

FACT SHEET

Symrise Inc., Colonels Island Site
Brunswick, GA

A draft permit has been prepared for the above-referenced hazardous waste facility. This fact sheet has been prepared in accordance with Section 391-3-11-.11(5)(h) 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 Symrise Inc. (the Permittee) 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 Permittee must comply for the permit's duration.

II. PERMIT STRUCTURE

The permit is divided into four parts. A cover sheet first sets forth the basic legal authority for issuing the permit. Section I then specifies the standard conditions, which are applicable to all hazardous waste management facilities. Section II specifies the conditions for post-closure care. Section III specifies the conditions for corrective action for the remediation of any contamination resulting from the operation of the regulated units. Section IV specifies a program for assessing and remediating all releases of hazardous wastes or constituents to the environment, which may have occurred but are not related to the regulated units already addressed.

III. FACILITY DESCRIPTION

Symrise Inc. is located on the southwest portion of Colonels Island in Brunswick, Glynn County, Georgia at 209 SCM Road and consists of approximately 192 acres, with the active portion consisting of approximately 25 acres. The Facility has been in operation since 1981, and currently processes alpha-pinene into fragrances, compounds and flavors, and is considered a small quantity generator of hazardous waste. The Facility has two open Consent Orders with EPD, EPD-HW-1046 and EPD-HW-1535. EPD HW-1046 was issued in 1993 and required a site-wide investigation of the integrity of the underground wastewater lines, an evaluation of LNAPL recovery via semi-annual groundwater monitoring and reporting. EPD-HW-1535 was issued in 2003 and focuses on monitoring well maintenance. A Consent Decree between EPA and the Facility was executed in 2014 and required the regulatory closure of the Facility Former Wastewater Treatment System that consist of the Aeration Basin, the First Flush Basin, the Process Wet Well, and associated underground lines. Currently, only the Aeration Basin has achieved clean closure and the remaining hazardous waste management units will be addressed in a RCRA post-closure care permit. In addition, the Consent Decree requires the post-closure care permit application to also address facility-wide corrective action.

Issuance of this permit is necessary to ensure that Symrise Inc. continues to comply with the currently applicable requirements in 40 CFR Parts 124, 260 through 266, and 270. This permit addresses post closure care for the HWMUs, corrective action for groundwater contamination, and corrective action for solid waste management units identified on site. **THIS PERMIT DOES NOT AUTHORIZE ANY ADDITIONAL DISPOSAL OF HAZARDOUS WASTE AT THE FACILITY.**

IV. PERMIT CONDITION

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
General Facility Standards	§ Part 264 subparts B, C, D, E, G, H	I.F
Special Conditions	§264.73(b)(9) §268	I.G

Section II - Post Closure Care

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Unit Identification		II.A
Waste Identification		II.B
Monitoring and Inspection	§264.15 §264.310	II.C
Post-Closure	§264.310	II.D

Section III – Groundwater Monitoring and Corrective Action

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Well Location and Construction	§264.95 §264.97 §264.100	III.A
Groundwater Protection	§264.92 §264.93 §264.94	III.B
Compliance Period	§264.96	III.C
Corrective Action Program	§264.100	III.D
Corrective Action Effectiveness Monitoring Program	§264.97 §264.100 §264.101	III.E
Determination of Background Concentrations	§264.97(g)	III.F
Sampling and Analysis Procedures	§264.97	III.G
Reporting, Record Keeping and Response	§264.73(b)(6) §264.100(g)	III.H
Permit Modification	§270.41 §270.42	III.I
Duty of Permittee	§264.92	III.J

Section IV - Corrective Action for Solid Waste Management Units and Areas of Concern

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Corrective Action Applicability	§264.101	IV.A
Notification Requirements for Discovered Releases at SWMUs and AOCs	§264.101	IV.B, IV.C
Verification Investigation	§264.101	IV.D
Interim Measures	§264.101	IV.E
RCRA Facility Investigation	§264.101	IV.F
Corrective Action	§264.101	IV.G

<u>Subject</u>	<u>Regulation</u>	<u>Permit Condition</u>
Schedule of Compliance	§264.101	IV.H
Permit Modification	§270.42	IV.I

V. PROCEDURES FOR REACHING A FINAL DECISION

The issuance of Symrise Inc. Hazardous Waste Facility Permit will be administered by EPD. The Division has rules, which require a permit to be issued for all facilities that treat, store, or dispose of hazardous waste.

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 forty-five (45) day comment period for each draft permit prepared. A posting will be made in the legal section of a major newspaper of general circulation; if posted on a weekend, the comment period will begin on the next business day. Any person interested in commenting on the application or draft permit must do so within the forty-five (45) day comment period (January 6, 2022, to February 23, 2022). A copy of the draft permit will be available at the Brunswick-Glynn County Public Library and the Georgia EPD Land Protection Branch – Hazardous Waste Corrective Action Program and online at <https://epd.georgia.gov/public-announcements>. All comments should be submitted in writing to EPD at 2 Martin Luther King Jr. Dr., S.E., Suite 1054 East Tower, Atlanta, Georgia 30334-9000, Attention: John Sayer, Land Protection Branch.

When the Director of EPD makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The permit is final 30 days after issuance.

Contact person for the Symrise Inc. Draft Hazardous Waste Permit is:

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