



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

June 8, 1993

HERCULES, INC.  
P.O. BOX 1937  
HATTIESBURG, MS 39401

Dear Madam or Sir:

Re: Title V Permit Program

As you may be aware, the Federal Clean Air Act was amended in 1990, and, under Title V of the Act, states are required to develop and implement a Federal Air Operating Permit Program. In 1993, the Mississippi legislature passed SB 2649 which established the legal authority needed for the DEQ to develop a Title V program that EPA can approve. One of the required program elements is a fee program which covers the entire direct and indirect cost of the Title V program. SB 2649 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 on the previous year's emissions.

A review of your current permit and file indicates that your source will be required to hold a Title V permit. Our evaluation of your allowable emissions is shown on the attached form. As provided by SB 2649, 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 SB 2649 and are listed on the attachments. If you choose the basis of actual emissions, you must submit your inventory of emissions for the previous calendar year (1992), by July 1, 1993, along with the methodology used in determining the inventory. If we do not receive an inventory of emissions from you by July 1, 1993, we will assume that you have elected to use the allowable emissions we have determined as the basis for this year's assessment of fees.

We have identified the pollutants which your files indicate that your source emits. It is your responsibility by law to report any and all pollutants emitted, not just those we identified. The attached list of regulated pollutants should be reviewed to make sure all



0800-06  
Forrest

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

FILE COPY

May 18, 1993

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

Dear Mr. Jordan:

RE: EPA Inspection--Transmittal of  
Inspection Report

Pursuant to a request by the EPA, we are forwarding a copy of the EPA report on the recent inspection of your facility.

If you have any questions, please advise.

Very truly yours,

Dan N. McLeod  
Stationary Source Compliance Section

DNM/sse  
Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

*Forrest*  
**RECEIVED**  
**MAY 10 1993**  
Dept of Environmental Qua  
Office of Pollution Contro

MAY 06 1993

4APT-AEB

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

*Hercules, Inc.*  
*Forrest Co.*  
*0600-00001*

Dear Mr. Wylie:

Enclosed are the reports from the EPA overview inspections conducted in Mississippi during the week of March 8, 1993. As agreed, I am forwarding copies for your review. As each facility indicated an interest in receiving a copy of their report, Wayne Anderson has assured me that MOPC would forward the reports to each source. The report for the multimedia inspection of Amerada Hess will be forwarded under a separate cover as it is currently under review by EPA's Multimedia Enforcement Team. If you have any questions or comments, please feel free to contact me, or Wendell Reed of my staff, at (404) 347-2904.

Sincerely yours,

*Sharron V. Porter*

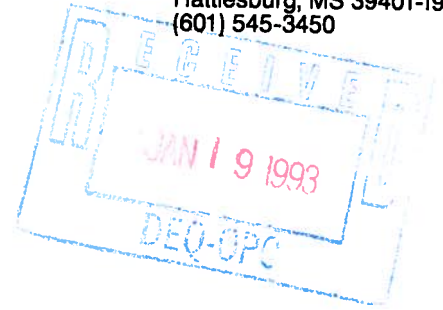
Sharron V. Porter, Chief  
Southern Compliance Unit  
Air Enforcement Branch

Enclosures



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

January 15, 1993



Certified Mail - Return Receipt Requested  
No. P 904 256 210

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

Dear Mr. Hall:

In reference to Operating Permit No. 0800-000<sup>D</sup>1, Part III, Other Requirements, (2), there was no work associated with emission point 130 from July 1, 1992 thru December 31, 1992.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl  
57



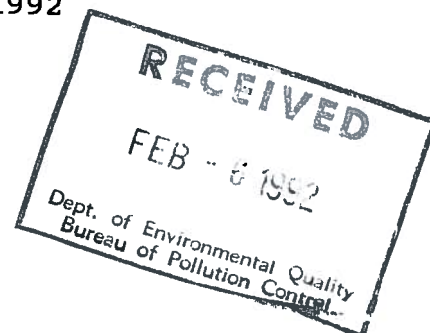
Fe

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

February 4, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
No. P 664 277 329

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>, please 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-2

Attachment

cc: P. W. Kirkendall - W/O Attachments

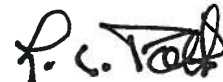
HATTIESBURG, MS.  
FEBRUARY 4, 1992

TO: C. JORDAN

FROM: L. C. POLK

RE: OPERATING PERMIT NO. 0800-00001

RE THE ABOVE PERMIT, PART III, OTHER REQUIREMENTS, (2),  
THE ATTACHED SEMI-ANNUAL REPORT IS SUBMITTED. THIS REPORT  
IS FOR JULY 1, 1991 THRU DECEMBER 31, 1991.

  
L. C. POLK

ATTACHMENT

FILE: PILOT PLANT FOLDER

ATTACHMENT

=====

ASSESSMENT

OF EMISSIONS

EQUIPMENT	DAYS	MATERIALS	PRODUCT	POTENTIAL EMISSIONS	CONTROL EQUIPMENT	TYPE VENT
DOWN	0			NONE	NOT APPLICABLE	NOT APPLICABLE



FILE COPY

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

February 7, 1992

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

Dear Mr. Jordan:

Re: Piccopale 85-55 WKX  
Facility No. 0800-00001  
Forrest County

We have determined that a permit is not necessary for you to conduct a one-day trial production of Piccopale 85-55 WKX in the existing Neuphor facility. We understand that there will be no appreciable emissions during the trial production which is scheduled for the week of February 17, 1992, or February 24, 1992.

Should you wish to produce Piccopale 85-55 WKX on a continuous basis, application for a permit will be necessary.

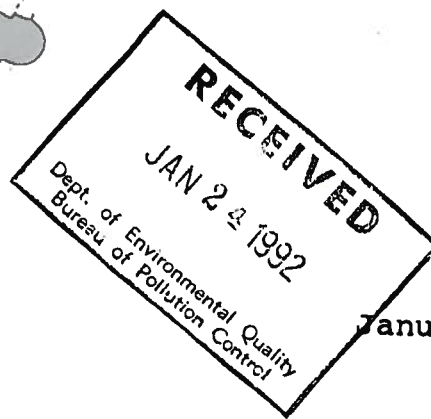
If you have any questions, please advise.

Sincerely,

Bobby G. Hall  
Air Permitting Branch

BGH:lr





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

January 23, 1992

No. P 664 277 328

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

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

ATTENTION: Bobby Hall

Dear Mr. Hall:

Re our 1/22/92 phone conversation, the purpose of this letter is to request a one-time trial production of Piccopale 85-55 WKX in our existing Neuphor facility.

As discussed this will be a one-time trial. The trial will last approximately one day. The purpose of the trial is to qualify ourselves as a back-up producer of this product. We do not anticipate any appreciable emissions. We plan to schedule the trial the week of 2/17/92 or 2/24/92.

The confidential attachment describes the trial formulation and details.

I trust this meets your requirements. Please advise.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:sj  
1001sj-36

Attachment



FILE COPY

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS  
GOVERNOR

November 20, 1991

CERTIFIED MAIL NO. P 868 026 374

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

Dear Mr. Kirkendall:

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

This is to acknowledge receipt on November 6, 1991, of certification of construction for The Kymone Plant (Emission Point 160).

The effective date of Operating Permit requirements for the Kymone Plant (Emission Point 160) is therefore November 6, 1991. 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 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.

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.



Very truly yours,

Dan N. McLeod  
Stationary Source Compliance Section

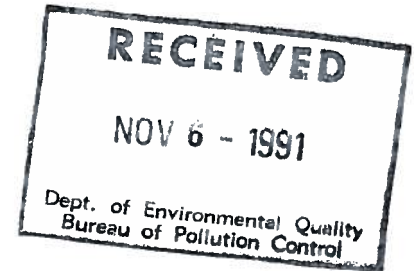
DNM: jc



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

November 5, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
No. P 664 277 312



Mr. Bobby G. Hall  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289-0385


Dear Mr. Hall:


The purpose of this letter is to submit Kymene construction certification on 10/14/91 and the subsequent startup of the new reactor and new packed bed water scrubber.

The new Reactor is operating with the new packed bed water scrubber and the old reactor is operating with the existing reactor vent water aspirator. The old reactor will be tied in to the new packed bed water scrubber as soon as the necessary tie-in equipment is received. We expect the equipment on order for tie-ins to be delivered and installed in February.

If I can answer any questions please call me.

Very truly yours,

  
Charles S. Jordan  
Environmental Supervisor

  
Charles A. McMahan P.E.  
Supervising Engineer  
Miss. Reg. No. 5249.



CSJ:mcl  
jordan/52

FILE COPY

August 21, 1991

CERTIFIED MAIL NO. P 675 195 630

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

Dear Mr. Kirkendall:

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

This is to acknowledge receipt on July 1, 1991 of certification of construction for the Dresinol production process; emission point 038.

The effective date of Operating Permit requirements for the Dresinol process equipment is therefore July 12, 1991. 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 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.

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.

Very truly yours,



Dan N. McLeod  
Stationary Source Compliance Section

DNM:vb



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

July 1, 1991

Certified Mail - Return Receipt Requested  
No. P 004 497 705

Mr. Bobby G. Hall  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289-0385

Dear Mr. Hall:

The purpose of this letter is to submit Dresinol construction certification and request a performance evaluation permit. Our plans are to start up the second week of July, 1991.

If I can answer any questions, please call me.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

Charles A. McMahan, P.E.  
Miss. Reg. No. 5249

CSJ:mcl  
ml0001/34

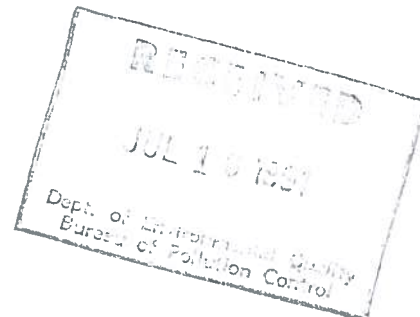




Hercules Incorporated  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401  
(601) 545-3450

July 15, 1991

Certified Mail - Return Receipt Requested  
No. P 004 497 710



Mr. Bobby G. Hall  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289-0385

Dear Mr. Hall:

The purpose of this letter is to provide in writing the Dresinol start-up date of 7/12/91, as required in our permit to operate, 0800-00001, Part III, other requirements, (7).

If I can answer any questions, please call me.

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

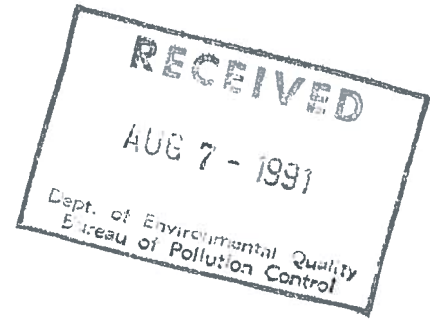
CSJ:mcl  
jordan/43



Forrest  
Hercules, c

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

August 5, 1991



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

Dear Sir:

Hercules Incorporated Safety Department is conducting in-house fire brigade training every Wednesday during the month of August, 1991.

This training is in conjunction with the Hattiesburg City Fire Department. We will have one session on August 7, 14, 21, and 28 under supervised conditions. It is a requirement of our fire brigade training. This exercise will require fire extinguishers and water hoses. Thank you for your cooperation in this matter.

Yours truly,

Wallace Harrell  
Shift Supervisor/Safety Tech.

WJH:mcl  
safety/7

cc: Don Pierce  
Charles Jordan  
Cheryl Rose  
Preston Kirkendall

George Herrington, Fire Chief  
810 N. Main St.  
Hattiesburg, MS 39401





FILE COPY

*Farrest*

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS  
GOVERNOR

June 27, 1991

Certified Mail No. P 165 464 977

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

Dear Mr. Kirkendall:

Re: Facility No. 0800-00001  
Hattiesburg, Mississippi

Enclosed is Operating Permit No. 0800-00001 issued for the operation of 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,

Maya Rao  
Air Permitting Branch

MR:lr  
Enclosure





Forrest  
00001

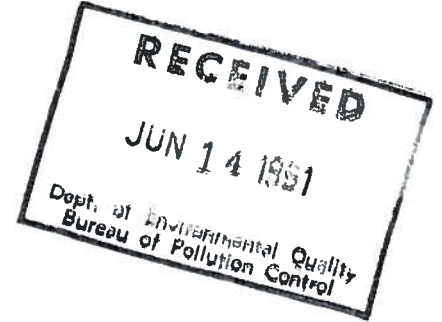
Hercules Incorporated  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401  
(601) 545-3450

Don Mc

June 10, 1991

Certified Mail - Return Receipt Requested  
No. P 004 497 698

Mr. Don Watts  
Office of Pollution Control  
P. O. Box 10385  
Jackson, MS 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 130.

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

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:mcl  
42

Attachment

cc: P. W. Kirkendall - W/O Attachments

CC: D. W. Linde

Hattiesburg, Ms  
June 10, 1991

To: C. Jordan - Hatt/Ms

From: S. Smith - Hatt/Ms

RE: Operating Permit No. 0800-00001

Re the above permit, part III, other requirements, (3), the attached semi-annual report is submitted. This report is for January 1, 1991 through June 31, 1991.

*Sharon Smith*

Attachment

File: Pilot Plant Folder

ATTACHMENT

Equipment	Days	Materials	Product	<u>Assessment of Emissions</u>		
				Potential Emissions	Control Equipment	Type Vent
<u>Kettle</u>						
A	0	----	----	None	Not Applicable	Not Applicable



*Forrest*

**STATE OF MISSISSIPPI**

DEPARTMENT OF ENVIRONMENTAL QUALITY

**RAY MABUS**  
GOVERNOR

May 30, 1991

CERTIFIED MAIL NO. P 675 195 806

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

Dear Mr. Kirkendall:

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

We have completed our review of the plans and specifications for the above referenced permit and approval is hereby indicated for air pollution control purposes only. Enclosed please find Construction Permit No. 0800-00001 for the construction of the air emissions equipment and air pollution control equipment.

Prior to startup of the air emissions equipment at this facility, a Performance Evaluation Permit must be obtained from the Permit Board. In order to obtain the Performance Evaluation Permit, it will be necessary to submit certification by a professional engineer registered in the State of Mississippi that construction was completed in accordance with the approved plans and specifications and a written request for the permit.

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,

Bobby G. Hall  
Air Permitting Branch

BGH:els  
Enclosure



FILE COPY

STATE OF MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
RAY MABUS  
GOVERNOR

MEMORANDUM

TO: Don Watts  
FROM: Bobby G. Hall  
RE: Hercules, Inc. New Source/Construction  
Facility No. 0800-00001  
Forrest County  
Major  
For May 28, 1991, Permit Board  
DATE: May 23, 1991

=====  
Hercules, Inc. has applied for a permit to construct a water educator scrubber for the existing Neuphor production process. This construction will allow Neuphor to be produced using ammonia, in which case the product is termed Dresinal instead of Neuphor. New emissions will be 0.027 tons per year of ammonia. Also, Hercules, Inc. has applied for a permit to construct a 5,000 gallon Kymene reactor to supplement the existing 3,000 gallon reactor. Also, a more efficient packed bed water scrubber will be constructed to replace the existing vent water eductor. The result of the increased Kymene capacity and more efficient scrubber will be a decrease in epichlorohydrin emissions and a slight increase in adipic acid powder emissions. Epichlorohydrin emissions will be 0.107 tons per year and adipic acid powder emissions will be 0.104 tons per year.

I recommend a Construction Permit be issued for these two processes.



FILE COPY

**STATE OF MISSISSIPPI**

DEPARTMENT OF ENVIRONMENTAL QUALITY

RAY MABUS  
GOVERNOR

February 20, 1991

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

Dear Mr. Jordan:

Re: Facility No. 0800-00001  
Hattiesburg, Mississippi  
Forrest County

Receipt is hereby acknowledged of your request for approval to construct air emissions equipment. Before we can complete our review, we must have two (2) copies of the following:

1. Emissions rates and basis for estimations for all emissions including the storage tanks, dust collector, and water scrubber.
2. A "detailed explanation of the process and control" equipment including capacities and flow stream compositions - Item Number three under additional information.

If you have any questions or need further assistance, please advise.

Sincerely,

Bobby G. Hall  
Air Permitting Branch

BGH:lr

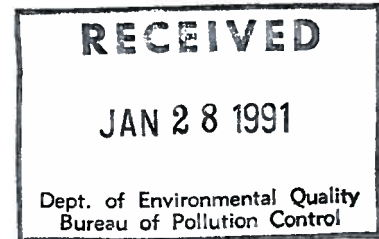


Hercules Incorporated  
West 7th Street  
P.O. Box 1937  
Hattiesburg, MS 39401  
(601) 545-3450

January 24, 1991

**Certified Mail - Return Receipt Requested**  
No. P 127 153 556

Mr. Don Watts  
Office of Pollution Control  
P. O. Box 10385  
Jackson, MS 39289



Dear Mr. Watts:

RE: Operating Permit No. 0800-00001  
Hattiesburg, MS

Please find the enclosed application, with a confidential section attachment (in duplicate), for permit to construct and operate air emissions equipment (for the expansion of our existing Kymene facility, emission point 160).

Please find the following data and support documentation for the expansion of our existing Kymene facility.

Increasing sales forecast will soon exceed our present capacity. New process changes designed to reduce the amount of excess reactants in the finished product will produce a more environmentally safe product and significantly reduce potential emissions. These process changes which significantly increase the reaction cycle time, coupled with increasing sales demands will require additional reactor capacity. We propose to install a 5,000 gallon reactor in addition to the existing 3,000 gallon reactor. The two reactor vents will be combined and the present vent water eductor (emission point 161) will be replaced with a more efficient packed bed water scrubber.

We would like to make these process change improvements by mid 1991. These changes require completing installation of the additional reactor by mid 1991. Please expedite this request.

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

Very truly yours,

Charles S. Jordan  
Environmental Supervisor



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

January 3, 1991

No. P 127 153 519  
Certified Mail - Return Receipt Requested



Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 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 130.

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

Very truly yours,

Charles S. Jordan  
Environmental Supervisor

CSJ:ml  
45

Attachment

cc: P. W. Kirkendall - W/O Attachments



CC: D.W. LINDE - HATT/MS

HATTIESBURG, MS  
JANUARY 3, 1991

TO: C. JORDAN - HATT/MS

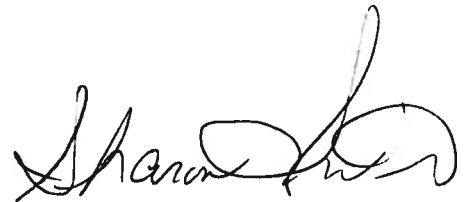
FROM: S. SMITH - HATT/MS

RE: OPERATING PERMIT NO. 0800-00001

RE THE ABOVE PERMIT, PART III, OTHER REQUIREMENTS, (3), THE ATTACHED SEMI-ANNUAL REPORT IS SUBMITTED. THIS REPORT IS FOR JULY 1, 1990 THROUGH DECEMBER 31, 1990.

ATTACHMENT

FILE: PILOT PLANT FOLDER

A handwritten signature in cursive script, appearing to read "Sharon Smith".

CONFIDENTIAL ATTACHMENT

ASSESSMENT  
OF EMISSIONS

EQUIPMENT	DAYS	MATERIALS	PRODUCT	POTENTIAL EMISSIONS	CONTROL EQUIPMENT	TYPE VENT
<u>SEITILE</u>						
A	0	-----	-----	NONE	NOT APPLICABLE	NOT APPLICABLE

Forrest

FILE COPY

October 15, 1990

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

Dear Mr. Jordan:

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

We have determined that a permit is not necessary for you to conduct a one-day plant trial production of the product Dresinol. Based on your letter dated September 19, 1990 and our telephone conversation, we understand that Dresinol is the same product as Neuphor except a small amount of ammonia water instead of caustic is used to dissolve casein in water. This one-day trial will occur approximately the last week in October, 1990, and involve approximately 1400 pounds (lbs) of 29% ammonia water pumped directly from drums.

Should you wish to produce Dresinol on a continuous basis, application for a permit will be necessary.

If you have any questions, please advise.

Sincerely,

Bobby G. Hall  
South Air Emissions Section

BGH:mhc



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

September 25, 1990



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

Dear Sir:

Hercules Incorporated Safety Department is conducting fire extinguisher training each Tuesday, Wednesday, and Thursday on the day shift 7:00 a.m. to 3:30 p.m. in the month of October 1990.

This exercise is a supervised requirement. Thank you for your cooperation in this matter.

Sincerely,

SAFETY DEPARTMENT

Wallace Harrell  
Shift Supervisor

WJH:mcl  
safety/4

cc: Don Pierce  
Cheryl Rose  
Charles Jordan  
Preston Kirkendall  
Wayne Lee, Fire Chief  
Hattiesburg

**FILE COPY**

*Forrest*

September 21, 1990

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

Dear Mr. Jordan:

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

Based on information you submitted to this office, emissions will be the same or less if Magiesol 47 oil is used instead of Telura oil to make a resin/hydrocarbon oil blend since both oils have less than 0.1 mm Hg vapor pressure at 70<sup>o</sup>F. Therefore, modification of your Operating Permit is not required for this above change.

Please consider, however, that any future changes may require a modification of your existing permit.

Sincerely,

Bobby G. Hall  
South Air Emissions Section

BGH:mhc



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

August 28, 1990

No. P 814 346 291  
CERTIFIED MAIL -  
RETURN RECEIPT REQUESTED



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

Dear Mr. Watts:

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

Following our phone conversation on 8/27/90, please find the following data and support documentation for our Hard Resins area emission point 080.

The reactor failure at another Hercules facility has resulted in the need for Hattiesburg to produce these Hard Resin products in order to supply customer needs.

The initial Hard Resin solution which requires production by September 15, 1990 is a Resin/hydrocarbon oil blend. The hydrocarbon oil is Magiesol 47 oil (MSDS attached). This blend (MSDS attached) will be made in our existing equipment as shown in the attached flow sheet. The blue color represents existing equipment already in use and the red color represents some equipment changes which are essentially all instrumentation improvements with some additional piping.

The tanks S-97 and S-98 were previously used to store Telura 662 oil to make another Resin/hydrocarbon oil blend which we now make at another location instead of Hattiesburg.

Both of these hydrocarbon oils, Magiesol and Telura, have less than 0.1 mm Hg vapor pressure at 70°F. Any emissions, if any, should be similar and the trade off, using Magiesol instead of Telura to make Resin/hydrocarbon oil blends, should result in essentially the same emissions.

I trust this meets your requirements and will allow us to start the Resin/hydrocarbon oil blend production in mid September using Magiesol 47 oil. We also understand that any additional products using new or different solvents will require a permit application.

Please let me know your determination. If I can answer any additional questions, please call me at (601) 545-3450.

Very truly yours,



Charles S. Jordan  
Environmental Supervisor

CSJ:ml  
jordan/50

Attachments



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

July 23, 1990

No. P 814 346 287  
Certified Mail - Return Receipt Requested



Mr. Don Watts  
Bureau of Pollution Control  
P. O. Box 10385  
Jackson, MS 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 130.

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

Very truly yours,

*Charles S. Jordan*  
Charles S. Jordan  
Environmental Supervisor

CSJ:ml  
45

Attachment

cc: P. W. Kirkendall - W/O Attachments



CC: D.W. LINDE  
P. TROTTER

HATTIESBURG, MS  
JULY 19, 1990

TO: C. JORDAN

FROM: S. SMITH

RE: OPERATING PERMIT NO. 0800-00001

RE THE ABOVE PERMIT, PART III, OTHER REQUIREMENTS, (3), THE ATTACHED SEMI-ANNUAL REPORT IS SUBMITTED. THIS REPORT IS FOR JANUARY 1, 1990 THROUGH JULY 15, 1990.

ATTACHMENT

FILE: PILOT PLANT HOLDER



ASSESSMENT  
OF EMISSIONS

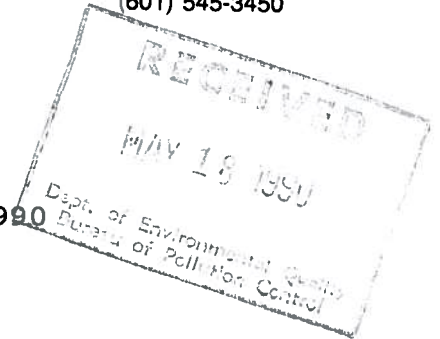
EQUIPMENT	DRYS	MATERIALS	PRODUCT	POTENTIAL EMISSIONS	CONTROL EQUIPMENT	TYPE VENT
-----------	------	-----------	---------	------------------------	----------------------	--------------

KLITL

H	0	NONE	NONE	NONE	N/A	N/A
---	---	------	------	------	-----	-----



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



May 17, 1990

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

Dear Sir:

Hercules Incorporated Safety Department is conducting fire extinguisher training each Tuesday, Wednesday and Thursday on the day shift 7:00 a.m. to 3:30 p.m. in the month of June and the month of October 1990.

This exercise is a supervised requirement. Thank you for your cooperation in this matter.

Sincerely,

SAFETY DEPARTMENT

Wallace Harrell  
Shift Supervisor

WJH:sj  
wjh-1

cc: Glenn Wharton  
Charles Jordan  
Cheryl Rose  
Preston Trotter



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

January 11, 1990

No. 815 346 175  
CERTIFIED MAIL -  
RETURN RECEIPTS REQUESTED

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

Dear Mr. Watts:

In reference to Operating Permit No. 0800-00001, please 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:ml  
21

Attachment

cc: P. W. Kirkendall  
without attachments



CC: J.C. KERR  
D.W. LINDE  
P. TROTTER

HATTIESBURG, MS  
JANUARY 8, 1990

TO: C. JORDAN

FROM: S. SMITH

RE: OPERATING PERMIT NO. 0800-00001

RE THE ABOVE PERMIT, PART III, OTHER REQUIREMENTS, (3), THE ATTACHED SEMI-ANNUAL REPORT IS SUBMITTED. THIS REPORT IS FOR JULY 1, 1989 THROUGH DECEMBER 31, 1989.

ATTACHMENT

FILE: PILOT PLANT HOLDER

A handwritten signature in cursive script, appearing to read "Sharon Smith".

ASSESSMENT  
OF EMISSIONS

EQUIPMENT	DAYS	MATERIALS	PRODUCT	ASSESSMENT OF EMISSIONS		
				POTENTIAL EMISSIONS	CONTROL EQUIPMENT	
				TYPE VENT		
KETTLE						
A	13	SEE CONFIDENTIAL ATTACHMENT	RESIN	WATER OF REACTION PARA-TERTIARY OCTYLPHENOL PARAFORMALDEHYDE GLYCERIN	CONDENSER	VAPORS DISCHARGED IN WATER
A	6	SEE CONFIDENTIAL ATTACHMENT	RESIN	WATER OF REACTION PARAFORMALDEHYDE NONYLPHENOL MALEIC ANHYDRIDE	CONDENSER	VAPORS DISCHARGED IN WATER