

March 22, 2024

Ms. Jeaneanne Gettle
Acting Administrator, Region 4
United States Environmental Protection Agency
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Mr. Jeff Cown
Director
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive SE
Suite 1252 -- East Tower
Atlanta, GA 30334

*RE: Request to form Regulatory Task force to oversee/regulate the clean-up of the
Hercules/Pinova site in Brunswick, GA*

Dear Acting Director Gettle and Director Cown;

Thank you for your attention to environmental and community protection in Georgia. This letter is submitted to you on behalf of Glynn Environmental Coalition, One Hundred Miles, Environmental Safety Collaboration, Altamaha Riverkeeper, Inc., Environmental Justice Advisory Board, and Community First Planning Commission. Our organizations are based in Brunswick, Georgia, Glynn County. For decades we have collectively worked with community members and elected officials suffering from the legacy contamination resulting from the former Hercules plant and recently closed Pinova plant. We write this letter to share our story and to request assistance, clarity, and stringent oversight in the regulatory process and required reporting related to the closing of the Brunswick Hercules/Pinova plant.¹

For over a century, industrial operations have bolstered our economy and provided jobs for families in Glynn County. These operations also threatened the health of our families, while contaminating the county's surface water, groundwater, and land. When the fire at the Pinova plant occurred in April 2023, all residents feared for their health and safety.² Unfortunately, the emergency response to this disaster was disjointed, and necessary emergency responders and equipment/materials were located far from town. The U.S. Environmental Protection Agency (EPA) On-Scene Coordinator report³ indicates that no concentrations of water or air pollutants exceeded the "site specific action levels." However, the report acknowledges that the agency was not on-site until after the fire was extinguished. Additionally, the report states that there are no acute exposure limits for alpha pinene, the flammable liquid that Pinova reported caused the fire.⁴ As such, the community members continue to question the health implications of the fire.

¹ The Brunswick News: "[End of an era: Pinova plant to close permanently](#)" (June 29, 2023).

² First Coast News: "[Parts of St. Simons Island, Brunswick evacuating around Pinova resin factory fire.](#)" (April 15, 2023).

³ On-Scene Coordinator – [Pinova Facility Fire](#)

⁴ *Ibid.* By the time EPA arrived, the fire was extinguished and there was no visible plume or vapors leaving the fire impacted area." Additionally the report states "Alpha pinene is a flammable liquid, but it does not have an [EPA Acute Exposure Guideline Level](#), which is a specific concentration level of an airborne chemical at which health effects may occur."

In response to health concerns, the Urbana/Perry Park Neighborhood Planning Assembly (NPA) conducted a survey of residents who live in the neighborhood surrounding the Pinova plant. The majority of those responding to the survey indicated they live less than one (1) mile from the Pinova plant. Other respondents live more than five (5) miles from the plant. The results of the survey indicated that over 90% of survey respondents felt they were not adequately informed about any potential health effects caused by the Pinova fire despite receiving communication from local authorities and emergency management agencies during/after the fire from social media, emergency alert on phone, robocall, internet, neighbor, and radio/TV broadcast. Adding to the community's concern of the impact of the April 2023 fire, community members are learning more about legacy pollutants known to be in Brunswick's environment. Through a partnership with several of our organizations, researchers at Emory University Rollins School of Public Health collected and tested 100 blood samples of residents in Brunswick. The aggregate results of the study indicate that Brunswick and Glynn County residents have higher than average levels of Aroclor 1268-related polychlorinated biphenyls (PCBs) and toxaphene, chemicals used or produced by our local industries.⁵

Since May 2023, our community leaders and associations have hosted and attended numerous listening sessions, Town Halls, and meetings designed to hear concerns from residents and to get answers from regulators and Pinova. State regulators, federal regulators, and Pinova representatives have been invited to all events. The most recent presentation was heard during the City of Brunswick Commission meeting held on February 21, 2024.⁶ During each of these sessions/meetings, residents have expressed concerns for health impacts and asked questions regarding next steps for ensuring the community is protected.⁷ Pinova representatives have presented information about implementing the corrective action plan developed when the plant was active and information for how the company proposes to clean up the plant site so that it can be re-used in the future. Additionally, state and federal regulators have attended many of these meetings to answer questions from the public. Mr. Jim McNamara of the Land Protection Branch of the Georgia Environmental Protection Division (GA EPD) has attended many events in person and virtually. However, he has only been willing to answer questions related to the hazardous waste permit and compliance of conditions with their RCRA permit. He would not answer anything he considered "outside of his lane," including questions about activities regarding asbestos removal, regulatory oversight of the plant decommissioning process, or the status of the air and water discharge permits. He gave no contacts within the GA EPD to assist in the community having their questions answered. He only responded to questions regarding how Pinova was complying with the conditions of the RCRA permit and corrective action plan⁸. While we appreciate the regulators' participation, many of our questions remain unanswered.

We continue to have serious concerns about quality control surrounding the Pinova plant decommissioning and clean-up, including what type of monitoring is occurring to ensure nearby residents are not harmed and next steps for remediating the legacy contamination. It is of great concern that no one person or agency appears to be overseeing or comprehensively regulating/reviewing Pinova's activities since the fire occurred, especially considering that Pinova and their parent company DRTA have

⁵ The Current: "[Study shows high exposure to PCBs in Brunswick](#)" (Sept 21, 2023)

⁶ [Brunswick City Commission Meeting Agenda](#) (February 21, 2024)

⁷ First Coast News: "[Glynn County's toxic legacy: Community members call for industry accountability](#)," (May 23, 2023) and The Brunswick News "[Group Upset with Regulators over Pinova Site](#)" (Oct 31, 2023)

⁸ Direct communication with Mr. Jim McNamara, Land Protection Branch, Georgia EPD. Urbana Perry Park NPA meeting - Sept. 26, 2023.

failed to comply with many regulations in the past,⁹ and with decommissioning expected to be complete by the end of 2024.¹⁰

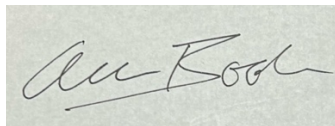
Our community has suffered from industrial pollution from this facility for over 100 years, in essence sanctioning unjust, unhealthy conditions for generations. We know that federal and state governments have the authority to require adequate clean-up of these contaminated sites.

As such, we request that you, as Acting Administrator of Region 4, U.S. EPA and as Director of the GA EPD, convene a task force of regulators to oversee Pinova's continuing decommissioning and clean-up efforts. The task force should include regulators responsible for compliance with air quality rules, asbestos, water quality control, land remediation experts, and local stakeholders to serve as community liaisons.

One of our representatives will follow up with each of you in the next few weeks to set up a meeting to discuss our request in-person or virtually.

Thank you again for your service and for your careful consideration of this letter. Please contact us at any time should you or your staff want to discuss these issues further. We look forward to your response and to working together to keep our community informed, protected, and healthy.

Sincerely,

A handwritten signature in black ink on a light-colored background, reading "Allen Booker".

Commissioner Allen Booker
Environmental Justice Advisory Board
allenbooker@rebuildglynncounty.org

A handwritten signature in blue ink, reading "Megan Desrosiers".

Megan Desrosiers, President and CEO
One Hundred Miles
megan@onehundredmiles.org

⁹ The Current: "[Records show Pinova stumbles in complying with regulations](#)" (April 17, 2023) and "[Rincon factory releases 500 gallons of unidentified material. Residents worry about health effects.](#)" (Oct. 24, 2023).

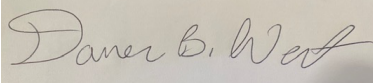
¹⁰ First Coast News: "[Officials hope to decommission Glynn County's Pinova by December 2024](#)" (Updated: December 22, 2023)



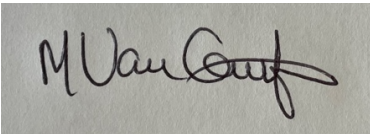
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