

PERMIT NO. HW-052(D&S)-2
ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

AMENDMENT TO HAZARDOUS WASTE FACILITY PERMIT

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Chapter 391-3-11, (as amended through March 26, 2021), adopted pursuant to that Act, Permit No. HW-052(D&S)-2, issued on November 2, 2020, to

Hercules LLC/Pinova, Inc.

I.D. No. GAD004065520

at the following location: **2801 Cook St., Brunswick, GA 31520**

- (1) Hazardous Waste Central Accumulation Area**
- (2) Post-Closure Care for Closed Surface Impoundments**
- (3) Groundwater Monitoring**
- (4) Post Closure Care and Corrective Action for Solid Waste Management Units and Areas of Concern**

Is hereby amended as follows:

By incorporating the modifications on the attached pages.

Reason for Amendment:

To incorporate the Hercules LLC/Pinova Inc. Corrective Action Plan, dated August 2022.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 31 pages, which pages are a part of this Amendment. This Amendment is hereby made a part of Permit No. HW-052(D&S)-2 and compliance with this Amendment is hereby ordered.



Richard E. Dunn, Director
Environmental Protection Division



ENVIRONMENTAL PROTECTION DIVISION

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Richard E. Dunn, Director
Environmental Protection Division

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Brunswick, Georgia, GAD004065520
Hercules LLC & Pinova, Inc. are hereinafter referred to as the Permittees.

SECTION I. GENERAL PERMIT CONDITIONS

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I.A. Scope and Effect of Permit

1. This permit is intended to be a comprehensive document that addresses all hazardous waste management activities currently occurring as well as those anticipated to occur at the facility. The Permit is divided into 5 Sections covering the following topics:

Section I. - General Permit Conditions
Section II. - Hazardous Waste Central Accumulation Area
Section III. – Post-Closure Care for Closed Surface Impoundments
Section IV. – Groundwater Monitoring
Section V. – Post Closure Care and Corrective Action for Solid Waste Management Units and Areas of Concern

Under this Permit, the Permittees are allowed to treat, store, or dispose of hazardous waste only in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited. The Permittees must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR Parts 260-268, 270, and 124). Where a citation to the Federal Regulations is made in this permit, it refers to the specific regulations adopted by the EPD. Permittees are expressly authorized under this permit to treat, store or dispose of hazardous waste to the extent that those activities are permissible under 40 CFR Parts 260-270 as incorporated in the Georgia Rules for Hazardous Waste Management. By way of example but not limitation, as described in the permit application dated April 2, 2018, and as further amended, the Permittees may temporarily store hazardous waste for 90 days or less in accordance with the hazardous waste generator requirements set forth in 40 CFR Part 262.

2. The issuance of this permit does not convey any property rights in either real or personal property, nor any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringements of Federal, State or local laws or regulations.
3. Compliance with this permit does not constitute a defense to any action brought by the Director under Section 18, Emergency Powers, of the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-75, as amended.

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- (f) Financial Assurance instrument for closure and post-closure care;
 - (g) Inspection logs; and
 - (h) Groundwater sampling and analysis plan.
4. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification as required by applicable rules.
 5. When the Permittees become aware that the Permittees failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittees shall promptly submit corrected facts or information.
 6. The Permittees shall at all times properly operate and maintain all facilities which are installed or used by the Permittees to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of a back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.
 7. The Permittees may not commence treatment, storage or disposal of hazardous waste at any new or substantially modified portion of the facility until the Permittees have submitted to the Director by certified mail, or hand delivery, a letter signed by the Permittees and a registered professional engineer or, when appropriate, registered professional geologist, stating that the facility has been constructed or modified in compliance with the permit where appropriate; and the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or the Director has either waived the inspection of, or within fifteen (15) days has not notified the Permittees of his or her intent to inspect.
 8. The Permittees shall treat, store and dispose of all contaminated groundwater and other contaminated environmental media in accordance with all applicable Federal, State and local laws.
 9. The Permittees must comply with 40 CFR 264.148 whenever necessary.

I.C. Monitoring and Reporting

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- (a) Release of any hazardous waste, hazardous waste constituents, or hazardous constituents that may cause an endangerment to public drinking water supplies;
- (b) Release or discharge of hazardous waste, hazardous waste constituents, or hazardous constituents, or a fire or explosion, which could threaten human health or the environment outside the facility.

The description of the occurrence shall include:

- (i) Name, address and telephone number of the owner or operator;
 - (ii) Name, address and telephone number of the facility;
 - (iii) Date, time and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.
6. Within fifteen (15) days of becoming aware of any reportable incident as in Condition I.C.5. above which may endanger human health or the environment, the Permittees shall submit a written report of the incident covering the following:
- (a) Description of occurrence as in Condition I.C.5. above;
 - (b) Cause of occurrence;
 - (c) Period of occurrence, including exact dates and times;
 - (d) Time occurrence expected to continue (if not already corrected); and
 - (e) Steps taken or planned to reduce, eliminate and prevent recurrence.
7. Reports of noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date.
8. The Permittees shall report instances of non-compliance, other than those described in Conditions I.C.5. and I.C.7., semi-annually on July 15 (covering January 1 - June 30) and January 15 (covering July 1 – December 31). The report shall cover the information requested in Condition I.C.5. for each incident.
9. All reports or other information requested by the Director shall be signed and certified according to the requirements in 40 CFR 270.11.

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emergency permit. Any other non-compliance with this permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification or denial of a permit renewal application.

4. Duty to Reapply. If the Permittees wish to continue an activity regulated by this permit after the expiration date of this permit, the Permittees must submit a complete application for a new permit at least one hundred eighty (180) days before this permit expires. Pursuant to 40 CFR 270.51, this permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittees have submitted a timely and complete application for a new permit and, through no fault of the Permittees, the Director has not issued a new permit on or before the expiration date of this permit.
5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittees in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
6. Duty to Mitigate. The Permittees shall take all reasonable steps to minimize or correct any adverse impact on the environment or human health resulting from non-compliance with this permit.
7. Duty to Provide Information. The Permittees shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with the permit. The Permittees shall also furnish to the Director, upon request, copies of records required to be kept by this permit.
8. Anticipated Non-Compliance. The Permittees shall give advance notice to the Director of any planned changes in the permitted facility or activity, which may result in non-compliance with permit requirements.
9. Electronic Records. Where this permit requires Permittees to maintain records or documents at the facility, the Permittees may satisfy such a requirement through the use of electronic records that are readily accessible at the facility, provided that the Permittees notify EPD in writing of the type of records or documents that the Permittees intend to maintain electronically, the format of those files and the steps that Permittees will take to ensure that the electronic versions of the records or documents reflect the final version such records or documents (as opposed to superseded drafts).

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or disposal operational units (e.g., one or more landfills, surface impoundments, or combination of them). The facility is described in the Permit Application dated April 2, 2018, and as further amended, in the site description in Section B and Figure B-1. For the purposes of implementing corrective action under 40 CFR 264.101, a facility includes all contiguous property under control of the owner or operator seeking a permit under the Georgia Hazardous Waste Management Act.

7. Hazardous Constituents for the purpose of this permit are those substances listed in 40 CFR 261 Appendix VIII and 40 CFR 264 Appendix IX, as revised or superseded.
8. Release for the purposes of this permit includes any unpermitted spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste, hazardous waste constituents or hazardous constituents.
9. Solid Waste Management Unit for the purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment, and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste, hazardous waste constituents or hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous waste.

SECTION II. HAZARDOUS WASTE CENTRAL ACCUMULATION AREA

II.A. General

The conditions in this section apply to the hazardous waste storage building and concrete slab that has been converted to a less than ninety (90) day Hazardous Waste Central Accumulation Area depicted in Figure B-1 and Figure E-1 of the April 2, 2018 permit application, and as further amended.

II.B. Conditions Related to the Central Accumulation Area

1. Hazardous waste may be stored in the Central Accumulation Area for no longer than ninety (90) days.
2. Operation of the Central Accumulation Area is subject to 40 CFR Part 262.

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in Section E of the permit application dated April 2, 2018, and as further amended. The certification must be signed by the Permittees and by a qualified Professional Engineer.

SECTION III. POST-CLOSURE CARE FOR CLOSED SURFACE IMPOUNDMENTS

III.A. Unit Identification

The Permittees shall provide post-closure care for five closed surface impoundments collectively known as the Closed Surface Impoundments. The locations of the closed impoundments are identified on Figure B-1 of the April 2, 2018 permit application, and as further amended.

The surface impoundments were historically used to hold wastewater resulting from the production of toxaphene. Production of toxaphene at the facility ceased in 1980. The impoundments were subsequently "closed by removal" in accordance with applicable standards under 40 CFR Part 265.

III.B. Waste Identification

Hazardous waste D015 was managed in the surface impoundments until closure in 1984. All sludges, wastes and waste residues were removed from the unsaturated zone beneath the impoundments during closure.

III.C. Monitoring and Inspection

The Permittees shall follow the inspection schedule for the closed surface impoundments as discussed in Sections D and E of the permit application dated April 2, 2018, and as further amended.

III.D. Post-Closure Care Period

During the facility's post-closure care/compliance period, the Director may, in accordance with the permit modification procedures in 40 CFR Parts 124 and 270, extend the post-closure period for the Closed Surface Impoundments if he or she finds that the extended period is necessary to protect human health and the environment pursuant to 40 CFR 264.117(a)(2)(ii).

III.E. Conditions Related to the Closed Surface Impoundments

The following activities must be carried out for the closed surface impoundments as prescribed in 40 CFR Part 264, Subparts G and H:

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IV.B. Monitoring Program

The Permittees shall implement the groundwater monitoring program at the facility as required to demonstrate the effectiveness of the groundwater monitoring as specified below:

1. The Permittees shall collect, preserve and analyze all groundwater samples as required by Condition IV.C.
2. The Permittees shall determine groundwater quality in accordance with the monitoring program identified in Table 2.
3. The groundwater monitoring program must include a determination of the groundwater surface elevation from all monitoring wells identified in Condition IV.A. each time groundwater is sampled.
4. The Permittees shall determine the groundwater flow rate and direction in the uppermost aquifer at least semi-annually.
5. For those constituent(s) specified in Table 1 for which background concentrations are listed, the Permittees shall establish background concentrations in accordance with 40 CFR 264.97(g).
6. Pursuant to 40 CFR 264.99(g), the Permittees shall analyze samples from one of the point of compliance wells: POC-1S, POC-2S, or POC-3S, plus any additional wells specified by the Director, for all constituents in Appendix IX of 40 CFR Part 264 at least annually to determine whether additional hazardous constituents are present in the uppermost aquifer and, if so, at what concentrations. The Appendix IX sampling shall be rotated among the point of compliance wells so that each well is sampled every three years. The Appendix IX results must be submitted within 120 days of the sampling. If the Permittees find Appendix IX constituents in the groundwater that are not identified in Table 1, then the Permittees may resample within one (1) month of receiving the results of the initial analysis, repeating the analysis. If the second analysis confirms the presence of new hazardous constituents, then the Permittees must report the concentrations of these additional hazardous constituents to the Director within seven (7) days of receiving the results of the second analysis, and add them to Table 1. Alternately, if the second analysis confirms the presence of the new Appendix IX constituents, the Permittees may, at the time of the next sampling event required by Condition IV.B.2., sample the well that the new Appendix IX constituents were detected in, the nearest down-gradient well, and any additional down-gradient wells to which groundwater may have traveled (based upon the evaluation required by Condition IV.B.4.) for the new Appendix IX constituents. If the new Appendix IX constituents are not identified

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SECTION V. POST CLOSURE CARE AND CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

V.A. Applicability

1. The requirements of this section apply to the determination of the need for and subsequent implementations of corrective action for releases from all solid waste management units (SWMUs), including the Closed Surface Impoundments described in Condition III.A., and areas of concern (AOC) contained within the facility property boundary as required by 40 CFR 264.101(a) and, as required by 40 CFR 264.101(c), those extending beyond the facility property boundary. The requirements of this section apply specifically to the following SWMUs and AOC identified by the RCRA Facility Assessment Report conducted by EPD and dated May 1992:
 - (a) The SWMUs and AOC identified in Appendix A-1, which require further investigations.
 - (b) The SWMUs and AOC identified in Appendix A-2, which require no further investigations at this time.
 - (c) The SWMUs and AOC identified in Appendix A-3, which are regulated units as defined by 40 CFR 264.90(a)(2).
 - (d) The SWMUs and AOC identified in Appendix A-4, which require Corrective Action.
 - (e) Any additional SWMUs or AOC discovered after the date of issuance of this permit due to groundwater monitoring, on-going field investigations, environmental audits and other means.

V.B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

1. Within fifteen (15) days of the Permittees' discovery of any SWMU or AOC under Condition V.A.1.(e), the Permittees shall notify the Director in writing of such discovery.
2. The Director shall notify the Permittees in writing of the discovery of any SWMU or AOC under Conditions V.A.1.(e).
3. Within thirty (30) days of the Permittees' discovery pursuant to Condition V.B.1. or within thirty (30) days of receipt of the Director's notification under Condition V.B.2., the Permittees shall submit to the Director the following information for each SWMU or AOC:

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Director's written approval of the VI Work Plan continuing through submission of the VI Report required by Condition V.D.3.

2. Upon receipt of the Director's written approval of the VI Work Plan, the Permittees shall implement the Work Plan in accordance with the schedule of implementation contained therein.
3. The Permittees shall submit a VI Report in accordance with the schedule of implementation contained within the approved VI Work Plan. The VI Report shall describe all actions taken to verify the presence or absence of releases including all data collected during the VI. The Director shall review the VI Report and notify the Permittees in writing of the need for further investigation and/or corrective action pursuant to Condition V.F. and/or V.G.

V.E. Interim Measures (IM)

1. Upon the Director's concurrence, the Permittees may conduct interim measures to contain, remove or treat contamination resulting from releases from any SWMU or AOC as necessary to protect human health and the environment. Such interim measures may be conducted concurrently with any investigations required by this permit.
2. Within ninety (90) days of the Permittees' determination that interim measures are appropriate and should be implemented, the Permittees shall submit to the Director an Interim Measures (IM) Workplan. The IM Workplan shall describe the measures that will be taken on an interim basis to contain, remove or treat contamination resulting from releases from the SWMU or AOC that is the subject to the IM Workplan. The IM Workplan shall include a schedule of implementation which includes intermediate milestones beginning with the Permittees' receipt of the Director's written approval of the IM Workplan and continuing through submission of the IM Report required by Condition V.E.5.
3. Upon receipt of the Director's written approval of the IM Workplan, the Permittees shall implement the Workplan in accordance with the schedule of implementation contained therein.
4. The Permittees shall provide written notice to the Director as soon as practicable of any planned changes, reductions or additions to the interim measures described in the IM Workplan.
5. The Permittees shall submit an IM Report in accordance with the schedule of implementation contained in the approved IM Workplan. The IM Report shall

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approved RFI Work Plan. The RFI Report shall provide a complete description of the nature and extent of all releases evaluated during the RFI including sources, migration pathways, actual or potential receptors and applicable background concentrations. The RFI Report shall address all releases which extend beyond the facility property boundary unless the Permittees demonstrate to the Director's satisfaction that despite the Permittees' best efforts, the Permittees were unable to obtain permission to undertake actions required by the Work Plan, or such action is not necessary to protect public health and the environment.

6. The Director shall review the RFI Report required under Condition V.F.5. and notify the Permittees in writing of the need for further investigation and/or corrective action as required by Condition V.G. and 40 CFR 264.101(a) and 40 CFR 264.101(c).
7. Within sixty (60) days of the Permittees' receipt of the Director's written notice for further investigation referenced in Condition V.F.6., the Permittee must address, to the Director's satisfaction, all comments and concerns included in the Director's written notice referenced in Condition V.F.6.

V.G. Corrective Action for SWMUs and /or AOCs

1. The Permittees shall perform corrective action in accordance with the Corrective Action Plan (CAP) dated August 2022. Any changes to the CAP shall be submitted as a request for permit modification in accordance with 40 CFR 270.41 and 40 CFR 270.42. The Permittees are not relieved of all responsibility to clean up a release that has migrated beyond the facility's boundary where offsite access is denied as required under 40 CFR 264.101(c).
2. Because releases to groundwater from the Closed Surface Impoundments have commingled with releases to groundwater from one or more of the SWMUs and AOCs described in Condition V.A.1., upon approval by the Director of the CAP described in Condition V.G.1., the CAP will satisfy the requirements of 40 CFR 264.91 through 264.100 and Sections V.H., V.I. and V.J. of this permit.
3. Within ninety (90) days of the Permittees' receipt of the Director's written notice referenced in Condition V.F.6. that a CAP is required for the SWMU or AOC covered by the notice, the Permittees shall submit a CAP to EPD. The CAP shall provide a description of the corrective measures to be taken with regard to releases from any SWMU and/or AOC identified in Condition V.F.5. as necessary to protect human health and the environment. The CAP shall be submitted as a request for permit modification in accordance with 40 CFR 270.41 and 40 CFR 270.42.

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3. Compliance Period for Closed Surface Impoundments
 - (a) The compliance period under 40 CFR 264.96 shall continue until the end of the post-closure care period established by Condition III.D. and defined in 40 CFR 264.117.
 - (b) The Permittees shall assure that groundwater monitoring and corrective action measures necessary to achieve compliance with 40 CFR 264.100 and the groundwater protection standard are taken during the compliance period.
 - (c) If the Permittees are engaged in a corrective action program at the end of the compliance period as defined in Condition V.H.3.(a) above, the compliance period is extended until corrective action as required under 40 CFR 264.100 has been terminated, as specified in Condition V.H.9.
4. The Permittees are not relieved of all responsibility to clean up a release to groundwater from the Closed Surface Impoundments that has migrated beyond the facility's boundary where off-site access is denied as required under 40 CFR 264.100(e)(2).
5. The corrective action system for the Closed Surface Impoundments must be installed and operated in such a manner as to mitigate the release of any hazardous waste, hazardous constituent(s) or hazardous waste constituent(s) to the environment.
6. The corrective action system for the Closed Surface Impoundments must be installed and operated in a manner so as to preclude further migration of the contaminant plume.
7. The Permittees shall treat, store, and dispose of all contaminated groundwater in accordance with all applicable federal, state and local laws.
8. Compliance with the groundwater protection standard, as defined under Condition V.I. will be based upon groundwater monitoring data obtained under Condition IV.B.2 that indicate that all constituents listed in Table 1 no longer exceed the groundwater protection standard at the point of compliance and throughout the contaminant plume. Comparisons for the purpose of determining compliance shall be made utilizing the statistical procedure described in 40 CFR 264.97(h) and (i).
9. If the groundwater protection standard is not met during the compliance period, the Permittees must continue corrective action for the Closed Surface Impoundments

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2. For any schedule of implementation required by this Section, if the time required to complete any interim activity is more than one (1) year, the schedule shall specify interim dates for the submission of reports of progress towards satisfaction of the interim requirements.
3. All plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for the submittal of any plan or report pursuant to the approved schedule or otherwise required by the permit may be granted by the Director based on the Permittees' demonstration that sufficient justification for the extension exists. Extensions of over thirty (30) days must be requested in writing.
4. Upon approval by the Director, all plans and reports shall be enforceable as Conditions of this Permit. If at any time the Permittees determine that any plan, report or schedule required under this Section no longer satisfies the requirements of this permit or 40 CFR 264.101, the Permittees must submit an amended plan, report or schedule to the Director within thirty (30) days of such determination.
5. If at any time the Director determines that any plan, report or schedule required under this Section no longer satisfies the requirement of this permit or 40 CFR 264.101, the Director will so notify the Permittees in writing and request that an amended plan, report or schedule be submitted within sixty (60) days of such determination.

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Pesticides

alpha BHC	Background*
delta BHC	"
gamma BHC (lindane)	0.004**
toxaphene (technical)	0.005**
toxaphene (TAUC)	0.005**

Inorganics

barium	1.0**
beryllium	Background*
chromium	0.05**
cobalt	0.0077***
copper	Background*
nickel	0.0091***
selenium	0.01**
vanadium	Detection Limit***
zinc	0.0645***

Dioxins/Furans

Hexachlorodibenzofurans (HxCDF), Total	Background*
Hexachlorodibenzo-p-dioxins (HxCDD), Total	"
Pentachlorodibenzofurans (PeCDF), Total	"
Pentachlorodibenzo-p-dioxin (PeCDD), Total	"
Tetrachlorodibenzofuran (TCDF), Total	"
Tetrachlorodibenzodioxin (TCDD), Total	"
2,3,7,8-TCDD	"

Miscellaneous

formaldehyde	Background*
sulfide	Background*

* To be determined according to procedures specified in 40 CFR 264.97

** Concentration limit derived from 40 CFR 264.94 Table 1.

*** Derived from site-specific background data

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UP-1S	Annual	All Table 1 Constituents
MW-2D	Annual	All Table 1 Constituents
MW-41I	Annual	All Table 1 Constituents

* Required Analysis – Constituents listed in Table 1
^Shall be sampled when access allows

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APPENDIX A-2

List of Solid Waste Management Units that require no further action at this time:

<u>SWMU Number</u>	<u>SWMU Name</u>
13	Residual Fuel Tank Area

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APPENDIX A-4

List of Solid Waste Management Units requiring Corrective Action:

SWMU Number	SWMU Name
1	Mill Room Pond
2	Plant Clarifier
3	Former Truck Dumper Area
4	Drum Crushing Unit
5	Former Toxaphene Plant Site
6	Y Tank Farm
7	Vinsol® Bins
8	Y-1, Y-2, Y-3 Tank Farm
9	Chemical Plant
11	Former Equalization Basin
12	Former Tank Car Percolation Pits
14	Stillhouse Railcar Loading Area
15	Old Extractor Bldg & Tank Area
16	Sawdust Pile
17	Former Sand Blasting Area
18	Former Sludge Tank Area
19	Sand Filter Drying Bed and Pads
20	Former Amberlite Treatment System
21	Hard Resins Tank Farm Area
22	Terpene Resins Area
23	Pexite Plant Blowdown Area
24	Toxaphene Stormwater Collection Sump
25	Tank Car Cleaning Area
26	Pexite Building Area
27	Resin Remelt & Drum Storage
28	Intermediate Vinsol® Bin
29	N-Street Ditch, South Ditch, & Small Branch Ditch
30	Non-Hazardous Waste Storage
31	Former Mercury Absorber Area
32	Staybellite Area
33	Tank Truck Liquid Loading Area
34	Product & Wastewater Piping
35	Former Drum Storage Area
36	Former Kymene Production Area and Tank Farm
37	Basin/Impoundments West of Lift Station 17
38	ICM Recovery Well Area
39	Refinery Process Building