

ENTERED BY LR

Permit Action Form
Hercules Inc
613 West 7th Street
Forrest County
Hattiesburg, MS 39401

PERMIT BOARD REPORT

MAY 11 2010

Branch Manager: Toby Cook
SIC: 2821

Recommendations

Folder No. - Activity Type

PER20080002 - RA-Air-Title V

Permit No.

0800-00001

DEQ Contact

Brian Stuart

Action: Issue

Modification

Transfer

Revoke

Reissue

Name Change

Deny

By:

Division Chief

Permit Board

Terminate

Programs:

Master File

Program	Sub Program	Start Date	End Date	Delete
Air	Title V - major	06/01/1990 1/26/1996	7-23-10	<input type="checkbox"/>
Air	RMP Program 3	08/02/2007		<input type="checkbox"/>
Water	PT CIU	03/12/1999		<input type="checkbox"/>
Hazardous Waste	Large Quantity Generator	01/20/1997		<input type="checkbox"/>
Air	NSPS Subpart Dc	09/12/1990		<input type="checkbox"/>
Water	Baseline Stormwater	01/29/2001		<input type="checkbox"/>
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)	03/12/1999		<input type="checkbox"/>
Water	Construction Stormwater	01/03/2006		<input type="checkbox"/>
Air-	MACT Subpart W	03/08/1998		<input type="checkbox"/>
Air	MACT Subpart H	03/08/1998		<input type="checkbox"/>
Air	PSD - Major (EPD use only)	06/11/1991		<input type="checkbox"/>
Water	PT SIU	03/12/1999		<input type="checkbox"/>
Water	NPDES Minor Industrial	09/29/1986		<input type="checkbox"/>

Marked subprograms should be deleted from the master file by the Master File Administrator

Permit Application

Program	Sub Program	Start Date	End Date
Air	Title V - major	06/01/1990 1/26/1996	
Hazardous Waste	Large Quantity Generator	01/20/1997	
Water	PT CIU	03/12/1999	
Air	NSPS Subpart Dc	09/12/1990	
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)	03/12/1999	

CAS

Program	Sub Program	Start Date	End Date
Water	Baseline Stormwater	01/29/2001	
Water	Construction Stormwater	01/03/2006	
Air	MACT Subpart H	03/08/1998	
Air	MACT Subpart W	03/08/1998	
Water	PT SIU	03/12/1999	
Water	PT CIU - Gum and Wood Chemical Mfg (Subpart 454)	03/12/1999	
Water	NPDES Minor Industrial	09/29/1986	

Air Use Only:

- Emissions data entered in enSite
- Emissions data prepared using Lotus 1-2-3 (Attached)
- Permitting action did not change emissions inventory.

TMDL Use Only:

'Y' indicates conformance with published TMDLs, 'N' indicates non-conformance.

Published TMDL	FLAG

Basis: The facility was completely shut down in 2009.

Coordination

Comments: Title V fees are current.

Relationships

People

Name	Address	City	State	Zip	Relationship
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Air Permit Contact For
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Contact For
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Hazardous Waste EPA ID Contact
Elliott Bickerstaff	PO Box 2261	Jackson	MS	39225	Is Title V Internal MDEQ Contact
Kendall Patterson	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Mitch Stevenson	8483 Field Ertel Road	Cincinnati	OH	45249	Is General Permit Contact For
Mitch Stevenson	8483 Field Ertel Road	Cincinnati	OH	45249	Is Application Signatory for
Thomas Strang	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Gary Shelley	613 West 7th	Hattiesburg	MS	39401	Is Contact For

Name	Address Street	City	State	Zip	Relationship
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Water Permit Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is General Permit Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Title V Fee Assessment Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	is DMR recipient for

Organizations

Name	Address	City	State	Zip	Relationship
Hercules Incorporated	613 West 7th Street	Hattiesburg	MS	39401	Is Operated by
A Unitified LLC	8483 Field Ertel Road	Cincinnati	OH	45249	Is Contractor for
Hercules Incorporated	613 West 7th Street	Hattiesburg	MS	39401	Is Owner of
Hercules, Inc.	613 West 7th Street	Hattiesburg	MS	39401	Is Title V Fee Billing Party For
Ashland Inc	613 West 7th Street	Hattiesburg	MS	39401	Is Owner of

Agency Interests

Name	Address	City	State	Zip	Relationship
%%:permit_fil e ais%%	%%NEXT%%	%%NEXT%%	%%NEXT%%	%%NEXT%%	%%NEXT%%

Administrative Tasks

Task	Scheduled Date	Completed Date
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2010	1/27/2010 1:54:27 PM
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2011	
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2012	
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2013	
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2014	

Task	Scheduled Date	Completed Date
Submit compliance certifications per APC-S-6, III.C.5 and 40 CFR 70.6(c)(5)(iv)	1/30/2015	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/30/2009	8/3/2009 1:45:55 PM
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2010	1/27/2010 1:54:47 PM
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/31/2010	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2011	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/31/2011	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2012	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/31/2012	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2013	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/31/2013	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2014	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	7/31/2014	
Submit certified semiannual monitoring reports per APC-S-6,III.A.3 and 40 CFR 70.6(a)(3)(iii)(A)	1/31/2015	
Name Change / Transfer Request Received		11/14/2008 10:56:39 AM
502(b)10 Request Received		8/28/2009 11:23:55 AM
502(b)10 Acknowledgement Letter Sent	9/4/2009	9/1/2009 8:33:53 AM
Application Received	10/24/2008 2:12:45 PM	10/24/2008 2:24:40 PM
Complete Application Received	12/23/2008	11/17/2008 1:50:01 PM
Draft Permit and Rationale Prepared	12/17/2008	1/28/2009 2:32:37 PM
Public Notice Issued	2/11/2009	2/23/2009 10:32:45 AM
Public Notice Completed	3/25/2009	3/25/2009 10:33:05 AM
Public Comments Processed	4/4/2009	4/4/2009 11:40:08 AM
Final Permit/Decision and Supporting Documents Prepared	4/7/2009	4/6/2009 11:40:16 AM
Permit Issued	4/11/2009	4/7/2009 2:35:51 PM
Final Permit Transmitted	4/12/2009	4/7/2009 2:36:37 PM
Inspection Conducted	1/22/2009	11/13/2008 1:34:10 PM
Administrative Completeness Determined/ Administrative Completeness Letter Sent if Needed	12/8/2008	11/17/2008 1:33:58 PM
Issue NOD(s) to Applicant	12/8/2008	

Task	Scheduled Date	Completed Date
Draft Permit Sent to Supervisor	1/30/2009	1/28/2009 2:32:41 PM
Draft Permit Sent to ECED	2/1/2009	1/28/2009 2:45:22 PM
Draft Permit Sent to Facility	2/1/2009	1/28/2009 2:45:28 PM
Permit Expiration Date	4/9/2009	3/31/2014 2:36:28 PM
Early Public Notice of Application Complete	11/24/2008	11/20/2008 3:03:22 PM
EPA Air Title V review begins	2/11/2009	2/18/2009 10:32:58 AM
Letter Acknowledging Receipt of Application Issued	10/26/2008	10/24/2008 2:24:48 PM
502(b)10 Request Received		9/18/2009 9:02:59 AM
502(b)10 Acknowledgement Letter Sent	9/25/2009	9/22/2009 7:59:50 AM
502(b)10 Request Received		11/10/2009 10:21:55 AM
502(b)10 Acknowledgement Letter Sent	11/17/2009	11/12/2009 2:50:59 PM
Revocation Request Received		4/14/2010 1:26:09 PM
Revoke Permit		

Existing Permits

Permit Number	Description
Water - NPDES	MS0001830
GP-Baseline	MSR110153
Air-AIRS AFS	2803500001
Air-Title V Fee Customer	080000001
GP-Construction	MSR103943
GARD	2022 001
Hazardous Waste-EPA ID	MSD008182081
Air-Title V Operating	080000001

Requirement Profiles:

Category	ID	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8
AI	2022	Compliance Use Only	Permits	Air	Title V				

Ashland Inc.

Environmental, Health and Safety

April 8, 2010

P. O. Box 2219
Columbus, OH 43216
Tel: 614 790-3333, Fax: 614 790-6080
www.ashland.com

Ms. Jan Patton
Mississippi Department of Environmental Quality
Office of Pollution Control
Environmental Compliance and Enforcement Division
P.O. Box 2261
Jackson, MS 39225

RECEIVED
APR 9 2010
Mississippi Department of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

RE: Delegation of Signatory for Environmental Reports and Documents
Hercules Incorporated
Hattiesburg, MS

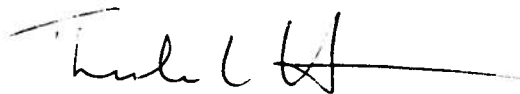
As President, Global Supply Chain, and Vice-President of Ashland Inc., parent company of Hercules Incorporated, I am the responsible corporate officer with respect to operations at the above-referenced facility. Therefore, in accordance with USEPA, State of Mississippi, and Local Authority regulations, I authorize the following positions for the facility to sign, certify and submit all reports, applications, notifications and other documents associated with the above-referenced permit(s), as well as any other information relating to air quality, water quality, solid and hazardous waste, remediation, water usage, watershed, toxic release inventory related activities at the above-referenced facility:

Manufacturing Director, North America
Regional Plant Manager
Remediation Project Manager

Please contact Rod Bolton at 414-461-4000, ext. 157 or rsbolton@ashland.com should you have any questions or require any changes to this delegation.

Thank you in advance for your attention to this matter.

Respectfully yours,



Theodore L. Harris
President, Global Supply Chain & EH&S
Vice President, Ashland Inc.

cc: Mr. Rick Sumrall
Mississippi Department of Environmental Quality
Office of Pollution Control
Environmental Compliance and Enforcement Division
P.O. Box 2261
Jackson, MS 39225

Forrest

HERCULES

Hercules Incorporated
Hercules Plaza
1313 North Market Street
Wilmington, DE 19894-0001

60-160/433

CHECK DATE
08/11/2009

CHECK NUMBER
0990465408

PAY...THREE HUNDRED SEVENTEEN DOLLARS 88 CENTS

TO
THE
ORDER
OF:


MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY
PO BOX 2339
JACKSON, MS 39225-2339

\$*****317.88

THE BANK OF NEW YORK MELLON
PITTSBURGH, PENNSYLVANIA



AP-6266
0800-0000/

⑆0990465408⑆ ⑆043301601⑆ 

RECEIVED

AUG 24 2009

MS DEPT. OF ENVIRONMENTAL QUALITY
ACCOUNTS RECEIVABLE

TITLE V AIR PERMIT FEES

- Quarter Payment Full Payment Other
- Title V Air Permit Fees 3479 - 41670 - 4044 - 0
- Penalty on Failure to Pay 3479 - 42350 - 4044 - 0

Signature

Date

ENTERED BY *SR*
 PERMIT BOARD REPORT

Permit Action Form
 Hercules, Inc.
 613 West 7th Street
 Forrest County
 Hattiesburg, MS 39401

APR 14 2009

Branch Manager: Toby Cook
 SIC: 2821

Recommendations

Folder No. - Activity Type

PER20080002 - RA-Air-Title V

Permit No.

0800-00001

DEQ Contact

Carrie Barefoot

Action:

- Issue
- Modification
- Transfer
- Revoke

- Reissue
- Name Change
- Deny

By:

- Division Chief
- Permit Board
- Terminate

Programs:

Master File

Program	Sub Program	Start Date	End Date	Delete
Air	NSPS Subpart Dc	09/12/1990		<input type="checkbox"/>
Air	Title V - major	06/01/1900		<input type="checkbox"/>
Water	NPDES Minor Industrial	09/29/1986		<input type="checkbox"/>
Air	MACT Subpart W	03/08/1998		<input type="checkbox"/>
Water	PT CIU	03/12/1999		<input type="checkbox"/>
Water	PT SIU	03/12/1999		<input type="checkbox"/>
Water	Baseline Stormwater	01/29/2001		<input type="checkbox"/>
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)	03/12/1999		<input type="checkbox"/>
Water	PT CIU - Gum and Wood Chemical Mfg (Subpart 454)	03/12/1999		<input type="checkbox"/>
Water	Construction Stormwater	01/03/2006		<input type="checkbox"/>
Hazardous Waste	Large Quantity Generator	01/20/1997		<input type="checkbox"/>

Marked subprograms should be deleted from the master file by the Master File Administrator

Permit Application

Program	Sub Program	Start Date	End Date
Air	NSPS Subpart Dc	09/12/1990	
Air	Title V - major	06/01/1900	
Air	MACT Subpart H	03/08/1998	
Air	MACT Subpart W	03/08/1998	

Air Use Only:

- Emissions data entered in enSite
- Emissions data prepared using Lotus 1-2-3 (Attached)

2AS

Permitting action did not change emissions inventory.

Basis: The permit conditions are based on the state standards and requirements of APC-S-1 and APC-S-6, MACT Subpart H and Subpart W, and NSPS Subpart Dc.

Coordination

Comments: This renewal permit will reflect the current operations at the plant. Currently, the only two manufacturing process that remain are the Kymene process area and the Paracol/AKD process area. EPA was provided 45 days for review, but was not considered a targeted source and no comments were received. Title V Fees are current.

Relationships

People

Name	Address	City	State	Zip	Relationship
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Air Permit Contact For
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Contact For
Charles Jordan	613 West 7th Street	Hattiesburg	MS	39401	Is Hazardous Waste EPA ID Contact
Elliott Bickerstaff	PO Box 2261	Jackson	MS	39225	Is Title V Internal MDEQ Contact
Kendall Patterson	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Mitch Stevenson	8483 Field Ertel Road	Cincinnati	OH	45249	Is General Permit Contact For
Mitch Stevenson	8483 Field Ertel Road	Cincinnati	OH	45249	Is Application Signatory for
Thomas Strang	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Gary Shelley	613 West 7th Street	Hattiesburg	MS	39401	Is Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Water Permit Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Application Signatory for
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	Is Title V Fee Assessment Contact For
Rodney Bolton	613 West 7th Street	Hattiesburg	MS	39401	is DMR

Name	Address Street	City	State	Zip	Relationship recipient for
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Organizations

Name	Address	City	State	Zip	Relationship
Hercules Incorporated	613 West 7th Street	Hattiesburg	MS	39401	Is Operated by
A Uniftied LLC	8483 Field Ertel Road	Cincinnati	OH	45249	Is Contractor for
Hercules, Inc.	613 West 7th Street	Hattiesburg	MS	39401	Is Title V Fee Billing Party For
Hercules Incorporated	613 West 7th Street	Hattiesburg	MS	39401	Is Owner of

Administrative Tasks

Task	Scheduled Date	Completed Date
Application Received	10/24/2008	10/24/2008
Letter Acknowledging Receipt of Application Issued	10/26/2008	10/24/2008
Inspection Conducted	1/22/2009	11/13/2008
Name Change / Transfer Request Received		11/14/2008
Complete Application Received	12/23/2008	11/17/2008
Administrative Completeness Determined/ Administrative Completeness Letter Sent if Needed	12/8/2008	11/17/2008
Early Public Notice of Application Complete	11/24/2008	11/20/2008
Draft Permit and Rationale Prepared	12/17/2008	1/28/2009
Draft Permit Sent to Supervisor	1/30/2009	1/28/2009
Draft Permit Sent to ECED	2/1/2009	1/28/2009
Draft Permit Sent to Facility	2/1/2009	1/28/2009
EPA Air Title V review begins	2/11/2009	2/18/2009
Public Notice Issued	2/11/2009	2/23/2009
Public Notice Completed	3/25/2009	3/25/2009
Public Comments Processed	4/4/2009	4/4/2009
Final Permit/Decision and Supporting Documents Prepared	4/7/2009	4/6/2009
Transmittal of Final Permit		
Issue NOD(s) to Applicant	12/8/2008	
Permit Expiration Date		

Existing Permits

Permit Number	Description
Air-Title V Fee Customer	08000001
GP-Construction	MSR103943
Water - NPDES	MS0001830
Water - Pretreatment	MSP091286
GP-Baseline	MSR110153

Permit Number	Description
Air-AIRS AFS	280350001
Hazardous Waste-EPA ID	MSD008182081
GARD	2022 001

Requirement Profiles:

Category	ID	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8
AI	2022	Compliance Use Only	Permits	Air	Title V				

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

**Hercules, Inc.
613 West 7th Street
Hattiesburg, Mississippi
Forrest County**

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: APR 07 2009

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: March 31, 2014

Permit No.: 0800-00001

0800-00001 PER20080002

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B 40 CFR 82 - PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C 40 CFR 63, SUBPART W - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR EPOXY RESINS PRODUCTION AND NON-NYLON POLYAMIDES PRODUCTION

APPENDIX D 40 CFR 63, SUBPART H - NATIONAL EMISSION STANDARDS FOR ORGANIC HAZARDOUS AIR POLLUTANTS FROM THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY FOR EQUIPMENT LEAKS

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual

emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
 - (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in

the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

1.20 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: APC-S-6, Section IV.D.4.)

- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions

specified in (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

- (a) Upsets (as defined by APC-S-1, Section 2.34)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements

of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process

equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
 - (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	The Kymene process area produces specialty chemicals used primarily as wet strength additives in the manufacturing of paper. Equipment in the process area includes reactors, tanks, vents, piping, etc. Emissions occur from associated equipment and from fugitive losses.
AA-001	The Kymene process vent equipped with a packed bed water scrubber.
AA-002	The Kymene adipic acid handling system equipped with a dust shaker.
AB-000	The Paracol/AKD process area produces AKD and wax dispersions used primarily as sizing agents in the manufacturing of paper. Equipment in the process area includes reactors, tanks, vents, piping, etc. Emissions occur from associated equipment and from fugitive losses.
AB-001	The Paracol/AKD process area vent and melter equipped with a water scrubber.
AM-003	The 24.345 MMBTU/hr package boiler only capable of burning natural gas.
AN-000	The Effluent Treatment process area consists of equalization, solids removal, pH adjustment, and neutralization.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)
- 3.A.3 The permittee shall not cause, allow, or permit emissions of any individual hazardous air pollutant (HAP) in excess of 9.9 tons for any consecutive 12-month period. (Ref.: Title V Operating Permit issued April 22, 2004)
- 3.A.4 The permittee shall not cause, allow, or permit emissions of total combined hazardous air pollutants (HAPs) in excess of 24.9 tons for any consecutive 12-month period. (Ref.: Title V Operating Permit issued April 22, 2004)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-000 AA-001 AN-000	APC-S-1, Section 8.1 and MACT Subpart W, 40 CFR 63.524(a)(2)	3.B.1	Total HAPs	Requirements of 40 CFR 63, Subpart H to control emissions from equipment leaks
AA-002 AB-001	APC-S-1, Section 3.6(a)	3.B.2	PM	$E=4.1(p)^{0.67}$
AM-003	APC-S-1, Section 4.1(a)	3.B.3	SO ₂	4.8 lbs/MMBTU
	APC-S-1, Section 3.4(a)(2)	3.B.4	PM	$E=0.8808 * P^{0.1667}$
	Title V Operating Permit Issued	3.B.5	Fuel Restriction	Combustion of natural gas only.

3.B.1 Emission Points AA-000, AA-001, and AN-000, are affected by and shall comply with the National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production (40 CFR Part 63 Subpart W) and the General Provisions (40 CFR Part 63 Subpart A). A copy of the National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production is attached in Appendix C.

For Emission Points AA-000, AA-001, and AN-000, the permittee shall comply with the requirements of 40 CFR Part 63 Subpart H to control emissions from equipment leaks. (Ref.: 40 CFR 63.524(a)(2))

3.B.2 The permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

$$E = 4.1(p)^{0.67}$$

where E is the emission rate in pounds per hour and P is the process weight input rate in tons per hour. (Ref.: APC-S-1, Section 3.6(a))

3.B.3 The permittee shall not have emissions of sulfur oxides in excess of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: APC-S-1, Section 4.1(a))

3.B.4 The permittee shall not have particulate emissions that exceed an emission rate as

determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: APC-S-1, Section 3.4(a)(2))

- 3.B.5 For Emission Point AM-003, the permittee shall combust only natural gas. (Ref.: Title V Operating Permit issued April 22, 2004)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
APC-S-1, Section 4.1(a)	3.C.1	SO ₂	4.8 lbs/MMBTU, or as otherwise limited by facility modification restrictions
APC-S-1, Section 3.6(a)	3.C.2	PM	E=4.1(p) ^{0.67} , or as otherwise limited by facility modification restrictions

- 3.C.1 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref: APC-S-1, Section 4.1(a))

- 3.C.2 The permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

$$E = 4.1 (p)^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Ref.: APC-S-1, Section 3.6(a))

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-000 AA-001 AN-000	40 CFR 63.6(e)	3.D.1	O & M	Operate and maintain equipment to minimize emissions
AA-000 AA-001 AN-000	40 CFR 63.6(e)(3)	3.D.2	SSM Plan	Develop and implement written startup, shutdown, and malfunction (SSM) plan

3.D.1 The permittee shall, at all times including periods of startup, shutdown and malfunctions, operate and maintain Emission Points AA-000, AA-001, and AN-000 in a manner consistent with good air pollution control practices for minimizing emissions at least to the emission levels authorized herein. (Ref.: 40 CFR 63.6(e))

3.D.2 The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining Emission Points AA-000 and AA-001 during periods of startup, shutdown, and malfunction and a program of corrective action for the malfunctioning of air pollution equipment authorized herein.

If 40 CFR 63, Subpart W or Subpart H, at any time, becomes applicable to Emission Point AN-000, the permittee shall develop and implement a startup, shutdown, and malfunction plan consistent with the above requirements. (Ref.: 40 CFR 63.6(e)(3))

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

**SECTION 5. MONITORING, RECORDKEEPING & REPORTING
REQUIREMENTS**

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below. (Ref.: APC-S-6, Section III.A.3)
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))

- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA. (Ref.: APC-S-6, Section III.A.3.a.(1))

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-000 AA-001 AN-000	HAP	Initial Compliance and Performance Testing	5.B.1	MACT Subpart W, 40 CFR 63.525
AA-000 AA-001 AN-000	HAP	Compliance Monitoring	5.B.2	MACT Subpart W, 40 CFR 63.526
AA-000 AA-001 AN-000	HAP	Recordkeeping Requirements	5.B.3	MACT Subpart W, 40 CFR 63.527
AA-001 AA-002 AB-001	Control Equipment Maintenance	Monitoring and Recordkeeping Requirements	5.B.4	APC-S-6, Section III.A.3
AM-003	Recordkeeping Requirements	Record of amount of natural gas combusted during each day	5.B.5	NSPS Subpart Dc, 40 CFR 60.48c(g)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-002 AB-001	Visible Emissions/ Opacity	Weekly monitoring and recordkeeping of visible emissions	5.B.6	APC-S-6, Section III.A.3
Facility-Wide	Individual and Total HAPs	Calculate and record monthly HAP emissions and total individual and combined HAP emissions for consecutive 12-month period	5.B.7	APC-S-6, Section III.A.3

- 5.B.1 For Emission Points AA-000, AA-001, and AN-000, when complying with the equipment leak requirements of 3.B.1, the permittee must achieve initial compliance by demonstrating the ability of its specific program to meet the compliance requirements of 40 CFR Part 63, Subpart H. The demonstration of the program to meet the compliance requirements of 40 CFR Part 63, Subpart H are those requirements set forth in 40 CFR 63.162(a) or (b), whichever is applicable. (Ref.: 40 CFR 63.525(i))
- 5.B.2 For Emission Points AA-000, AA-001, and AN-000, the permittee shall perform monitoring by the following method:
When complying with the equipment leaks requirements of 3.B.1, the permittee shall meet the monitoring requirements spelled out in the applicable sections of 40 CFR Part 63, Subpart H. (Ref.: 40 CFR 63.526(d))
- 5.B.3 For Emission Points AA-000, AA-001, and AN-000, the permittee shall perform the following recordkeeping:
When complying with the equipment leak provisions stated in 3.B.1, the permittee shall implement the recordkeeping requirements outlined in 40 CFR 63.181. These records shall be retained for a period of 5 years in accordance with the requirements of 40 CFR 63.10(b)(1). (Ref.: 40 CFR 63.527(d))
- 5.B.4 For Emission Points AA-001, AA-002, and AB-001, the permittee shall perform weekly maintenance checks to ensure proper operation of the pollution control equipment. Records of the inspections and/or maintenance shall be kept in log form and made available for review upon request. The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. (Ref.: APC-S-6, Section III.A.3.a(3))
- 5.B.5 For Emission Point AM-003, the permittee shall record and maintain records of the amount of natural gas combusted each day. (Ref.: 40 CFR 60.48c(g))
- 5.B.6 For Emission Points AA-002 and AB-001, the permittee shall conduct weekly inspections for 0800-00001 PER20080002

visible emissions (VE) (one-minute interval). The permittee shall maintain a log noting 1) whether any air emissions (except for water vapor) were visible from the emission point and 2) all emission points from which visible emissions occurred. If no VE are observed then no further observations are required.

For emission points with VE, the permittee shall record 1) the color of the emission, 2) whether the emission was light or heavy, 3) the cause of the emission, and 4) any corrective action taken.

Upon observation of VE from an emission point, the frequency of observation for that emission point shall become daily until no VE is observed for three consecutive days. After three consecutive days of no VE, the inspection frequency may be reduced to weekly. If no VE are observed for three consecutive months of weekly observations, the frequency may be reduced to monthly. However, if VE are observed during a monthly inspection, the frequency of inspection shall revert to the daily then weekly schedule as specified above.

Upon detecting VE, the permittee shall immediately inspect the control device and take appropriate corrective action. Records of VE inspections and any corrective action taken shall be kept in log form and made available for review upon request. (Ref.: APC-S-6, Section III.A.3.a(2))

- 5.B.7 For the entire facility, the permittee shall calculate and record the tons of individual hazardous air pollutant (HAP) emitted each month and the total individual HAP emissions for each consecutive 12-month period. The permittee shall also calculate and record the total combined HAPs emitted for each consecutive 12-month period. (Ref.: APC-S-6, Section III.A.3.a(2))

C. Specific Reporting Requirements

- 5.C.1 For Emission Point AA-000, AA-001, and AN-000, the permittee shall submit the following reports (Ref.: 40 CFR 63.528):

When complying with the equipment leak provisions stated in 3.B.1, the permittee shall implement the reporting requirements outlined in 40 CFR 63.182. (Ref.: 40 CFR 63.528(b))

- 5.C.2 The permittee shall submit the written reports of all required stack testing results within forty-five (45) days of the test(s) date. (Ref.: APC-S-6, Section III.A.3.c)
- 5.C.3 For all fuel burning equipment, the permittee shall submit a written report in accordance with Condition 5.A.4 summarizing the type and quantity of fuel(s) combusted. (Ref.: APC-S-6, Section III.A.3.c(1))

- 5.C.4 For all hazardous air pollutant (HAP) emissions, the permittee shall submit reports of the monthly individual HAP emissions and the individual and combined HAP emissions for each consecutive 12-month period required to be recorded in Condition 5.B.20 above. The reports shall be submitted in accordance with Condition 5.A.4 above. (Ref.: APC-S-6, Section III.A.3.c)
- 5.C.5 For Emission Points AA-002 and AB-001, the permittee shall report any abnormal visible emissions recorded, including the 1) the color of the emission, 2) whether the emission was light or heavy, 3) the cause of the abnormal emission, and 4) any corrective action taken. The reports shall be submitted in accordance with Condition 5.A.4 above. (Ref.: APC-S-6, Section III.A.3.c)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

- 6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit.

- 7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- (a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.
 - (b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - (c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - (d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - (b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - (d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)
 - (e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 Φ m in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

40 CFR 82

PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C

40 CFR 63, Subpart W

**National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production
and Non-Nylon Polyamides Production**

APPENDIX D

40 CFR 63, SUBPART H

**National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic
Organic Chemical Manufacturing Industry for Equipment Leaks**

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

**Hercules, Inc.
613 West 7th Street
Hattiesburg, Mississippi
Forrest County**

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: April 22, 2004

Permit Modified: August 3, 2004

Permit Modified: MAR 2 6 2009 (Ownership change)

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: March 31, 2009

Permit No.: 0800-00001

0800-00001 PER20030001

Permit Application Summary Form

General Facility Information

Facility Name: Hercules, Inc.
Facility Address: 613 West 7th Street
Hattiesburg, MS 39401
Source description: Manufacture specialty chemicals used in the paper industry
SIC code of major product: 2821
AFS or CDS Plant ID: 2803500001
Date application Received: October 24, 2008
Permit No: 0800-00001
Permit Activity: PER20080002 - RA-Air-Title V

Pollutant	Potential (tpy)
Carbon Monoxide	8.78
HAP, Total (Limit)	24.9
Nitrogen oxides	10.45
Particulate Matter	105.15
Particulate Matter (10 microns or less)	105.15
Sulfur Dioxide	0.06
VOC	10.47

Compliance Summary

Source out of Compliance Compliance Schedule included Compliance Certification Signed

Applicable Requirements List

Program	Sub Program
Air	NSPS Subpart Dc
Hazardous Waste	Large Quantity Generator
Hazardous Waste	Conditional Exempt Small Quantity Generator
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)
Water	PT SIU
Air	Title V - major
Water	PT CIU
Air	MACT Subpart W
Water	NPDES Major Industrial
Water	NPDES Minor Industrial
Water	Baseline Stormwater

Miscellaneous

- Acid rain source
- Source subject to 112(r)
- Source requested synthetic PTE limit to avoid major source requirement (e.g., PSD, MACT)
- Source applied for federally enforceable emissions cap
- Source provided terms for alternative operating scenarios

- Source subject to a MACT standard
- Source requested case-by-case 112(g) or (j) determination
- Source applied for a plant-wide applicability limit (PAL)
- Source requested terms for operational flexibility
- Source requested streamlining of multiple applicable requirements
- Source requested monitoring plan to establish periodic monitoring
- Application proposes new control technology
- Certified by responsible official
- Diagrams or drawings included
- Confidential business information (CBI) included

NSPS APPLICABILITY

Emission Point AM-003 (24.345 MMBTU/HR steam boiler) was constructed after June 9, 1989, and therefore is subject to the NSPS requirements for steam generating units (40 CFR 60, Subpart Dc).

SPECIFIC APPLICABLE REQUIREMENTS

Emission Point	Pollutant	Draft Permit Emission Limit(s)	Monitoring Requirements
AA-001 AA-002 AB-001	PM	$E=4.1(p)^{0.67}$	Weekly inspections and/or maintenance of control equipment
AA-002 AB-001	Opacity	40%	Weekly visible emissions evaluation
AM-003	SO ₂	4.8 lbs/MMBTU	No monitoring is required because these units may only combust natural gas or propane, which emit very low levels of PM and SO ₂ .
	PM	$E=0.8808*I^{0.1667}$	No monitoring is required because these units may only combust natural gas or propane, which emit very low levels of PM and SO ₂ .
	Fuel	Natural Gas Only	Record and maintain records of the type and amount of each fuel combusted during each day
Facility Wide	HAP	9.9 tons/yr individual HAPs 24.9 tons/yr total HAPs	Calculate and record the tons of individual and total HAPs emitted each month

**INFORMATION RELATIVE TO
THE DRAFT TITLE V OPERATING PERMIT
January 28, 2009**

FOR:
**Hercules Inc
613 West 7th Street
Hattiesburg, MS 39401**

FACILITY DESCRIPTION

Hercules manufactures specialty organic chemicals for use in manufacturing paper products. In the past 20+ years Hercules has been downsizing their operations at the Hattiesburg plant. This renewal of the existing Title V Operating Permit will reflect the current operations at the plant. Currently, the only two manufacturing process that remain are the Kymene process area and the Paracol/AKD process area. With this renewal, Hercules is decommissioning and removing the Neuphor process area, Hard Resins Flaking process area, and the rosin melter.

TITLE V PROGRAM APPLICABILITY BASIS

After removal of these emission points and their allowable emissions, Hercules still remains above the Title V major source threshold of 100 tpy for PM/PM₁₀. In a previous permitting action, Hercules took limits on individual and total HAPs to avoid future MACT applicability.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements effective upon the date of permit issuance. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including the following:
 - a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (APC-S-1)
 - b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (APC-S-3),
 - c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5), and 40 CFR Part 52.21 by reference, and
 - d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2), relating to construction permits and synthetic minor operating permits;

2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;
3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;
4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;
5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;
6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;
7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;
8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;
9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;
10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;
11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;
12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of APC-S-6 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

MACT APPLICABILITY

Emission points AA-000, AA-001, and AN-000 are subject to and shall comply with the provisions set forth in 40 CFR 63, Subpart H – National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks and 40 CFR 63, Subpart W – National Emission Standards for Epoxy Resins Production and Non-nylon Polyamides Production.

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

Project Awareness Checklist

The primary purpose of this checklist is to allow early identification of "big picture" items that could affect EPD's permitting decisions. The checklist will be filled out by the permit manager, with input from the permit applicant as needed. Many of the questions will be answered after the pre-application meeting. The applicable portions of the checklist should be filled out prior to developing the draft permit. The checklist should be attached to the permit action form (PAF).

This checklist does not establish or affect legal rights or obligations. This checklist does not establish or affect procedural requirements for the development or issuance of permits. MDEQ is under no obligation to complete any or all of this checklist.

References to web sites or other sources external to MDEQ are intended for informational purposes only and do not imply any official MDEQ endorsement of, or responsibility for, the opinions, ideas, reliability, data or products presented at those locations, or guarantee the validity of the information provided.

Name of facility

Hercules Inc

AI #

2022

Permit type

- | | |
|--|--|
| <input type="checkbox"/> Issuance | <input type="checkbox"/> Modification |
| <input type="checkbox"/> Reissuance without Modification | <input checked="" type="checkbox"/> Reissuance with Modification |
| <input checked="" type="checkbox"/> Routine | <input type="checkbox"/> Priority |

Critical path

- | | | | |
|---|--------------------------------|--|--------------------------------------|
| <input checked="" type="checkbox"/> Air | <input type="checkbox"/> Water | <input type="checkbox"/> Hazardous Waste | <input type="checkbox"/> Solid Waste |
|---|--------------------------------|--|--------------------------------------|

Notes/Comments

A. Air

Section Not Applicable

Yes
 No
 Not Applicable

- A1. Is the facility located in an area that may become a non-attainment area when the new NAAQS are implemented? [PM2.5](#)
- A2. Is this facility a significant minor source as defined by [APC-S-2, Section I.B.21](#)?
- A3. Will this facility generate dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof, such as to cause a nuisance to property from which it originated? ([APC-S-1, Section 3.3](#))
- A4. Is this project subject to any of the following regulations?
 - New Source Performance Standards (NSPS) ([40 CFR Part 60](#))
 - National Emission Standards for Hazardous Air Pollutants (NESHAP) ([40 CFR Parts 61 and 63](#))
 - Compliance Assurance Monitoring (CAM) ([40 CFR Part 64](#))
 - Prevention of Significant Deterioration (PSD) ([40 CFR Part 52](#))
 - Acid Rain Program ([40 CFR Part 72](#))
 - Chemical Accident Prevention Provisions ([40 CFR Part 68](#))
- A5. Does this facility fall into one of the 28 listed source categories? ([40 CFR 52](#))
- A6. Is this facility located within 200 km of any [Class I](#) area? ([40 CFR 52](#))
 - Will there be construction or air emissions near a [national](#)/state forest or [national](#)/state park or other recreational area? Yes / No / NA
- A7. Will any air discharges have an impact on water quality?

B. Hazardous Waste

Section Not Applicable

C. Solid Waste

Section Not Applicable

D. Water

Section Not Applicable

E. SARA Title III (EPCRA) Reporting

Section Not Applicable

F. Other

Section Not Applicable

F1. List all existing permits and their expiration dates:

Permit Number	Description	Expiration
Hazardous Waste- EPA ID	MSD00818208 1	
Water - Pretreatment	MSP091286	10/31/2009
Air-Title V Fee Customer	080000001	
Air-Title V Operating	080000001	3/31/2009
GP-Baseline GARD	MSR110153 2022 001	9/30/2010
Water - NPDES	MS0001830	4/30/2012
GP-Construction	MSR103943	5/31/2010
Air-AIRS AFS	2803500001	

- Are permit applications in-house for all permits that have expired or will expire in ≤ 180 days? Yes / No / NA
If no, will the current permitting action proceed?
 Yes / No / NA

Permit Activity	Last Permit Expired Task	Last App Received Task

F2. Are all fees (e.g., Title V), fines, and/or compliance with DEQ orders current?

- Check enSite for actions on or after October 1, 2001. Check with ECED for earlier actions.
- Check with Mona Varner for fees.

F3. Check complaints database and compliance history.

- Check enSite for actions on or after October 1, 2001. Check with ECED for earlier actions.
- What is the nature of the historical compliance problems (if applicable)?

There are current enforcement actions pending regarding sludge found in the Effluent Treatment Area.

- Are there any pending agreed orders? Yes / No / NA

F4. Are there EJ considerations?

- Review demographic maps and per capita income information.
- Does the area around the site appear to be a low-income or minority area?
Yes / No / NA
- Is there a significant amount of industrial activity? Yes / No / NA
- Are there indications that there is a significant population of non-English-speaking people near the site? Yes / No / NA
- Are we aware of any variances or violations in local zoning?
Yes / No / NA
- Are there quality of life issues? Yes / No / NA
- Contact the EJ coordinator if there appear to be EJ concerns.
- Determine what kind of additional public information activities need to be done.

F5. Has it been determined that there is public interest in this project?

- Is there organized public opposition? Yes / No / NA
- Who is the opposition?
- Has there been media coverage or the possibility of media coverage?
Yes / No / NA
- Are there regulation changes on the horizon that would result in more stringent requirements for the project? Yes / No / NA
- Are there actual, potential, or alleged human health or environmental impacts? Yes / No / NA
 If yes, explain.

F6. Are there cumulative impact issues?

- Is there a concentration of emissions in the area?
Yes / No / NA
- Research by reviewing files, etc. for effects of past projects, the effects of current projects, and the effects of probable future projects. It includes the effects of other projects which interact with this project and, together, are considerable.
- Is GIS information available? Yes / No / NA
 Has it been used? Yes / No / NA

F7. Is the Mississippi Development Authority (MDA) interested?

- Is the proposed project in an economically underdeveloped area of the state? Yes / No / NA
- Is the project receiving CDBG (Community Development Block Grant) funding? Yes / No / NA
 CDBG funding is given for projects in low-to-moderate income areas and thus indicates the possibility of EJ considerations.

- F8. Will this project have the potential to impact threatened and endangered species? [Pesticide limitations](#) for endangered species link. [NPDES link.](#) <http://endangered.fws.gov/>
- Contact WQAB for a list of species.
- F9. Will this project have the potential to impact archeological and cultural resources?
- Has the [Mississippi Department of Archives and History](#) been contacted? Yes / No / NA
- F10. Is this facility located in a politically sensitive area?
- F11. Will this facility have a significant economic impact on the area?
- F12. Does this project involve other state or federal agencies, and if so, in what way?
- EPA Review of Title V Permit
- F13. Is the project (or company or location, etc.) listed in the Heightened Awareness Projects database (located in Lotus Notes)?
- Yes / No / NA
- If yes, get in touch with the listed contact person.
- F14. Review “Enclosure B: EPA/State Review and Oversight Tools for NPDES Permits” to determine if any additional information needs to be gathered. (The document is located in the Knowledge Center.)
- F15. Is there *anything else* that might slow down the permitting decision or change any permit conditions? ([Industrial Sector Notebooks](#)) If yes, describe.

FILE COPY

**INFORMATION RELATIVE TO
THE DRAFT TITLE V OPERATING PERMIT
January 28, 2009**

FOR:
**Hercules Inc
613 West 7th Street
Hattiesburg, MS 39401**

FACILITY DESCRIPTION

Hercules manufactures specialty organic chemicals for use in manufacturing paper products. In the past 20+ years Hercules has been downsizing their operations at the Hattiesburg plant. This renewal of the existing Title V Operating Permit will reflect the current operations at the plant. Currently, the only two manufacturing process that remain are the Kymene process area and the Paracol/AKD process area. With this renewal, Hercules is decommissioning and removing the Neuphor process area, Hard Resins Flaking process area, and the rosin melter.

TITLE V PROGRAM APPLICABILITY BASIS

After removal of these emission points and their allowable emissions, Hercules still remains above the Title V major source threshold of 100 tpy for PM/PM₁₀. In a previous permitting action, Hercules took limits on individual and total HAPs to avoid future MACT applicability.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (APC-S-6), and applicable requirements effective upon the date of permit issuance. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

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 - c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (APC-S-5), and 40 CFR Part 52.21 by reference, and
 - d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (APC-S-2), relating to construction permits and synthetic minor operating permits;

2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;
3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of APC-S-1;
4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of APC-S-1 and 40 CFR Parts 61, 63, and 68;
5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (APC-S-7) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;
6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;
7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;
8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;
9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;
10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;
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NSPS APPLICABILITY

Emission Point AM-003 (24.345 MMBTU/HR steam boiler) was constructed after June 9, 1989, and therefore is subject to the NSPS requirements for steam generating units (40 CFR 60, Subpart Dc).

SPECIFIC APPLICABLE REQUIREMENTS

Emission Point	Pollutant	Draft Permit Emission Limit(s)	Monitoring Requirements
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AM-003	SO ₂	4.8 lbs/MMBTU	No monitoring is required because these units may only combust natural gas or propane, which emit very low levels of PM and SO ₂ .
	PM	$E=0.8808 * T^{-0.1667}$	No monitoring is required because these units may only combust natural gas or propane, which emit very low levels of PM and SO ₂ .
	Fuel	Natural Gas Only	Record and maintain records of the type and amount of each fuel combusted during each day
Facility Wide	HAP	9.9 tons/yr individual HAPs 24.9 tons/yr total HAPs	Calculate and record the tons of individual and total HAPs emitted each month

Permit Application Summary Form

FILE COPY

General Facility Information

Facility Name: Hercules, Inc.
 Facility Address: 613 West 7th Street
 Hattiesburg, MS 39401
 Source description: Manufacture specialty chemicals used in the paper industry
 SIC code of major product: 2821
 AFS or CDS Plant ID: 2803500001
 Date application Received: October 24, 2008
 Permit No: 0800-00001
 Permit Activity: PER20080002 - RA-Air-Title V

Pollutant	Potential (tpy)
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HAP, Total (Limit)	24.9
Nitrogen oxides	10.45
Particulate Matter	105.15
Particulate Matter (10 microns or less)	105.15
Sulfur Dioxide	0.06
VOC	10.47

Compliance Summary

- Source out of Compliance Compliance Schedule included Compliance Certification Signed

Applicable Requirements List

Program	Sub Program
Air	NSPS Subpart Dc
Hazardous Waste	Large Quantity Generator
Hazardous Waste	Conditional Exempt Small Quantity Generator
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)
Water	PT SIU
Air	Title V - major
Water	PT CIU
Air	MACT Subpart W
Water	NPDES Major Industrial
Water	NPDES Minor Industrial
Water	Baseline Stormwater

Miscellaneous

- Acid rain source
 Source subject to 112(r)
 Source requested synthetic PTE limit to avoid major source requirement (e.g., PSD, MACT)
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- Source requested streamlining of multiple applicable requirements
- Source requested monitoring plan to establish periodic monitoring
- Application proposes new control technology
- Certified by responsible official
- Diagrams or drawings included
- Confidential business information (CBI) included

PROOF OF PUBLICATION
THE STATE OF MISSISSIPPI
FORREST COUNTY



MISSISSIPPI
MDEQ
Permitting Contracts

09 FEB 27 AM 3:08

V406020

PERSONALLY appeared before me, the undersigned notary public in and for Forrest County, Mississippi,

BARBARA CALLAHAN

PASTE PROOF HERE

6019615171A
MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD
0200210926
Public Notice Mississippi Environmental

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

Public Notice Start Date: February 23, 2009
MDEQ Contact: Carrie Barefoot
Deadline For Comment: March 25, 2009

Hercules, Inc. located at 613 West 7th Street, in Hattiesburg, MS, (601) 545-3450 has applied to the Mississippi Department of Environmental Quality for the following permitting action(s): Air Ref. No. 0800-00001. The applicant's operations fall within SIC Code 2821.

Hercules manufactures specialty organic chemicals for use in manufacturing paper products. Hercules has applied for a renewal of the existing Title V Operating Permit and appropriate modifications to reflect the current operations at the plant. Currently, the only two manufacturing processes that remain are the Kymene process area and the Paracol/AKD process area. With this renewal, Hercules is decommissioning and removing the Neuphor process area, Hard Resins Flaking process area, and the rosin melter. The facility's potential to emit exceeds the threshold limit of 100 tons per year (tpy) for particulate matter (PM/PM10), which was established by the Title V Program of the Clean Air Act. Due to a decrease in criteria pollutants with this permit action, Hercules is not subject to review under the Prevention of Significant Deterioration (PSD) regulations. The facility will maintain federally enforceable limits on the potential to emit hazardous air pollutants (HAP) to avoid future National Emission Standards for Hazardous Air Pollutant Sources (NESHAPS). These limits will be below the threshold limits of 25 tpy for total HAPs and 10 tpy for individual HAPs.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation is an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation. Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Carrie Barefoot at the Permit Board's address shown above, no later than March 25, 2009. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit(s). The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed permit if that is the recommendation. The Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application.

an authorized clerk of the HATTIESBURG AMERICAN, a daily newspaper published in the City of Hattiesburg, Forrest County, Mississippi who, being duly sworn, states that the notice, a true copy of which is hereto attached, appeared in the issues of said newspaper as follows:

2/23/2009

Size: 914 words / 2.00 col. x 117.00 lines
Published: 1 time(s)
Total: \$112.68

Signed Barbara Callahan
Authorized Clerk of
The Hattiesburg American

SWORN to and subscribed before me on 2/23/2009.

Jennifer Y Brogdon
Notary Public

Feb. 23, 2009
Date

EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period, as long as no public comments are received within the 30-day public notice period. If comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Mississippi Department of Environmental Quality that comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended.

The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address:

<http://www.epa.gov/Region4/air/permits/Mississippi.htm>. Additional details about the application(s), including a copy of the draft permit(s), are available by writing or calling Edna Banks at the above Permit Board address and telephone number. For those with Internet access, a copy of the proposed draft permit(s) may be found on the Mississippi Department of Environmental Quality's website at: <http://opc.deq.state.ms.us/publicnotice.aspx>. This information is also available for review at the following location(s) during normal business hours:

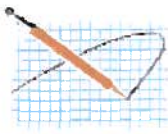
Mississippi Department of Environmental Quality
Office of Pollution Control
515 E. Amite Street
Jackson, Mississippi 39201
The Library of Hattiesburg, Petal, & Forrest County
329 Hardy Street
Hattiesburg, MS 39401

Please bring the foregoing to the attention of persons whom you know will be interested.

Publish: February 23, 2009

0200210926-01

Linda Stanford
3-3-09



Ebonye
Allen/EPD/OPC/DEQ
02/19/2009 08:05 AM

To Carrie Barefoot/EPD/OPC/DEQ@DEQ
cc
bcc

Subject Fw: EPA/MDEQ Title V enReview - Review Start
Notice (Hercules Inc)

Ebonye Allen
Environmental Permits Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225
(601)961-5553

----- Forwarded by Ebonye Allen/EPD/OPC/DEQ on 02/19/2009 08:01 AM -----



Ebonye_Allen@deq.state.ms
.us
02/18/2009 07:00 PM

To Ebonye_Allen@deq.state.ms.us
cc
Subject EPA/MDEQ Title V enReview - Review Start Notice
(Hercules Inc)

Please respond to
Ebonye_Allen@deq.state.ms.us

This email is notification that the EPA comment period for the following draft/proposed Title V Permit will begin on the EPA Review Start Date shown below.

Facility Name: Hercules Inc
City: Hattiesburg
County: Forrest

Permit Number: 0800-00001

Permit Type: Title V Renewal

EPA Review Start Date: 02/18/2009

Public Notice Start Date: 02/23/2009

Public Notice End Date: 03/25/2009

The draft/proposed Title V permit and associated documentation can be viewed at the following link:
[Permit No. 0800-00001](#).

Additional information about this facility can be viewed at the following link: [Hercules Inc](#).

A complete listing of current draft/proposed Title V permits can be viewed at the following link:
[EPA/MDEQ Title V enReview](#).

Per our Implementation Agreement with USEPA, please submit your comments within forty-five (45) days of the EPA Review Start Date. Targeted sources will include a scanned copy of the Title V application.

Please contact the permit writer, Ebonye Allen ((601) 961-5553 / Ebonye_Allen@deq.state.ms.us), or the branch manager, Toby Cook ((601) 961-5067 / Toby_Cook@deq.state.ms.us), for additional information or if any of the associated documents are not available.

Recipients: adams.yolanda@epa.gov, lakeman.sean@epa.gov, purvis.james@epa.gov, Toby_Cook@deq.state.ms.us, Ebonye_Allen@deq.state.ms.us.

This email was electronically generated on Wed 18-Feb-2009 19:00:13.



Ebonye Allen/EPD/OPC/DEQ
03/27/2009 07:59 AM

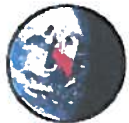
To **Carrie Barefoot/EPD/OPC/DEQ**
cc
bcc

Subject **Fw: EPA/MDEQ Title V enReview - Public Notice End Date (Hercules Inc)**

History: This message has been forwarded.

Ebonye Allen
Environmental Permits Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225
(601)961-5553

--- Forwarded by **Ebonye Allen/EPD/OPC/DEQ** on 03/27/2009 07:54 AM ---



Ebonye_Allen@deq.state.ms.us

03/26/2009 07:00 PM

Please respond to
Ebonye_Allen@deq.state.ms.us

To **Ebonye_Allen@deq.state.ms.us**
cc
Subject **EPA/MDEQ Title V enReview - Public Notice End Date (Hercules Inc)**

This email is notification that the Public Notice period for the following draft/proposed Title V permit has ended.

Facility Name: Hercules Inc
City: Hattiesburg
County: Forrest

Permit Number: 0800-00001

Permit Type: Title V Renewal

EPA Review Start Date: 03/25/2009

Public Notice Start Date: 02/23/2009
Public Notice End Date: 03/25/2009

The draft permit and associated documentation can be viewed at the following link: [Permit No. 0800-00001](#).

Additional information about this facility can be viewed at the following link: [Hercules Inc](#).

A complete listing of current draft/proposed Title V permits can be viewed at the following link: [EPA/MDEQ Title V enReview](#).

Per our Implementation Agreement with USEPA, please submit your comments within forty-five (45) days of the EPA Review Start Date. Targeted sources will include a scanned copy of the Title V application.

Please contact the permit writer, Ebonye Allen ((601) 961-5553 / Ebonye_Allen@deq.state.ms.us), or the branch manager, Toby Cook ((601) 961-5067 / Toby_Cook@deq.state.ms.us), for additional information or if any of the associated documents are not available.

Recipients: adams.yolanda@epa.gov, lakeman.sean@epa.gov, purvis.james@epa.gov, Toby_Cook@deq.state.ms.us, Ebonye_Allen@deq.state.ms.us.

This email was electronically generated on Thu 26-Mar-2009 19:00:29.



Ebonye
Allen/EPD/OPC/DEQ
04/03/2009 07:53 AM

To Carrie Barefoot/EPD/OPC/DEQ
cc
bcc

Subject Fw: EPA/MDEQ Title V enReview - EPA Review Not
Required (Non-Targeted Permit)

Ebonye Allen
Environmental Permits Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225
(601)961-5553

— Forwarded by Ebonye Allen/EPD/OPC/DEQ on 04/03/2009 07:48 AM —



adams.yolanda@epa.gov

04/02/2009 07:00 PM

Please respond to
adams.yolanda@epa.gov

To Ebonye_Allen@deq.state.ms.us

cc

Subject EPA/MDEQ Title V enReview - EPA Review Not Required
(Non-Targeted Permit)

EPA has not targeted this draft/proposed Title V permit for review and does not plan to review it, unless requested by the public or MDEQ.

Facility Name: Hercules Inc
City: Hattiesburg
County: Forrest

Permit Number: 0800-00001

Permit Type: Title V Renewal

EPA Review Start Date: 02/18/2009

Public Notice Start Date: 02/23/2009

Public Notice End Date: 03/25/2009

A complete listing of current draft/proposed Title V permits can be viewed at the following link:
[EPA/MDEQ Title V enReview.](#)

Recipients: Toby_Cook@deq.state.ms.us, Ebonye_Allen@deq.state.ms.us.

This email was electronically generated on Thu 02-Apr-2009 19:00:16.

Public Notice
Mississippi Environmental Quality Permit Board
P. O. Box 2261
Jackson, Mississippi 39225
Telephone No. (601) 961-5171

FILE COPY

Public Notice Start Date: February 23, 2009
Deadline For Comment: March 25, 2009

MDEQ Contact: Carrie Barefoot

Hercules, Inc. located at 613 West 7th Street, in Hattiesburg, MS, (601) 545-3450 has applied to the Mississippi Department of Environmental Quality for the following permitting action(s): Air Ref. No. 0800-00001. The applicant's operations fall within SIC Code 2821.

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The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address: <http://www.epa.gov/Region4/air/permits/Mississippi.htm>.

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Mississippi Department of Environmental Quality
Office of Pollution Control
515 E. Amite Street
Jackson, Mississippi 39201

The Library of Hattiesburg, Petal, & Forrest County
329 Hardy Street
Hattiesburg, MS 39401

Please bring the foregoing to the attention of persons whom you know will be interested.