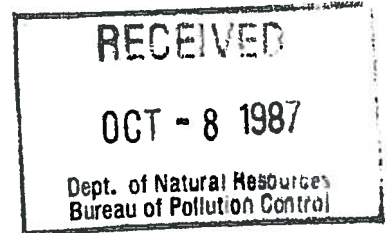






Hercules Incorporated  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401  
(601) 545-3450

October 6, 1987



Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Don:

Operating Permit No. 0800-00001

Please find the attached plan as required by Part III, other requirements, Item (8). Also, please reference my July 22, 1987 letter and in particular your subsequent air emissions inspection visit during which we discussed the required sampling and procedures. We are in agreement that if an area is not operating and not sampled by the end of CY-87, it will be sampled within 30 days after start-up.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ/de  
de0016

Attachments

m10011

SAMPLING PLAN

<u>Emission Point</u>	<u>Definition</u>	<u>Sampling</u>
010	Rosin Process Area	Storage tank data forms
011	Mill Room Area	Area down.
012	Extractor, Refinery, and Still House Combination Water and Oil Scrubber	Area down.
013	Pexite Plant Oil Scrubber	EPA Method 25 for VOC.
020	Delnav Plant	Area permanently shut down by year's end.
021	Flare Tower	Calculation for sulfur dioxide for banking.
022	Limestone Tank No. 1	See Emission Point 020.
023	Limestone Tank No. 2	See Emission Point 020.
024	Digestion Sump Vent	EPA Method 25 for VOC for banking.
030	Poly-Pale Plant	Storage tank data forms
031	McKee Boiler	By calculation for natural gas
032	McKee Boiler	By calculation for natural gas
033	Water Scrubber (2 vents)	EPA Method 25 for VOC, plus sulfur dioxide impinger trap, plus toluene by G.C.
034	Heat Treatment	No vent
040	Rosin Shed	Storage tank data forms
041	Drumming Operation	Per our discussion we propose not to sample.
042	Flaking Belt Vapor Water Scrubber	EPA Method 25 for VOC

<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
043	Flaking Belt Dust Water Scrubber	EPA Method 5 for particulates
050	Package Boiler No.5	By calculation for natural gas
060	Vinsol Resin Process	Storage tank data forms
061	Sealas Furnace No.1	By calculation for natural gas
062	Sealas Furnace No.2	Identical to Emission Point 061
063	Water Scrubber Kettle No. 1	EPA Method 25 for VOC
064	Water Scrubber Kettle No. 2	Identical to Emission Point 063
070	Truline Flaking and Packaging Area	Storage tank data forms
071	Flaking Belt Vapor Water Scrubber	EPA Method 25 for VOC
072	Dracco Baghouse Model 20-S	EPA Method 5 for particulates
073	Pangborn Baghouse Model 600	EPA Method 5 for particulates
080	Hard Resins Area	Storage tank data forms
081	Struthers-Wells Boiler	By calculation for natural gas
082	Water Scrubber	EPA Method 25 for VOC, plus Maleic Anhydride by G.C.
090	Continuous Ester- ification Area	Storage tank data forms
091	Foster Wheeler Boiler	By calculation for natural gas
092	Continuous Ester- ification Unit	EPA Method 25 for VOC

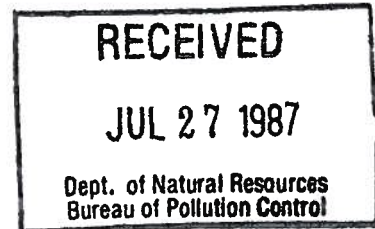
<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
100	Hard Resins Flaking House	Storage tank data forms
101	Bvell Norbo Dust Collector	EPA Method 5 for particulates
102	Flaking Belt Vapor Water Scrubber	EPA Method 25 for VOC
110	Foral and Staybelite Plant	Storage tank data forms
111	Struthers-Wells Boiler	By calculation for natural gas
112	Hydrogen Process	EPA Method 25 for VOC
120	Hydrogen Furnace	Storage tank data forms
130	Pilot Plant Area	Storage tank data forms
131	Struthers-Wells Boiler	By calculation for natural gas
132	Vent No. 1	Area down.
133	Vent No. 2	Area down.
140	Resin 731 Area	Storage tank data forms
150	Stills and Dresinate Area	Storage tank data forms
151	Foster-Wheeler Boiler	By calculation for natural gas
160	Kymene Plant	Storage tank data forms
161	Kettle Water Aspirator	EPA Method 25 for VOC, plus Epichlorohydrin by G.C.
162	Dust Collector	EPA Method 5 for particulates
170	Defoamer Plant	Storage tank data forms

<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
171	Silica Drier Furnace	By calculation for natural gas
172	Dust Collector	EPA Method 5 for particulates
180	Rosin Amine D Plant	Storage tank data forms
181	Struthers-Wells Boiler	By calculation for natural gas
182	Ammoniation Water Scrubber	EPA Method 25 for VOC plus ammonia impinger trap
183	Amine Reactor Water Scrubber	EPA Method 25 for VOC
190	Polyrad and Polyol Area	Storage tank data forms, plus EPA Method 25 for VOC, plus ethylene oxide by G.C.
200	Para-menthane Unit	Area down.
210	Para-menthane Hydroperoxide Unit	Area down.
220	Sulfate Turpentine Refining Unit	Area down.
230	Carbon Regeneration Furnace Scrubber	EPA Method 25 for VOC
240	Murry Boiler	By calculation for natural gas
152	Stills and Dresinate Area	Storage tank data forms
250	Para-cymene Unit	Storage tank data forms
260	Synthetic Pine Oil Facility	Storage tank data forms
270	Paracol Plant	Storage tank data forms



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

July 22, 1987



Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS. 39209

Dear Don:

Operating Permit No. 0800-00001

Please find the attached plan as required by Part III, other requirements, Item (8).

We have acquired the services of Bonner Analytical Testing Company, Hattiesburg, MS. to perform all sampling and analyses.

Since this sampling will be the first time we have actually generated data, we have left some of the sampling details open (Sample volumes, times, flowrates, etc.) for Bonner to define once the actual testing is performed. We have chosen what we consider the best first approach to sampling. We recognize the fact that some of these modified methods may or may not merit an additional request for a specific sampling or data evaluation at a later date and hope the Bureau will concur with this approach.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:ml  
ml0004-5

m10011

SAMPLING PLAN

<u>Emission Point</u>	<u>Definition</u>	<u>Sampling</u>
010	Rosin Process Area	Storage tank data forms
011	Mill Room Area	Adsorbent tube(s) for volatile organic compounds calculated as Methanol proceeded by a filter for gravimetric determination of aerosols as organic/inorganic as determined by ash, plus a separate filter for gravimetric determination of aerosols as organic/inorganic as determined by ash.
012	Extractor, Refinery, and Still House combination water and oil scrubber	Method described for emission point 011 and will be referred to as Method 011 from now on.
013	Pexite Plant Oil Scrubber	Method 011
020	Delnav Plant	Storage tank data forms
021	Flare tower	By calculation for hydrogen sulfide
022	Limestone Tank No. 1	Method 011, plus HCL impinger trap, plus sulfide impinger trap.
023	Limestone Tank No. 2	Method 011, plus HCL impinger trap, plus sulfide impinger trap.
024	Digestion sump vent	Method 011, plus sulfide impinger trap.
030	Poly-Pale Plant	Storage tank data forms
031	McKee Boiler	By calculation for natural gas
032	McKee Boiler	By calculation for natural gas
033	Water scrubber	Method 011, plus sulfur dioxide impinger trap
034	Heat treatment	Method 011



<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
040	Rosin Shed	Storage tank data forms
041	Drumming operation	Method 011
042	Flaking belt vapor water scrubber	Method 011
043	Flaking belt dust water scrubber	Method 011
050	Package Boiler No.5	By calculation for natural gas
060	Vinsol resin process	Storage tank data forms
061	Sealas furnace No.1	By calculation for natural gas
062	Sealas furnace No.2	By calculation for natural gas
063	Water scrubber kettle No. 1	Method 011
064	Water scrubber kettle No. 2	Method 011
070	Truline flaking and packaging area	Storage tank data forms
071	Flaking belt vapor water scrubber	Method 011
072	Dracco Baghouse Model 20-S	Method 011
073	Pangborn Baghouse Model 600	Method 011
080	Hard Resins Area	Storage tank data forms
081	Struthers-Wells Boiler	By calculation for natural gas
082	Combination water and oil scrubber	Method 011

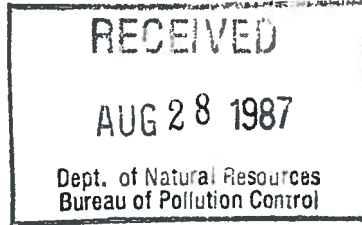
<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
090	Continuous Esterification Area	Storage tank data forms
091	Foster Wheeler Boiler	By calculation for natural gas
092	Continuous Esterification Unit	Method 011
100	Hard Resins Flaking House	Storage tank data forms
101	Bvell Norbo dust	Method 011
102	Flaking belt vapor water scrubber	Method 011
110	Foral and Staybelite Plant	Storage tank data forms
111	Struthers-Wells Boiler	By calculation for natural gas
112	Hydrogen process	Method 011
120	Hydrogen Furnace	Storage tank data forms
130	Pilot Plant Area	Storage tank data forms
131	Struthers-Wells Boiler	By calculation for natural gas
132	Vent No. 1	Method 011
133	Vent No. 2	Method 011
140	Resin 731 Area	Storage tank data forms
150	Stills and Dresinate Area	Storage tank data forms
151	Foster-Wheeler Boiler	By calculation for natural gas
160	Kymene Plant	Storage tank data forms
161	Kettle water aspirator	Method 011
162	Dust collector	Method 011

<u>Point</u>	<u>Definition</u>	<u>Sampling</u>
170	Defoamer Plant	Storage tank data forms
171	Silica drier furnace	By calculation for natural gas
172	Dust collector	Method 011
180	Rosin Amine D Plant	Storage tank data forms
181	Struthers-Wells boiler	By calculation for natural gas
182	Ammoniation water scrubber	Method 011, plus ammonia inspinger trap
183	Amine reactor water scrubber	Method 011
190	Polyrad and Polyol Area	Storage tank data forms, plus Method 011
200	Para-menthane Unit	Storage tank data forms, plus Method 011
210	Para-menthane hydroperoxide unit	Storage tank data forms, plus Method 011
220	Sulfate turpentine refining unit	Storage tank data forms, plus Method 011
230	Carbon Regeneration Furnace Scrubber	Method 011
240	Murry boiler	By calculation for natural gas
152	Stills and Dresinate Area	Storage tank data forms
250	Para-cymene unit	Storage tank data forms
260	Synthetic Pine Oil Facility	Storage tank data forms
270	Paracol Plant	Storage tank data forms



Forrest

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



August 27, 1987

Mr. Don Watts  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

Dear Mr. Watts:

In reference to Operating Permit No. 0800-0001, find the attached semi-annual report detailing all work done for emission point 130.

We will continue to submit this report on a semi-annual basis.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:sj  
jordan:3

Attachments

cc: D. W. Linde  
E. C. Lindsay  
D. T. Smith, Jr.

Hattiesburg, Miss.  
August 25, 1987

To: C. S. Jordan

From: C.W.O. Eilo

Operating Permit No. 08000-0001 Hattiesburg, Ms.

With reference to the above permit, Part III, other requirements, 4, the attached semi-annual report is submitted. This report is for January 1, 1987 through June 30, 1987.

Pilot Plant Development Projects: January 1, 1987 - June 30, 1987

<u>Equipment</u>	<u>Operating Date</u>	<u>Days</u>
Continuous Thermal Polymerization Unit	5/17/87 to 5/22/87	6

Product

Cyclopentadiene Trimer (oligomers of cyclopentadiene)

Raw Materials

Dicyclopentadiene  
Nitrogen

Assessment of Emissions

Potential Emissions

Cyclopentadiene vapor  
Nitrogen

Control Equipment

Conservation vent (storage tanks)  
Activated carbon drum (packaging facility)

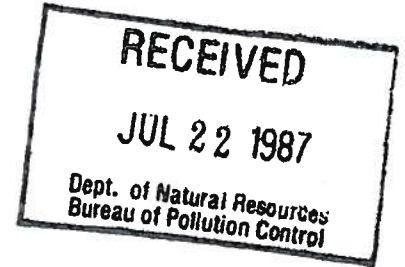
Vent Type

Control valve  
Relief valve



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

July 20, 1987



Don Watts  
Bureau of Pollution Control  
P.O. Box 10385  
Jackson, MS 39209

Dear Don

The purpose of this letter is to inform you of proposed improved ethylene oxide handling facilities. These improvements include refrigeration capabilities, insulated lines, air monitors with alarms, process alarms, remote actuated pumps and valves, etc.

Also, we propose to replace the existing bubble type water scrubber vent with a more efficient Croll-Reynolds ethylene oxide absorption conversion system. The model 16T-20H packed tower converts E. O. vapors to ethylene glycol in wastewater.

If I can answer any additional questions, please let me know.

Very truly yours

Charles Jordan  
Environmental Supervisor

CJ:am

0122r/11



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

May 5, 1987

RECEIVED

MAY 12 1987

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Don:

Re: Construction Permit No. 0800-00001, 1/13/87, Emission Point 038

Reference my 3/16/87 letter addressing the addition of a maleic anhydride storage tank and your 4/20/87 letter with requirements to complete an enclosed application and storage tank data form. Please find the attached application and storage tank data form.

In order to be consistent with our current permit to operate (where process emission points are in series 010, 020, 030, etc.) perhaps our Neuphor construction emission point should be changed to the next number in this numbering series (280). For example, the Neuphor plant would be emission point 280, with emission point 281 the adduct reactor carbon adsorption scrubber.

If I can answer any questions, please call me.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ/de  
0529L

Attachments





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

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MAY - 4 1987

May 1, 1987

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Don:

The purpose of this letter is to inform you of the start-up of our Neuphor Plant. The Neuphor rosin emulsion process is being operated with incoming feed ingredients and essentially no emissions.

The process vent, a two-stage activated carbon absorption scrubber on the rosin adduct reactor, is not in operation. Upon completion of the adduct reactor we will submit certification and request a performance evaluation permit prior to incorporating this emission point into our permit to operate.

If I can answer any questions, please call me.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan  
Environmental Supervisor

CSJ:jce

0011e/27



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

February 10, 1987

RECEIVED  
FEB 17 1987

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Don:

We have received your 1/29/87 draft operating permit and appreciate the opportunity to comment. Please find our following comments.

In reference to your cover letter comments and on page 29, part III, Other Requirements, item (8), we agree with the August 1, 1987 date for developing and submitting a workable plan subject to Bureau approval for each emission point. Because of our enormous number of over 1,000 storage tanks, we are requesting that the 120 days granted in APC-S-2, 2.6.1, to complete item (8) begin once the Bureau has approved the plan.

We have the following concerns relative to sulfur content fuels. It is my understanding that by August 1, 1987, the air quality regulations should be amended to address SO<sub>2</sub> emissions relative to calendar year 1970. Since it is not clear exactly when or what these changes will be, and since we were burning almost all natural gas in 1970, we request on page 28, Part III, Other Requirements, (1) for emission point 050, the following changes:

Paragraph one:

By this condition, the stated facility is allowed sulfur dioxide emissions exceeding those emitted by the facility in 1970. This condition is authorized by the Bureau until the expiration date of the permit or seven months after subsequent and additional Bureau authorization is given, whichever comes first.

Paragraph two: Omit

Paragraph three:

Attendant to the authorization stated above, this facility shall make written quarterly reports to the Bureau with the first report to be made ninety (90) days after the natural gas curtailment begins. The reports shall state density, heating value, daily usage (pounds/day), date of use and sulfur content of any and all fuels which exceed 2.2 percent sulfur by weight.

It is not clear why written quarterly reports should start at the time of reapplication because the reapplication itself requires fuel data.

Bureau of Pollution Control  
Page 2

On page 27, Part II, Emission Limitations and Monitoring Requirements, for emission point 240, authorized emission limitations for SO<sub>2</sub> are 4.8 lbs/10<sup>6</sup> BTU and 59.3 TPY. On page 29, Part III, Other Requirements, (5) for emission point 240, requires quarterly fuel oil reporting. We are confident we can operate within our permit limits without quarterly reporting and request the requirements for reports be removed or required only for situations not authorized in the permit.

Prior to the shutdown of our four woodboilers which were replaced with No. 6 boiler, we had five boilers (4 wood and No. 5 boiler) to insure continuity of the many complex and diversified plant operations at this facility. Now we only have two boilers (No. 5 and No. 6) and therefore request to have some flexibility incorporated into the permit which would allow our authorized fuel usage in either boiler when a boiler is out of service.

If I can answer any questions, please call me.

Very truly yours,

HERCULES INCORPORATED



Charles Jordan  
Environmental Supervisor

CJ/nb  
1671E

Forrest



## Interoffice Memo

February 5, 1987

Mr. Don Watts  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

RECEIVED  
FEB - 9 1987

Dear Mr. Watts:

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

In reference to Operating Permit No. 0800-0001, please find the attached semi-annual report detailing all work done for emission point 021.

We will continue to submit this report on a semi-annual basis.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ/nb  
0529L

Attachments

<u>Equipment</u>	<u>Days</u>	<u>Materials</u>	<u>Product</u>	<u>Assessment of Emissions</u>		
				<u>Pot. Emissions</u>	<u>Control Equip.</u>	<u>Type Vent</u>
1-liter Autoclave	18	Hydrocarbon Resin Hydrogen Nickel Catalyst	Hydrogenated Hydrocarbon Resin	Hydrogen	None	Manual Vent Valve



Forrest

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

March 16, 1987

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

RECEIVED  
MAR 18 1987

Dear Don:

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Per our previous discussion, please find the attached drawing for a Maleic Anhydride storage tank. This tank will allow the Neuphor process (emission point 038 as described under our permit to construct dated 1/13/87) to produce adduct using either Fumaric Acid or Maleic Anhydride. The additional storage tank will allow the Neuphor process to produce 12 MM lbs./yr. of Maleic Anhydride-rosin adduct with a capacity of 20 MM lbs./yr.

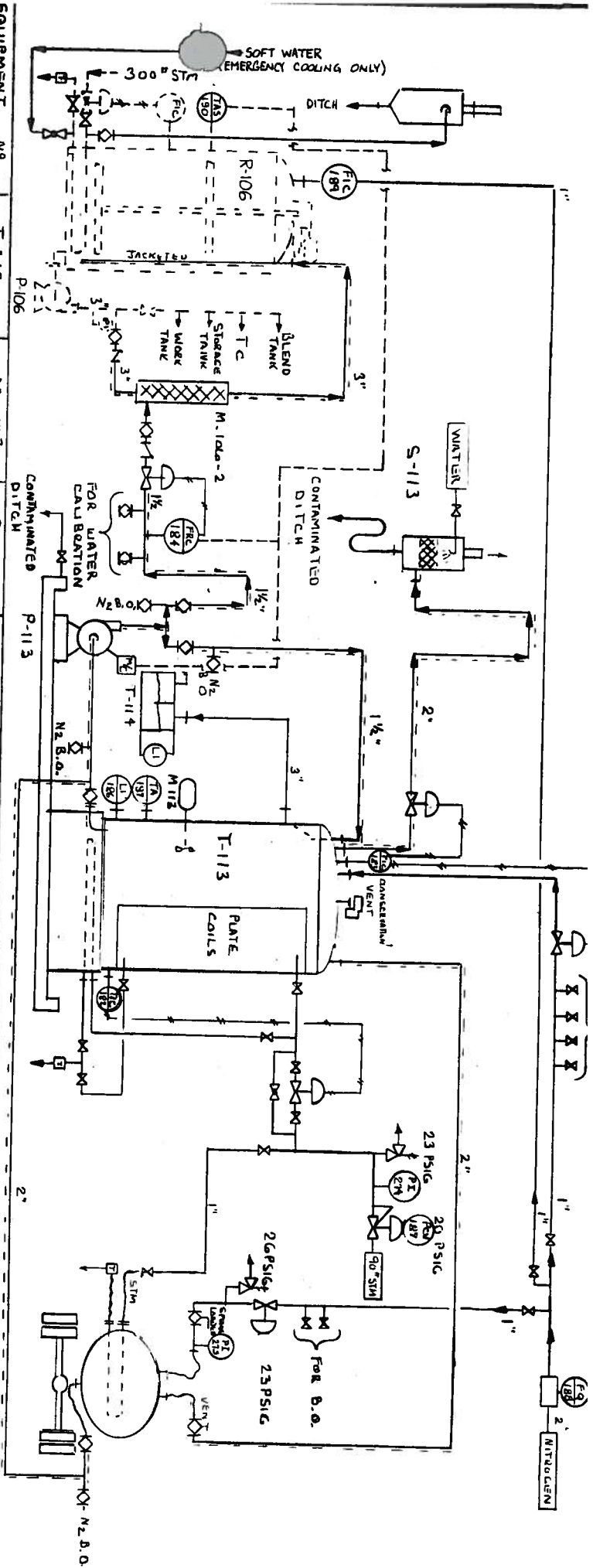
If I can answer any additional questions please let me know.

Very truly yours,

C. S. Jordan  
Environmental Supervisor

CSJ:sj  
0736C

Attachment



EQUIPMENT	NO	DESIGN NAME	DESIGN PRESS PSIG	DESIGN TEMP OF	MATERIAL	SIZE	DRAWING NO	REV
MALEIC ANHYDRIDE STORAGE TANK	T-113	8" H <sub>2</sub> O COLUMN	200°F	316 %	9'-0" x 13'-0" HI	3 H.P.		
MALEIC ANHYDRIDE STORAGE TANK AGITATOR	M-113	15 GPM @ 300 FT. HD.	316 %	14 1/4" x 15 HP	304L %			
MALEIC ANHYDRIDE STORAGE TANK SCRUBBER	S-113	304L %	16" x 36" LG	316 %	6" x 15'-0" LONG	78 GPM @ 120 PSIG		
MALEIC ANHYDRIDE SEAL POT	T-114	316 %	400°F	TYPE 5054 ALUM.	11'-0" x 16'-0" HI			
STATIC MIXER	M-106-2	78 GPM @ 120 PSIG	316 %	400°F	TYPE 5054 ALUM.			
ADDUCT REACTOR/TRANSFER PUMP	P-106 (EXISTING)	ADDUCT REACTOR						
ADDUCT REACTOR	R-106 (EXISTING)							

8 P. N°

NO DATE JOB NO DESCRIPTION REVISIONS

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SCALE: DRAWN M. DUBOIN 1-87 CHECKED BY *[Signature]* 3-87 APPROVED APPROVED

PLANT ACCOUNT CLASSIFICATION

HERCULES INCORPORATED  
PLANT HATTIESBURG  
BUILDING NEURDOR  
MALEIC ANHYDRIDE FACILITIES  
FLOW SHEET  
DRAWING NUMBER 042 9115 000 2HM C  
PLANT ACCOUNT CLASSIFICATION

PROJ. PEND JOB NUMBER  
MICRO FILM  
REV. NO. 3936



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

October 20, 1986



OCT 21 1986

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

-> Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Mr. Watts:

Re your 10/14/86 letter addressing our Neuphor application, please find a copy of the application form properly signed and stamped by a professional engineer registered in the State of Mississippi.

Also enclosed is a second signature page which we request be used with the original application as a replacement for the unsigned page.

Very truly yours,

C. S. Jordan  
Environmental Supervisor

CSJ:sj  
0744C





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

October 7, 1986

RECEIVED  
OCT - 8 1986

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Dear Don:

Permit Application for Neuphor Plant

Please find the attached permit application for our Neuphor plant (Emission point 038).

A process description is included in the confidential attachment.

Sincerely,

C. S. Jordan  
Environmental Supervisor

CSJ:sj  
0736C

Attachment



Hercules Incorporated  
Hercules Plaza  
Wilmington, DE 19894  
(302) 594-5000  
Telex: 83-5479

CERTIFICATE OF AUTHORITY

Pursuant to the provisions of the State of Mississippi and the United States Environmental Protection Agency environmental regulations, I, D. S. Hollingsworth, being a principal executive officer of the Corporation of at least the level of Vice President, do hereby certify that I have this day authorized and directed, as my duly authorized representative, the person designated below (being the individual having responsibility for the overall operation of the regulated facility), to complete, sign, and submit, in the name and on behalf of the Corporation, all environmental reports or requests for information required by Federal and/or State permit issuing authorities:

Authorized Representative: G. R. Yandle, Sr.  
Plant Manager

Regulated Facility: Hercules Incorporated  
Hattiesburg, Mississippi

IN WITNESS WHEREOF, I have hereunto affixed my signature on this 22<sup>ND</sup> day of September 1986.

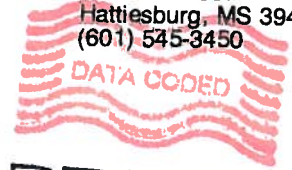
HERCULES INCORPORATED

  
\_\_\_\_\_  
D. S. Hollingsworth  
Vice Chairman

0046n



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



September 12, 1986

**RECEIVED**

SEP 17 1986

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Mr. Watts:

With reference to your letter of September 8, 1986, please find our permit renewal application with a confidential section attached.

Very truly yours,

C. S. Jordan  
Environmental Supervisor

CSJ/nb

Attachment

1557E



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



September 8, 1986

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

Dear Mr. Jordan:

Re: Facility No: 0800-00001  
Hattiesburg, Mississippi

Per your telephone request on September 8, 1986, enclosed is the renewal application you had previously submitted. I understand that you will make changes to that part of the application currently marked confidential and then return it to us.

If you have any questions, please contact me.

Very truly yours,

Don Watts  
South Air Emissions Section

DW:sr  
Enclosure





August 15, 1986

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

RECEIVED  
AUG 20 1986

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Miss. 39209

Dear Sir:

RE: OPERATING PERMIT NO 0800-00001  
HATTIESBURG, MISSISSIPPI

Please find the attached permit renewal application.

If I can answer any questions, please call me.

Very truly yours,

C. S. Jordan  
Environmental Supv.

CSJ:jr

Attachment

0357c:13



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

August 1, 1986

Mr. Don Watts  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

**RECEIVED**  
AUG 06 1986  
DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Dear Mr. Watts:

In reference to Operating Permit No. 0800-0001, please find the attached semi-annual report detailing all work done for emission point 021.

We will continue to submit this report on a semi-annual basis.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ/de  
0529L

Attachments



cc: D. W. Linde  
F. C. Lindsay  
D. T. Smith, Jr.

## Interoffice Memo

Hattiesburg, Miss.  
August 1, 1986

To: C. S. Jordan

From: Ray Bulson

OPERATING PERMIT NO. 08000-0001 HATTIESBURG, MS.

Re the above permit, Part III, other requirements, 4, the attached semi-annual report is submitted. This report is for January 1, 1986 through June 30, 1986.

RB:ect  
0054r:2

A handwritten signature in blue ink that reads "Ray Bulson".



PILOT PLANT

ASSESSMENT OF EMISSIONS

*****						
EQUIPMENT	DAYS	MATERIALS	PRODUCT	POTENTIAL EMISSIONS	CONTROL EQUIPMENT	TYPE VENT
*****						
AUTOCLAVE	46	HYDROCARBON RESINS	HYDROGENATED HYDROCARBON RESIN	HYDROGEN	VALVE	VALVE
		HYDROGEN		NITROGEN		
		NITROGEN				



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

April 14, 1986

**RECEIVED**  
APR 15 1986

Mississippi Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Attn: Don Watts

Dear Mr. Watts:

The purpose of this letter is to inform you that we will be receiving and storing BHMT (Bisexamethylenetriamine) for use as a feed ingredient in Kymene manufacture. The two existing BHMT storage tanks are equipped with conservation vents. BHMT has a melting point of 42°C.

If I can answer any additional questions, please call me.

Very truly yours,

C. S. Jordan  
Environmental Supervisor

CSJ:sj  
0662C

FORREST



Don W.

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

April 7, 1986

RECEIVED

APR - 9 1986

Mr. Dwight K. Wylie, P.E. Chief  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Dear Mr. Wylie:

In reference to Operating Permit No. 0800-0001, please find the attached monthly reports detailing the compliance status of the boilers for emission points 009 and 010.

We will continue to submit this report on a monthly basis.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ/de  
0529L

Attachments

4/04/86

To: C. S. Jordan

From: L. C. Polk

Operating Permit No. 00800-00001 Hattiesburg, MS  
Issued For The Operation of Air Emissions Equipment

In reference to the above permit, Part III, Other Requirements, 1-C, the following monthly report is for MARCH, 1986.

The report details the compliance status of the boilers with copies of all visible emissions evaluations in which any reading exceeds 40% opacity.

Total number of VEE copies attached = 2

In addition, copies of log sheets are attached for all visible emission evaluations when opacity exceeds 40% for two minutes or more.

Number of log sheets attached = 1

*L. C. Polk*

PART II

Page 14 of 35  
Permit No. 0800-000

PART II  
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning February 11, 1986, and lasting until September 1, 1986, the permittee is authorized to operate air emissions equipment and emit air contaminants from the Hard Resins Area, including the production of metal resinates, Emission Point 015.



Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

OE-3B



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



MEMORANDUM

FILE COPY

TO: Wayne Anderson

FROM: Don Watts

SUBJECT: Hercules, Inc. Modification/Operating  
Forrest County  
Facility No: 110-0800-00001-015  
Major/South  
For February 11, 1986, Permit Board

DATE: February 3, 1986

Hercules has been operating under a PEP a process from the production of metal resinates within the Hard Resins Area. Recent inspection showed this process to be operating as designed with no noticeable emissions. Therefore, I recommend that the Operating Permit be modified to include the process which is currently under a PEP.



RECEIVED

FEB 6 1986

*Quest*

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

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

RECEIVED

Hattiesburg, MS  
February 5, 1986

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watt  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

Dear Mr. Watts:

In reference to operating permit No. 0800-0001, please find the attached semi-annual report detailing all work done for emission point 021.

We will continue to submit this report on a semi-annual basis.

Very truly yours,

Charles Jordan  
Environmental Supervisor

CJ:jr

Attachments

0357c



## Interoffice Memo

cc: G. R. Yandle  
H. R. Buckley  
D. T. Smith, Jr.  
E. C. Linsay

Hattiesburg, Mississippi  
January 8, 1986

To: C. S. Jordan

From: O. E. Brock

Operating Permit No. 08000-0001  
Hattiesburg, Mississippi

Re the above permit, Part III, Other Requirements, 4, the attached semi-annual report is submitted. This report is for July 1, 1985 through December 31, 1985.

*O. E. Brock*

OEB:sj  
0607C

Attachment



<u>Equipment</u> <u>Kettle</u>	<u>Days</u>	<u>Materials</u>	<u>Product</u>	<u>Assessment</u> <u>of Emissions</u>		
				<u>Pot.</u> <u>Emissions</u>	<u>Control</u> <u>Equip.</u>	<u>Type</u> <u>Vent</u>
A	2	Drakeol-34 Adtac B-BHT	Rosin	Drakeol-34	Total Condenser	No Fl

# GRAY, MONTAGUE & PITTMAN

A PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELLORS AT LAW  
525 MAIN BUILDING  
POST OFFICE DRAWER 1978

TELEPHONE  
(601) 544-1234

REGINALD A. GRAY, JR. (1919-1978)  
FRANK D. MONTAGUE, JR.  
R. A. GRAY, III  
JAMES C. PITTMAN, JR.  
F. DOUGLAS MONTAGUE, III  
THOMAS E. SCHWARTZ  
BARBARA B. PARKER

HATTIESBURG, MISSISSIPPI 39401

October 15, 1985  
(Dictated October 14, 1985)

RECEIVED  
OCT 17 1985

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mississippi Air and Water Pollution  
Control Commission  
1100 Robert E. Lee Building  
Jackson, MS 39201

Gentlemen:

A highly respected Hattiesburg client who lives in the Hercules plant area is quite concerned about air pollution, noting that the smoke stack emissions from Hercules vary in color and that a number of people in the Hercules area are incapacitated because of what they believe to be plant emissions.

I assume that your Department or the Environmental Protection Agency monitors and measures such emissions and would appreciate a copy of any available reports thereasto. Your invoice for the reports will be promptly paid.

Sincerely,



Frank D. Montague, Jr.

FDMjr:ms



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

October 11, 1985

RECORDED  
OCT 15 1985

DEPT. OF NATURAL RESOURCE  
BUREAU OF POLLUTION CONTROL

Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Mr. Watts:

Re: Performance Evaluation Permit No. 0800-00001

Due to current business conditions, the operation of metal resinate production associated with the above referenced performance evaluation permit, which expires October 28, 1985, has been delayed.

I will notify you as soon as business conditions require normal metal resinate production. If I can answer any additional questions, please call me.

Very truly yours,

Charles Jordan  
Environmental Sypervisor

CJ/de  
0529L

October 9, 1985

Mr. G. R. Yandel  
Hercules Inc.  
P. O. Box 1957  
Hattiesburg, Mississippi 39401

Dear Mr. Yandel:

Re: Facility No. 0200-00901  
Hattiesburg, Mississippi

**FILE COPY**  
*Forest*

On August 14, 1985, Mr. Charles Jordan and I discussed your plans to bring in a gas-fired package boiler to use in place of the woodwaste boilers. I informed him then that an application should be submitted and approval obtained prior to bringing in the package boiler. No application has yet been received.

During an inspection on August 28, 1985, Ms. Heidi Nowery of our South Regional Office was told that Hercules planned to convert all boilers to gas-fired units in October or November. This is different from what I was told on August 14, 1985, by Mr. Jordan.

Please furnish us your plans for the boilers by October 17, 1985. If you have any questions, please contact us.

Very truly yours,

Don Watts  
South Air Emissions Section

DW:cm  
cc: Mr. Charles Jordan, Hercules  
Mr. D. H. Maybury



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



*Forrest*

M E M O R A N D U M

TO: File

FROM: Don Watts

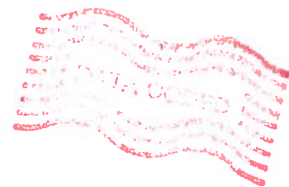
SUBJECT: Hercules Incorporated  
110-0800-00001  
Forrest County  
Review of Test Report

DATE: August 15, 1985

Stack test reports for tests performed by EML, Inc., on the four (4) woodwaste boilers at Hercules have been reviewed. No problems were noted, and the tests should be accepted as demonstration of compliance.

Updated emissions inventory forms will be prepared.

DW:hdb





Hercules Incorporated  
Forest Resources  
P. O. Drawer 1937  
Hattiesburg, MS 39401  
(601) 545-3450

July 18, 1985

Mr. Don Watts  
Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

Dear Mr. Watts:

In reference to operating permit No. 0800-0001, please find the attached semi-annual report detailing all work done for emission point 021.

We will continue to submit this report on a semi-annual basis.

Very truly yours,

Charles Jordan  
Environmental Supervisor

CSJ:bs

Attachments



## Interoffice Memo

cc: G. R. Yandle  
H. R. Buckley  
D. T. Smith, Jr.  
E. C. Linsay

Hattiesburg, Mississippi  
July 17, 1985

To: C. S. Jordan

From: O. E. Brock

Operating Permit No. 08000-0001  
Hattiesburg, Mississippi

Re the above permit, Part III, Other Requirements, 4, the attached semi-annual report is submitted. This report is for January 1, 1985 through June 30, 1985.

*O. E. Brock*

OEB:sj  
0519C

Attachment

<u>Equipment</u> <u>Kettle</u>	<u>Days</u>	<u>Materials</u>	<u>Product</u>	<u>Assessment</u> <u>of Emissions</u>		
				<u>Pot.</u> <u>Emissions</u>	<u>Control</u> <u>Equip.</u>	<u>Type</u> <u>Vent</u>
A	3	Tall Oil Rosin Diethylene Glycol Calcium Formate Magie 535 Oil	Rosin	Diethylene Glycol	Total Condenser	No Flow
B	13	Rosin Toluene Calcium Oxide Zinc Oxide	Resinate	Water of Reaction Toluene	Total Condenser	No Flow
C	31	Rosin Lactol Spirits Rosin Residue Pamak T.P. Conto Rosin Isopropyl Alcohol	Rosin	Lactol Spirits Isopropyl Alcohol	Total Condenser	No Flow
D	2	Stearic Acid Ethylene Diamine Silicone	Amide	Water of Reaction	Total Condenser	No Flow
<u>Reactors</u>						
A		Hydrocarbon Resin p-Menthane H <sub>2</sub>	Hydrogenated Resin	Hydrogen	None	Hydrogen Purge





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

June 14, 1985

Mississippi Department of Natural Resources  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

ATTN: Don Watts

Dear Mr. Watts:

RE: OPERATING PERMIT NO. 0800-00001

As required under Permit No. 0800-00001, part III, (1), D, please find the enclosed Report of Particulate Emissions Tests for Hercules Incorporated Boilers 1,2,3, and 4.

If I can answer any questions please call me.

Very truly yours,

Charles Jordan  
Environmental Supervisor

CJ:sw

Enclosure



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

May 17, 1985

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

Dear Mr. Wylie:

This letter is in response to your request made at our May 3rd meeting for a general plan to ensure the continuous compliance of our wood fired boilers.

During the early part of 1984 our stump grinding operation was shut down. This eliminated our long time internal supply of spent wood chips for fuel consumption in our wood-fired boilers. For the first time ever, we had to go outside of Hercules and find an alternate wood fuel supply. By the middle of 1984, we had developed alternate suppliers for wood chip fuel. However, we also began to realize new problems associated with this new fuel source. These consisted of varying types and sizes of chips, sawdust, and moisture content. By the latter part of 1984, we had initiated an ongoing engineering study designed to (1) cope with our new fuel and (2) outline mechanical improvements to our existing, very old (ca-1935) boilers. Unfortunately, due to continued low projected production rates, construction of new boilers seems unlikely in the near future. As a result, we realize that our existing boilers must operate within compliance. We believe the following course of action should permit continuous compliance of our boilers.

All fuel wood suppliers (approximately 17) have been notified that no sawdust will be allowed in chips purchased by our plant. Failure to comply with this requirement will result in termination of their purchase agreement. As a result of this effort, we have already terminated purchase agreements for three wood suppliers for excess sawdust in their deliveries. We expect to have our sawdust problems and supplier requirements in full effect by June 30, 1985. Regular monitoring will continue to assure high quality wood chip deliveries in the future.

We are currently trying to increase boiler efficiencies with several mechanical improvements. We have just completed improvements in the operation of the Induced Draft fan damper and a major modification in the overfire air nozzles for No. 4 boiler. These improvements coupled with extensive refractory work to seal up the boiler should allow much better control of the firebox pressure and minimize excess air. We are ready to begin an evaluation of No. 4 boiler performance (excess oxygen levels, temperatures, etc.). We should complete this evaluation by the end of July, 1985. Better control of the firebox pressure with damper and refractory improvements should result in better oxygen and temperature control. The overfire air nozzle improvements

should increase turbulence in the firebox and allow a larger zone of high temperature incineration to facilitate complete combustion. Once we have demonstrated the success of No. 4 boiler improvements, we will make equivalent changes in the other three boilers. Modifications to all four boilers will be completed by the end of this year.

We also plan to install new oxygen analyzers on all four wood boilers. These units will permit continuous monitoring of firebox oxygen levels and provide a good indication for draft and damper control. The new analyzers will be installed by the 4th quarter, 1985.

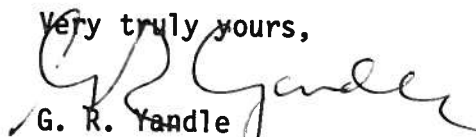
We are studying the feasibility of a project to install a mechanical vacuum pump to improve our ash removal system. The purpose of the vacuum pump is to allow faster ash removal. This should result in less cooling of the boiler when it is shut down to clean fires and thus help minimize smoke during startup.

All of our Boiler Room personnel have completed the first phase of our plantwide operator training program consisting of basic operator training. The second training phase specific to boiler room operation is 80% written and will be completed by July 31, 1985. Training of Boiler Room operators and supervision will continue with phase two in the 3rd quarter, 1985. The third phase of training and performance certification will be completed by mid-1986.

We believe the plan, as outlined above, will enable us to meet our woodwaste boiler permit conditions and satisfy your request from our May 3rd meeting.

If you need any additional information or if we can answer any additional questions, please call us.

Very truly yours,

  
G. R. Yandle  
Plant Manager

GRY/CJ/k1m

1583K

Forest

May 8, 1985

Mr. G. R. Yandle  
Hercules Incorporated  
P. O. Box 1937  
Hattiesburg, Mississippi 39401

FILE COPY

Dear Mr. Yandle:

Re: Facility No. 0800-00001  
Hattiesburg, Mississippi

It was a pleasure to meet with you and the other Hercules personnel last week. As a result of the meeting we understand that you will be submitting within two weeks a general plan to ensure the continuous compliance of the woodwaste boilers.

If you have any questions, please contact us.

Very truly yours,

Don Watts  
South Air Emissions Section

DW:cm



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



M E M O R A N D U M

TO: File

FROM: Jesse Thompson, Jr.

SUBJECT: Stack Test Performed  
Facility No. 110-0800-00001

DATE: May 2, 1985

On Tuesday April 30, 1985, the No. 4 woodwaste boiler was tested for particulate emissions at Hercules in Hattiesburg. The testing was performed by Danny Russell of EML. The testing began at 10:06 a.m. and was finished at 1:53 p.m. A V.E. was done during the test which revealed an average opacity of 22.4%. I recommend that the test be accepted.

JT:hdb



*Forest*

ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 \* 224-B Hwy 51 North  
Ridgeland, Mississippi 39157

(601) 856-3092

---

April 17, 1985

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

Re: Hercules Inc.  
Hattiesburg, Mississippi

Dear Mr. Watts

This letter is to propose a schedule for conducting particulate emissions tests for compliance determination for the four wood waste boilers operated at Hercules. We would like to schedule the four tests for the week of April 29, 1985, anticipating the first test to begin on Tuesday the 30th.

Please call me if you have any questions or if the schedule is not acceptable

Very truly yours,

ENVIRONMENTAL MONITORING LABORATORIES



Daniel G. Russell

DGR/mr

cc: Mr. Charles Jordon  
Hercules, Inc.

*True*

**FILE COPY**

March 22, 1985

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

Dear Mr. Jordan:

Re: Facility No: 0800-00001  
Hattiesburg, Mississippi

The proposed project to produce metal resinates will require as a minimum, a modification to your Permit to Operate. However, if the project will create emissions of new pollutants or increase emission rates of current pollutants, a Permit to Construct will be required. To determine the proper permitting procedure, the enclosed application must be completed and returned.

If you have any questions, please contact us.

Very truly yours,

Don Watts  
South Air Emissions Section

DW:sr  
Enclosure

Don Wo



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

March 29, 1985

CONFIDENTIAL "PROPRIETARY INFORMATION"

Department of Natural Resources  
Bureau of Pollution Control  
P.O. Box 10385  
Jackson, Mississippi 39209

Attention: Dwight K. Wylie

Dear Mr. Wylie:

The purpose of this letter is to inform the Bureau of Pollution Control that Hercules is installing additional safety equipment for our Phosgene cylinder facilities.

The additional safety precaution, for which we are committing approximately \$500,000 to its installation, is to provide additional protection against the possibility of an unexpected release. The additional safety precaution consists of enclosing the cylinder facilities in a building provided with adequate safety equipment features for containing and neutralizing any release.

The existing caustic neutralization scrubber associated with the cylinder facilities will be replaced with a larger scrubber capable of handling both the present scrubber requirements plus any unexpected release contained in the new safety building housing.

Very truly yours,

Charles S. Jordan  
Environmental Coordinator

CSJ:bs  
0020t





RECEIVED

## Interoffice Memo

MAR 19 11 38 AM

March 14, 1985

Mr. Dwight K. Wylie, P.E.  
Chief, Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

ATTN: Mr. Wylie:

This letter is in reply to your March 8, 1985, letter addressing the cause and corrective action taken for the January 29, 1985, visible emission cited in your February 19, 1985, letter. Since my February 26, 1985, letter addressed future boiler improvements, the purpose of this letter is to respond to your request concerning the cause and correction of the January 29, 1985, visible emission.

As noted on the January 29, 1985, visible emission data sheet remarks section, the following conditions were present during this incident and the following corrective action was taken.

No. 2 boiler, emission point 009 - south stack, was out of service because of mechanical failure. The boiler was taken out of service on January 26, 1985, because of a ruptured economizer tube and put back in service the afternoon of January 29, 1985.

No. 1 boiler, emission point 009 - south stack, was shut down for cleaning fires from 9:55 A.M. to 11:35 A.M. during the time of the visible emission reading.

This left only two boilers, No. 3 and No. 4, emission point 010 - north stack, to supply the entire plant steam load while cleaning No. 1 boiler fires.

During this period we encountered severe problems with wet sawdust in our woodchips which caused the visible emission problem. Too much sawdust, especially wet, tends to blanket the fire, reduce forced draft, and enhances incomplete combustion.

As the result of this incident we are now rejecting all loads of woodchips containing excessive sawdust, wet or dry.

In summary, the visible emission problem was caused by wet sawdust feed coupled with generating the plant steam demand with only two boilers. Any future loads of woodchips containing excessive amounts of sawdust will not be used.

I trust this information fulfills your requests. If I can answer any additional questions please call me.

Very truly yours,



C. S. Jordan  
Environmental Coordinator

CSJ:m1  
0275Y



HIMONT U. S. A., Inc.  
P. O. Box 1687  
Lake Charles, LA 70602  
(318) 882-1651

March 13, 1985

Mr. Dwight K. Wylie, P.E.  
Chief, Air Division  
Mississippi Department of Natural Resources  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, Mississippi 39209

Dear Mr. Wylie:

Re: Hercules Incorporated - Hattiesburg

Please ensure that copies of correspondence pertaining to Hercules' Hattiesburg plant in the future are mailed to the following address:

(Mr.) D. H. Maybury, Regional Environmental Manager  
Hercules Incorporated  
501 Gloucester Street  
Brunswick, Georgia 31520

The change is a result of a recent "redistribution" of the environmental responsibilities for Hercules' plants.

It has been a pleasure knowing you.

Sincerely,

A handwritten signature in black ink, appearing to read "L. G. Lund".

L. G. Lund  
Manager Regulatory Affairs  
Health, Environment and Safety

rd  
Attachment  
5126r

xc: D. H. Maybury - Brunswick, Georgia

**FILE COPY**

*Forest*

March 8, 1985

Mr. Charles S. Jordan  
Environmental Coordinator  
Hercules, Inc.  
Box 1937  
Hattiesburg, Mississippi 39401

Dear Mr. Jordan:

We have received your letter of February 26, 1985; however, we do not see where this addresses the cause or correction of the visible emissions problem we cited in our letter. Therefore, we must proceed with this matter as a violation of emission regulations unless we hear something else from you.

If you have any questions, please advise.

Very truly yours,

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

DKW:WBA:sr



*Don-file*

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

February 26, 1985

Mr. Dwight K. Wylie, P.E.  
Chief, Air Division  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS. 39209

Dear Mr. Wylie:

This letter is in reply to the request in your February 19, 1985, letter.

As part of Hercules' commitment to comply with all regulatory requirements, we recognize the need for any improvements we can make in order to operate our boilers with a minimum amount of opacity.

During the later part of 1984 we modified the overfire in one of our boilers by reducing the outlet diameter on the air nozzles. The purpose of this was to create higher velocities and more turbulence in the overfire region to facilitate combustion. Problems with the boiler I.D. fan have prevented the evaluation of this change. The I.D. fan will be back in service next week and we expect to evaluate and complete this study by April 1, 1985.

If successful we will then modify the overfire on our other three boilers in order to minimize opacity.

If I can answer any additional questions, please call me.

Very truly yours,

Charles S. Jordan  
Environmental Coordinator

CSJ:m1  
0265Y

**FILE COPY**

February 19, 1985

Mr. H. R. Buckley, Plant Manager  
Hercules Incorporated  
P.O. Box 1937  
Hattiesburg, Mississippi 39401

Dear Mr. Buckley:

On January 29, 1985, personnel from our office observed exceedances of emission limits for opacity at Hercules. Copies of the VEE's for these exceedances are attached. These exceedances constitute apparent violations of the emission limits for Hercules. Please let us know within ten (10) days what Hercules has done or will do to correct these apparent violations; a compliance schedule for accomplishing these actions, if not already accomplished; and actions Hercules will take to ensure that this does not occur again.

If you have any questions, please let us know.

Very truly yours,

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

DKW:sr  
Enclosures

cc: Mr. L. G. Lund



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



*Forest  
Hawks*

February 19, 1985

Mr. James T. Wilburn, Chief  
Air Management Branch  
U.S. Environmental Protection Agency  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Dear Jim:

Enclosed please find our regular monthly air pollution control enforcement report for the month of January, 1985. On the enclosed Major Source Status Report, the January, 1985, updates have been noted in red ink.

The status reports on previously submitted (FY-84) action plans are given below:

(1) Mississippi Army Ammo Plant - Picayune, Mississippi

A show-cause conference was held January 29, 1985. The Army committed to provide a firm compliance schedule on the forge area problems (hoods and SMOG-HOGS) by April 1, 1985. The army's progress on the Mechanical Plant (boilers) is on schedule.

(2) Chevron USA, Inc. Sulfur Plant IV - Pascagoula, Mississippi

We are still awaiting EPA concurrence with the compliance test methods for Sulfur Plant IV.

Regarding the failure of blowers on the two sulfur tanks, the company is on schedule with the compliance schedule.

(3) Grisham Paving Company - Tishomingo, Mississippi

The company has not demonstrated compliance. An Order was issued at the January 16, 1985, Commission meeting. A copy of this Order is enclosed.

(4) Mid-State James Paving Company - Louisville, Mississippi (Meridian, Mississippi)

Based on EPA's letter of February 1, 1985, concerning the compliance test report, the compliance status is being changed from compliance by inspection to compliance by testing.

(5) Barriere Construction Company - Picayune, Mississippi

We are awaiting EPA response regarding the compliance test methodology problems.

Mr. James T. Wilburn  
Page 2  
February 19, 1985

Pursuant to discussions in our February 12, 1985, conference call, we have sent a warning letter notifying Kitchens Brothers Lumber Company of the two visible emissions violations. The company feels they have corrected the boiler problems which caused the excessive visible emissions but have not provided us satisfactory explanation or commitment on preventing future exceedences. Due to the boiler not operating recently we've been unable to perform additional visible emissions evaluations.

Hercules, Inc. of Hattiesburg has been changed to "unknown" compliance status. Visible emissions evaluations by two independent observers on January 29, 1985, showed exceedences of the opacity regulation on one of the two woodwaste boiler stacks. A letter is being sent to the company notifying them of our results and asking for their explanation of the cause of the exceedences and their plans to prevent future exceedences.

Hot Mix No. 1, Laurel, Mississippi, has been previously identified as out-of-compliance with emission limits as determined by stack test. The company has been informed of the violation and has taken certain actions (equipment inspection, etc.) but has not yet retested or provided a schedule for achieving compliance. We expect to shortly take action to either hold a show-cause conference, issue an Order, or hold a hearing.

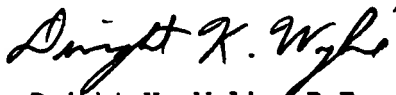
Republic Refining near Johns, Mississippi, had been carried in "unknown" compliance status but, based on recent inspection and comparison of current operating data with that taken during the last compliance test, we feel the facility is in compliance with the emission limits. Therefore, we are changing the status to "in-compliance-by-inspection". A copy of the inspection report is attached.

Enclosed is the "Source Level Information for CDS" for APAC-Mississippi, Inc., 1680-00013. Please note that the applicable regulation is SIP, not NSPS. The NSPS designation was an error. This is the plant formerly located at Carrollton, Mississippi, in Carroll County and was determined at that time not to be NSPS subject.

Also, enclosed please find a summary of asbestos demolition activities for January, 1985, including the status of any asbestos demolition violations, and copies of the excess emissions reports on NSPS Subpart D and Da sources for the last calendar quarter of 1984.

Also, enclosed are earlier violation notification letters for Hot Mix No. 1, Hot Mix No. 4, and Kitchens Brothers Lumber.

Very truly yours,



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

DKW:sr  
Enclosures





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



*Forrest*

MEMORANDUM

TO: DON WATTS  
 FROM: HEIDI MOWERY  
 SUBJECT: HERCULES, INC., FORREST CO. 0800-00001  
 DATE: 1-29-85

ON THE ABOVE DATE, WHILE IN THE VICINITY, AN EXCURSION FROM THE NORTH STACK OF HERCULES, INC. WAS NOTICED BY MIKE BRADSHAW AND MYSELF. AFTER SEVERAL MINUTES OBSERVATION, A V.E.E. WAS CONDUCTED SINCE THE EXCURSION CONTINUED.

UPON CONTACTING THE BOILER OPERATOR, MR. VAN BEEK INFORMED ME THAT THE GRATES WERE BEING RAKED AT THE TIME. HE ALSO COMMENTED THAT THEIR OWN INDIVIDUAL WHO DOES THE DAILY V.E.E.S USUALLY DID SO AT THAT TIME AND THAT THEIR DAILY RECORD WOULD PROBABLY SHOW THE EXCURSIONS AS WELL. MR. VAN BEEK ALSO MENTIONED THAT THEY WERE HAVING A PROBLEM WITH WET SAWDUST FUEL.

SHOULD YOU NEED ANY FURTHER DETAILS REGARDING THIS MATTER, PLEASE CONTACT ME.

*Heidi Mowery*  
 HEIDI MOWERY  
*HM*

DATA CODED