

**FACT SHEET**  
**HERCULES LLC/PINOVA INCORPORATED**  
**BRUNSWICK, GEORGIA**

A draft permit has been prepared to modify Hercules LLC/ Pinova, Inc.'s Hazardous Waste Facility Permit HW-052(D&S)-2. This fact sheet has been prepared in accordance with Section 391-3-11-.11(5)(h) (40 CFR Part 124) of Georgia's Rules for Hazardous Waste Management in order to briefly advise the public of the principal facts and the significant factual, legal, methodological and policy questions considered in preparing the draft permit.

**I. PERMIT PROCESS**

The purpose of the permitting process is to afford the Environmental Protection Division (EPD), interested citizens and other governmental agencies the opportunity to evaluate the ability of Hercules LLC/Pinova, Inc. (the Co-Permittees) to comply with the applicable hazardous waste management requirements promulgated under the Georgia Hazardous Waste Management Act. The permit conditions are set forth in one concise document which describes all the applicable requirements with which the Permittees must comply for the permit's duration.

**II. PERMIT STRUCTURE**

The permit is divided into five parts. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I specifies the general permit conditions, which are applicable to all hazardous waste management facilities. Section II specifies the conditions for the hazardous waste central accumulation area. Section III specifies the conditions for post-closure care for the former toxaphene surface impoundments. Section IV specifies a program for ground water monitoring for the remediation of any contamination resulting from the operation of the former toxaphene surface impoundments. Section V specifies conditions of corrective action for solid waste management units and areas of concern from all releases of hazardous wastes or constituents to the environment, which may have occurred but are not related to the units already addressed.

**III. FACILITY DESCRIPTION**

Hercules, LLC/Pinova, Inc. is located at 2801 Cook Street in Brunswick, Glynn County, and has been in operation since 1911. During that time, the facility produced various commercial products including wood rosin and specialty chemicals such as toxaphene pesticides, carboxyl methyl cellulose (a water soluble polymer), DIB (di-isopropyl benzene) and Kymene (wet-strength resin). Currently, the facility produces a variety of wood resin products and terpene oils. These products are used in a wide variety of products including soft drinks, chewing gum, adhesives, and building supplies.

Between 1948 and 1980, the facility produced a pesticide known as toxaphene at a production area near the center of the facility. The five former toxaphene surface impoundments, covering about eight acres on the north side of the facility, were used between 1971 and 1980 for the equalization and settling of wastewater from the toxaphene manufacturing processes. Sludge settled to the bottom of the impoundments, while the water was discharged to the facility outfall. Surface water runoff from the toxaphene manufacturing area was also directed to the impoundments. In 1984, all remaining sludge and contaminated soil in the impoundments were removed down to the groundwater table and the area was backfilled with clean soil. The units became subject to post-

closure care requirements when EPA enforced more stringent closure standards in 1987 pursuant to the Hazardous and Solid Waste Amendments of 1984.

The facility was issued a hazardous waste permit HW-052 (S) by EPD in December 31, 1987, for storage of 56,320 gallons of hazardous waste in containers. In 1995, the permit was modified to include post-closure care activities with respect to the impoundments and assessment of contamination and corrective action. In 2010, Hercules sold the specialty chemical manufacturing plant to Pinova, Inc. and the permit was updated to add Pinova, Inc. as a Permittee to HW-052(D&S). The permit was renewed on November 2, 2020. Upon the renewal of the permit, Hercules LLC/Pinova Inc. is no longer allowed to store hazardous waste onsite for more than 90 days. The proposed modification of the permit will incorporate the Corrective Action Plan, dated August 2022, into the permit.

THIS PERMIT DOES NOT AUTHORIZE ANY ADDITIONAL DISPOSAL OF HAZARDOUS WASTE AT THE FACILITY.

#### IV. PERMIT CONDITIONS

The following is a list of the major permit conditions and the authority for each condition. Regulatory citations are for the 40 CFR section as referenced in Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management.

##### **Section I - General Permit Conditions**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Scope and Effect of Permit	§270.4 §270.41 §270.42 §270.43	I.A
Management Requirements	§270.30	I.B
Monitoring and Reporting	§270.30(j) §270.31 §270.11	I.C
Responsibilities	§270.30 §270.40	I.D
Definitions		I.E

##### **Section II – Hazardous Waste Central Accumulation Area**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
General		II.A

Conditions Related to the Central Accumulation Area	§264 Subpart G §264 Subpart H §264.178	II.B
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**Section III – Post-Closure Care For Closed Surface Impoundments**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Unit Identification		III.A
Waste Identification		III.B
Monitoring and Inspection	§264.15 §264.310	III.C
Post-Closure Care Period	§264.117 §264.120	III.D
Conditions Related to the Closed Surface Impoundments	§264 Subpart G §264 Subpart H	III.E

**Section IV – Groundwater Monitoring**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Monitoring Well Location and Construction	§264.95 §264.97 §264.100	IV.A
Monitoring Program	§264.95 §264.97 §264.100	IV.B
Sampling and Analysis Procedures	§264.97	IV.C
Reporting, Recordkeeping And Response	§264.73(b)(6) §264.100(g)	IV.D

**Section V – Post Closure Care and Corrective Action for Solid Waste Management Units and  
Areas of Concern**

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Applicability	§264.101	V.A
Notification and Assessment	§264.101	V.B

## Requirements for Newly Identified SWMUs and AOCs

Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs and AOCs	§264.101	V.C
Verification Investigation	§264.101	V.D
Interim Measures		V.E
RCRA Facility Investigation	§264.101	V.F
Corrective Action for SWMUs and/or AOCs	§264.101	V.G
Post Closure Care Corrective Action Program for Closed Surface Impoundments	§264.101	V.H.
Groundwater Protection Standard	§264.92 §264.93 §264.94	V.I
Permit Modification	§270.41 §270.42	V.J
Schedule of Compliance	§264.101	V.K

**V. PROCEDURES FOR REACHING A FINAL DECISION**

The issuance of a modified hazardous waste permit to Hercules LLC/Pinova, Inc. will be administered by EPD. EPD has rules which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste and facilities that require post-closure care and corrective action.

The State of Georgia received final authorization for the 1984 amendments to the Resource Conservation and Recovery Act (RCRA), as amended, on September 18, 1986. Therefore, upon issuance, this permit will constitute a full RCRA permit as required by the Georgia Hazardous Waste Management Act and RCRA.

Georgia's Rules for Hazardous Waste Management Section 391-3-11-.11(4)(a) (40 CFR 124.10) require that the public be given a minimum forty-five (45) day comment period for each draft permit prepared. EPD has extended the comment period to sixty (60) days. The comment period will begin on August 31, 2022 and end on November 1, 2022. Any person interested in commenting on the

draft permit must do so within the sixty (60) day comment period. All comments should be submitted in writing to:

Jim McNamara  
Program Manager  
Hazardous Waste Corrective Action Program  
2 Martin Luther King Jr. Dr., SE  
Suite 1054, Floyd Towers East  
Atlanta, Georgia 30334-9000  
(470) 938-3389

A public hearing will be held on September 29, 2022 at 6:30 pm at the College of Coastal Georgia's Stembler Theater. A public availability session will be held from 3:00 p.m. to 5:00 p.m. followed by a public hearing from 6:30 p.m. to 9:00 p.m. When the Director of EPD finalizes his decision with respect to the permit modification, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit renewal decision. The permit renewal is final thirty (30) days after issuance.