



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



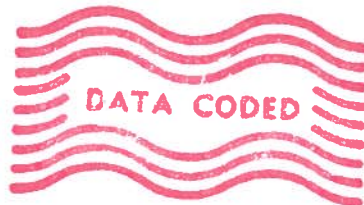
→ TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES, INC. - FORREST COUNTY/0800-00001
DATE: DECEMBER 20, 1982

On the above date, I went to Hercules, Inc.,
in Hattiesburg. I met with Charles Jordan at
the facility. The opacities of both stacks were
less than 5% at the time of my inspection.

If you have any questions, please call me.

DETRICH BROWN

mf



FILE COPY

December 14, 1982

Mr. H. R. Buckley
Hercules, Inc.
P. O. Box 1937
Nattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Operating Permit No. 0800-00001
Nattiesburg, Mississippi

This letter is for the purpose of alerting you to the fact that the referenced permit expires on May 1, 1983. If you wish the permit to be considered for renewal, you will need to file a new application. Application forms are enclosed.

If you have any questions, please advise.

Very truly yours,

Don Watts
South Air Emissions Section

DW:cl
Enclosure



Forrest

Hercules Incorporated
West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
(601) 545-3450

November 19, 1982

RECEIVED

NOV 22 REC'D

**DEPT OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL**

Dwight K. Wylie, PE Chief
Air Quality Division
P. O. Box 10385
Jackson, MS 39209

Dear Dwight,

Work orders have been written to install sampling parts and platforms for stack testing woodwaste boilers 3 and 4.

Although no time has been determined when the work can be best scheduled, we do intend to stack test before our present permit expires.

If you have any questions please contact us.

Very truly yours,

C S Jordan

C. S. Jordan

CSJ:nb

FILE COPY

Forward

November 5, 1982

Mr. Charles Jordan
Hercules Incorporated
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Jordan:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

We have received your letter of October 25, 1982, concerning the woodwaste boilers. It is acceptable to us that you submit this visible emissions data and the recorded data on a monthly basis (by the 15th of the following month) until the expiration of your present permit, at which time we can discuss the requirements for the new permit.

However, we found no mention in your letter of the possible time for stack testing woodwaste boilers 3 and 4. We want to remind you that stack testing of boilers 3 and 4 will be required.

If you have any questions, please contact us.

Very truly yours,

Dwight K. Wylie, P.E., Chief
Air Division

DKW:DW:cl



Hercules Incorporated
West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
(601) 545-3450

October 25, 1982

Dwight K. Wylie, P.E. Chief
Air Quality Division
P. O. Box 10385
Jackson, Mississippi 39209

Dear Dwight:

This letter is in reply to your September 28, 1982, letter addressing our wood boilers and our subsequent phone conversation.

We are now performing visible emission evaluations once a day, Monday through Fridays, as discussed in your item number one. We will report the results at the end of each month.

We are in the process of setting up a procedure to record data as discussed in your item number two. This data will also be reported at the end of each month.

We have a tentative date of October 25, 26, and 27, 1982, set up for stack tests.

In view of the above data reporting we are requesting that this data be generated from now until expiration of our permit to operate on May 1, 1983, at which time we would like to review with the commission the necessity of having both of these items incorporated into our permit to operate.

If I can answer any questions please call me.

Very truly yours,

Charles Jordan
Environmental Coordinator

CJ:bs

RECEIVED
OCT 27 REC'D

DEPT. OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 931-6171



Forrest

MEMORANDUM

TO: DON WATTS
FROM: MARGARET HASE
SUBJECT: HERCULES, INC./FORREST COUNTY
0800-00001
DATE: NOVEMBER 4, 1982

On the above date, I went to Hercules, Inc., in Hattiesburg
for monthly V.E. Evaluation, copies of which are attached.

No problems were noted during my inspection.

If you have any questions, please contact me.

Margaret Hase
MARGARET HASE





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 961-5171



MEMORANDUM

TO: DON WATTS
FROM: MARGARET HASE
SUBJECT: HERCULES, INC. - FORREST COUNTY/0800-00001
DATE: OCTOBER 28, 1982

On the above date, I went to Hercules, Inc., in Hattiesburg. I met with Charles Jordan at the facility. The opacities of both stacks were 5-10% at the time of my inspection.

If you have any questions, please contact me.

Margaret Hase
MARGARET HASE





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 961-5171



MEMORANDUM

TO: File

FROM: Jesse Thompson, Jr.

SUBJECT: Stack Tests Performed
Hercules - Hattiesburg, Mississippi
Facility Number 110-0800-00001

DATE: October 28, 1982

On Monday, October 25th and Tuesday, October 26th, stack tests were performed on Boiler #1 at Hercules. The tests were performed by EML of Jackson. The test personnel consisted of Danny Russell and T. J. Culpepper. Boiler #1 consists of two boilers with a common stack. There were no portholes in the stack, so the test was conducted in the ductwork from each boiler to the stack. Hercules did not have a supply of wood Monday morning, so the test was delayed until the arrival of purchased wood by truck. The sampling began at 12:47 p.m., and was finished at 7:16 p.m. The sampling on the other boiler began on Tuesday, at 10:18 a.m., and was finished at 5:30 p.m. Method 5 was utilized during the sampling and was conducted as outlined in the Federal Register. I recommend that the test results be accepted.

JTjr:hdb



FORREST

ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 • 224-B Highway 51 North
Ridgeland, Mississippi 39157

(601) 856-3092

October 22, 1982

RECEIVED
OCT 22 REC'D

Mr. Don Watts
Mississippi Bureau of Pollution Control
Post Office Box 10385
Jackson, Mississippi 39209

DEPT. OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL

Re: Hercules
Hattiesburg, Mississippi

Dear Mr. Watts:

This letter is to propose test procedures for required emissions tests of Hercules' wood waste boilers.

Hercules has four identical wood fired boilers and two masonry stacks, each serving two of the boilers. Since the stacks are not equipped with sampling ports it is desirable to obtain particulate emissions samples from sample ports in the duct work which vents flue gas from the boiler to the masonry stacks.

Portholes are located on a 6 foot vertical length of rectangular duct 58 inches by 53 inches (4.6 feet equivalent diameter). Hard bends are located before and after the 6 foot section and turbulence and/or void spots are likely. This arrangement of the portholes does not meet requirements of Method 1.

If turbulence is present the accuracy of the results of typical Method 5 testing may be effected. Any error would be due to the fact that although an isokinetic sampling rate may be maintained in accordance with the vertical, laminar flow of air and particles through the duct, the real isokinetic rate may be in error due to turbulent, varying direction of air and particles.

The error would tend to decrease emissions results because of the effect of the probe tip area diminishing in exposed area to an increasingly angled flow of air. This effect may be counteracted by using a nozzle with a larger area than required for a 100% isokinetic sample rate.

It is proposed that for Hercules' boiler tests, the test for cyclonic flow (Method 1, Paragraph 2.4) be conducted. If indications are that cyclonic flow does exist, the sampling rate can be maintained at 50% of isokinetic. This should more than compensate for any negative bias by imparting a positive bias. If cyclonic flow is not indicated, it is proposed that "typical

Mr. Don Watts
October 22, 1982
Page Two

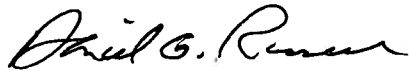
Method 5" tests be made. Negative or void spots do not necessarily indicate turbulent flow. If void spots are encountered, these will simply be bypassed. If more than 10 of the 48 samples points have zero or negative velocity pressure indications, other alternatives will be pursued.

Our current plans are to test two boilers on October 25, and 26, and if additional time is required, October 27.

Please advise me if these proposals are unacceptable or if you have any questions.

Very truly yours,

ENVIRONMENTAL MONITORING LABORATORIES, INC.



Daniel G. Russell

DGR/mr

Forest
FILE COPY

September 28, 1982

Mr. H. R. Buckley
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

As a result of our meeting at your plant on September 16, 1982, we agreed on the following actions.

1. Visible Emissions evaluations shall be performed on the boilers once a day, Monday through Friday by Hercules. The time of day should be varied each day.
2. The method used by Hercules to record time the opacity exceeds 40% shall be modified to show the length of each opacity excursion, the time period it occurs, and whether a start-up of the boilers is occurring.

We feel that these items should be incorporated into your Permit to Operate.

We also understood that you will be looking for calibration filters which can be used to calibrate your monitors at 20%, 40%, 60%, and 80%.

As we discussed, Hercules will be required to stack test prior to expiration of its Permit to Operate on May 1, 1983. Therefore, I have enclosed a list of stack testing firms for your information.

We would like your written response to these items as soon as possible so that we can proceed with modification of your Permit to Operate. If you have any questions, please contact us.

Very truly yours,

Dwight K. Wylie, P.E., Chief
Air Quality Division

DKW:hls
Enclosure



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



Forrest

TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES, INC. - FORREST COUNTY/0800-00001.
DATE: AUGUST 17, 1982

On the above date, I went to Hercules, Inc.,
in Hattiesburg. The opacities of both stacks
were less than 5%.

If you have any questions, please contact me.

DETRICH BROWN

MB



FILE COPY

August 10, 1982

Mr. H. R. Buckley
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

We have received your letter of July 26, 1982, responding to our concerns regarding an opacity exceedence on June 30, 1982.

Although you state in your letter that it was the South Stack, not the North Stack, that was in non-compliance, our inspector's report and the visible emissions evaluation form indicate that it was the North Stack that was observed in non-compliance. The visible emissions evaluation form was signed by and a copy accepted by Mr. C. Jordan of your company apparently indicating his agreement.

Also, you state that the boiler was started back up around 11:45. The VE done on the North Stack started at 11:40, and the first reading was 100%. This indicates that the boiler had been in operation for some period of time prior to the first reading. Also, the VE form indicated normal boiler operation.

In response to your letter of July 15, 1982, we still feel that we need self-monitoring from Hercules. I suggest that we meet to discuss a monitoring program and the above mentioned opacity. Please let me know of a convenient time for such a meeting.

If you have any questions, please let me know.

Very truly yours,

Dwight K. Wylie, P. E., Chief
Air Quality Division

DKW:DW:els



Hercules Incorporated
West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
(601) 545-3450

July 26, 1982

Dwight K. Wylie
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Dear Mr. Wylie:

This letter is in reply to your June 15, 1982 letter addressing smoke opacity. The darker opacity readings you referred to were on the South Stack instead of the North Stack.

The reason for this brief period of smoke was that No. 1 Boiler was shut down at 10:35 to clean the boiler grates and started back up around 11:45.

Although the regulations allow start up operations up to 15 minutes darker emissions, we take every precaution to minimize smoking as evidenced by the brief period of darker opacity.

If you have any questions please contact us.

Very truly yours,

R. C. Schneider
Production Manager

For:
H. R. Buckley
Plant Manager

HRB/RCS/nb

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JUL 27 REC'D

DEPT. OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



→ TO: DON WATTS
FROM: MARGARET HASE
SUBJECT: HERCULES, INC.-FORREST COUNTY
(0800-00001)
DATE: JULY 20, 1982

On the above date, I went to Hercules, Inc.,
in Hattiesburg. The opacities of both stacks
were less than 5%.

If you have any questions, please contact me.

MARGARET HASE

A handwritten signature in black ink, appearing to be "MH", written over the typed name "MARGARET HASE".





Hercules Incorporated
West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
(601) 545-3450

July 15, 1982

RECEIVED
JUL 16 REC'D

DEPT OF NATURAL RESOURCE
BUREAU OF POLLUTION CONTROL
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Attention: Dwight K. Wylie

Dear Dwight:

This letter is in response to your 6/24/82 letter and the subsequent 6/31/82 phone conversation with C. S. Jordan concerning visible emission evaluations.

Since you were unaware that we have both continuous opacity monitors and a television monitor on our stacks, we feel you might agree that our present mode of opacity evaluation is much better than occasional visible emission evaluation readings.

We have four boilers and two stacks, a Heat Timer opacity monitor on each boiler with a signal light and alarm horn, and a timer on each stack recording the time we exceed 40% opacity.

Attachment I is last quarter's opacity data. The data indicate our smoke opacity was less than 40% opacity for 99.5% of the time. This was less than the 45 minutes allowed for our shut down to clean fires on 90 of the 91 days.

Attachment II is one year's data of the Bureau's visible emission data of our stacks. The average opacity was 8.7% for the north stack and 16.8% for the south stack.

We see no reason to modify our Permit to Operate to require visible emissions evaluations which are very costly, since we are continuously monitoring opacity. We feel that we are not in violation of the State smoke regulations based on the Bureau's own visible emission evaluation records. We submit the attached data for your evaluation.

If you have any questions, please contact us.

Very truly yours,

H. R. Buckley
Resident Manager

HRB:nb

FILE COPY

Forest

July 15, 1982

Mr. Harold Buckley
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

On June 30, 1982, visible emissions evaluations were performed on your woodwaste boilers by Warren Gardner of our South Regional Office. The average opacity of the South Stack was 10.4%, and the average opacity of the North Stack was 28.8%. Both boilers were in compliance over the eighteen-minute reading period. However, the average opacity of the North Stack for the first six-minute reading was 59.4% with half of the readings being 80-100% opacity. Therefore, the North Stack was out of compliance for that six-minute period. Boiler operation was described as normal during this period.

Please provide an explanation of the reason for the non-compliance period and the actions you are taking to prevent a recurrence of the non-compliance period. We will expect your written response by July 30, 1982.

If you have any questions, please contact us.

Very truly yours,

Dwight K. Wylie, P. E., Chief
Air Quality Division

EKW:DW:els



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



Forrest

→ TO: DON WATTS
FROM: WARREN GARDNER
SUBJECT: HERCULES, INC. - 0800-0001/FORREST COUNTY
DATE: JUNE 30, 1982

On the above date, I went to Hercules to a monthly V.E. Evaluation, a copy of which is attached. Copies of the forms were also given to Charlie Jordan for the records at Hercules.

If further information is needed, please call.

WARREN GARDNER *WLG*





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



Forrest

TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES, INC. - FORREST COUNTY/0800-0001
DATE: JUNE 28, 1982

On the above date, I went to Hercules, Inc.,
in Hattiesburg. I was unable to do a V. E.
Evaluation because of the weather. The opacity
of the South stack appeared to be a steady 10-15%.
The opacity of the North stack was less than 5%.
No problems were noted during my inspection.
If you have any questions, please call.

Detrich Brown
DETRICH BROWN

MB



FILE COPY

June 24, 1982

Forest

Mr. Harold Buckley
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

As you are aware, we have had complaints in the past concerning high opacity from your woodwaste boilers.

As an aid towards resolution of this problem, we had requested that your company have someone certified to perform visible emissions evaluations. Since your personnel were recently certified, we are preparing a modification to your Permit to Operate. This modification will require that visible emissions evaluations be performed three times per day on each stack with the results submitted monthly.

Prior to taking this matter to the Permit Board, we are offering you the opportunity to comment. If you have any questions, please contact us.

Very truly yours,

Dwight K. Wylie, P.E., Chief
Air Quality Division

DKW:DW:cl



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES, INC.-0800-0001-FORREST COUNTY
DATE: MAY 3, 1982

On the above date, I went to Hercules, Inc.,
in Hattiesburg for a monthly V. E. Evaluation. A
copy of the V. E. is attached. I met with Mr. Lott
at the facility. No problems were noted during my
inspection.

If you have any questions, please call.

Handwritten initials, possibly "DB", written in black ink.

Detrich Brown
DETRICH BROWN



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES INC., 0800-0001/FORREST COUNTY
DATE: APRIL 28, 1982

On the above date, I went to Hercules, Inc., in Hattiesburg for a monthly V. E. Evaluation. A copy of the V. E. is attached. I met with Mr. Jordan at the facility. No problems were noted during my inspection.

If you have any questions, please contact me.

Detrich Brown
DETRICH BROWN





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES INC., 0800-0001/FORREST COUNTY
DATE: MARCH 18, 1982

On the above date, I went to Hercules, Inc., in Hattiesburg for a monthly V. E. Evaluation. A copy of the V. E. is attached. I met with Mr. Jordan at the facility. No problems were noted during my inspection.

If you have any questions, please contact me.

Detrich Brown
DETRICH BROWN

lb





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: DETRICH BROWN
SUBJECT: HERCULES - FORREST COUNTY (0800-00001)
DATE: JANUARY 26, 1982

On the above date, I went to Hercules in Hattiesburg in response to a complaint. I performed a V. E. Evaluation on the North Stack. The opacity ranged from 10% to 50%, the average being 27%. The South Stack's opacity was less than 5%.

I saw no problems of fallout or strong odor at the facility. If there are any questions, please call.

Detrich Brown
DETRICH BROWN
1/27/82





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: MARGARET HASE
SUBJECT: HERCULES-0800-00001/FORREST COUNTY
DATE: JANUARY 19, 1982

On the above date, I went to Hercules, Inc., in Hattiesburg for a monthly V. E. Evaluation, a copy of which is attached. There were no problems at the facility during my inspection.

If you have any questions, please contact me.

Margaret Hase
MARGARET HASE





MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



Forrest

TO: DON WATTS

FROM: MARGARET HASE

SUBJECT: HERCULES, INC-0800-00001/FORREST COUNTY

DATE: DECEMBER 17, 1981

On the above date, I went to Hercules, Inc., in Hattiesburg for monthly V. E. Evaluation, copies of which are attached. I met with Mr. Charles Jordan at the facility. No problems were noted during the inspection.

If you have any questions, please contact me.

Margaret Rees Hase

MARGARET HASE



Forest
FILE COPY

December 30, 1981

Mr. Harold Buckley
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

Re: Facility No. 0800-00001
Hattiesburg, Mississippi

As you are aware, we have recently initiated a monitoring program in the area around your facility.

As an aid to our monitoring program, and since you do not have the capability to perform visible emissions evaluations, we would like for you to submit the daily Boiler Room Log Sheets to us as we have discussed previously. We would like to have these submitted at the end of each two-week period. If possible, we would like to have submitted those sheets from November 24, 1981, to the present.

If you have any questions, please contact us.

Very truly yours,

Don Watts
South Air Emissions Section

DW:els



MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209
(601) 354-2550



TO: DON WATTS
FROM: MARGARET HASE
SUBJECT: HERCULES - FORREST COUNTY (0800-00001)
DATE: NOVEMBER 30, 1981

On the above date, Dee Brown and I went to Hercules, Inc., in Hattiesburg for a monthly V. E. Evaluation, copies of which are attached. We met with Charles Jordan at the facility and there were no problems during our inspection.

If you have any questions, please contact me.

Margaret Hase

MARGARET HASE



D or W

Correct

NOV 18 1981



44-03

Mr. John Wester
302 Maple Street
Nattiesburg, Mississippi 39401

DEPT OF NATURAL RESOURCES
BUREAU OF AIR POLLUTION CONTROL

Dear Mr. Wester:

This is in response to your October 13, 1981, complaint regarding air pollution from Hercules, Inc. located in Nattiesburg, Mississippi.

The Environmental Protection Agency (EPA) shares a joint responsibility with the Mississippi Department of Natural Resources, Bureau of Pollution Control (BPC) to assure that air pollution sources in Mississippi are in compliance with the established emission limiting regulations. These emission limiting regulations were established to achieve and maintain specific ambient (air we breathe) standards designed to protect the public health and welfare. Although EPA shares this responsibility with the State of Mississippi, the BPC is the primary agency responsible for assuring that these regulations are met.

On November 10, 1981, Mr. Jayne J. Aronson, of my staff, telephonically communicated with Mr. Donald Watts (Mississippi BPC) to discuss your complaint regarding the air pollution from Hercules, Inc. located in Nattiesburg, Mississippi. Mr. Watts mentioned that he has been in contact with you and is aware of your concerns. He said that the BPC is presently working towards resolving any air pollution problems in the Nattiesburg area. The BPC is setting up an ambient air monitoring sampler to measure the levels of total suspended particulate (TSP) in your area. The BPC will initiate appropriate action to correct any identified air pollution problems.

The BPC inspects all major stationary sources at least once a year with follow-up inspections when necessary. These inspections are conducted in order to determine whether the sources are operating in compliance with the applicable air pollution regulations. EPA inspects approximately 5 - 10% of the major sources in Mississippi to verify the compliance status and supplement information contained in the state files. The next time we are in the Nattiesburg area, we will plan on inspecting the Hercules, Inc. facility and inform you of the results of our inspection.

If I can be of any further assistance, please feel free to contact me or Mr. Wayne J. Aronson at (404) 381-4862.

Sincerely yours,

Thomas W. Devine Director
Air and Waste Management Division

cc: Mr. Donald Watts
Mississippi Bureau of Pollution Control

MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

COMPLAINT FORM

NOVEMBER 17, 1981 8:00am Air Water
Date Time

PERSON REPORTING: Mr. Ms. JOE GOLDSMITH

ADDRESS: HATTIESBURG FORREST 210 W. 7th ST 544-8046
City County Street or P. O. Box Phone

COMPLAINT SITE: HERCULES

TEXT OF COMPLAINT: THEY WERE BLOWING THE STACK AGAIN THIS MORNING
AND SOAT IS ALL OVER EVERYTHING.

COMPLAINT TAKEN BY: LOYD SHARP

REFERRED TO: Name
 North Regional Office
 Central Regional Office Other _____
 South Regional Office

REFERRED BY: Phone Mail Courier

ROUTED TO R.O. BY: DON WATTS DATE _____

RESOLUTION: DISCUSSED WITH WATTS ON NOVEMBER 17TH. HE AND GEORGE PARKER
WERE GOING TO HATTIESBURG THAT MORNING AND HE SAID THEY WOULD
HANDLE THE COMPLAINT. LVS

I talked to Mr. Goldsmith this day. He was complain
only about black smoke - not fallout. I explained
that we were in the process of locating monitors.
He seemed satisfied for now.

Forrest Co.
FILE COPY
Hercules - 000

October 30, 1981

Mr. Joe Goldsmith
210 West Seventh Street
Hattiesburg, Mississippi 39401

Dear Mr. Goldsmith:

The analysis of the composite sample taken by Mr. Phil Bass has been completed. This analysis indicates a relatively high percent composition of wood fiber, which is not a natural pollutant.

We will initiate a monitoring program in the area within the next two weeks to determine if there are any violations of ambient air quality. We will also be canvassing the area for other potential contributors to air quality effects to ensure that all possible emission sources are considered. We will keep you informed as to the progress of our monitoring program and other findings.

If you have any questions, please contact us.

Very truly yours,

Den Watts
South Air Emissions Section

DW:els

Forrest Co.
FILE COPY
Hercules - 000

October 30, 1981

Mrs. M. P. Wehling
600 Broad Street
Hattiesburg, Mississippi 39401

Dear Mrs. Wehling:

We have received your letter concerning possible air pollution by Hercules in Hattiesburg.

Unfortunately, since the measurement of air quality is quite complicated, there are no simple methods that you could employ to monitor or sample the air in your area; however, we do perform monitoring and we are investigating the air quality in your area. If problems are found, we will act to seek necessary remedies.

Please be aware that, while Hercules is the largest and most noticeable air pollution source in the Hattiesburg area, air quality is dependent also upon other industrial, commercial and private sources. Our investigations will, therefore, include considering all possible air pollution sources so that, if problems are found, the cause can be correctly identified.

If you have any questions or comments, please contact us at (601) 961-5171 or P. O. Box 10385, Jackson, Mississippi, 39209.

Very truly yours,

Don Watts
South Air Emissions Section

DW:els

Forrest Co.
FILE COPY
- 000

October 30, 1981

Mr. Charles Jordan
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39401

Dear Mr. Jordan:

Re: Facility No. 8800-0000
Hattiesburg, Mississippi

Over the past months, we have received several complaints concerning black smoke from the boilers and particulate fallout in the residential area near your plant.

In response to these complaints, a composite sample was taken of fallout on stationary objects in the area. The qualitative analysis of this sample indicates a relatively high percentage of wood fiber. A copy of the analysis results are enclosed. Therefore, we will be initiating a monitoring program in the area in the near future.

We have very little current emissions data on Hercules since the last stack tests were performed almost 6 years ago and the only emissions data since those tests are the opacity measurements we have taken. Since these complaints usually refer to black smoke from the boilers, we feel that you should as a minimum have a qualified visible emissions evaluator so that a routine visible emissions evaluation program (performing evaluations at least twice per day) can be instituted. We will be holding a VEE training school in Pascagoula November 3-5, 1981. We strongly urge that you have people attend this school.

We will be in contact with you concerning the specific actions needed. Meanwhile, if you have any questions, please contact us.

Very truly yours,

Don Watts
South Air Emissions Section

DW:els
Enclosure

FILE COPY

September 28, 1981

Senator David M. Smith
46th District
813 Glenwood Drive
Hattiesburg, Mississippi 39401

Dear Senator Smith:

This letter is in response to your letter of September 18, 1981, concerning a letter from Mr. Joe Goldsmith of Hattiesburg. The background for this matter is as follows.

On July 21, 1981, we received a complaint from Mr. Goldsmith concerning black smoke from Hercules. Mr. Goldsmith also stated that his neighbor's car was covered with black wood fiber. On July 28, 1981, we responded to the complaint by sending a team composed of two of our field investigators from our regional office in Ocean Springs and Mr. Don Watts, an environmental engineer from our central office in Jackson. Personnel of our regional offices normally investigate complaints and provide follow-up. Mr. Watts was sent because he has knowledge on the complex sources of possible air pollution at Hercules. At the time of this inspection we performed visual measurements on the emissions from Hercules and found them to be within regulations.

Our personnel met with Mr. Goldsmith at his house and discussed the situation and possible actions. Pursuant to this discussion, a sample was collected from the neighbor's car and carried back to Jackson for analysis at our lab. The sample was collected in an acceptable manner. The purpose of the sample was to determine if the material on the car came from Hercules' emissions, as Mr. Goldsmith thought. Unfortunately, the sample collected was lost in our laboratory. We have not, according to my understanding and knowledge, lost a sample before and are embarrassed at losing this one. However, we do process approximately 50 samples/day and some mistakes do occur.

We learned that the sample had been lost when Mr. Watts began inquiring about sample results. Since then we have resampled and Mr. Goldsmith has been informed of this.

The measurement of ambient air quality must be done by very sophisticated and expensive instrumentation. There is no adopted or official method for taking a "grab" air sample for determination of ambient air quality. We have both a continuous particulate sampler and ozone monitor in Hattiesburg for the purpose of measuring ambient air quality. The data from these samplers do not indicate any general air quality problems in Hattiesburg.

Senator David M. Smith
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On August 17, 1981, we again went to Hattiesburg as part of our monitoring program and performed measurements of Hercules' emissions. Both stacks were in compliance.

The following are your questions and our response to each.

1. What is the procedure for taking, handling and testing air and solid samples?

Air and solid samples are collected and analyzed in accordance with reference methods, which are developed by the U. S. Environmental Protection Agency. However, on occasion we do collect "grab" samples to provide an immediate clue regarding the source of a problem. Such sampling is not designed to be complete and absolute by itself and certainly does not determine definitively whether a problem exists. This type of sampling generally is done in the most convenient possible way.

2. What type of test would the Bureau of Pollution Control run here locally to determine air quality?

To determine air quality, we operate continuously field analyzers which are permanently located in an area.

3. Would the Bureau run such a test here? If not, why?

We currently operate field analyzers for particulate matter and ozone in Hattiesburg. Because of expense and disruption to our ambient monitoring program, we would prefer to not relocate our Hattiesburg stations. We believe the problem can be identified and solved otherwise.

4. To whom does the Bureau report its findings?

As appropriate, findings are reported to the Mississippi Commission on Natural Resources and the Environmental Protection Agency. In the case of a complaint investigation, we also report our findings to the complainant.

As is normal when we receive such a complaint, we are increasing our surveillance and monitoring of likely contributing sources.

If you have additional questions or if you wish more detail, please contact us.

Very truly yours,

Charles H. Chisolm, Director
Bureau of Pollution Control