hazardous Cell

Note:
RCRA = Resource Conservation and Recovery Act

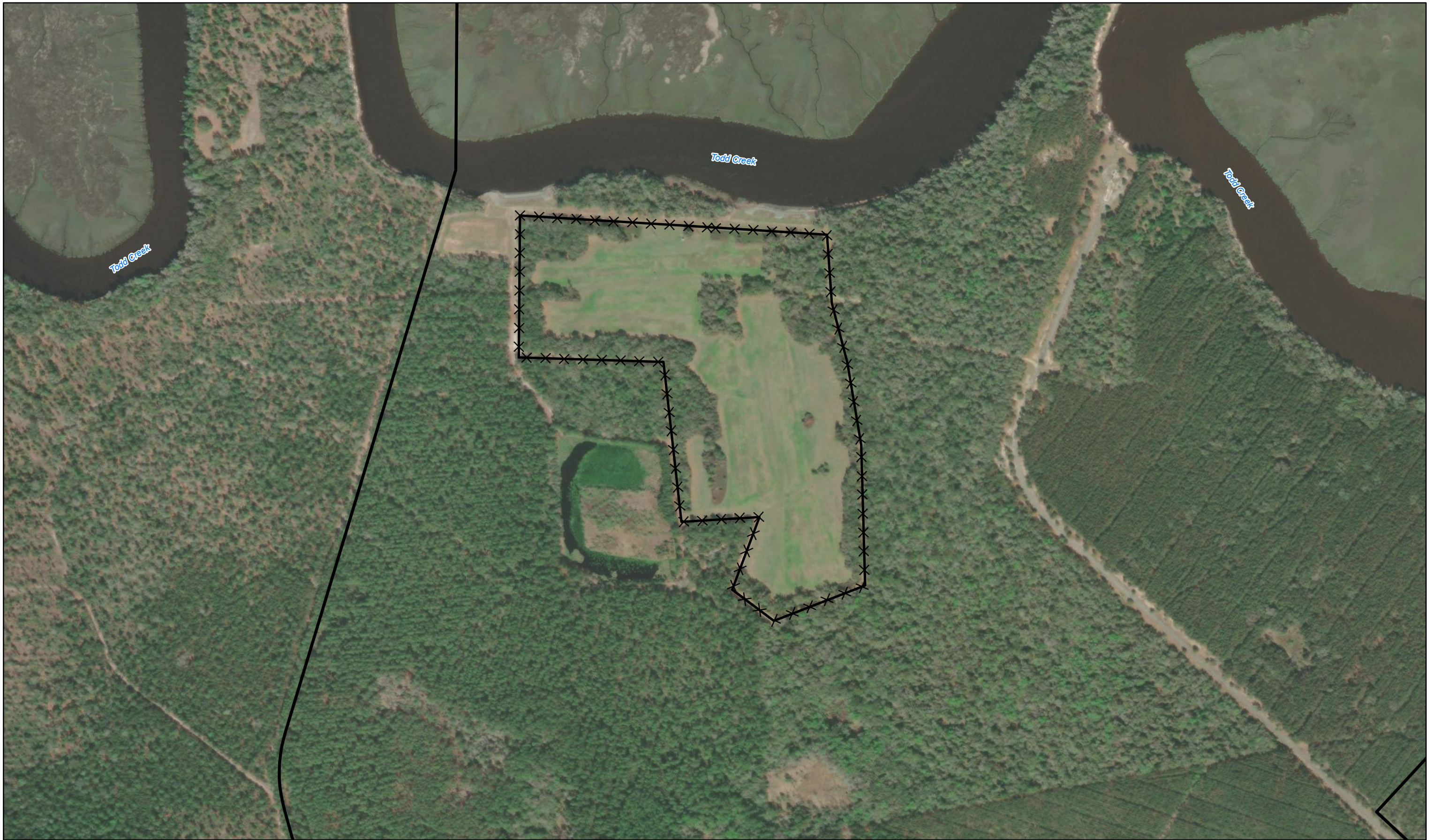




Union Carbide Corporation
Woodbine, Georgia

WELL LOCATION MAP RCRA LANDFILL

ARCADIS

FIGURE
A.2



LEGEND
 Closed Landfill
 Property Boundary

Notes:
 1. ESRI Aerial from ArcGIS Online, Dated 3/5/2023

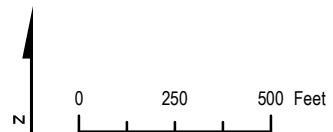


Figure A.3. Aerial Image of Landfill
 Union Carbide Corporation
 UCC Woodbine, Camden County, Georgia