



STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

December 8, 1994

Certified Mail No. Z 765 989 659

Mr. Charles S. Jordan, Environmental Supervisor  
Hercules Inc.  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401

Dear Mr. Jordan:

Re: Notice of Effective Dates  
Hercules Incorporated  
Hattiesburg, Mississippi  
Facility No. 0800-00001

This is to acknowledge receipt on November 29, 1994, of certification of construction for the new tank car first out product loading/unloading station, Emission Point 280 .

The effective date of Operating Permit requirements for Emission Point 280 is therefore November 29, 1994. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit.

Any significant modification to this process of facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit.

The Operating Permit expires on June 1, 1996. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

If you have any questions or if we can be of service, please let me know.

Sincerely,

Brian McVey  
Stationary Source Compliance Section

BMV:ts

OFFICE OF POLLUTION CONTROL, P. O. BOX 10385, JACKSON, MS 39289-0385, (601) 961-5171



FILE COPY

STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

December 7, 1994

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

Dear Mr. Jordan:

Re: Facility No. 0800-00001  
Hercules Incorporated  
Hattiesburg, MS

We have received your letter dated November 23, 1994, regarding your proposed replacement of diethylenetriamine (DETA) with hexamethylenediamine (HMDA) in storage tank K-120. Based on our regulations, you do not need a construction permit at this time. However, notification of this replacement should be sent to our office once completed.

If you have any questions, please contact me at (601)961-5669.

Sincerely,

James Dowdy  
Air Permitting Branch

JD:vt



November 23, 1994

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

Certified Mail - Return Receipt Requested  
No. Z 060 871 908

Wayne Anderson  
Air Permitting Branch  
Office of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289-0385



Dear Mr. Anderson:

Re: Construction Permit No. 0800-00001

Please find the following certification that construction was completed in accordance with the approved plans and specifications for the new tank car first out product loading/unloading station. The start-up date began November 4 and was completed the 2nd week of November, 1994.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



November 23, 1994

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

Certified Mail - Return Receipt Requested  
No. Z 060 871 909

Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson MS 39289-0385



Dear Mr. Watts:

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

Please find the following data and support documentation for our existing Kymene production process emission point 160.

One of the ingredients in one of our existing Kymene products is Diethylenetriamine (DETA). Sales demand require producing Kymene using Hexamethylenediamine (HMDA). We plan to convert one of our two existing DETA storage tanks to HMDA storage service. The HMDA Kymene production will be produced within our current permitted capacity for Kymene production.

Both HMDA and DETA are in the alkyl amine chemical family. Upon approval storage tank K-120 will be converted from DETA to HMDA storage service. During the interim period for the storage tank conversion (installation of separate pump, transfer line, etc.) we would respectfully request the interim use of HMDA from drums to supply sales demands.

Our permitted Kymene capacity is 110.8 MM lbs/year. Our current production will increase from approximately 85 MM lbs/year to approximately 90 MM lbs/year as a result of this minor change. Due to sales demands please expedite this request.

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

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



**FILE COPY**

**STATE OF MISSISSIPPI**

DEPARTMENT OF ENVIRONMENTAL QUALITY

**JAMES I. PALMER, JR.**  
EXECUTIVE DIRECTOR

September 27, 1994

**Mr. G. R. Preston Kirkendall**  
Hercules, Inc.  
P.O. Box 1937/ W 7th St.  
Hattiesburg, MS 39401

Dear Mr. Kirkendall:

Re: Facility No. 0800-00001  
Synthetic Minor Operating Permit Program

As of our latest review, your current file indicates that your facility will be required to hold a Title V Operating Permit. This letter is to address the requirements and conditions of the Synthetic Minor Operating Permit Program for potential Title V facilities. After revisions to the State Implementation Plan (SIP) are approved by the United States Environmental Protection Agency (EPA), the Mississippi Department of Environmental Quality (DEQ) will have the authority to issue Synthetic Minor Operating Permits.

In order to receive a Synthetic Minor Operating Permit, your facility must first be classified as a Synthetic Minor Source. A Synthetic Minor Source is any facility which would otherwise constitute a major source under Commission Regulation APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", except that the owner or operator of the facility elects for federally enforceable emissions limitations which may include permit conditions restricting hours of operation; type or amount of material stored, combusted, or processed; or establishing more stringent air pollution control efficiency requirements to lower allowable emissions for air pollutants in the State Permit to Operate below applicability thresholds for a Title V major source. As you may be aware, the current thresholds defining a facility as a Title V major source are 10 tons per year (tpy) or more of any hazardous air pollutant, 25 tpy or more of any combination of hazardous air pollutants, or 100 tpy or more of any air pollutant.

We are trying to determine how many Title V sources are planning to pursue a Synthetic Minor Operating Permit. Therefore, we would like for you to complete and return the enclosed form by October 10, 1994. Your indication is not a commitment; you will still have the opportunity to pursue either a Title V Permit or a Synthetic Minor Permit. This information will simply be used as a tool in planning the most efficient use of our resources.

If you have any questions, please call me at (601)961-5171.

Sincerely,

**Brian Ketchum**  
Title V Permitting Section

Enclosure



FILE  
COPY

**STATE OF MISSISSIPPI**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**JAMES I. PALMER, JR.**  
EXECUTIVE DIRECTOR

**August 8, 1994**

**Mr. Preston Kirkendall**  
**Plant Manager**  
**Hercules Inc.**  
**P. O. Box 1937**  
**Hattiesburg, MS 39401**

**Dear Mr. Kirkendall:**

**Re: Facility No. 0800-00001**  
**Hattiesburg, Mississippi**

**On June 30, 1994, Office personnel performed an inspection of the referenced facility. There were no apparent air pollution problems.**

**If you have any questions, please contact us.**

**Very truly yours,**

**Jody Lindsey**  
**Stationary Source Compliance Section**



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

June 10, 1994



Certified Mail - Return Receipt Requested  
No. P 664 277 462

Wayne Anderson  
Air Permitting Branch  
Office of Pollution Control  
P. O. Box 10385  
Jackson MS 39289-0385

Dear Mr. Anderson:

Re: Construction Permit No. 0800-00001

Please find the following certification that construction was completed in accordance with the approved plans and specifications for the new slurry tank associated with emission point 280. Startup date for the new slurry tank was June 1, 1994.

Construction for the new tank car first out product loading/unloading station, also associated with emission point 280, is not complete. When it is completed we will submit certification and the startup date for the new tank car station.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



Forest  
**FILE COPY**

**STATE OF MISSISSIPPI**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
**JAMES I. PALMER, JR.**  
EXECUTIVE DIRECTOR

June 3, 1994

Certified Mail No. P 390 336 584

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

Dear Mr. Jordan:

Re: Permit to Construct &  
Permit to Operate No. 0800-00001  
Hattiesburg, Mississippi

This letter is to inform you that the above referenced Permit to Construct and Permit to Operate have been modified. These modifications consist of changing the Toluene emission limits for Emission Points 280, 281, and 282 to 13.34 lbs/hr and 58.4 tons/year.

Enclosed please find the modified permits.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Very truly yours,

Brad Shanks  
Air Permitting Branch

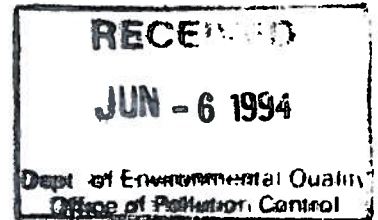
BS:sr  
Enclosure





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

June 3, 1994



Certified Mail - Return Receipt Requested  
No. P 664 277 460

Wayne Anderson  
Air Permitting Branch  
Office of Pollution Control  
P. O. Box 10385  
Jackson MS 39289-0385

Dear Mr. Anderson:

Re: Construction Permit No. 0800-00001

Please find the date of startup for the new slurry tank to be, June 1, 1994.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



**STATE OF MISSISSIPPI**

DEPARTMENT OF ENVIRONMENTAL QUALITY

**JAMES I. PALMER, JR.**  
EXECUTIVE DIRECTOR

**May 13, 1994**

**Mr. Charles Jordan**  
**Hercules, Inc.**  
**P.O. Box 1937/ W 7th St**  
**Hattiesburg, MS 39401**

**Dear Mr. Jordan:**

**Re: Title V Air Operating  
Permit Program**

As you are aware, Title V of the Federal Clean Air Act requires all states to develop and implement a Federal Air Operating Permit Program. Sections 49-17-1 through 49-17-43 of the Mississippi Code Annotated establish the legal authority for the DEQ to develop a Title V program. One of the required program elements is a fee program which covers the entire direct and indirect cost of the Title V program. Section 49-17-30 established that this fee would be based on the emissions of regulated air pollutants from all facilities required to hold a Title V permit and would be assessed annually.

A review of your current file indicates that your source will be required to hold a Title V permit. The evaluation of your allowable emissions is shown on the attached reporting form. As provided by Section 49-17-32, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in Section 49-17-32 and are listed on the attachments. If you choose the basis of actual emissions, you must submit the attached reporting form showing your inventory of emissions for the 1993 calendar year by July 1, 1994, along with the calculations and the methodology used in determining the inventory. If an inventory of emissions has not been received by July 1, 1994, the allowable emissions shown on the attached reporting form will be used as the basis for this year's assessment of fees.

Section 49-17-30 established that the interim fee prior to full implementation of the Title V program is \$4/ton of emissions of each pollutant for which fees can be assessed under the Title V program. For purposes of fee assessment and collection, the maximum emission rate of each pollutant used in the calculation of fees shall be 4,000 tons per year per facility. Fees will be assessed on all regulated pollutants except carbon monoxide (CO) and CFCs/HCFCs.



STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

FILE COPY

April 5, 1994

Certified Mail No. P 300 839 291

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

Dear Mr. Jordan:

Re: Facility No. 0800-00001  
Hattiesburg, Mississippi

Enclosed please find Construction Permit No. 0800-00001 for the construction of the air emissions equipment and air pollution control equipment.

Also enclosed is Operating Permit No. 0800-00001, which has been modified to include the new air emissions equipment. Operation of the air emissions equipment at the facility shall be in accordance with the terms, conditions, and limitations of the permit. This permit expires on June 1, 1996. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

Any significant modification to this process or facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit.

Prior to startup of the new air emissions equipment at this facility, it will be necessary to submit certification that construction was completed in accordance with the approved plans and specifications. Upon receipt of the certification of construction, the applicable Emission Points in the referenced Operating Permit will become effective.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

If you have any questions or if we can be of any service, please let me know.

Very truly yours,

Brad Shanks  
Air Permitting Branch

BS:sr  
Enclosure

OFFICE OF POLLUTION CONTROL, P. O. BOX 10385, JACKSON, MS 39289-0385, (601) 961-5171



STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

February 17, 1994

Dear Sir:

Under the Clean Air Act as amended in 1990, the Environmental Protection Agency (EPA) is required to publish National Emission Standards for Hazardous Air Pollutants (NESHAP) according to selected source categories. The EPA has recently proposed a NESHAP which, when finalized, will require that no chromium or chromium compounds be used in any Industrial Process Cooling Tower (IPCT) for water treatment programs or any other reason. This standard will apply for any cooling tower that is a major source or an integral part of a facility that is a major source.

The Mississippi Department of Environmental Quality is attempting to identify facilities in Mississippi that may be impacted. We are asking for your help in this determination by completing and returning the enclosed survey. Also enclosed is a sheet which gives the definition of a major source as stated in the CAA and a brief description of what an industrial process cooling tower is and how it is used.

We believe you will be able to complete this survey in just a few minutes. Please return this survey by March 25, 1993. If you have any question, please call me at (601) 961-5672.

Sincerely,

A handwritten signature in cursive script that reads "Scott Hodges".

Scott Hodges  
Air Toxics Branch

Enclosure

Definition of a major source as defined in Section 112 (a) (1) of the Clean Air Act:

Major Source - The term "major source" means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants listed in Title III of the Clean Air Act (see attachment), or any such lesser quantity as the EPA may establish by rule.

Definition of a Cooling Tower and Industrial Process Cooling Tower as defined in 40 CFR Part 63, Subpart Q:

Cooling Tower - "Cooling tower" means an open water recirculating device that uses fans or natural draft to draw or force ambient air through the device to cool warm water by direct contact.

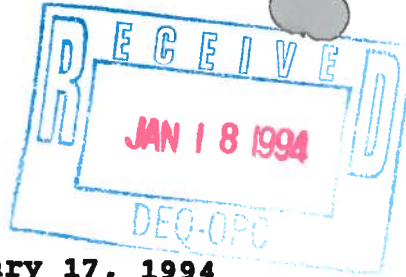
Industrial Process Cooling Tower - "Industrial Process Cooling Tower" or IPCT means any cooling tower that is used to remove heat that is produced as an input or output of a chemical or industrial process(es), as well as any cooling tower that cools industrial processes in combination with heating, ventilation or air conditioning systems.

**Hazardous Air Pollutants Subject to the Provisions of Section 112 of the 1990 Clean Air Act Amendments**

Chemical Name	CAS No.	Chemical Name	CAS No.
Acetaldehyde	75070	Cresol(o)	95487
Acetamide	60355	Cresol(p)	106445
Acetonitrile	75058	Cresols/Cresylic acid	1319773
Acetophenone	98862	Cumene (Isopropylbenzene)	98828
Acetylamino fluorene(2)	53963	Cyanide Compounds <sup>1</sup>	—
Acrolein	107028	D(2,4), salts and esters	94757
Acrylamide	79061	DDE	3547044
Acrylic acid	79107	Diazomethane	334883
Acrylonitrile	107131	Dibenzofurans	132649
Allyl chloride	107051	Dibromo-3-chloropropane(1,2)	96128
Aminobiphenyl(4)	92671	Dibutylphthalate	84742
Aniline	62533	Dichlorobenzene(1,4)(p)	106467
Anisidine(o)	90040	Dichlorobenzidene(3,3)	91941
Antimony Compounds	—	Dichloroethyl ether	
Arsenic Compounds	—	(Bis(2-chloroethyl)ether)	111444
(inorganic including arsine)	—	Dichloropropene(1,3)	542756
Asbestos	1332214	Dichlorvos	62737
Benzene	71432	Diethanolamine	111422
Benzidine	92875	Diethyl aniline (N,N)	
Benzotrichloride	98077	(Dimethylaniline (N,N))	121697
Benzyl chloride	100447	Diethyl sulfate	64675
Beryllium Compounds	—	Dimethoxybenzidine(3,3')	119904
Biphenyl	192524	Dimethyl aminoazobenzene	60117
Bis(2-ethylhexyl)phthalate (DEHP)	117817	Dimethyl benzidine(3,3')	119937
Bis(chloromethyl)ether	542881	Dimethyl carbamoyl chloride	79447
Bromoform	75252	Dimethyl formamide	68122
Butadiene(1,3)	106990	Dimethyl hydrazine(1,1)	57147
Cadmium Compounds	—	Dimethyl phthalate	131113
Calcium cyanamide	156627	Dimethyl sulfate	77781
Caprolactam	105602	Dinitro-o-cresol(4,6), and salts	534521
Captan	133062	Dinitrophenol(2,4)	51285
Carbaryl	63252	Dinitrotoluene(2,4)	121142
Carbon disulfide	75150	Dioxane(1,4) (1,4-Diethyleneoxide)	123911
Carbon tetrachloride	56235	Diphenylhydrazine(1,2)	122667
Carbonyl sulfide	463581	Epichlorohydrin	
Catechol	120809	(Chloro-2,3-epoxypropane(1))	106898
Chloramben	133904	Epoxybutane(1,2) (1,2-Butylene oxide)	106887
Chlordane	57749	Ethyl acrylate	140885
Chlorine	7782505	Ethyl benzene	100414
Chloroacetic acid	79118	Ethyl carbamate (Urethane)	51796
Chloroacetophenone(2)	532274	Ethyl chloride (Chloroethane)	75003
Chlorobenzene	108907	Ethylene dibromide (1,2-Dibromoethane)	106934
Chlorobenzilate	510156	Ethylene dichloride (1,2-Dichloroethane)	107062
Chloroform	67663	Ethylene glycol	107211
Chloromethyl methyl ether	107302	Ethylene imine (Aziridine)	151564
Chloroprene		Ethylene oxide	75218
(Neoprene; 2-Chloro-1,3-butadiene)	126998	Ethylene thiourea	96457
Chromium Compounds	—	Ethylidene dichloride	
Cobalt Compounds	—	(1,1-Dichloroethane)	75343
Coke Oven Emissions	—	Formaldehyde	50000
Cresol(m)	108394	Glycol ethers <sup>2</sup>	—

<sup>1</sup> X-CN where X = H' or any other group where a formal dissociation may occur, for example, KCN or Ca(CN)<sub>2</sub>.

<sup>2</sup> Includes mono- and di- ethers of ethylene glycol, diethylene glycol and triethylene glycol R-(OCH<sub>2</sub>CH<sub>2</sub>)<sub>n</sub>-OR' where: n = 1, 2, or 3



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

January 17, 1994

Certified Mail - Return Receipt Requested  
No. P 664 277 443

Brad Shanks  
Air Permitting Branch  
Office of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289-0385

Re: Facility No. 0800-00001  
Hattiesburg, MS

Dear Mr. Shanks:

Please find the following response to your January 10, 1994, letter requesting our projected schedule for commencement of construction and completion of construction.

We have scheduled the slurry tank tie-in and replacement of the reactor(s) take-off line, during the first week of February with the tank car unloading station to follow. We project the completion of these items by March 4th.

If I can answer any additional questions please call me at 601-545-3450.

Very truly yours,

  
Charles S. Jordan

CSJ:mcl



FILE COPY

STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

January 10, 1994

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


Dear Mr. Jordan,

Re: Facility No. 0800-00001  
Hattiesburg, Ms.

This letter is to acknowledge receipt of your application on December 16, 1993, for an initial or modified air permit(s). Within forty-five (45) days after the date of receipt of the application you will be notified either that the application is complete or of the major components required to complete the application.

Please let us know your projected schedule for commencement of construction and completion of construction. We would appreciate your response within a week. If you have any questions, please let me know.

Very truly yours,

Brad Shanks   
Air Permitting Branch

BS:bs



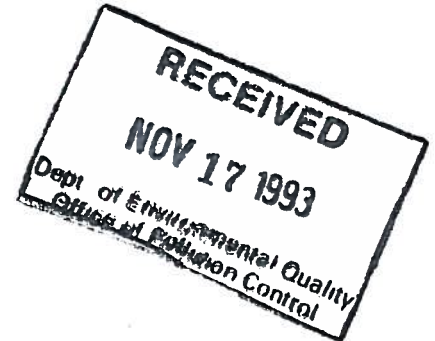


Hercules Incorporated  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401-1937  
(601) 545-3450

November 16, 1993

Certified Mail - Return Receipt Requested  
No. P 664 277 436

Richard Sumrall  
Air Toxics Branch  
OFFICE OF POLLUTION CONTROL  
P. O. Box 10385  
Jackson MS 39289-0385




Dear Mr. Sumrall:

Re your 10/21/93 letter request for HAP data, please find the attached information.

Please note the reported pollutant rate is estimated as actual or average lbs/year for CY-1992 instead of max pollutant rate (lbs/hr). If this is not satisfactory or additional data is needed please let me know.

Yours very truly,

  
Charles S. Jordan  
Environmental Supervisor

CSJ:mcl

Attachments



STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

October 21, 1993

Hercules Inc.  
PO BOX 1937  
Hattiesburg, MS 39401

Dear Sir:

The Federal Clean Air Act as amended in 1990 required the Environmental Protection Agency (EPA) to publish a list of all categories and subcategories of major and area sources of hazardous air pollutants. In addition, the EPA is required to establish air emission standards for each category and subcategory. The Hazardous Organic National Emission Standard for Hazardous Air Pollutants (HON) is one of the first emission standards proposed by EPA. When finalized, this regulation will reduce organic hazardous air pollutant emissions from chemical processes in the Synthetic Organic Chemical Manufacturing Industry and seven other processes. These other processes are: Styrene-Butadiene Rubber production; Polybutadiene production; Chlorine production; Pesticide production; Pharmaceutical Production; Chlorinated Hydrocarbon use; and Miscellaneous Butadiene use.

We are attempting to identify facilities in Mississippi that will be impacted by this new regulation. We are therefore asking for your help in securing information on your chemical manufacturing processes. Enclosed is a survey that outlines the needed information. Please complete and return this survey by November 30, 1993.

If you have any questions, please call me at (601) 961-5791.

Sincerely,

Richard Sumrall  
Air Toxics Branch

RS/ss  
Enclosure



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

October 9, 1992



Certified Mail - Return Receipt Requested  
No. P 904 256 203

Mr. Bobby Hall  
Office of Pollution Control  
P. O. Box 10385  
Jackson, MS 39209

Dear Mr. Hall:

In reference to Operating Permit No. 0800-0001<sup>0</sup>, Part III, Other Requirements, (2), there was no work associated with emission point 130 from January 1, 1992 thru June 30, 1992.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



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

June 24, 1993



Certified Mail - Return Receipt Requested  
No. P 664 277 395

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

Dear Mr. Hall:

The purpose of this letter is to document our 6/22/93 phone conversation. Re our discussion Hercules would like to install an existing water scrubber on TO-180 storage tank vent. The TO-180 storage tank contains rosin residue boiler fuel, which is predominantly rosin light ends, and is occasionally kept warm to remove any trace amounts of water which facilitates any blending/burning of these by-products for energy recovery.

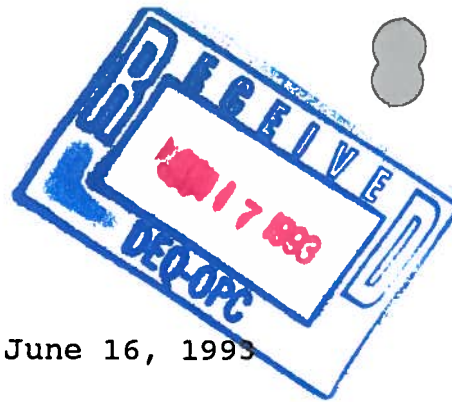
This scrubber is available because of plant down-sizing. Emission point 060 is being physically removed. Rather than discarding the water scrubber associated with 060, we propose to install the scrubber on TO-180. We feel this would be a better alternative as opposed to discarding the scrubber for scrap value.

I trust you concur with this use of the scrubber. We are willing to go to the expense of installing this scrubber on an existing storage tank as opposed to scrap value for the scrubber.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl



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

June 16, 1993

Certified Mail - Return Receipt Requested  
No. P 664 277 393

Patrick Edgens  
Air Quality Division  
Office of Pollution Control  
P. O. Box 10385  
Jackson MS 39289-0385

Dear Mr. Edgens:

Please find the enclosed Mississippi Department of Environmental Quality Major Air Pollution Source Annual Emissions Reporting form.

Hercules has elected to use actual emissions in determining the annual quantity of emissions to be used in assessing fees. The methods of calculation outlined as acceptable methods (1 thru 5) in your instructions are shown on the form. Also attached is a confidential section supporting these methods.

Please note we have no explanation as to why the potential emission rates shown for sulfur dioxide and particulates are so high. We only burn natural gas in our industrial boilers.

I trust this form fulfills our requirements for electing to use actual emissions for assessing fees and if I can answer any additional questions please call me at 601-545-3450.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl  
84

Attachment