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Hercules Inc

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ID	Branch	SIC	County	Basin	Start	End
2022	Chemical	2821, 2861, 2899, 2899	Forrest	Pascagoula River	06/11/1991	

Physical Address (Primary)	Mailing Address
613 West 7th Street Hattiesburg, MS 39401	613 West 7th Street Hattiesburg, MS 39401

Telecom Type	Address or Phone
Website	www.herc.com
Work Phone Number	(601) 545-3450

Alt ID	Alt Name	Alt Type	Start	End
2803500001	Hercules Inc	Air-AIRS AFS	06/11/1991	
080000001	<i>Hercules, Inc.</i>	<i>Air-State Operating</i>	06/11/1991	06/01/1994
080000001	Hercules, Inc.	Air-Title V Fee Customer	11/13/1998	
080000001	<i>Hercules, Inc.</i>	<i>Air-Title V Operating</i>	11/13/1998	11/12/2003
080000001	<i>Hercules, Inc.</i>	<i>Air-Title V Operating</i>	04/22/2004	03/26/2009
080000001	<i>Hercules, Inc.</i>	<i>Air-Title V Operating</i>	03/26/2009	03/31/2009
080000001	Hercules, Inc.	Air-Title V Operating	04/07/2009	03/31/2014
2022 001	Hercules Inc	GARD	04/13/1989	
MSR110153	<i>Hercules, Inc.</i>	<i>GP-Baseline</i>	01/29/2001	12/16/2005
MSR110153	<i>Hercules Inc</i>	<i>GP-Baseline</i>	12/16/2005	03/26/2009
MSR110153	Hercules Inc	GP-Baseline	03/26/2009	09/30/2010

MSR103943	Hercules, Inc.	GP-Construction	01/03/2006	03/26/2009
MSR103943	Hercules, Inc.	GP-Construction	03/26/2009	05/31/2010
MSR110153	Hercules, Inc.	GP-Sara Title III	10/17/1997	01/29/2001
MSD008182081	Hercules, Inc.	Hazardous Waste-EPA ID	01/20/1997	
2022	Hercules Powder Company	Historic Site Name	01/01/1912	09/01/1968
2022	Hercules, Inc.	Official Site Name	09/01/1968	
MS0001830	Hercules, Inc.	Water - NPDES	09/29/1986	09/28/1991
MS0001830	Hercules, Inc.	Water - NPDES	10/22/1991	10/21/1996
MS0001830	Hercules, Inc.	Water - NPDES	09/30/1997	09/29/2002
MS0001830	Hercules, Inc.	Water - NPDES	10/31/2002	05/04/2007
MS0001830	Hercules, Inc.	Water - NPDES	05/04/2007	03/26/2009
MS0001830	Hercules, Inc.	Water - NPDES	03/26/2009	04/30/2012
MSP091286	Hercules, Inc.	Water - Pretreatment	03/12/1999	02/28/2004
MSP091286	Hercules Inc	Water - Pretreatment	11/05/2004	03/26/2009
MSP091286	Hercules Inc	Water - Pretreatment	03/26/2009	10/31/2009

Program	SubProgram	Start Date	End Date
Air	MACT Subpart H	03/08/1998	
Air	MACT Subpart PPP	06/01/1999	12/16/2005
Air	MACT Subpart W	03/08/1998	
Air	NSPS Subpart Dc	09/12/1990	
Air	Title V - major	06/01/1900	
General Permit	No subprogram specified		
Hazardous Waste	Conditional Exempt Small Quantity Generator	01/20/1997	11/21/2005
Hazardous Waste	Large Quantity Generator	01/20/1997	
Water	Baseline Stormwater	01/29/2001	
Water	Construction Stormwater	01/03/2006	
Water	NPDES Major	09/29/1986	03/12/1999

	<i>Industrial</i>		
Water	NPDES Minor Industrial	09/29/1986	
Water	PT CIU	03/12/1999	
Water	PT CIU - Gum and Wood Chemical Mfg (Subpart 454)	03/12/1999	
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)	03/12/1999	
Water	PT SIU	03/12/1999	

Latitude	Longitude	Metadata	S / T / R	Map Links
31 ° 20 ' 9 .02 (031.335839)	89 ° 18 ' 26 .04 (089.307233)	<p>Point Desc: PG- Plant Entrance (General). Data collected by J. Dewayne Headrick on 11/2/2005.</p> <p>Method: GPS Code (Psuedo Range) Standard Position (SA Off)</p> <p>Datum: NAD83</p> <p>Type: MDEQ</p>	<p>Section:</p> <p>Township:</p> <p>Range:</p>	<p>SWIMS</p> <p>Google Maps</p> <p>MapQuest</p>

4/7/2009 4:13:24 PM

JM

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Title V Annual Certification of Compliance Review Report

SITE NAME: Hercules Inc
Chemical Branch

AFS ID: 2803500001

AIR PERMIT NO: 0800-00001

COUNTY: Forrest

ISSUED: 04/07/2009

MODIFIED:

EXPIRES: 04/23/2010

PHYSICAL ADDRESS

613 West 7th Street

Hattiesburg, MS 39401

MAILING ADDRESS

613 West 7th Street

Hattiesburg, MS 39401

FACILITY CONTACT: Charlie Jordan

FACILITY PHONE NO.: 601-584-3360

CMS SOURCE CATEGORY: Major - A

ECED CONTACT: Jan Patton

COMPLIANCE EVALUATION ACTIVITY TYPE: ACC Review

REVIEW PERIOD: 01/01/2009 - 12/31/2009

DATE DUE: 01/31/2010

DATE REVIEWED: 11/18/2011

DATE RECEIVED: 01/27/2010

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Rodney S. Bolton

TITLE: Regional Plant Manager

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V

SUBPARTS:

ECED DETERMINED COMPLIANCE STATUS: Compliant - MC

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Title V Annual Certification of Compliance Review Report

EVALUATION OF FACILITY SUBMITTAL/REPORT

CRITERIA	RATING	COMMENTS
TIMELINESS	Yes	
COMPLETENESS	Yes	
METHODOLOGY/BASIS	Satisfactory	
COMPLIANCE W/PERMIT REQTS	Compliant	

COMPLIANCE ASSISTANCE PROVIDED: No If yes, please describe:

WERE ANY FINDINGS AND/OR RECOMMENDATIONS RELAYED TO THE FACILITY DURING THE COMPLIANCE EVALUATION: No If yes, please describe:

COMMENTS:

The facility had ceased most of the processes at the Hattiesburg facility. They reported continuous compliance with the permit requirements for the remaining operations.

SIGNATURE: Jan Y Patton

DATE: 12/12/2011



**Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Evaluation Report**

Site Name: Hercules Inc
Chemical Branch

AFS ID: 2803500001

Air Permit No.: 0800-00001 {Mod.: 04/07/2009 Exp. Date: 04/23/2010}

Physical Address
613 West 7th Street
Hattiesburg, MS 39401
Forrest County

Mailing Address
613 West 7th Street
Hattiesburg, Mississippi 39401

Facility Contact: Mr. Charles Jordan
Facility Phone No.: 601-584-3360

CMS Source Category: Major - A
ECED Contact: Jan Patton

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due: 07/31/2010
Date Received: 07/30/2010

Date Reviewed: 11/18/2011
Date Observed: N/A
Date Performed: N/A

Official Signing/Submitting Report:

Name: Rodney S. Bolton **Title:** Plant Manager

Air Program(s): (Check all applicable programs included in this evaluation)

SIP
PSD
NSPS

NESHAPS
MACT
Subparts: Dc, W

ECED Determined Compliance Status (applies only to ACC's): Not Applicable

EVALUATION OF FACILITY SUBMITTAL/REPORT		
Criteria	Rating	Comments
Timeliness	Yes	
Completeness	Yes	
Methodology/Basis	Satisfactory	
Compliance w/Permit Reqs	Compliant	



**Mississippi Department of Environmental Quality
Office of Pollution Control**

Air Compliance Evaluation Report

Compliance Assistance Provided: No If yes, describe:

Were any actions taken by the facility to come back into compliance during the on-site visit: Not Applicable If yes, describe:

Were any findings and/or recommendations relayed to the facility during the compliance evaluation: Not Applicable If yes, describe:

Comments: No deviations reported. Operations ceased in December 2009 and the permit was terminated on April 23, 2010. Therefore, this will be Hercules' **last semi-annual monitoring report.**

Signature:

Jan M. B. [Signature]

Date:

13 Nov 2010

gmp

Mississippi Department of Environmental Quality Office of Pollution Control

Title V Annual Certification of Compliance Review Report

SITE NAME: Hercules Inc
Chemical Branch

AFS ID: 2803500001

AIR PERMIT NO: 0800-00001

COUNTY: Forrest

ISSUED: 04/07/2009

MODIFIED:

EXPIRES: 04/23/2010

PHYSICAL ADDRESS
613 West 7th Street

MAILING ADDRESS
613 West 7th Street

Hattiesburg, MS 39401

Hattiesburg, MS 39401

FACILITY CONTACT: Charlie Jordan

CMS SOURCE CATEGORY: Major - A

FACILITY PHONE NO.: 601-584-3360

ECED CONTACT: Jan Patton

COMPLIANCE EVALUATION ACTIVITY TYPE: ACC Review

REVIEW PERIOD: 01/01/2010 - 12/31/2010

DATE DUE: 01/31/2011

DATE REVIEWED: 09/21/2011

DATE RECEIVED: 01/18/2011

OFFICIAL SIGNING / SUBMITTING REPORT:

NAME: Rodney S. Bolton

TITLE: Regional Plant Manager

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V

SUBPARTS:

ECED DETERMINED COMPLIANCE STATUS: Compliant - MC

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Title V Annual Certification of Compliance Review Report

EVALUATION OF FACILITY SUBMITTAL/REPORT

CRITERIA	RATING	COMMENTS
TIMELINESS	Yes	
COMPLETENESS	Yes	
METHODOLOGY/BASIS	Satisfactory	
COMPLIANCE W/PERMIT REQTS	Compliant	

COMPLIANCE ASSISTANCE PROVIDED: No If yes, please describe:

WERE ANY FINDINGS AND/OR RECOMMENDATIONS RELAYED TO THE FACILITY DURING THE COMPLIANCE EVALUATION: No If yes, please describe:

COMMENTS:

The Hercules' Hattiesburg facility did not operate any process operations in calendar year 2010. They terminated the Title V on 04/23/2010 and submitted the remaining reports in order to comply with the reporting requirements.

SIGNATURE: Jan M. Patton

DATE: 12/12/2011



**Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Evaluation Report**

Site Name: Hercules Inc
Chemical Branch

AFS ID: 2803500001

Air Permit No.: 0800-00001 {Mod.: 04/07/2009 Exp. Date: 04/23/2010}

Physical Address
613 West 7th Street
Hattiesburg, MS 39401
Forrest County

Mailing Address
613 West 7th Street
Hattiesburg, Mississippi 39401

Facility Contact: Mr. Charles Jordan
Facility Phone No.: 601-584-3360

CMS Source Category: Major - A
ECED Contact: Jan Patton

Compliance Evaluation Activity Type: Semiannual Monitoring Report - PX

Date Due: 01/31/2010
Date Received: 01/27/2010

Date Reviewed: 03/14/2011
Date Observed: N/A
Date Performed: N/A

Official Signing/Submitting Report:

Name: Rodney S. Bolton **Title:** Regional Plant Manager

Air Program(s): (Check all applicable programs included in this evaluation)

SIP
PSD
NSPS

NESHAPS
MACT
Subparts: Dc, W

ECED Determined Compliance Status (applies only to ACC's): Not Applicable

EVALUATION OF FACILITY SUBMITTAL/REPORT		
Criteria	Rating	Comments
Timeliness	Yes	
Completeness	Yes	
Methodology/Basis	Satisfactory	
Compliance w/Permit Reqs	Compliant	



**Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Evaluation Report**

Compliance Assistance Provided: No If yes, describe:

Were any actions taken by the facility to come back into compliance during the on-site visit: Not Applicable If yes, describe:

Were any findings and/or recommendations relayed to the facility during the compliance evaluation: Not Applicable If yes, describe:

Comments: No deviations reported. The Hattiesburg Facility ceased operations in December 2009.

Signature: Jan M Patton **Date:** 14 March 2011

JM

**Mississippi Department of Environmental Quality
Office of Pollution Control**

Air Full Compliance Evaluation (FCE) Summary Report

SITE NAME: Hercules Inc
Chemical Branch

AFS ID: 2803500001

AIR PERMIT NO: 0800-00001

COUNTY: Forrest

ISSUED: 04/22/2004

MODIFIED: 12/16/2005

EXPIRES: 07/31/2009

PHYSICAL ADDRESS

613 West 7th Street

Hattiesburg, MS 39401

MAILING ADDRESS

613 West 7th Street

Hattiesburg, MS 39401

FACILITY CONTACT: Charles Jordan

FACILITY PHONE NO.: 601-584-3360

CMS SOURCE CATEGORY: Major - A

ECED CONTACT: Jan Patton

COMPLIANCE EVALUATION ACTIVITY TYPE: FCE Onsite

DATE FCE COMPLETED: 09/24/2009

AIR PROGRAMS: MACT, NSPS, SIP, TITLE V

SUBPARTS:

COMPLIANCE ASSISTANCE PROVIDED: No If yes, describe:

COMMENTS:

Facility plans on closing the facility by the end of 2009.

Compliance Evaluation Activity

ACTIVITY	RECEIVED	REVIEWED	MON. START	MON. END	FOLDER
Semi-Annual Monitoring Reports	01/21/2009	09/24/2009	07/01/2008	12/31/2008	ACE20030001
ACC	02/04/2008	09/24/2009	01/01/2007	12/31/2007	ACE20030001
Semi-Annual Monitoring Reports	02/04/2008	09/24/2009	07/01/2007	12/31/2007	ACE20030001
Semi-Annual Monitoring Reports	08/03/2009	09/24/2009	01/01/2009	06/30/2009	ACE20030001
ACC	01/21/2009	09/24/2009	01/01/2008	12/31/2008	ACE20030001

Agency Interest No.: 2022
ACE20030001

Mississippi Department of Environmental Quality
Office of Pollution Control
Air Full Compliance Evaluation (FCE) Summary Report


Semi-Annual Monitoring Reports	08/11/2008	09/24/2009	01/01/2008	06/30/2008	ACE20030001
No stack test required by permit					See Source File

On-Site Compliance Evaluation Activity

ACTIVITY	CONDUCTED	FOLDER
On-Site Inspection	03/17/2009	INS20090001

Air Enforcement Actions

ACTIVITY	ISSUED	FOLDER
No air enforcement actions during evaluation period		See Source File

SIGNATURE: 

DATE: 25 Sept 2009



**Mississippi Department of Environmental Quality
Office of Pollution Control
Air Compliance Inspection Report**

Site Name: Hercules Inc
Chemical Branch

Permit Number(s): Air-Title V Operating Permit No. 080000001

AFS ID: 2803500001

Physical Address

613 West 7th Street
Hattiesburg, MS 39401
Forrest County

Mailing Address

613 West 7th Street
Hattiesburg, Mississippi 39401

Evaluation Type: Compliance Evaluation Inspection - Title V

Date of Evaluation: 3/17/2009

Inspection Participants: Jan Patton , MDEQ
Rick Sumrall, MDEQ
Jaricus Whitlock, MDEQ
Willie McKercher, MDEQ
Charlie Jordan, Hercules (Contractor)
Gary Shelley, Hercules Operations Manager

Air Program(s)	Subpart(s)
MACT	H, W
NSPS	Dc
SIP	

Purpose of Inspection

MDEQ conducted this inspection to evaluate Hercules' compliance with Air-Title V Operating Permit No. 080000001 and the Mississippi Air Regulations.

Permit Status

MDEQ issued Air-Title V Operating Permit No. 080000001 on April 22, 2004 and set it to expire March 31, 2009. At the time of the inspection, MDEQ were renewing the permit.

Facility Description

Hercules manufactures specialty organic chemicals for use in manufacturing paper products. Hercules has been downsizing the Hattiesburg operations and announce plans

to cease operations by the end of 2009.

Inspection Summary

We started the inspection with a records review. I reviewed the weekly inspection records for AB-001 and AL-002. It appeared that there were some gaps in the recordkeeping in September 2007 and January 2008.

We reviewed the LDAR records and did not note any concerns. Hercules appeared to have the 5 years worth of records with the exception of those with possible gaps.

We then walked through the site. We noted the LDAR tags and no unusual visible emissions.

Conclusions

I noted concerns about the apparent gaps in some of the recordkeeping. However, I also noted the records may have gotten misplaced. Hercules personnel should check the mentioned recordkeeping periods and note any missing inspection records on the Annual Compliance Certification.

Signature: Sam J. Patton Date: 02/10/2016

Photos / Other Attachments

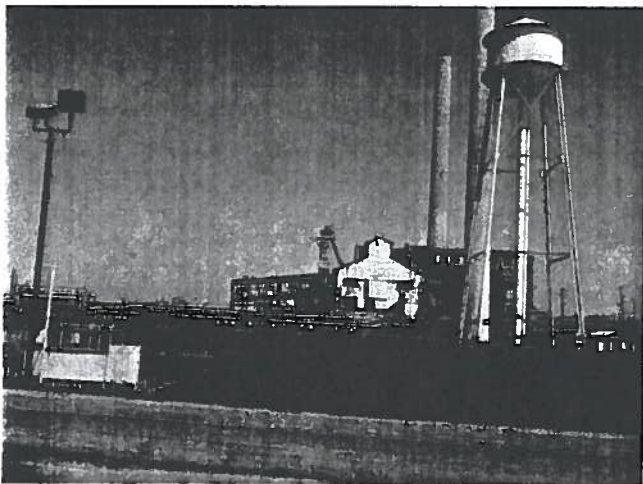


Photo 1 - Hercules, Hattiesburg Facility

Hattiesburg, MS Plant
613 West 7th Street
Hattiesburg, MS 39401
(601) 545-3450

January 12, 2011

US Environmental Protection Agency
Region IV
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303

RECEIVED
JAN 18 2011
Dept of Environmental Quality
Office of Pollution Control

Re: Hercules Incorporated
Permit No. 0800-00001
Title V Annual Compliance Certification

Dear Sir or Madam:

The attached report is submitted for purposes of compliance certification in accordance with Title V operating permit condition 4.2 and APC-S-6, Section III.C.5. As Responsible Official for Ashland Hercules Water Technologies, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

Please note, as reported in the previous Title V Annual Compliance Certification, Hercules Incorporated, Hattiesburg, MS production operations were shut down in December, 2009. The facility did not operate in 2010. The permit was terminated on April 23, 2010. This is the last Title V Annual Compliance Certification to be submitted.

If you have any questions or need any further information, please let me know.

Sincerely,

RS Bolton
Rodney S. Bolton
Regional Plant Manager

Attachment

cc: Mr. Rick Sumrall, Chief
ECED, Chemical Branch
MS Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39255-2261

HERCULES, INCORPORATED
HATTIESBURG, MISSISSIPPI – TITLE V PERMIT #0800-00001
ANNUAL TITLE V COMPLIANCE CERTIFICATION

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
General Conditions - Conditions 1.1 through 1.16	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Facility did not operate in 2010
General Condition - Condition 1.17	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Facility did not operate in 2010
General Conditions - Conditions 1.18 through 1.25	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Facility did not operate in 2010
Facility-Wide Emissions Limitations (FWEL) - Condition 3.A.1	Facility-Wide	IN	Continuous	Visual observation.	Facility did not operate in 2010
FWEL - Condition 3.A.2	Facility-Wide	IN	Continuous	Visual observation.	Facility did not operate in 2010
FWEL - Condition 3.A.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Facility did not operate in 2010
FWEL - Condition 3.A.4	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Facility did not operate in 2010
Emission Point Specific Limitations & Standards (EPSL&S) - Condition 3.B.1	AA-000, AA-001, AN-000	IN	Continuous	Affected equipment is routinely monitored for leaks and identified leaks are properly repaired. See condition 5.B.2	Facility did not operate in 2010
EPSL&S - Condition 3.B.2	AA-002, AB-001, AC-004, AG-005,	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	Facility did not operate in 2010

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2010)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
EPSL&S - Condition 3.B.3	AM-003	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Facility did not operate in 2010
EPSL&S - Condition 3.B.4	AM-003	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment > 10 mmBTU/hr.	Facility did not operate in 2010
EPSL&S - Condition 3.B.5	AM-003	IN	Continuous	Process Knowledge	Facility did not operate in 2010
Insignificant and Trivial Activity Emission Limitations & Standards (ITAE&S) - Condition 3.C.1	Facility-Wide	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment < 10 mmBTU/hr.	Facility did not operate in 2010
ITAE&S - Condition 3.C.2	Facility-Wide	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Facility did not operate in 2010
ITAE&S - Condition 3.C.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	Facility did not operate in 2010
Operation and Maintenance Requirements (O&M)- Condition 3.D.1	AA-000, AA-001, AN-000	IN	Continuous	Applicable Startup, Shutdown, and Malfunction (SSM) Plan and best management practices, routine monitoring, and process knowledge regarding pollution control.	Facility did not operate in 2010

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2010)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
O&M - Condition 3.D.2	AA-000, AA-001	IN	Continuous	Maintain SSM Plan and follow provisions.	Facility did not operate in 2010
Compliance Schedule (CS) - Condition 4.1	Facility-wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and records retention.	Facility did not operate in 2010
CS - Condition 4.2	All Title V permit conditions	IN	Continuous	Submittal of this report and certification.	Facility did not operate in 2010
Monitoring, Recordkeeping & Reporting Requirements (MR&RR) - Condition 5.A.1	Facility-Wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and recordkeeping.	Facility did not operate in 2010
MR&RR - Condition 5.A.2	Facility-Wide	IN	Continuous	Process knowledge and records retention. When recording weekly monitoring information, the time of each measurement was identified by date and shift. In place of shift, we now record the actual time that the measurement or monitoring is made.	Facility did not operate in 2010
MR&RR - Condition 5.A.3	Facility-Wide	IN	Continuous	Records retention.	Facility did not operate in 2010
MR&RR - Condition 5.A.4	Facility-Wide	IN	Continuous	Prompt reporting.	Facility did not operate in 2010
MR&RR - Condition 5.A.5	Facility-Wide	IN	Continuous	Report deviations based on guidance from MDEQ.	Facility did not operate in 2010
MR&RR - Condition 5.A.6	Facility-Wide	IN	N/A	N/A	Facility did not operate in 2010
MR&RR - Condition 5.B.1	AA-000, AA-001, AN-000	IN	Continuous	Records retention, submittal of required reports, and routine leak detection monitoring of affected components and prompt repair of identified leaks.	Facility did not operate in 2010

Hercules, Incorporated - Hattiesburg, Mississippi
Annual Title V Certification (CY - 2010)
January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 5.B.2	AA-000, AA-001, AN-000	IN	Continuous	Routine leak detection monitoring of affected components and prompt repair of identified leaks.	Facility did not operate in 2010
MR&RR - Condition 5.B.3	AA-000, AA-001, AN-000	IN	Continuous	Recordkeeping associated with routine LDAR monitoring; SSM Plan; and visual equipment leak inspections.	Facility did not operate in 2010
MR&RR - Condition 5.B.4	AA-001, AA-002, AB-001, AG-003, AG-005, AM-003	IN	Continuous	Recordkeeping of maintenance inspections.	Facility did not operate in 2010
MR&RR - Condition 5.B.5	AM-003	IN	Continuous	Record and maintain records of the amount of Natural Gas combusted each day	Facility did not operate in 2010
MR&RR - Condition 5.B.6	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Facility did not operate in 2010
MR&RR - Condition 5.B.7	Facility-wide	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Facility did not operate in 2010
MR&RR - Condition 5.C.1	AA-000, AA-001,	IN	Continuous	Prompt reporting.	Facility did not operate in 2010
MR&RR - Condition 5.C.2	AA-000, AA-001, AM-003	IN	N/A	Prompt reporting of stack test data. N/A during compliance period because no stack test required during reporting period.	Facility did not operate in 2010
MR&RR - Condition 5.C.3	AM-003 Facility-wide	IN	Continuous	Prompt reporting in accordance with 5.A.4.	Facility did not operate in 2010
MR&RR - Condition 5.C.4	Individual HAP, Combined HAP's	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Facility did not operate in 2010
MR&RR - Condition 5.C.5	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Facility did not operate in 2010

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2010)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 6.1	Facility-Wide	IN	N/A	N/A	Facility did not operate in 2010
Title VI Requirements Conditions 7.1 through 7.5	Facility-wide use of ozone depleting substances	IN	Continuous	Process Knowledge and record retention, as well as ensuring that employees or contractors employed for these services are properly certified and use approved equipment.	Facility did not operate in 2010

Ashland Hercules Water Technologies

613 West 7th Street
Hattiesburg, MS 39401
Tel (601) 584-3238
Fax (601)584-3226

July 31, 2010

RECEIVED
JUL 30 2010
Dept of Environmental Quality
Office of Pollution Control

Mr. Rick Sumrall, Branch Chief
Environmental Compliance & Enforcement Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261

Re: Hercules Incorporated
Facility No. 0800-00001
Title V Semi-Annual Report
1/01/10-6/30/10

Dear Mr. Sumrall:

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending June 30, 2010. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semi-annual report from January 1, 2010, to June 30, 2010.

As you are aware, the entire facility process operations were shut down in 2009. The Title V permit, Facility No. 0800-00001, was terminated on April 23, 2010. Unless advised otherwise by MDEQ, this is the last semi-annual report to be submitted.

As Responsible Official for Hercules Incorporated, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

If you have any questions or need further information, please let me know.

Sincerely,

RS Bolton
Rodney S. Bolton
Plant Manager

Attachment(s)

Contents of Report

The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of January 1, 2010 through June 30, 2010, contains the following sections:

1. Fuel Burning Equipment
2. Kymene Process Area
3. AKD Process Area
4. Kymene LDAR Monitoring
5. Deviations from Permit Requirements



Fuel Burning Equipment

FUEL BURNING REPORT SUMMARY

As required by 5.A.4, 5.B.5, and 5.C.3, monthly records of the type and quantity of fuel combusted are provided in this section. No natural gas was combusted during this semi-annual reporting period.

The Fuel burning equipment did not operate during this time period.

Kymene Process Area

KYMENE PROCESS AREA REPORT SUMMARY

As required by 5.B.7, for the entire facility, calculations and records for the tons of individual hazardous air pollutant (HAP) emitted each month and the total individual HAP emissions for each consecutive 12-month period were performed. Calculations and records for the total combined HAP's emitted for each consecutive 12-month period were performed.

As required by 5.A.4, and 5.C.4, for all hazardous air pollutant (HAP) emissions, monthly individual HAP emissions and the individual and combined HAP emissions for each consecutive 12-month period are included in this section.

The Kymene process did not operate during this time period.

Kymene Reactor Scrubber (AA-001)

As required by 5.B.4, weekly operator maintenance checks were performed on the Kymene Reactor Scrubber (AA-001).

The Kymene process did not operate during this time period.

Adipic Acid Dust Shaker (AA-002)

As required by 5.B.4, weekly operator and mechanic maintenance checks were performed on the Adipic Acid Dust Shaker (AA-002).

As required by 5.B.6, inspections for visible emissions (VE) were performed in accordance with 5.B.6.

As required by 5.A.4, and 5.C.5, there were no abnormal visible emissions recorded during this reporting period.

The Kymene process did not operate during this time period.

Deviations:

There were no deviations

(MONTHLY) and (CONSECUTIVE 12-MONTH) HAP emissions, Individual and Combined

DATE	ETHYLENE OXIDE		EPICHLOROHYDRIN		TOTAL	
	MONTHLY	12 MONTH	MONTHLY	12 MONTH	MONTHLY	12 MONTH
Apr-04	0.057	0.057	0.183	0.183	0.240	0.240
May-04	0.057	0.114	0.182	0.365	0.239	0.479
Jun-04	0.057	0.171	0.185	0.550	0.242	0.721
Jul-04	0.057	0.228	0.186	0.736	0.243	0.984
Aug-04	0.057	0.285	0.186	0.922	0.243	1.207
Sep-04	0.057	0.342	0.185	1.107	0.242	1.449
Oct-04	0.057	0.399	0.186	1.293	0.243	1.692
Nov-04	0.587	0.986	0.183	1.478	0.770	2.462
Dec-04	0.524	1.510	0.182	1.658	0.706	3.168
Jan-05	0.211	1.721	0.194	1.852	0.405	3.573
Feb-05	0.187	1.908	0.184	2.036	0.371	3.944
Mar-05	0.136	2.044	0.181	2.217	0.317	4.281
Apr-05	0.242	2.229	0.178	2.212	0.420	4.441
May-05	0.056	2.228	0.179	2.209	0.235	4.437
Jun-05	0.056	2.227	0.179	2.203	0.235	4.430
Jul-05	0.000	2.170	0.178	2.195	0.178	4.385
Aug-05		2.113	0.181	2.190	0.181	4.303
Sep-05		2.056	0.178	2.183	0.178	4.239
Oct-05		1.999	0.184	2.181	0.184	4.180
Nov-05		1.412	0.182	2.180	0.182	3.592
Dec-05		0.888	0.183	2.181	0.183	3.089
Jan-06		0.877	0.182	2.169	0.182	2.848
Feb-06		0.490	0.180	2.165	0.180	2.655
Mar-06		0.354	0.179	2.163	0.179	2.517
Apr-06		0.112	0.182	2.167	0.182	2.279
May-06		0.058	0.178	2.166	0.178	2.222
Jun-06		0.000	0.188	2.175	0.188	2.175
Jul-06			0.187	2.184		
Aug-06			0.187	2.190		
Sep-06			0.186	2.198		
Oct-06			0.183	2.197		
Nov-06			0.181	2.198		
Dec-06			0.177	2.190		
Jan-07			0.183	2.191		
Feb-07			0.179	2.190		
Mar-07			0.165	2.181		
Apr-07			0.187	2.196		
May-07			0.180	2.198		
Jun-07			0.184	2.194		
Jul-07			0.179	2.188		
Aug-07			0.181	2.180		
Sep-07			0.181	2.175		
Oct-07			0.178	2.170		
Nov-07			0.185	2.174		
Dec-07			0.188	2.185		
Jan-08			0.188	2.190		
Feb-08			0.189	2.200		
Mar-08			0.184	2.204		
Apr-08			0.165	2.202		
May-08			0.182	2.204		
Jun-08			0.184	2.204		
Jul-08			0.175	2.200		
Aug-08			0.175	2.194		
Sep-08			0.177	2.190		
Oct-08			0.176	2.188		
Nov-08			0.177	2.180		
Dec-08			0.175	2.167		
Jan-09			0.199	2.178		
Feb-09			0.207	2.198		
Mar-09			0.206	2.218		
Apr-09			0.206	2.239		
May-09			0.207	2.264		
Jun-09			0.208	2.288		
Jul-09			0.208	2.321		
Aug-09			0.209	2.355		
Sep-09			0.207	2.385		
Oct-09			0.198	2.407		
Nov-09			0.000	2.230		
Dec-09			0.000	2.055		
Jan-10			0.000	1.856		
Feb-10			0.000	1.649		
Mar-10			0.000	1.443		
Apr-10			0.000	1.237		
May-10			0.000	1.030		
Jun-10			0.000	0.822		
Jul-10			0.000	0.614		
Aug-10			0.000	0.405		
Sep-10			0.000	0.196		
Oct-10			0.000	0.000		

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

As required by 5.B.4, weekly operator maintenance checks were performed on the Paracol Water Scrubber (AB-001).

As required by 5.A.4 and 5.C.5, there were no abnormal visible emissions recorded during this reporting period.

The AKD process did not operate during this time period.

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

In Accordance with 40 CFR 63, Subpart W, Subpart H, and Permit Conditions 5.B.1, 5.B.2, 5.B.3, and 5.C.1, Hercules Incorporated is providing the following required information:

- Report required by 40 CFR 63.182(d)(2);
- Summary report of actual monitoring data; and
- Recordkeeping and reporting of Startup, Shutdown, and Malfunctions per SSM Plan.
 - Form A: SSM Plan Conformance
 - Form B: Nonconformance to SSM Plan (no nonconformance incidents)

The Kymene process did not operate during this time period.

PERIODIC LEAK MONITORING REPORT

January 1, 2010 through June 30, 2010

Hercules Incorporated
Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

1. **Number of affected *valves* in HAP service for which leaks were detected as described in § 63.168(b), the percent leakers, and the total number monitored:**
 - No affected valve was discovered leaking ($V_L=0$) during the referenced reporting period (>500 ppm);
 - $[V_L/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
 - 0 total valves ($V_T=0$) were monitored.
2. **Number of *valves* for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:**
 - None.
3. **Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:**
 - No affected pumps were discovered leaking ($P_L=0$) during the required monthly monitoring ($>1,000$ ppm);
 - $[P_L/P_T] * 100 = 0.00\%$ of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
 - 3 affected pumps monitored 0 times for a total of 0 pumps ($P_T=0$) monitored.
4. **Number of *pumps* for which leaks were not repaired per § 63.163(c):**
 - None.
5. **Number of affected *agitators* in HAP service for which leaks were detected as described in § 63.173(a) & (b):**
 - The affected agitator did not leak during the referenced reporting period ($>10,000$ ppm);
6. **Number of *agitators* for which leaks were not repaired per § 63.173(c):**
 - None.

7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:

- No affected connectors were measured at or above 500 ppm ($C_L=0$) during the referenced reporting period;
- $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
- 0 total connectors ($C_T=0$) were monitored.

8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:

- None.

9. Explain any *delay of repairs*:

- All applicable repairs were made in a timely fashion.

10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), *pressure relief device* releases:

- None.

11. Notification of a change in *connector monitoring alternatives* as described in §63.174(c)(1):

- As allowed in §63.174(c)(1)(ii), Hercules Incorporated changed connector monitoring alternatives during the July 1 - December 31, 2000, semi-annual reporting period. Instead of monitoring opened or broken connectors for leaks within three (3) months of being returned to organic HAP service, Hercules chooses **not** to monitor connectors that have been opened or had the seal broken. It is realized that nonrepairable connectors can not be counted while complying with this alternative; therefore, in the percent leaking calculations C_{AN} will be set to zero.

12. *Monitoring results and component summary report* during the semi-annual reporting period:

- Summary information from the referenced semi-annual reporting period is attached.

The Kymene process did not operate during this time period.

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS

January 1, 2010 through June 30, 2010

**Hercules Incorporated
Hattiesburg, Mississippi**

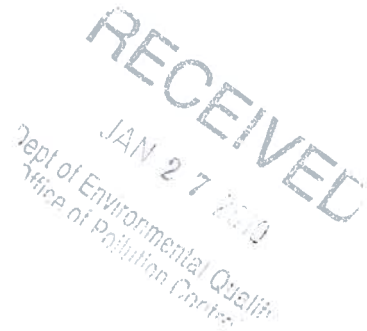
1. As required by 5.A.4 of the Title V Operating Permit, deviations from permit requirements must be clearly identified and reported. Deviations from permit requirements are detailed below:

There were no facility process operations during this time period.

Hattiesburg, MS Plant
613 West 7th Street
Hattiesburg, MS 39401
(601) 545-3450

January 22, 2010

Mr. Rick Sumrall, Branch Chief
Environmental Compliance & Enforcement Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261



Re: Hercules Incorporated
Facility No. 0800-00001
Title V Semi-Annual Report
07/01/09-12/31/09

Dear Mr. Sumrall:

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending December 31, 2009. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semi-annual report from July 1, 2009, to December 31, 2009.

Please note, as you are aware, the Hattiesburg production operations were shut down in December, 2009.

As Responsible Official for Ashland Hercules Water Technologies, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

If you have any questions or need further information, please let me know.

Sincerely,

Rodney S. Bolton
Regional Plant Manager

Attachment(s)

Contents of Report

The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of July 1, 2009 through December 31, 2009, contains the following sections:

1. Fuel Burning Equipment
2. Kymene Process Area
3. AKD Process Area
4. Kymene LDAR Monitoring
5. Deviations from Permit Requirements

Fuel Burning Equipment

FUEL BURNING REPORT SUMMARY

As required by 5.A.4, 5.B5, and 5.C.3, monthly records of the type and quantity of fuel combusted are provided in this section. Only natural gas was combusted during this semi-annual reporting period.

502B10

A 502B10 notification was filed on November 4, 2009.

MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 5.A.4

YEAR 2009

GAS USAGE - MCF

<u>EMISSION POINT</u>	<u>DESCRIPTION</u>	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUNE</u>	<u>JULY</u>	<u>AUG</u>	<u>SEPT</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>	<u>Totals</u>
AC001	Poly-pale nat. gas Dowtherm boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AF001	RAD nat. gas Dowtherm boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AG001	HRA nat. gas Dowtherm boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AJ001	Rosin dist. nat. gas Dowtherm boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AM001	No. 5 package boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AM002	No. 6 package boiler	0	0	0	0	0	0	0	0	0	0	0	0	0
AM003	No. 7 package boiler	3,154	2,888	2,934	2,573	2,748	3,227	2,892	2,456	3,612	922	604	18	28,031
AN001	Carbon Reg. nat. gas Furnace	0	0	0	0	0	0	0	0	0	0	0	0	0
T5ngas		3,154	2,888	2,934	2,575	2,748	3,227	2,892	2,456	3,612	922	604	18	28,031

Kymene Process Area

KYMENE PROCESS AREA REPORT SUMMARY

As required by 5.B.7, for the entire facility, calculations and records for the tons of individual hazardous air pollutant (HAP) emitted each month and the total individual HAP emissions for each consecutive 12-month period were performed. Calculations and records for the total combined HAP's emitted for each consecutive 12-month period were performed.

As required by 5.A.4, and 5.C.4, for all hazardous air pollutant (HAP) emissions, monthly individual HAP emissions and the individual and combined HAP emissions for each consecutive 12-month period are included in this section.

Kymene Reactor Scrubber (AA-001)

As required by 5.B.4, weekly operator maintenance checks were performed on the Kymene Reactor Scrubber (AA-001).

Adipic Acid Dust Shaker (AA-002)

As required by 5.B.4, weekly operator and mechanic maintenance checks were performed on the Adipic Acid Dust Shaker (AA-002).

As required by 5.B.6, inspections for visible emissions (VE) were performed in accordance with 5.B.6.

As required by 5.A.4, and 5.C.5, there were no abnormal visible emissions recorded during this reporting period.

Deviations:

No deviations were noted during this reporting period.

502B10

A 502B10 notification was filed on September 16, 2009.

A revised 502B10 notification was filed on September 24, 2009.

(MONTHLY) and (CONSECUTIVE 12-MONTH) HAP emissions, Individual and Combined

DATE	ETHYLENE OXIDE		EPICHLOROHYDRIN		TOTAL	
	MONTHLY	12-MONTH	MONTHLY	12-MONTH	MONTHLY	12-MONTH
Apr-04	0.057	0.057	0.183	0.183	0.240	0.240
May-04	0.057	0.114	0.182	0.365	0.239	0.479
Jun-04	0.057	0.171	0.185	0.550	0.242	0.721
Jul-04	0.057	0.228	0.186	0.736	0.243	0.984
Aug-04	0.057	0.285	0.186	0.922	0.243	1.207
Sep-04	0.057	0.342	0.185	1.107	0.242	1.449
Oct-04	0.057	0.399	0.186	1.293	0.243	1.692
Nov-04	0.587	0.986	0.183	1.476	0.770	2.462
Dec-04	0.524	1.510	0.182	1.658	0.706	3.168
Jan-05	0.211	1.721	0.194	1.852	0.405	3.573
Feb-05	0.187	1.908	0.184	2.036	0.371	3.944
Mar-05	0.136	2.044	0.181	2.217	0.317	4.261
Apr-05	0.242	2.229	0.178	2.212	0.420	4.441
May-05	0.056	2.228	0.179	2.209	0.235	4.437
Jun-05	0.056	2.227	0.179	2.203	0.235	4.430
Jul-05	0.000	2.170	0.178	2.195	0.178	4.365
Aug-05		2.113	0.181	2.190	0.181	4.303
Sep-05		2.056	0.178	2.183	0.178	4.239
Oct-05		1.999	0.184	2.181	0.184	4.180
Nov-05		1.412	0.182	2.180	0.182	3.592
Dec-05		0.888	0.183	2.181	0.183	3.069
Jan-06		0.877	0.182	2.169	0.182	2.846
Feb-06		0.490	0.180	2.165	0.180	2.655
Mar-06		0.354	0.179	2.163	0.179	2.517
Apr-06		0.112	0.182	2.167	0.182	2.279
May-06		0.056	0.178	2.166	0.178	2.222
Jun-06		0.000	0.188	2.175	0.188	2.175
Jul-06			0.187	2.184		
Aug-06			0.187	2.190		
Sep-06			0.186	2.198		
Oct-06			0.183	2.197		
Nov-06			0.181	2.196		
Dec-06			0.177	2.190		
Jan-07			0.183	2.191		
Feb-07			0.179	2.190		
Mar-07			0.180	2.191		
Apr-07			0.187	2.196		
May-07			0.180	2.198		
Jun-07			0.184	2.194		
Jul-07			0.179	2.186		
Aug-07			0.181	2.180		
Sep-07			0.181	2.175		
Oct-07			0.178	2.170		
Nov-07			0.185	2.174		
Dec-07			0.188	2.185		
Jan-08			0.188	2.190		
Feb-08			0.189	2.200		
Mar-08			0.184	2.204		
Apr-08			0.185	2.202		
May-08			0.182	2.204		
Jun-08			0.184	2.204		
Jul-08			0.175	2.200		
Aug-08			0.175	2.194		
Sep-08			0.177	2.190		
Oct-08			0.176	2.188		
Nov-08			0.177	2.180		
Dec-08			0.175	2.167		
Jan-09			0.199	2.178		
Feb-09			0.207	2.196		
Mar-09			0.206	2.218		
Apr-09			0.206	2.239		
May-09			0.207	2.264		
Jun-09			0.208	2.288		
Jul-09			0.208	2.321		
Aug-09			0.209	2.355		
Sep-09			0.207	2.385		
Oct-09			0.198	2.407		
Nov-09			0.000	2.230		
Dec-09			0.000	2.055		

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

As required by 5.B.4, weekly operator maintenance checks were performed on the Paracol Water Scrubber (AB-001).

As required by 5.A.4 and 5.C.5, there were no abnormal visible emissions recorded during this reporting period.

502B10

A 502B10 notification was filed on August 26, 2009.

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

In Accordance with 40 CFR 63, Subpart W, Subpart H, and Permit Conditions 5.B.1, 5.B.2, 5.B.3, and 5.C.1, Hercules Incorporated is providing the following required information:

- Report required by 40 CFR 63.182(d)(2);
- Summary report of actual monitoring data; and
- Recordkeeping and reporting of Startup, Shutdown, and Malfunctions per SSM Plan.
 - Form A: SSM Plan Conformance
 - Form B: Nonconformance to SSM Plan (no nonconformance incidents)

No problems or deviations from the permit were noted during the routine monthly LDAR monitoring.

In accordance with the 502B10 submittal in September, all LDAR monitoring was concluded in the month of October.

PERIODIC LEAK MONITORING REPORT

July 1, 2009 through December 31, 2009

Hercules Incorporated
Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

1. Number of affected *valves* in HAP service for which leaks were detected as described in § 63.168(b), the percent leakers, and the total number monitored:

- No affected valve was discovered leaking ($V_L=0$) during the referenced reporting period (>500 ppm);
- $[V_L/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
- 67 total valves ($V_T=67$) were monitored.

2. Number of *valves* for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:

- None.

3. Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:

- No affected pumps were discovered leaking ($P_L=0$) during the required monthly monitoring ($>1,000$ ppm);
- $[P_L/P_T] * 100 = 0.00\%$ of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
- 3 affected pumps monitored 4 times for a total of 12 pumps ($P_T=12$) monitored.

4. Number of *pumps* for which leaks were not repaired per § 63.163(c):

- None.

5. Number of affected *agitators* in HAP service for which leaks were detected as described in § 63.173(a) & (b):

- The affected agitator did not leak during the referenced reporting period ($>10,000$ ppm);

6. Number of *agitators* for which leaks were not repaired per § 63.173(c):

- None.

7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:

- No affected connectors were measured at or above 500 ppm ($C_L=0$) during the referenced reporting period;
- $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
- 310 total connectors ($C_T=0$) were monitored.

8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:

- None.

9. Explain any *delay of repairs*:

- All applicable repairs were made in a timely fashion.

10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), *pressure relief device* releases:

- None.

11. Notification of a change in *connector monitoring alternatives* as described in §63.174(c)(1):

- As allowed in §63.174(c)(1)(ii), Hercules Incorporated changed connector monitoring alternatives during the July 1 - December 31, 2000, semi-annual reporting period. Instead of monitoring opened or broken connectors for leaks within three (3) months of being returned to organic HAP service, Hercules chooses **not** to monitor connectors that have been opened or had the seal broken. It is realized that nonrepairable connectors can not be counted while complying with this alternative; therefore, in the percent leaking calculations C_{AN} will be set to zero.

12. *Monitoring results and component summary report* during the semi-annual reporting period:

- Summary information from the referenced semi-annual reporting period is attached.

Startup, Shutdown, and Malfunction Plan (SSM) Checklist -- Form A

Shutdown Date	Shutdown Time (AM or PM)	Startup Date	Startup Time (AM or PM)	Initials	SSM Plan Properly Followed?		Was Form B Completed?		Was There a Malfunction?		Identify the event as a startup, shutdown, or malfunction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.
					Yes	No	Yes	No	Yes	No	
		8/16/09	7:15 AM	R.B	✓		✓		✓		START UP
8/15/09	6 AM			GRC	✓		✓		✓		Shutdown for weekend
	12:00 AM	8/17/09	9:57 AM	JB	✓		✓		✓		Startup
08/22/09				R.B	✓		✓		✓		Shut Down
		8/24/09	9 AM	GRC	✓		✓		✓		Start up on Monday
8/30/09	12 AM			JB	✓		✓		✓		Shut down
8/31		8/31/09	9 AM	R.B	✓		✓		✓		START UP ran through week of 9/7/09 did not shut
		8/31/09		GRC	✓		✓		✓		Power restored in R401
		9/13/09	2 PM	GRC	✓		✓		✓		Thunderstorm / Lost Power for 2 hour while MS Power restored electricity
											Boiler Gelled in R401
09/18/09	5:00 PM				✓		✓		✓		Power lost
		09/18/09	7:20 PM		✓		✓		✓		START UP
10/4/09	6:00 AM			GRC	✓		✓		✓		Final Shutdown of the plant

For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.

Startup, Shutdown, and Malfunction Plan (SSM) Checklist -- Form A

Shutdown Date	Shutdown Time (AM or PM)	Startup Date	Startup Time (AM or PM)	Initials	SSM Plan Properly Followed?		Was Form B Completed?		Was There a Malfunction?		Identify the event as a startup, shutdown, or malfunction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.
					Yes	No	Yes	No	Yes	No	
6/14/09	2 AM			ARC	✓		✓		✓		Shutdown
6/15/09		6/15/09	9:56 AM	JB	✓		✓		✓		Startup
6/19/09	1:00 AM			R.B	✓		✓		✓		SHUT DOWN
6/24/09		6/24/09	11:00 AM	R.B	✓		✓		✓		START UP
6/18/09	12 noon			ARC	✓		✓		✓		Shutdown
6/29/09		6/29/09	4:24 pm	JB	✓		✓		✓		Startup
7/3/09	5:40 AM			ARC	✓		✓		✓		Shutdown
7/10/09		7/10/09	9:52 AM	JB	✓		✓		✓		Startup
7/14/09				R.B	✓		✓		✓		SHUT DOWN
7/13/09		7/13/09	7 AM	ARC	✓		✓		✓		Startup
7/25/09	2:00 PM										NO SHUT DOWN / START UP
7/27/09		7/27/09	10:00 AM	R.B	✓		✓		✓		SHUT DOWN
8/2/09	12:45 pm			JB	✓		✓		✓		Startup
8/2/09		8/2/09	10:50 AM	JB	✓		✓		✓		Shut down
8/9/09	5:55 AM			R.B	✓		✓		✓		START UP
8/9/09				JB	✓		✓		✓		Shut down

For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS

July 1, 2009 through December 31, 2009

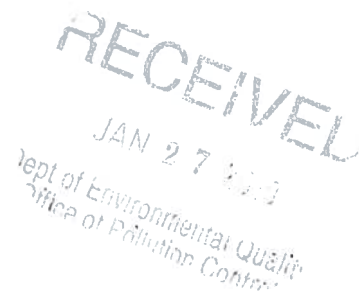
**Hercules Incorporated
Hattiesburg, Mississippi**

1. As required by 5.A.4 of the Title V Operating Permit, deviations from permit requirements must be clearly identified and reported. Deviations from permit requirements are detailed below:

No deviations were noted during this reporting period.

Hattiesburg, MS Plant
613 West 7th Street
Hattiesburg, MS 39401
(601) 545-3450

January 22, 2010

US Environmental Protection Agency
Region IV
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303Re: Hercules Incorporated
Permit No. 0800-00001
Title V Annual Compliance Certification

Dear Sir or Madam:

The attached report is submitted for purposes of compliance certification in accordance with Title V operating permit condition 4.2 and APC-S-6, Section III.C.5. As Responsible Official for Ashland Hercules Water Technologies, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

Please note, the Hattiesburg production operations were shut down in December, 2009.

If you have any questions or need any further information, please let me know.

Sincerely,

Rodney S. Bolton
Regional Plant Manager

Attachment

cc: ✓ Mr. Rick Sumrall, Chief
ECED, Chemical Branch
MS Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39255-2261

**HERCULES, INCORPORATED
 HATTIESBURG, MISSISSIPPI – TITLE V PERMIT #0800-00001
 ANNUAL TITLE V COMPLIANCE CERTIFICATION**

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
General Conditions - Conditions 1.1 through 1.16	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	These are general conditions such as paying the annual Title V fees, allowing DEQ on-site, permit duration, etc.
General Condition - Condition 1.17	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Allows changes without a permit modification with proper 502(b)10 notification. Several 502(b)10 submittals were made. The facility-wide was shut-down in 2009.
General Conditions - Conditions 1.18 through 1.25	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	These are general conditions such as emergency, upsets, startups and shutdowns.
Facility-Wide Emissions Limitations (FWEL) - Condition 3.A.1	Facility-Wide	IN	Continuous	Visual observation.	Smoke opacity, startup opacity, and soot blowing opacity limitations.
FWEL - Condition 3.A.2	Facility-Wide	IN	Continuous	Visual observation.	Opacity \leq 40% from any air contaminant.
FWEL - Condition 3.A.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Calculation of any individual Hazardous Air Pollutant not to exceed 9.9 tons for any consecutive 12 month period.
FWEL - Condition 3.A.4	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Calculation of total combined Hazardous Air Pollutants not to exceed 24.9 tons for any consecutive 12 month period.
Emission Point Specific Limitations & Standards (EPSL&S) - Condition 3.B.1	AA-000, AA-001, AN-000	IN	Continuous	Affected equipment is routinely monitored for leaks and identified leaks are properly repaired. See condition 5.B.2	Control emissions from equipment leaks.

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2009)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
EPSL&S - Condition 3.B.2	AA-002, AB-001, AC-004, AG-005,	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) – process weight equation.
EPSL&S - Condition 3.B.3	AM-003	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
EPSL&S - Condition 3.B.4	AM-003	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment > 10 mmBTU/hr.	Fuel burning sources >10 mmBTU/hr not to exceed PM emissions of $E = 0.8808 * I^{-0.667}$.
EPSL&S - Condition 3.B.5	AM-003	IN	Continuous	Process Knowledge	Combust only Natural Gas
Insignificant and Trivial Activity Emission Limitations & Standards (ITAEI&S) - Condition 3.C.1	Facility-Wide	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment < 10 mmBTU/hr.	Fuel burning sources <10 mmBTU/hr not to exceed 0.6 lb/mmBTU of PM.
ITAEI&S - Condition 3.C.2	Facility-Wide	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
ITAEI&S - Condition 3.C.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) - process weight equation.

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2009)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
Operation and Maintenance Requirements (O&M)-Condition 3.D.1	AA-000, AA-001, AN-000	IN	Continuous	Applicable Startup, Shutdown, and Malfunction (SSM) Plan and best management practices, routine monitoring, and process knowledge regarding pollution control.	Maintain emission points in manner consistent with good air pollution control practices.
O&M - Condition 3.D.2	AA-000, AA-001	IN	Continuous	Maintain SSM Plan and follow provisions.	Maintain a startup, shutdown, and malfunction plan and a corrective action program.
Compliance Schedule (CS) - Condition 4.1	Facility-wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and records retention.	Permittee must be in compliance with all applicable requirements upon issuance of the Title V permit.
CS - Condition 4.2	All Title V permit conditions	IN	Continuous	Submittal of this report and certification.	Submit annual certification of compliance status.
Monitoring, Recordkeeping & Reporting Requirements (MR&RR) - Condition 5.A.1	Facility-Wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and recordkeeping.	Install, maintain and operate equipment and/or institute procedures as necessary to perform recordkeeping and monitoring as specified in Section 5. See below.
MR&RR - Condition 5.A.2	Facility-Wide	IN	Continuous	Process knowledge and records retention. When recording weekly monitoring information, the time of each measurement was identified by date and shift. In place of shift, we now record the actual time that the measurement or monitoring is made.	List of required monitoring information to be maintained with required records, where applicable.
MR&RR - Condition 5.A.3	Facility-Wide	IN	Continuous	Records retention.	Maintain required records for 5 years from the date of the record.
MR&RR - Condition 5.A.4	Facility-Wide	IN	Continuous	Prompt reporting.	Submittal of required semi-annual reports by July 31 st and January 31 st .
MR&RR - Condition 5.A.5	Facility-Wide	IN	Continuous	Report deviations based on guidance from MDEQ.	Prompt reporting of deviations from permit requirements.

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2009)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 5.A.6	Facility-Wide	IN	N/A	N/A	Permittee shall use the EPA Reference Test Methods when performing required testing.
MR&RR - Condition 5.B.1	AA-000, AA-001, AN-000	IN	Continuous	Records retention, submittal of required reports, and routine leak detection monitoring of affected components and prompt repair of identified leaks.	Compliance with equipment leak requirements.
MR&RR - Condition 5.B.2	AA-000, AA-001, AN-000	IN	Continuous	Routine leak detection monitoring of affected components and prompt repair of identified leaks.	Perform monitoring per applicable requirements.
MR&RR - Condition 5.B.3	AA-000, AA-001, AN-000	IN	Continuous	Recordkeeping associated with routine LDAR monitoring; SSM Plan; and visual equipment leak inspections.	Perform recordkeeping per applicable requirements.
MR&RR - Condition 5.B.4	AA-001, AA-002, AB-001, AG-003, AG-005,	IN	Continuous	Recordkeeping of maintenance inspections.	Perform weekly maintenance checks to ensure proper operation of control equipment and maintain sufficient replacement parts.
MR&RR - Condition 5.B.5	AM-003	IN	Continuous	Record and maintain records of the amount of Natural Gas combusted each day	Burn only Natural Gas and retain daily operating records.
MR&RR - Condition 5.B.6	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Conduct weekly inspections for Visible Emission (VE) (one-minute interval)
MR&RR - Condition 5.B.7	Facility-wide	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period

Hercules, Incorporated - Hattiesburg, Mississippi
 Annual Title V Certification (CY - 2009)
 January 2010

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 5.C.1	AA-000, AA-001,	IN	Continuous	Prompt reporting.	Since complying with 3.B.1, meet reporting requirements of 40 CFR 63.182, Subpart H.
MR&RR - Condition 5.C.2	AA-000, AA-001, AM-003	IN	N/A	Prompt reporting of stack test data. N/A during compliance period because no stack test required during reporting period.	Submit written report of stack test results to MDEQ within 45 days of stack test.
MR&RR - Condition 5.C.3	AM-003 Facility-wide	IN	Continuous	Prompt reporting in accordance with 5.A.4.	Submit written report summarizing the type, and quantity of fuel burned in all fuel burning equipment.
MR&RR - Condition 5.C.4	Individual HAP, Combined HAP's	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period
MR&RR - Condition 5.C.5	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Report any abnormal visible emissions recorded
MR&RR - Condition 6.1	Facility-Wide	IN	N/A	N/A	N/A. No alternative operating scenarios are permitted.
Title VI Requirements Conditions 7.1 through 7.5	Facility-wide use of ozone depleting substances	IN	Continuous	Process Knowledge and record retention, as well as ensuring that employees or contractors employed for these services are properly certified and use approved equipment.	This section applies to repair and maintenance on motor vehicle air conditioning units, plant refrigeration, and plant appliances that contain ozone depleting substances (i.e. Freon).

ASHLAND

HERCULES
Forrest Co
Air 0800 0001

Ashland Hercules Water Technologies

613 West 7th Street
Hattiesburg, MS 39401
Tel (601) 584-3238
Fax (601)584-3226

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
CERTIFICATION #: 7005 0390 0000 1703 8991

January 31, 2009



US Environmental Protection Agency
Region IV
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303

Re: Hercules Incorporated
Permit No. 0800-00001
Title V Annual Compliance Certification

Dear Sir or Madam:

The attached report is submitted for purposes of compliance certification in accordance with Title V operating permit condition 4.2 and APC-S-6, Section III.C.5. As Responsible Official for Ashland Hercules Water Technologies, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

If you have any questions or need any further information, please let me know.

Sincerely,

Rodney S. Bolton
Plant Manager

Attachment:

cc: ✓ Mr. Rick Sumrall, Chief
ECED, Chemical Branch
MS Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39255-2261

HERCULES

**HERCULES, INCORPORATED
 HATTIESBURG, MISSISSIPPI – TITLE V PERMIT #0800-00001
 ANNUAL TITLE V COMPLIANCE CERTIFICATION**

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
General Conditions - Conditions 1.1 through 1.16	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	These are general conditions such as paying the annual Title V fees, allowing DEQ on-site, permit duration, etc.
General Condition - Condition 1.17	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Allows changes without a permit modification with proper 502(b)10 notification. One submittal was made on 01/28/08.
General Conditions - Conditions 1.18 through 1.25	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	These are general conditions such as emergency, upsets, startups and shutdowns.
Facility-Wide Emissions Limitations (FWEL) - Condition 3.A.1	Facility-Wide	IN	Continuous	Visual observation.	Smoke opacity, startup opacity, and soot blowing opacity limitations.
FWEL - Condition 3.A.2	Facility-Wide	IN	Continuous	Visual observation.	Opacity ≤ 40% from any air contaminant.
FWEL - Condition 3.A.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Calculation of any individual Hazardous Air Pollutant not to exceed 9.9 tons for any consecutive 12 month period.
FWEL - Condition 3.A.4	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Calculation of total combined Hazardous Air Pollutants not to exceed 24.9 tons for any consecutive 12 month period.
Emission Point Specific Limitations & Standards (EPSSL&S) - Condition 3.B.1	AA-000, AA-001, AN-000	IN	Intermittent	Affected equipment is routinely monitored for leaks and identified leaks are properly repaired. See condition 5.B.2	Control emissions from equipment leaks.

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
EPSL&S - Condition 3.B.2	AA-002, AB-001, AC-004, AG-005, AM-003	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) - process weight equation.
EPSL&S - Condition 3.B.3	AM-003	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
EPSL&S - Condition 3.B.4	AM-003	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment > 10 mmBTU/hr.	Fuel burning sources > 10 mmBTU/hr not to exceed PM emissions of E = 0.8808 * I ^{-0.667} .
EPSL&S - Condition 3.B.5	AM-003	IN	Continuous	Process Knowledge	Combust only Natural Gas
Insignificant and Trivial Activity Emission Limitations & Standards (ITAEI&S) - Condition 3.C.1	Facility-Wide	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment < 10 mmBTU/hr.	Fuel burning sources < 10 mmBTU/hr not to exceed 0.6 lb/mmBTU of PM.
ITAEI&S - Condition 3.C.2	Facility-Wide	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
ITAEI&S - Condition 3.C.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) - process weight equation.

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
Operation and Maintenance Requirements (O&M)- Condition 3.D.1	AA-000, AA-001, AN-000	IN	Continuous	Applicable Startup, Shutdown, and Malfunction (SSM) Plan and best management practices, routine monitoring, and process knowledge regarding pollution control.	Maintain emission points in manner consistent with good air pollution control practices.
O&M - Condition 3.D.2	AA-000, AA-001	IN	Continuous	Maintain SSM Plan and follow provisions.	Maintain a startup, shutdown, and malfunction plan and a corrective action program.
Compliance Schedule (CS) - Condition 4.1	Facility-wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and records retention.	Permittee must be in compliance with all applicable requirements upon issuance of the Title V permit.
CS - Condition 4.2	All Title V permit conditions	IN	Continuous	Submittal of this report and certification.	Submit annual certification of compliance status.
Monitoring, Recordkeeping & Reporting Requirements (MR&RR) - Condition 5.A.1	Facility-Wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and recordkeeping.	Install, maintain and operate equipment and/or institute procedures as necessary to perform recordkeeping and monitoring as specified in Section 5. See below.
MR&RR - Condition 5.A.2	Facility-Wide	IN	Continuous	Process knowledge and records retention. When recording weekly monitoring information, the time of each measurement was identified by date and shift. In place of shift, we now record the actual time that the measurement or monitoring is made.	List of required monitoring information to be maintained with required records, where applicable.
MR&RR - Condition 5.A.3	Facility-Wide	IN	Continuous	Records retention.	Maintain required records for 5 years from the date of the record.
MR&RR - Condition 5.A.4	Facility-Wide	IN	Continuous	Prompt reporting.	Submittal of required semi-annual reports by July 31 st and January 31 st .
MR&RR - Condition 5.A.5	Facility-Wide	IN	Continuous	Report deviations based on guidance from MDEQ.	Prompt reporting of deviations from permit requirements.

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 5.A.6	Facility-Wide	IN	N/A	N/A	Permittee shall use the EPA Reference Test Methods when performing required testing.
MR&RR - Condition 5.B.1	AA-000, AA-001, AN-000	IN	Continuous	Records retention, submittal of required reports, and routine leak detection monitoring of affected components and prompt repair of identified leaks.	Compliance with equipment leak requirements.
MR&RR - Condition 5.B.2	AA-000, AA-001, AN-000	IN	Continuous	Routine leak detection monitoring of affected components and prompt repair of identified leaks.	Perform monitoring per applicable requirements.
MR&RR - Condition 5.B.3	AA-000, AA-001, AN-000	IN	Continuous	Recordkeeping associated with routine LDAR monitoring; SSM Plan; and visual equipment leak inspections.	Perform recordkeeping per applicable requirements.
MR&RR - Condition 5.B.4	AA-001, AA-002, AB-001, AG-003, AG-005, AM-003	IN	Continuous	Recordkeeping of maintenance inspections.	Perform weekly maintenance checks to ensure proper operation of control equipment and maintain sufficient replacement parts.
MR&RR - Condition 5.B.5	AA-003	IN	Continuous	Record and maintain records of the amount of Natural Gas combusted each day	Burn only Natural Gas and retain daily operating records.
MR&RR - Condition 5.B.6	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Conduct weekly inspections for Visible Emission (VE) (one-minute interval)
MR&RR - Condition 5.B.7	Facility-wide	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
MR&RR - Condition 5.C.1	AA-000, AA-001,	IN	Continuous	Prompt reporting.	Since complying with 3.B.1, meet reporting requirements of 40 CFR 63.182, Subpart H.
MR&RR - Condition 5.C.2	AA-000, AA-001, AM-003	IN	N/A	Prompt reporting of stack test data. N/A during compliance period because no stack test required during reporting period.	Submit written report of stack test results to MDEQ within 45 days of stack test.
MR&RR - Condition 5.C.3	AM-003 Facility-wide	IN	Continuous	Prompt reporting in accordance with 5.A.4.	Submit written report summarizing the type, and quantity of fuel burned in all fuel burning equipment.
MR&RR - Condition 5.C.4	Individual HAP, Combined HAP's	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period
MR&RR - Condition 5.C.5	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Report any abnormal visible emissions recorded
MR&RR - Condition 6.1	Facility-Wide	IN	N/A	N/A	N/A. No alternative operating scenarios are permitted.
Title VI Requirements Conditions 7.1 through 7.5	Facility-wide use of ozone depleting substances	IN	Continuous	Process Knowledge and record retention, as well as ensuring that employees or contractors employed for these services are properly certified and use approved equipment.	This section applies to repair and maintenance on motor vehicle air conditioning units, plant refrigeration, and plant appliances that contain ozone depleting substances (i.e. Freon).

HERCULES

Hercules
Forrest Co
Air 0800-0000

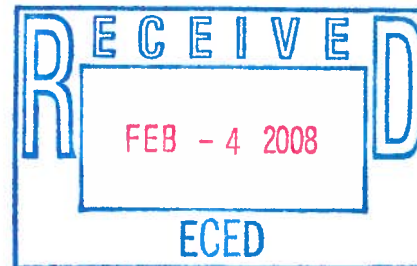


Hercules Incorporated
613 West 7th Street
Hattiesburg, MS 39401
(601) 545-3450
Fax: (601) 584-3226
www.herc.com

JMP

January 31, 2008

US Environmental Protection Agency
Region IV
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303



Re: Hercules Incorporated
Permit No. 0800-00001
Title V Annual Compliance Certification

Dear Sir or Madam:

The attached report is submitted for purposes of compliance certification in accordance with Title V operating permit condition 4.2 and APC-S-6, Section III.C.5. As Responsible Official for Hercules Incorporated, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the attached document are true, accurate, and complete.

If you have any questions or need any further information, please let me know.

Sincerely,

Rodney S. Bolton
Plant Manager

Attachment

cc: ✓ Mr. Rick Sumrall, Chief
ECED, Chemical Branch
MS Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

**HERCULES, INCORPORATED
 HATTIESBURG, MISSISSIPPI – TITLE V PERMIT #0800-00001
 ANNUAL TITLE V COMPLIANCE CERTIFICATION**

TERM OR CONDITION OF TITLE V PERMIT	EMISSION POINT(S)	COMPLIANCE STATUS	CONTINUOUS OR INTERMITTENT	METHOD FOR DETERMINING COMPLIANCE	SUMMARY OF REQUIREMENT & NOTES
General Conditions - Conditions 1.1 through 1.16	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	These are general conditions such as paying the annual Title V fees, allowing DEQ on-site, permit duration, etc.
General Condition - Condition 1.17	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	Allows changes without a permit modification with proper 502(b)10 notification. Two submittals were made on 6/18/07 and 11/12/07.
General Conditions - Conditions 1.18 through 1.25	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement.	These are general conditions such as emergency, upsets, startups and shutdowns.
Facility-Wide Emissions Limitations (FWEL) - Condition 3.A.1	Facility-Wide	IN	Continuous	Visual observation.	Smoke opacity, startup opacity, and soot blowing opacity limitations.
FWEL - Condition 3.A.2	Facility-Wide	IN	Continuous	Visual observation.	Opacity ≤ 40% from any air contaminant.
FWEL - Condition 3.A.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Calculation of any individual Hazardous Air Pollutant not to exceed 9.9 tons for any consecutive 12 month period.
FWEL - Condition 3.A.4	Facility-Wide	IN	Continuous	Process knowledge and engineering judgment.	Calculation of total combined Hazardous Air Pollutants not to exceed 24.9 tons for any consecutive 12 month period.

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Emission Point Specific Limitations & Standards (EPSL&S) - Condition 3.B.1	AA-000, AA-001, AN-000	IN	Intermittent	Affected equipment is routinely monitored for leaks and identified leaks are properly repaired. See condition 5.B.2	Control emissions from equipment leaks. On 9/21/07, two open ended lines (no longer in use) were identified without caps. Quick connect hoses were removed and blind flanges were installed on both lines thus eliminating both open ended lines.
EPSL&S - Condition 3.B.2	AA-002, AB-001, AC-004, AG-005, AM-003	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) - process weight equation.
EPSL&S - Condition 3.B.3	AM-003	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
EPSL&S - Condition 3.B.4	AM-003	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment > 10 mmBTU/hr.	Fuel burning sources > 10 mmBTU/hr not to exceed PM emissions of $E = 0.8808 * I^{-0.667}$.
EPSL&S - Condition 3.B.5	AM-003	IN	Continuous	Process Knowledge	Combust only Natural Gas
Insignificant and Trivial Activity Emission Limitations & Standards (ITAEI&S) - Condition 3.C.1	Facility-Wide	IN	Continuous	Process knowledge and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment < 10 mmBTU/hr.	Fuel burning sources < 10 mmBTU/hr not to exceed 0.6 lb/mmBTU of PM.

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ITAE&S - Condition 3.C.2	Facility-Wide	IN	Continuous	Process knowledge, sulfur content of fuel, and engineering calculations based on EPA AP-42 emission factors for gas-fired fuel burning equipment.	Fuel burning sources not to exceed 4.8 lbs/mmBTU of SO ₂ .
ITAE&S - Condition 3.C.3	Facility-Wide	IN	Continuous	Process knowledge and engineering judgement based on calculations performed using AP-42 emission factors for similar industrial processes.	APC-S-1, Sect. 3.6(a) - process weight equation.
Operation and Maintenance Requirements (O&M)- Condition 3.D.1	AA-000, AA-001, AN-000	IN	Continuous	Applicable Startup, Shutdown, and Malfunction (SSM) Plan and best management practices, routine monitoring, and process knowledge regarding pollution control.	Maintain emission points in manner consistent with good air pollution control practices.
O&M - Condition 3.D.2	AA-000, AA-001	IN	Continuous	Maintain SSM Plan and follow provisions.	Maintain a startup, shutdown, and malfunction plan and a corrective action program.
Compliance Schedule (CS) - Condition 4.1	Facility-wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and records retention.	Permittee must be in compliance with all applicable requirements upon issuance of the Title V permit.
CS - Condition 4.2	All Title V permit conditions	IN	Continuous	Submittal of this report and certification.	Submit annual certification of compliance status.
Monitoring, Recordkeeping & Reporting Requirements (MR&RR) - Condition 5.A.1	Facility-Wide	IN	Continuous	Process knowledge, engineering judgement, routine monitoring, and recordkeeping.	Install, maintain and operate equipment and/or institute procedures as necessary to perform recordkeeping and monitoring as specified in Section 5. See below.

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MR&RR - Condition 5.A.2	Facility-Wide	IN	Continuous	Process knowledge and records retention. When recording weekly monitoring information, the time of each measurement was identified by date and shift. In place of shift, we now record the actual time that the measurement or monitoring is made.	List of required monitoring information to be maintained with required records, where applicable.
MR&RR - Condition 5.A.3	Facility-Wide	IN	Continuous	Records retention.	Maintain required records for 5 years from the date of the record.
MR&RR - Condition 5.A.4	Facility-Wide	IN	Continuous	Prompt reporting.	Submittal of required semi-annual reports by July 31 st and January 31 st .
MR&RR - Condition 5.A.5	Facility-Wide	IN	Continuous	Report deviations based on guidance from MDEQ.	Prompt reporting of deviations from permit requirements.
MR&RR - Condition 5.A.6	Facility-Wide	IN	N/A	N/A	Permittee shall use the EPA Reference Test Methods when performing required testing.
MR&RR - Condition 5.B.1	AA-000, AA-001, AN-000	IN	Continuous	Records retention, submittal of required reports, and routine leak detection monitoring of affected components and prompt repair of identified leaks.	Compliance with equipment leak requirements.
MR&RR - Condition 5.B.2	AA-000, AA-001, AN-000	IN	Continuous	Routine leak detection monitoring of affected components and prompt repair of identified leaks.	Perform monitoring per applicable requirements.
MR&RR - Condition 5.B.3	AA-000, AA-001, AN-000	IN	Continuous	Recordkeeping associated with routine LDAR monitoring, SSM Plan; and visual equipment leak inspections.	Perform recordkeeping per applicable requirements.

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MR&RR - Condition 5.B.4	AA-001, AA-002, AB-001, AG-003, AG-005,	IN	Continuous	Recordkeeping of maintenance inspections.	Perform weekly maintenance checks to ensure proper operation of control equipment and maintain sufficient replacement parts. 502(B)10 notification submitted for AG-003 and AG-005 on 6/18/07.
MR&RR - Condition 5.B.5	AM-003	IN	Continuous	Record and maintain records of the amount of Natural Gas combusted each day	Burn only Natural Gas and retain daily operating records.
MR&RR - Condition 5.B.6	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Conduct weekly inspections for Visible Emission (VE) (one-minute interval)
MR&RR - Condition 5.B.7	Facility-wide	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period
MR&RR - Condition 5.C.1	AA-000, AA-001,	IN	Continuous	Prompt reporting.	Since complying with 3.B.1, meet reporting requirements of 40 CFR 63.182, Subpart H.
MR&RR - Condition 5.C.2	AA-000, AA-001, AM-003	IN	N/A	Prompt reporting of stack test data. N/A during compliance period because no stack test required during reporting period.	Submit written report of stack test results to MDEQ within 45 days of stack test.
MR&RR - Condition 5.C.3	AM-003 Facility-wide	IN	Continuous	Prompt reporting in accordance with 5.A.4.	Submit written report summarizing the type, and quantity of fuel burned in all fuel burning equipment.

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MR&RR - Condition 5.C.4	Individual HAP, Combined HAP's	IN	Continuous	Process knowledge and engineering judgment based on calculations using operating inventory records	Calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and each consecutive 12-month Period. Calculate and record the total combined HAP's emitted for each consecutive 12-month period
MR&RR - Condition 5.C.5	AA-002, AB-001	IN	Continuous	Visible Emission (VE) readings	Report any abnormal visible emissions recorded
MR&RR - Condition 6.1	Facility-Wide	IN	N/A	N/A	N/A. No alternative operating scenarios are permitted.
Title VI Requirements Conditions 7.1 through 7.5	Facility-wide use of ozone depleting substances	IN	Continuous	Process Knowledge and record retention, as well as ensuring that employees or contractors employed for these services are properly certified and use approved equipment	This section applies to repair and maintenance on motor vehicle air conditioning units, plant refrigeration, and plant appliances that contain ozone depleting substances (i.e. Freon).