

# COMMENTS ON HERCULES, INC. TITLE V AIR PERMIT

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## Highlights of Proposed Permit

- Release of 6 million pounds of toxins a year (3,000 tons)
  - Includes two dozen toxic chemicals
  - Allows unconditional release for as long as four hours
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## Hercules Plant Brunswick, GA

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### Related Toxic Contamination from Hercules in Brunswick

- 009 Superfund site on Parkway near Colonial Mall (toxaphene contaminated landfill)
- Terry Creek Superfund site
- Toxaphene contaminated estuary
- Former toxaphene impoundments with related groundwater contamination
- Neighborhood with toxaphene contaminated yards

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Above based on data from US-EPA, GA-EPD and the Glynn Environmental Coalition

**Southeast Georgia  
Regional Medical Center**



## Comments on Hercules, Inc. Title V Air Permit

*On September 3rd, I joined several dozen concerned citizens in attending a public hearing held by the Environmental Protection Division (EPD) in Brunswick to explain the Clean Air Act permitting process and to receive questions and comments about that process as it applies to the current review of an air quality permit application by Hercules, Incorporated. Hercules operates an aging chemical processing plant located in an area that is shared by numerous residential, commercial, and public land uses, including a public school, a hospital, and many homes of low- and moderate-income families. Enormous amounts of community effort (and public resources) have been invested in identifying, analyzing, and controlling toxic materials generated by Hercules over many decades of its existence, mostly accomplished in the past ten years through the initiatives of the Glynn Environmental Coalition, a grassroots non-profit environmental group, working through the Superfund Program administered by the federal Environmental Protection Agency (EPA). Given the extended period of known risk exposure from past Hercules activities, offensive smell, and various identified respiratory health problems linked to Hercules stack emissions (totaling some six million pounds a year), the public is justifiably concerned about the prospects of this permit being issued. The following material is derived from our written comments submitted to EPD and copied to EPA.*

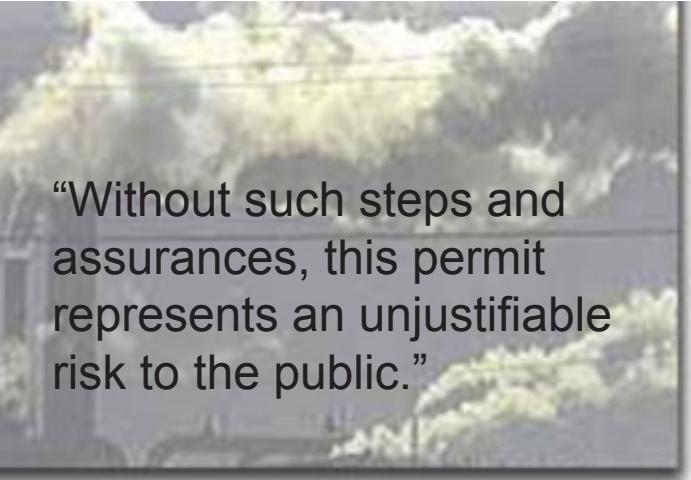
– David Kyler

EPD has not demonstrated that the Title V permit for Hercules would be in the public's interest, or that it would become so if issued. The Center's conclusions were based on our assessment of review procedures as described by EPD, combined with related written materials showing details about technical assessment and human health risk of the two dozen chemicals emitted by Hercules at the Brunswick site.

Neither the information available, nor the technical analysis applied to it, is sufficient to protect the public from the considerable threats presented by these toxic releases. It is also very troubling that EPD would allow 'accidental' chemical releases by Hercules for as long as 4 hours, regardless of the content, risk, or frequency of such events.

Furthermore, EPD presented no evidence that testing for the full range of hazardous constituents and their interactive effects in the ambient atmosphere was done, or that this testing was at frequent enough intervals over a sufficient period and under various weather conditions to ensure reliable assessment.

A case in point of particular concern is the known risk of exposure to both formaldehyde (released in huge quantities by the nearby Georgia Pacific plant) and formic acid,



“Without such steps and assurances, this permit represents an unjustifiable risk to the public.”

6.4 tons of which are emitted annually by Hercules. There are likely to be numerous other examples of dangerously elevated risks from combined exposure within the impact area of the Hercules plant, but EPD provided no credible assurances that these were adequately analyzed.

In the face of such overwhelming challenges and deficiencies, EPD was presented with extensive compelling empirical evidence about major respiratory health problems in the surrounding community. Many residents believe these problems are linked to Hercules air emissions, possibly in combination with other ambient conditions in the vicinity. There was no information offered by EPD suggesting that staff members were familiar with these relevant public health issues, or that such issues had been adequately investigated in conducting the permit review.

It is the Center's position that until EPD can demonstrate both (1) sufficient analysis to ensure that the permit would not “injure people, unreasonably interfere with the enjoyment of life or use of property,” (as specified in the applicable law) and (2) reliable, accountable procedures for monitoring and assessment of all operations under such a permit, no permit should be issued.

In summary, prior to further consideration of this permit EPD should provide the following:

1. An independent evaluation of the impacts of combined chemical exposures from Hercules and other industrial emitters in the area.
2. An independent epidemiological study of respiratory and other health problems of the residents exposed to Hercules emissions.
3. Specifications for mandatory reporting and evaluation of all releases that are not explicitly permitted, regardless of the duration, frequency, or composition of these deviations from permitted conditions.

Without such steps and assurances, this permit represents an unjustifiable risk to the public.