enSearch

home login Hercules Inc MASTERFILE RELATED STATUS ATTACHMENTS TASKS

	Branch	SIC	<u>10</u>	County	Basin	Start	End
2022	Chemical	2821, 2861, 2899,	2899	Forrest	Pascagoula River	06/11/1991	

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

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

•

Alt ID	Alt Name	Alt Type	Start	End
2803500001	Hercules Inc	Air-AIRS AFS	06/11/1991	
080000001	Hercules, Inc.	Air-State Operating		06/01/1994
08000001	Hercules, Inc.	Air-Title V Fee Customer	11/13/1998	00,01,1004
080000001	Hercules, Inc.	Air-Title V Operating		11/12/2003
080000001	Hercules, Inc.	Air-Title V Operating		03/26/2009
080000001	Hercules, Inc.	Air-Title V Operating		03/31/2009
08000001	Hercules, Inc.	Air-Title V Operating	04/07/2009	
2022 001	Hercules Inc	GARD	04/13/1989	
MSR110153	Hercules, Inc.	GP-Baseline	01/29/2001	
MSR110153	Hercules Inc	GP-Baseline		03/26/2009
MSR110153	Hercules Inc	GP-Baseline	03/26/2009	
<u>MSR103943</u>	Hercules, Inc.		01/03/2006	
MSR103943	Hercules, Inc.		03/26/2009	
MSR110153	Hercules, Inc.		10/17/1997	
MSD008182081		Hazardous Waste-EPA ID	01/20/1997	01/20/2001
2022	Hercules Powder Company	Historic Site Name	01/01/1912	09/01/1968
2022	Hercules, Inc.		09/01/1968	
MS0001830	Hercules, Inc.	Water - NPDES	09/29/1986	09/28/1991
MS0001830	Hercules, Inc.		10/22/1991	
	Hercules, Inc.		09/30/1997	
MS0001830	Hercules, Inc.		10/31/2002	
MS0001830	Hercules, Inc.		05/04/2007	

MS0001830	Hercules, Inc.	Water - NPDES	03/26/200904/30/2012
MSP091286	Hercules, Inc.	Water - Pretreatment	03/12/199902/28/2004
MSP091286	Hercules Inc	Water - Pretreatment	11/05/200403/26/2009
MSP091286	Hercules Inc	Water - Pretreatment	03/26/2009 10/31/2009

Program	SubProgram	Start Date	End Date
Air	MACT Subpart H	03/08/1998	
Air	MACT Subpart PPP		12/16/2005
Air	MACT Subpart W	03/08/1998	
Air	NSPS Subpart Dc	09/12/1990	
Air	RMP Program 3	08/02/2007	1
Air	Title V - major	06/01/1900	
General Permit	No subprogram specified		
Hazardous Waste	Conditionally Exempt Small Quantity Generator	01/20/1997	11/21/2005
Hazardous Waste	Large Quantity Generator	01/20/1997	
Water	Baseline Stormwater	01/29/2001	
Water	Construction Stormwater	01/03/2006	
Water	NPDES Major Industrial	09/29/1986	03/12/1999
Water	NPDES Minor Industrial	09/29/1986	
Water	PT CIU	03/12/1999	
Water	PT CIU - Organic Chemicals Mfg (Subpart 414)	03/12/1999	
Water	PT SIU	03/12/1999	

Latitude		Metadata	S/T/R	Map Links
.02	.04	Point Desc: PG- Plant Entrance (General). Data collected by J. Dewayne Headrick on 11/2/2005.	Section: Township: Range:	MGIS Google Maps
		Method: GPS Code (Psuedo Range) Standard Position (SA Off) Datum: NAD83 Type: MDEQ		<u>MapQuest</u>

10/20/2009 10:22:57 AM

MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 5.A.4

YEAR 2008

GAS USAGE - MCF

				-	GAS USAGE - MCF	GE - MC	Ľ,								
EMISSION POINT	DESCRIPTION	NAL	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	001	NON	DEC	Totals	
AC001	Poly-pale nat. gas Dowtherm boiler	0	0	0	ō	0	0	o	C	C	C	c	C		
AF001	RAD nat gas Dowtherm boiler	0	0	0	ō		0	C	C						
AG001	HRA nat. gas Dowtherm boiler	0	ō	ō	0	ō	0								
AJ001	Rosin dist. nat. gas Dowtherm boiler	0	0	0	0		C		b						
AM001	No. 5 package boiler	0	0	0	0		G		of c						\mathcal{D}
AM002	No. 6 package boiler	0	o			c	fe	ste 			ō		5		
AM003	No. 7 package boiler	3,154	2.888	2,934	2.575	2.748	3 227)	>				5	2	
AN001	Carbon Reg.nat. gas Furnace	0	0	0	0	0	0	0	ō	o	C	C	c	C	
T5ngas		3,154	2,888	2,934	2,575	2,748	3,227								

Kymene Process Area

KYMENE PROCESS AREA REPORT SUMMARY

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

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

Kymene Reactor Scrubber (AA-001)

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

Adipic Acid Dust Shaker (AA-002)

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

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

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

Deviations:

LDAR Tag #'s 83501, 83506, 83523, 83502(1st) and $83502(2^{nd})$, were identified as leaking on 1/17, 3/4, 6/9, 6/12(1st) and 6/15(2nd), respectively. All five events were monitored within 5 days of repair.

Jun-09

TOTAL = 0.208

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

DATE			OVIDE				-
DATE		ETHYLENE			ROHYDRIN		TAL
MY	L L	NONTHLY	12-MONTH	MONTHLY	12-MONTH	MONTHLY	12-MONTH
Apr-04		0.057	0.057	0183	0.183	0.240	0.240
May-04		0.057	0114	0182	0.365	0.239	0.479
Jun-04		0.057	0.171	0.185	0 550	0.242	0.721
Jul-04		0.057	0.228	0.186	0.736	0 243	0.964
Aug-04		0.057	0.285	0.186	0.922	0.243	1.207
Sep-04		0.057	0.342	0.185	1,107	0 242	1.449
Oct-04		0.057	0.399	0 188	1 293	0.243	1.692
Nov-04		0.587	0.986	0.183	1.476	0.770	2 462
Dec-04		0.524	1.510	0.182	1.658	0.706	3.168
Jan-05		0.211	1.721	0.194	1.852	0.405	3.573
Feb-05		0.187	1 908	0184	2 036	0 371	3 944
Mar-05		0136	2.044	0 181	2 217	0.317	4.281
Apr-05		0.242	2.229	0,178	2.212	0.420	4.441
May-05		0.056	2.228	0.179	2.209	0.235	4.437
Jun-05		0.056	2 227	0.179	2.203	0.235	4.430
Jul-05		0.000	2,170	0 178	2.195	0.178	4.365
Aug-05			2 113	0.181	2.190	0.181	4 303
Sep-05			2 056	0.178	2 183	0.178	4.239
Oct-05			1.999	0 184	2.181	0.184	4 180
Nov-05			1.412	0.182	2.180	0.182	3 592
Dec-05			0.888	0.183	2.181	0.183	3.069
Jan-06			0.677	0.182	2.169	0.182	2.846
Feb-06			0.490	0.180	2.165	0.180	2.655
Mar-06			0.354	0.179	2 163	0.179	2.517
Apr-06			0 112	0.182	2.167	0.182	2.279
May-06			0.056	0.178	2.166	0.178	2 222
Jun-06			0.000	0,188	2.175	0.188	2,175
Jul-06				0.187	2.184		
Aug-06				0.187	2.190		
Sep-06				0.186	2 198		
Oct-06				0.183	2 197		
Nov-06				0.181	2.196		
Dec-06				0.177	2 190		
Jan-07				0.183	2 191		
Feb-07				0.179	2.190		
Mar-07				0.180	2,191		
Apr-07				0.187	2,196		
May-07				0.180	2.198		
Jun-07 Jul-07				0.184	2,194		
				0.179 0.181	2,186 2.180		
Aug-07 Sep-07				0.181	2.175		
Oct-07				0.178	2 170		
Nov-07				0.185	2 174		
Dec-07				0.188	2.185		
Jan-08				0.188	2.190		
Feb-08				0.189	2.200		
Mar-08				0.184	2.204		
Apr-08				0.185	2 202		
May-08				0.182	2 204		
Jun-08				0.184	2.204		
Jul-08				0.175	2.200		
Aug-08				0.175	2 194		
Sep-08				0.177	2.190		
Oct-08				0.176	2.188		
Nov-08				0.177	2,180		
Dec-08				0 175	2.167		
Jan-09				0.199	2.178		
Feb-09				0.207	2.196		
Mar-09				0.206	2.218		
Apr-09				0.206	2.239		
May-09				0 207	2 264		
Jun-09				0 208	2.288		
-09 Jul					2,113		
Aug-09					1 938		
Sep-09					1.761		
Oct-09					1.585		
Nov-09					1.408		
Dec-09					1 233		



AUG 3 2009

Dept of Environmental Quality Office of Pollution Control)

Ashland Hercules Water Technologies

Forrest CD Air 0800 0000

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

July 31, 2009

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

Re:

Hercules Incorporated Facility No. 0800-00001 Title V Semi-Annual Report 1/01/09-6/30/09

Dear Mr. Sumrall:

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending June 30, 2009. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semiannual report from January 1, 2009, to June 30, 2009.

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

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

Sincerely,

RS Bolton

Rodney S. Bolton Plant Manager

Attachment(s)





Contents of Report

The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of January 1, 2009 through June 30, 2009, contains the following sections:

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



\bigcirc

\bigcirc

FUEL BURNING REPORT SUMMARY

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

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

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

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

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

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

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

Deviations: The following problem or deviation from the permit was noted during the semi-annual LDAR monitoring report submittal. The LDAR contractor changed monitoring technicians in June, and the quarterly valve monitoring scheduled for June was inadvertently missed during the routine monthly monitoring of pumps and agitators. When this omission was discovered, the LDAR contractor was scheduled in and monitored 2nd quarter valves on July 8, 2009. Valve monitoring will be conducted during the September monthly monitoring to satisfy this requirement for the 3rd quarter.

PERIODIC LEAK MONITORING REPORT

January 1, 2008 through June 30, 2008

Hercules Incorporated Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

- 1. Number of affected *valves* in HAP service for which leaks were detected as described in § 63.168(b), the percent leakers, and the total number monitored:
 - No affected valve was discovered leaking (V_L=0) during the referenced reporting period (>500 ppm);
 - $[V_L/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
 - 67 total valves (V_T=67) were monitored.
- 2. Number of *valves* for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:
 - None.
- 3. Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:
 - No affected pumps were discovered leaking (P_L=0) during the required monthly monitoring (>1,000 ppm);
 - $[P_L/P_T] * 100 = 0.00\%$ of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
 - 3 affected pumps monitored 6 times for a total of 18 pumps (P_T=18) monitored.
- 4. Number of *pumps* for which leaks were not repaired per § 63.163(c):
 - None.
- 5. Number of affected *agitators* in HAP service for which leaks were detected as described in § 63.173(a) & (b):
 - The affected agitator did not leak during the referenced reporting period (>10,000 ppm);
- 6. Number of agitators for which leaks were not repaired per § 63.173(c):
 - None.

- 7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:
 - No affected connectors were measured at or above 500 ppm (C_L=0) during the referenced reporting period;
 - $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
 - 0 total connectors (C_T=0) were monitored.
- 8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:
 - None.
- 9. Explain any *delay of repairs*:
 - All applicable repairs were made in a timely fashion.
- 10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), *pressure relief device* releases:
 - None.
- 11. Notification of a change in *connector monitoring alternatives* as described in §63.174(c)(1):
 - As allowed in §63.174(c)(1)(ii), Hercules Incorporated changed connector monitoring alternatives during the July 1 December 31, 2000, semi-annual reporting period. Instead of monitoring opened or broken connectors for leaks within three (3) months of being returned to organic HAP service, Hercules chooses **not** to monitor connectors that have been opened or had the seal broken. It is realized that nonrepairable connectors can not be counted while complying with this alternative; therefore, in the percent leaking calculations C_{AN} will be set to zero.

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

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

		Sta	Startup, Shutdown	Shutd		nd Me	alfun	ction	and Malfunction Plan (SSM) Checklist Form A
	Shutdown		Startup		1 7				Identify the event as a startim, children or malfinitian and associate
Shutdown Date	Shutdown Time (AM or Date PM)			Initials	Properly Followed?	Was Form B Completed?		Was There A Malfunction?	_
					Yes No	Yes	No	Yes N	No
		11/11/08	11/1/188 thm	R	7				Startus
11/2/108	illallo8 9:38 Pm	•	- E.	BU	7		7	4	Shiddewn
-			11/24/17 -2020	GRC	Ņ		>	-	Ant up Billing
11/27/c8 10:00 pm	10:00 000			<i>R</i> .B.	7		7	2	SHUT DOWN
		20/10/21	12/01/06 7.20 Am	R. R.	7		7		START U.D
12/6/08	430	1 4		33	7		7		Shit down
-		12 8/07	10:2	3	7		1		Stud up
19/13/08	12:15m			GPC	>		2		(Shitt down
		12/15/0	15/08-41.30pm	R.R.	7		7	7	START UP
8-101(51	10:00 M		•		7		2	7	SHUT DOWN
-	•	lokce/cl	TP	E.	7	-	7	7	Charle wo
solacier	LAM			Jy Jy))	ر	- Shutchin
-		2012/21	2968 10 mm Tom	A We	Z		7	<i>Ŀ</i> .	Starter
1/1/09	54°	-		an	7		1	4	Shind Cours
		1/04/09	May 2 gampoli	14	_7		7	7	Start as
1/6/09	126.P			2	7		7	7	Shit down
Før å malf	unictijon, us	se the sta	irtup/shut	down da	ate and tim	e colum	Ins to re	scord the	For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.

date and time columns to record the duration of the event. I IMONINI I E IMONINI 2

		Sta	rtup, S	Shutd	Startup, Shutdown, and	nd Mal	func	tion Pla	Malfunction Plan (SSM) Checklist Form A	1
	Shutdown		Startup		SSM Plan				Identify the event as a startup. shutdown, or malfuction and provide	
Shutdown Date	Time (AM or PM)	Startup Date	Time (AM or PM)	Initials	Properly Followed?	Was Form B Completed?		Was There A Malfunction?	comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.	
					Yes No	Yes		Yes No		
		MB 89/1/1	8Am	GRe	>		>	>	July 10 -1. 15, 405 Pr1. 36 Twee	300
1/10/09/11/95	1145			R	7		7	/	ł	jo jo
	•	1/2/09	S. 30Am	R.B.	7		7	7	START UP	0
117/09	839 /17	-			7		7			
-		1/19/09	8:38 Am	SUC	7		7	7	Stert and	
P0/46/1	Corn			S B C B	7	د 		7	Chull men	
		Polyc/1	1 pm	J B B	2	ر)	500 P.D	
2/109	1/4			JP3	7	1		7	Shut down	
-		md 11 Po/1/6		Left	>		2	7	Stalled 15,23,44 -1767un	
3/1/09	(cildan			GRC	2	ر.	1	2	Thut do won	
		2/9/69 20m		CRC	2	2		7	Stard wo 14. 52 and + 1. 92 +	c.
20/14/02	ADEIRI			JEC V	>	7	~	2	Shut down	0
		2/16/09	10120	GRC	>	3	1	A	Chert we)
22109	1252 Am			AL S	7	->		7	Shitdown	
-	T	2/23/07	2/23/04 8: wan RuB.	R.B.	7	7	\sum	7	STALT NP	
20/8e/E	SCOM			BR	7		7	2	Shildow	
For a malfu	unction, us	se the sta	ırtup/shuı	down d	ate and tim	e column	s to rec	sord the du	For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.	

and Malfunction Plan (SSM) Checklist Form A	Identify the event as a startup, shutdown, or maifuction and provide Was There A comments or Action(s) taken during SSM. Include scrubber water flowrate Malfunction? (gpm) at Startup.	S No	V SHUT DOWN	V Start wo	V Thubdown	1 Startuo	v Shit claur	V START UP	it Shit down	V Start and	1 Shitchinh	V Thereas	V SHUT DOWN	V START UP	U Shuddawn	V Startino	V Shuther	Alacter 10 Am BRC V V Shartro
d Malfunct	Was Form B W	Yes No Yes	\mathbf{V}	7	5)	7	7	7	7	>	>	7	7	$\mathbf{\mathcal{I}}$	7		>
	SSM Pian Properly Followed?	Yes_No	V	7	>	>	7	7	Z	7		>	7	7	$\overline{\mathbf{N}}$	7		>
Shutdown	Initials		RIB	Sel.	GRC	<u>B</u> C	ES.	RIB.	$\mathcal{T}\mathcal{H}$	J73	Se Se	GRC	RıB	R.13,	GRC	R	GRC	BC
Startup, S	Startup Time (AM or PM)			817		TAM		11:55ax		1151		9,30		\$:30 m		11.90 m		IDAM BRC
Stal	Startup Date			3/109	`	3/9/09 TAM		03/16/09 11:55an		3/23/9		3/32/6		04/6/09 8:30 Am	-	Histor		4/2059
	Shutdown Time (AM or PM)		1:00 Am		Hildon		4,31A	9			4:15 m		1400:1		le Am		a. Usan	
	Shutdown Date		my oo: 1 Lo/H/CO	-	3/1/69		3469		RAIBS SIS AM	•	3/88/69		1 23/09 1:00 1:00 M	-	4/10/00	-	4/18/09	Cor o mole

		Sta	Startup, Shutdown	Shutd	UM0		d Malf	unct	ion Pla	and Malfunction Plan (SSM) Checklist Form A
Shutdown	Shutdown Time (All) or	S			SSM Plan Properly	Plan erly	Was Form B		Was There A	
Date	(Md	Date	or PM)	Initials	Yes No	No d	Yes No	_	Malfunction? Yes No	(gpm) at Startup.
1/25/pg	25/09257			20	7		7		7	Shutdown
4 12-10-9		4/27/67	10.4 m	R, R	7		7		7	START UP
5/2/00	Siysa			GRC	2)		2	Judden son
		5/4/09	The mark	AL:	Z		7		7	Starting
25/09/09	1,40 Am			RBI	2				2	SHUTDOWN
<u>.</u>		5/1/03	7130	RB	2		د ا		7	Haller
Slielog	545			elt	7		1	$\overline{\mathbf{A}}$]	Shitchin
-		5/8/a	3:30, (m	E E E	5		2		2	Slader
Polecto	lDem		-	GRC	2		ر 	$\overline{\ }$	7	Shipdoner
F	•	5/mals	1240 12Fm	JP	7		7		7	Stintus
5/3000	leam	, ,	>	CBC	2		2		7	Shuddown
		6/1/6/	6,30m	B	>		7		2	Slauturo 15.01 contracto
6/6/09	720 720			SIC	7		7		7	Shut down
		6/2/07	6/2/07 10:30m R.R.	R.R.	\sum		7		7	START UP
6/0/02	Spor			an	Z		7		7	Flutdown - cert of Eri
		0/11/09	7.60 ar R-13.	R.3,	7		7		7	57427 UP
For a mali	function, us	se the sta	artup/shut	down d	ate an	d time	columns	to rect	ord the du	For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.

auon or the event. B p 5 2 .

3rm 042-0039-003 rev 2

**

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS January 1, 2009 through June 30, 2009

Hercules Incorporated Hattiesburg, Mississippi

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

Kymene Process Area LDAR Tag #'s 83501, 83506, 83523, 83502(1st) and 83502(2nd), were identified as leaking on 1/17, 3/4, 6/9, 6/12(1st) and 6/15(2nd), respectively. All five events were monitored within 5 days of repair.

The following problem or deviation from the permit was noted during the semi-annual LDAR monitoring report submittal. The LDAR contractor changed monitoring technicians in June, and the quarterly valve monitoring scheduled for June was inadvertently missed during the routine monthly monitoring of pumps and agitators. When this omission was discovered, the LDAR contractor was scheduled in and monitored 2nd quarter valves on July 8, 2009. Valve monitoring will be conducted during the September monthly monitoring to satisfy this requirement for the 3rd quarter.



Forrest Co Air 0800-000

Hercules

Ashland Hercules Water Technologies

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

CERTIFIED MAIL – RETURN RECEIPT REQUESTED <u>CERTIFICATION # 7005 0390 0000 1703 9004</u>

January 31, 2009



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

> Re: Hercules Incorporated Facility No. 0800-00001 Title V Semi-Annual Report 07/01/08-12/31/08

Dear Mr. Sumrall:

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending December 31, 2008. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semi-annual report from July 1, 2008, to December 31, 2008.

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

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

Sincerely,

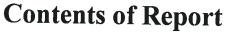
RS Bolton

Rodney S. Bolton Plant Manager

Attacments:







The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of July 1, 2008 through December 31, 2008, contains the following sections:

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

Fuel Burning Equipment



FUEL BURNING REPORT SUMMARY

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

MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 5.A.4

YEAR 2008

GAS USAGE - MCF

EMISSION					LON - 19400 049		L								
POINT	DESCRIPTION	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	<u>SEPT</u>	<u>0CI</u>	NOV	DEC	Totals	
AC001	Poly-pale nat. gas Dowtherm boiler	0	o	0	0	0	0	ō	G	C		C	ē	C	
AF001	RAD nat. gas Dowtherm boiler	0	0	0	0	0	o	To			C	PC			
AG001	HRA nat. gae Dowtherm boiler	0	0	0	0	0	0			c			ōc		
A.001	Rosin dist. nat. gas Dowtherm boiler	0	0	0	ō	0	0	ſ		c			Þ		
AM001	No. 5 package boiler	0	o	0	ō		ē	c							-
AM002	No. 6 package boiler	0	0	P		C	e								
AM003	No. 7 package boiler	3,233	2.941	2.705	2.461	2.620	1 914	2 292	2546	2 363	2 And	2 067		20 264	
AN001	Carbon Reg.nat. gas Fumace	0	0	0	o	0	0	P	0	0	0	0		5	
"Sngas		3,233	2,941	2,705	2,461	2,620	1,914	2,292	2,546	2,363	2,402	2.067	2,820	30.364	

Kymene Process Area

0

KYMENE PROCESS AREA REPORT SUMMARY

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

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

Kymene Reactor Scrubber (AA-001)

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

Adipic Acid Dust Shaker (AA-002)

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

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

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

Deviations:

No deviations were noted during this reporting period.

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

DATE	ETHYLEN			Rohydrin	TOT	AL
MY	MONTHLY	12-MONTH	MONTHLY	12-MONTH	MONTHLY	12-MONTH
Apr-04	0.057	0.057	0.183	0.183	0.240	0 240
May-04	0.057	0.114	0.182	0.365	0.239	0.479
Jun-04	0.057	0.171	0.185	0.550	0.242	0.721
Jul-04	0.057	0.228	0.186	0.736	0.243	0.964
Aug-04	0.057	0.285	0.186	0.922	0.243	1.207
Sep-04	0.057	0.342	0.185	1.107	0.242	1.449
Oct-04	0.057	0.399	0.186	1 293	0.243	1.692
Nov-04	0.587	0.986	0.183	1.478	0.770	2.482
Dec-04	0.524	1.510	0.182	1.658	0.708	3.168
Jan-05	0.211	1.721	0.194	1.852	0.405	3.573
Feb-05	0.187	1.908	0.184	2.036	0.371	3.944
Mar-05	0.136	2.044	0.181	2.217	0.317	4 261
Apr-05	0.242	2.229	0.178	2.212	0.420	4 441
May-05	0.056	2.228	0.179	2.209	0.235	4.437
Jun-05	0.056	2.227	0.179	2.209		
Jul-05	0.000	2.170	0.178		0.235	4.430
Aug-05	0.000	2.113	0.181	2.195	0.178	4.365
Sep-05		2.056		2.190	0.181	4.303
Oct-05		1.999	0.178	2.183	0.178	4.239
Nov-05		1.412	0.184	2.181	0.184	4.180
Dec-05			0.182	2.180	0.182	3.592
Jan-08		0.888	0.183	2.181	0.183	3.069
Feb-08		0.677	0.182	2.169	0.182	2.846
Mar-06		0.490	0.180	2.165	0.180	2.655
Apr-06		0.354	0.179	2 163	0.179	2.517
		0.112	0.182	2.167	0.182	2.279
May-06		0.056	0.178	2.166	0.178	2 222
Jun-06		0.000	0.188	2.175	0.188	2.175
Jul-08		0.000	0.187	2.184	0.187	2.184
Aug-08		0.000	0.187	2.190	0.187	2.190
Sep-08		0.000	0.186	2.198	0.186	2,198
Oct-06		0.000	0.183	2.197	0.183	2.197
Nov-08		0.000	0.161	2.198	0.181	2.198
Dec-08		0.000	0.177	2,190	0.177	2.190
Jan-07		0.000	0.183	2.191	0.183	2,191
Feb-07		0.000	0.179	2.190	0.179	2.190
Mar-07		0.000	0.180	2.191	0.180	2.191
Apr-07		0.000	0.187	2.198	0.187	2.198
May-07		0.000	0.180	2.198	0.187	2.190
Jun-07		0.000	0.184	2.194	0.180	2.198
Jul-07	A REAL PROPERTY IN A REAL PROPERTY OF A REAL PROPER	0.000	0.179	2.186	0.184	2.194
Aug-07		0.000	0.181	2.180	0.181	
Sep-07		0.000	0.181	2.100		2.180
Oct-07		0.000	0.161	2.1/5	0.181	2.175
Nov-07		0.000	0.185		0.178	2.170
Dec-07		0.000		2.174	0.185	2.174
Jan-08		0.000	0.188	2.185	0.188	2.185
Feb-08		0.000	0.188	2.190		2.002
Mar-08			0.189	2.200		1.823
Apr-08		0.000	0.184	2.204		1.643
May-08		0.000	0.185	2.202		1.458
		0.000	0.182	2.204		1.276
Jun-08		0.000	0.184	2.204		1.092
Jul-08		0.000	0.175	2.200		0.913
Aug-08		0.000	0.175	2.194		0.732
Sep-08		0.000	0,177	2.190		0.551
Oct-08		0.000	0,176	2.188		0.373
Nov-08		0.000	0.177	2.180		0.188
Dec-08		0.000	0.175	2.187		0.000

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

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

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

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

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

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

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

PERIODIC LEAK MONITORING REPORT July 1, 2008 through December 31, 2008

Hercules Incorporated Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

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

- No affected valve was discovered leaking (V_L=0) during the referenced reporting period (>500 ppm);
- $[V_L/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
- 98 total valves (V_T=98) were monitored.
- 2. Number of valves for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:
 - None.
- 3. Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:
 - No affected pumps were discovered leaking (P_L=0) during the required monthly monitoring (>1,000 ppm);
 - [P_I/P_T] * 100 = 0.00% of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
 - 3 affected pumps monitored 6 times for a total of 18 pumps (P_T=18) monitored.
- 4. Number of pumps for which leaks were not repaired per § 63.163(c):
 - None.
- 5. Number of affected agitators in HAP service for which leaks were detected as described in § 63.173(a) & (b):
 - The affected agitator did not leak during the referenced reporting period (>10,000 ppm);
- 6. Number of agitators for which leaks were not repaired per § 63.173(c):
 - None.

- 7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:
 - No affected connectors were measured at or above 500 ppm (C_L=0) during the referenced reporting period;
 - $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
 - 310 total connectors (C_T=0) were monitored.
- 8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:
 - None.
- 9. Explain any *delay of repairs*:
 - All applicable repairs were made in a timely fashion.
- 10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), *pressure relief device* releases:
 - None.

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

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

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

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

		Sta	Startup, Shutdown	Shutd		nd M	alfun	ction F	and Malfunction Plan (SSM) Checklist Form A
	Shutdown		Startup						Identify the event as a startup, shutdown, or malfuction and provide
Shutdown Date	Time (AM or PM)	Startup Date	Time (AM or PM)	Initials	Properly Followed?		Was Form B Completed?	Was There A Malfunction?	
					Yes No	Yes	No	Yes No	
		11/11/18	illals the	æ	7				Stertes
80/12/11	ILALOS 9:38Pm			SIL	7		7	7	Shut Down
-			11/24/6 TIDA GRC	GRC	>		>	2	that we by too
11/27/05 10:00 0 m	10:00 0:00	,		R.B.	7		7	2	SHUT DOWN
-	•	2010	12/01/05 7.20 Am	R.R.	7		7		START UP
12/6/05	430 AM	• •			7		7		Shitdown
-		19/8/21	10.7	G	2		1	1	Sturt up
80/51/61	12:15m	•		Con	2		>	2	Shitt down
		1 Jela	1 15 Jest 4:30pm	R.R.	7		7	2	START UP
2)19/02	10,00,01				2		7	7	SHUT DOWN
-		mar toker	TAN	Se la	د د		7	7	Charler D
so/seven	1 PW			SP	2)	ر	Shudden and
		12/29/6	2968 10 Am Dame	A R	Z		Ζ	<i>.</i> 	Stevens
1/1/09	560			<i>di</i>	7		Ż	<i>.</i> 7	Shid and
		1/04/09	Moy 2 9m	74	7		7	7	Start ap
1/6/09	10.0			2			7	7	Shit down
Før å malt	For a malfunction, use the startup/shutdown date and	se the sta	artup/shu	tdown di		ne colur	nns to r	ecord the	time columns to record the duration of the event.

to record the duration of the event. 3 5 ŝ -2

		Sta	Startup, S	Shutdown,	own, and	d Malfu	nction Pla	Malfunction Plan (SSM) Checklist Form A
Shutdown] Date	Shutdown Time (AM or PM)	Startup Date	Startup Time (AM or PM)	Initials	SSM Plan Properly Followed?	Was Form B Completed?	Was There A Malfunction?	Identify the event as a startup, shutdown, or malfuction and provide Was There A ccomments or Action(s) taken during SSM. Include scrubber water flowrate Malfunction? (gpm) at Startup.
					Yes No	Yes No	Yes No	
		09/22/08 1:00 M	Locom	RJ	7	7	7	Start of
9/27/08 92m	141 Jam		-	EL,	7	7		Shut Quert
,	6	09/25/68	liam	RR	7	7	7	START UP
10/4/08	503 54m			ar	7	7		Shut down
		10/0/0	620	ar	7	Ĵ]	Starting
tolulox	Gian			R.R.	7	7	7	SHUT DOWN
		10/13/08	781	<u>A</u> Rr)	3	7	And And
10/18/08 12:30Am	2:30Am			R.13,	7	7	1	SHUT DOWN
-		1:30 pm	1:30n	R.13,	2	$\overline{\gamma}$	1	START UP
x1/sda	930			R.B.	Z	7	7	SHUT DEWN
		10/2/18	11:37	JB	7	7	7	Starting
10/3/08	5:45m			GRN	7	7	2	Shutdown
		2012/11		GRC	7	7	2	Clark
11808	507				7	7	$\mathbf{\mathcal{Z}}$	Shutdown
-		11/10/08	MAOGIC 20/01/11	R.R.	7	7	$\overline{7}$	5TART UP
11/15/08	B:00m	•		GRC	2	2	2	Sulder m Builder Er 1 hand
For a malfunction, use the startup/shutdown date and	inction, us	se the sta	irtup/shut	down d		columns to	record the du	

2 Ŀ

		Sta	Startup, Shutdown,	Shutd	OWD	l, and	I Malfu	nctio	n Pla	Malfunction Plan (SSM) Checklist Form A	
	Shutdown		Startup		SSM Plan	nar				Identify the event as a start in chriticium, or malfunction and associate	
Shutdown Date	Time (AM or PM)	Startup Date	Time (AM or PM)	Initials	Properly Followed?		Was Form B Completed?		Was There A	comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.	
					Yes	+	Yes No	+	No		
		5/19/08/945	shb	JB	7				7	Monder Starting after boiler was ward	ed on
5 24/08	416 4Am		-	dr	>		7		7	un inlense	(
-		5/27/6	5/27/05 gam	RB	>		2		7	Tuesday Shart was and me inde	A
5/31/08	3ilsam			200	>		2		2	Shutteren Rul Icrestend	
		4/2/0× 1	6 km	STB	>				7	Flantino	
id12/08	1100			ar	7		7		Z	RAN THROWS ATH + STU Plant Shut	low
-	-	\$ /23/08 9 40	940	JBC.	7		7				lat them
6/38/08	3:25AM			GRA.	>		7		7	Shutdown historing	
		120/8 Arm		GRC	>		>		λ	Startus of Building	
20/h/L	Mak		-	GR	>		>		2	Shuthern W. coling	
	-	7/1/0	or give An R.B.	R.B.	7		7	<u>\</u>	7	START OP	
80/61/2	5AM			GRC	>		>		>	Shuthern Ruldene	0
		Thylos	Thylas 20m BRC	CBC D	>		>		>	Shartwo (sh Palitation on Mon	Ě
20/10/20	12:3044		-	R.B.	\mathbf{Z}		$\overline{\mathcal{A}}$		7	SHUTDOWN O	D
-	8	otalla 11 Am		R.13.	Z		7		1	START UP	
80/12/2	4 Pm			TB.	7		7		7	Shut down Lor weekend	
Por a malfu	uction, us	e the sta	artup/shu	tdown di	ate an	d time	columns to	o record	the dur	2	_

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS

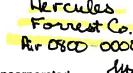
July 1, 2008 through December 31, 2008

Hercules Incorporated Hattiesburg, Mississippi

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

No deviations were noted during this reporting period.





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

July 31, 2008

Mr. Rick Sumrall, Branch Chief Environmental Compliance & Enforcement Division Mississippi Department of Environmental Quality P.O. Box 10385 Jackson, MS 39289-0385

Re: Hercules Incorporated Facility No. 0800-00001 Title V Semi-Annual Report 1/01/08-6/30/08

Dear Mr. Sumrall:

HERCULES

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending June 30, 2008. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semi-annual report from January 1, 2008, to June 30, 2008.

The following notation is the result of our on-going plant demolition activities. The Neuphor Process Area, for which a 502B10 notification was filed on January 28, 2008, has been removed from the Contents of Report section.

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

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

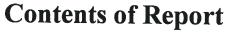
Sincerely,

RS Bolton

Rodney S. Bolton Plant Manager

Attachment(s)





The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of January 1, 2008 through June 30, 2008, contains the following sections:

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

Fuel Burning Equipment



FUEL BURNING REPORT SUMMARY

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

MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 5.A.4

YEAR 2008

GAS USAGE - MCF

					$\left(\right)$						
	Totals	C						15 874		15.874	
	DEC	c									
	NOV	C		be						· 	
	001										
	SEPT	C									
	AUG	C		Ĉ				C			
	JULY	C							0		
5	JUNE	0						1.914	0	1,914	
	MAY	0	0	0	0	0	0	2.620	0	2,620	
	APR	0	0	0	0	0	0	2,461	0	2,461	
,	MAR	ō	0	0	0	0	0	2,705	0	2,705	
	FEB	0	0	0	o	0	0	2,941	0	2,941	
	NAL	0	0	0	ō	0	0	3,233	0	3,233	
Z	DESCRIPTION	Poly-pale nat. gas Dowtherm boiler	RAD nat. gas Dowtherm boiler	HRA nat. gas Dowtherm boiler	Rosin dist. nat. gas Dowtherm boiler	No. 5 package boiler	No. 6 package boiler	No. 7 package boiler	Carbon Reg.nat. gas Furnace		
EMISSION	POINT	AC001	AF001	AG001	AJ001	AM001	AM002	AM003	AN001	T5ngas	

Kymene Process Area

KYMENE PROCESS AREA REPORT SUMMARY

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

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

Kymene Reactor Scrubber (AA-001)

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

Adipic Acid Dust Shaker (AA-002)

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

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

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

Deviations:

LDAR Tag #'s 6015, 6015, 6010, 7854, 7856, and 6015, were identified as leaking on 2/4, 2/15, 3/28, 4/9, 4/18, and 4/23, respectively. All six events were monitored within 5 days of repair.



TOTAL = 0.183



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

DATE	ETHYLE	IE OXIDE	EPICHLO	ROHYDRIN	TO	TAL
M/Y	MONTHLY	12-MONTH	MONTHLY	12-MONTH	MONTHLY	12-MONTH
Apr-04	0.057	0.057	0 183	0 183	0 240	0 240
May-04	0 057	0114	0 182	0 365	0 239	0 479
Jun-04	0 057	0 171	0 185	0 550	0 242	0 721
Jul-04	0 057	0.228	0 186	0 7 3 6	0 243	0 964
Aug-04	0 057	0 285	0 186	0 922	0 243	1 207
Sep-04	0 057	0.342	0 185	1 107		
Oct-04					0 242	1 4 4 9
	0.057	0 399	0 186	1 293	0 243	1 692
Nov-04	0 587	0 986	0 183	1 476	0 770	2 462
Dec-04	0 524	1 510	0 182	1 658	0 706	3 168
Jan-05	0 211	1 721	0 194	1 852	0 405	3 573
Feb-05	0 187	1 908	0184	2 036	0 371	3 944
Mar-05	0 136	2 0 4 4	0181	2 217	0 317	4 261
Apr-05	0 242	2 229	0 178	2.212	0.420	4 441
May-05	0 056	2 228	0 179	2 209	0 235	4 437
Jun-05	0 056	2 227	0 179	2 203	0 235	4 430
Jul-05	0 000	2 170	0.178	2 195	0.178	4 365
Aug-05		2113	0 181	2 190	0,181	4 303
Sep-05		2 056	0 178	2 183	0.131	4 303
Oct-05		1 999	0 184	2 183	0 184	4 239 4 180
Nov-05		1 412	0 182			
Dec-05				2 180	0 182	3 592
		0 888	0 183	2181	0 183	3 069
Jan-08		0 677	0 182	2169	0 182	2 846
Feb-06		0.490	0180	2 165	0 180	2 655
Mar-06		0 354	0179	2 1 6 3	0 179	2 517
Apr-06		0112	0 1 8 2	2 67	0 182	2.279
May-06		0 056	0178	2166	0.178	2 222
Jun-06		0 000	0 188	2 1 7 5	0.188	2 175
Jul-06		0.000	0 187	2184	0 187	2 184
Aug-06		0 000	0187	2 1 9 0	0 187	2 190
Sep-06		0 000	0 186	2 198	0 186	2.198
Oct-06		0 000	0 183	2 197	0 183	2 198
Nov-06		0.000	0 181			
Dec-06				2.196	0 181	2 196
Jan-07		0 000	0.177	2 1 9 0	0 177	2 190
		0 000	 0.183	2 191	0 183	2.191
Feb-07		0 000	0 179	2 1 9 0	0.179	2 190
Mar-07		0 000	0 180	2 1 9 1	0.180	2 191
Apr-07		0.000	0 187	2 196	0 187	2 196
May-07	I I I I I I I I I I I I I I I I I I I	0.000	0 180	2 1 9 8	0.180	2.198
Jun-07		0.000	0 184	2 1 9 4	0 184	2 194
Jul-07		0.000	0 179	2186	0.179	2 186
Aug-07		0 000	0 181	2 180	0 181	2 180
Sep-07		0 000	0.181	2175	0 8	2 175
Oct-07		0 000	0 178	2 170	0 78	2 170
Nov-07		0 000	0 185	2.174	0 185	2 170
Dec-07		0 000	0 188	2 185		
Jan-08		0 000			0 188	2 185
			0 188	2 190		2 002
Feb-08		0 0 0 0	0.189	2 200		1 823
Mar-O8		0 000	0 184	2.204		1 643
Apr-08		0 000	0.185	2 202		1 456
May-08		0.000	0 182	2 204		1 276
Jun-08		0 000	0 183	2 203		1 092

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

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

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

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

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

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

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

PERIODIC LEAK MONITORING REPORT

January 1, 2008 through June 30, 2008

Hercules Incorporated Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

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

- No affected valve was discovered leaking (V_L=0) during the referenced reporting period (>500 ppm);
- $[V_L/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
- 98 total valves (V_T=98) were monitored.
- 2. Number of *valves* for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:
 - None.
- 3. Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:
 - No affected pumps were discovered leaking (P_L=0) during the required monthly monitoring (>1,000 ppm);
 - $[P_L/P_T] * 100 = 0.00\%$ of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
 - 3 affected pumps monitored 6 times for a total of 18 pumps (P_T=18) monitored.
- 4. Number of *pumps* for which leaks were not repaired per § 63.163(c):
 - None.
- 5. Number of affected *agitators* in HAP service for which leaks were detected as described in § 63.173(a) & (b):
 - The affected agitator did not leak during the referenced reporting period (>10,000 ppm);
- 6. Number of agitators for which leaks were not repaired per § 63.173(c):
 - None.

- 7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:
 - No affected connectors were measured at or above 500 ppm (C_L=0) during the referenced reporting period;
 - $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
 - 0 total connectors (C_T=0) were monitored.
- 8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:
 - None.
- 9. Explain any delay of repairs:
 - All applicable repairs were made in a timely fashion.
- 10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), *pressure relief device* releases:
 - None.
- 11. Notification of a change in *connector monitoring alternatives* as described in §63.174(c)(1):
 - As allowed in §63.174(c)(1)(ii), Hercules Incorporated changed connector monitoring alternatives during the July 1 December 31, 2000, semi-annual reporting period. Instead of monitoring opened or broken connectors for leaks within three (3) months of being returned to organic HAP service, Hercules chooses **not** to monitor connectors that have been opened or had the seal broken. It is realized that nonrepairable connectors can not be counted while complying with this alternative; therefore, in the percent leaking calculations C_{AN} will be set to zero.

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

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

TABLE Z

SEMI-FOULL REPORT MONITORING ESULTS

							Jan-Jun
	JAN	FEB	MAR	APR	MAY	JUN	Total
alves Monitored:	<u></u>						
KYMENE	0	0	49	0	49	0	98
Total	0	0	49	0	49	0	98
Valves Leaking:	0	0	0	0	0	0	0
	0	0	0	0	0	0	0 0

							Jan-Jun
	JAN	FEB	MAR	APR	MAY	JUN	Total
umps Monitored:							· · · · ·
KYMENE	3	3	3	3	3	3	18
Total	3	3	3	3	3	3	19
Pumps Leaking:							
	0	0	0	0	n	nl	
KYMENE Total	0	0	0 0	0 0	0	0 0	0 0

							Jan-Jun
	JAN	FEB	MAR	APR	MAY	JUN	Total
onnectors Monitored:							
Total	0	0	0	0	0	0	0
onnectors Leaking:							
onnectors hearing.							
Total	0	0	0	0	0	0	0
	0	0	0	0	0	0	0

	-						Jan-Jun
	JAN	FEB	MAR	APR	MAY	JUN	Total
crewed Connectors							
Total	0	0	0	0	0	0	0
crewed Connectors							
Total	0	0	0	0	0	0	0
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

THELE Z (CONC. C)

SEMI-RUAL REPORT MONITORING ESULTS

								Jan-Jun
		JAN	FEB	MAR	APR	MAY	JUN	Total
lg Mon	itored:							
	KYMENE	1	1	1	1	1	1	6
	Total	1	1	1	1	1	1	6
lg Lea	king:			T				
Ag Lea	king:	0	0	0	0	0	0	0
Ag Lea		0	0	0 0	0	0	0 0	0 0

		1 . 10					Jan-Jun
	JAN	FEB	MAR	APR	MAY	JUN	Total
essure Relief Device							
Total	0	0	0	0	0	0	0
essure Relief Device	L						
	0	0	0	0	0	0	0

				(0	28		Ce	Y	J Ç)				
Malfunction Plan (SSM) Checklist Form A	Identify the event as a startup, shutdown, or malfuction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.		START UP	Weekend shut dawe	t start up	Shutdown Sor Weeken	Start up	SHUT DOWN	Start wo	5H - Yelt water on all weekene	+ 5TANT OF 00 0	The Idai on Building Eclines	Start in Building	Shut down der Schuden wich	Aber and the state of the second of	Shuttown has Weekend,	2	Start UP	For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.
tion PI	Was There A Malfunction?	Yes No	<u> </u>	7	7)	7	1	>		7	Ń	ノ	7	7	2		7	ecord the
	Was Form B V Completed? N	Yes No Y	$ \mathcal{N} $	7	7	7	7	1	>		7	Ń	7	7	7	7		7	e columns to r
Startup, Shutdown, and	SSM Plan Properly Followed?	Yes No	7	1	1		1	1			1	~	Ś	7	2			7	ite and tim
Shutdo	Initiats			al	TH.	BROV	T# 1	<i>R</i> 13	E		R13.	GRi		J.C	GR	B		R.B.	tdown da
rtup, S	Startup Startup Date or PM)		12/21/27 7.45An R.B.		657		710897.AM		Ignan		944		6:35						artup/shu
Sta			12/14/21		412/cs	-	1.7/084		1/14/08		1/21/cr		1/35/05		Dives			12/1/08	se the st
	Shutdown Time (AM or PM)			5/8m		10-3Com		5.45 An				T:LDAM		8190	>	1145	>		function, u
	Shutdown Date			rolarkei		1/4/67		1/12/08	1.1			1/26/08		20125		24/08	-		For a mali

con 1 kno service reck 51 Lanne Identify the event as a startup, shutdown, or malfuction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (1) a Support to altor tiers race F 2 Ver Michanica to ame well breek Ter mechnica 101 4 Neo hanic 100 4 Startup, Shutdown, and Malfunction Plan (SSM) Checklist -- Form C 1 Kartun Low DOWN Crew Dowl de auvr Shutdown SHUT DOWN Shutdown ଟ artur For a malfunction, use the startup/shutdown date and time columns to record the duration of the event. - diawn STANTU 2 Monday Malfunction? (gpm) at Startup. Stat up Stantus Shut FAN SHUT STANT 3 SHUN Shut Was There A °N N 7 7 7 1 7 Yes Was Form B Completed? °N N 7 7 7 \mathcal{T} 7 Yes SSM Plan Properly Followed? Yes No 7 7 2 ~ 7 F. q R.B. Initials GRO 2 af P.B. R.13 MG Ê Ris R PBS'S 1080 I Startup Time (AM 3 How 1200 7,35 or PM) los Hi 45a 1200 12Am 44 Bloks 3/12/08 3/11/n8 218/08 3/03/04 Startup 22400 Date Sicean R Time (AM or ž 4.302 <u>6:15nm</u> 03'30 AN Shutdown 8 37 M \$3:30 5 is (Md 367 145 Pm 3/12/08 Nuel08 2122/08 03/24/08 Shutdown 10/08 31105 02/23/08 R 0311716X Date 5/8/ 3

Startup, Shutdown, and Malfunction Plan (SSM) Checklist Form A	Introvent Startup Startup SSM Plan Properly Was Form B Was Form B Was There A Identify the event as a startup, shutdown, or malfuction and provide P(M) Date or P(M) Initials Followed? Completed?	Yes No Yes No Yes No	Calades 8: 16an 2.13. V START UP	TAW & Chut Leeen	alailes argument	130 AH	Hype 12:10 GRO. V V V Standing	411010	13 to the low of the low of the start we		#21/08 10 Am JD / Stenting	R.B. V V SHUT DOWN	4/28/08 Piyes and Car / Spain Dur	AM GROVING	colos Tiusin R.B. V V START UP		4/2/00 JR V V	<u>></u>	a malfunction, use the startup/shutdown date and time columns to record the duration of the event.
S	wn A or		CX/an	WH-9		130 AH		5 Asn Whi	A Xet	7:30		1.004 W	412%	2 Am	c 2/05/	Tem T	11	324m	inclion, use the
	Shutdown 1 Date			3/22/2		cylest cs er		4/12/08	411408-	4/19/05		80/25/20	-	<u>Ela/08</u>		59/08 "	-	05/11/08	For a malfu

Startup Time (AM Initiale Followed? Completed? Was There A Date or PM) Initiale Followed? Completed? Mo Yes No Yes
SSM Plan Property Initials Followed? Ves No Ves No Ves No Ves Vo Ves Vo

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS January 1, 2008 through June 30, 2008

Hercules Incorporated Hattiesburg, Mississippi

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

Kymene Process Area LDAR Tag #'s 6015, 6015, 6010, 7854, 7856, and 6015, were identified as leaking on 2/4, 2/15, 3/28, 4/9, 4/18, and 4/23, respectively. All six events were monitored within 5 days of repair.



January 31, 2008 Hercules Incorporated 613 West 7th Street Hattiesburg, MS 39401 (601) 545-3450 Fax: (601) 584-3226 www.happor FEB 4 2008 Office of Environmental Quality Office of Pollution Control

Mr. Rick Sumrall, Branch Chief Environmental Compliance & Enforcement Division Mississippi Department of Environmental Quality P.O. Box 10385 Jackson, MS 39289-0385

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

Dear Mr. Sumrall:

As required by Title V Operating Permit Conditions 5.A.4. [ref.: APC-S-6, Section III.A.3.c.(1)], 5.C.1.(b) [40 CFR 63.182 (ref.: 40 CFR 63.528(b))], 5.C.3, 5.C.4, and 5.C.5, attached is the required summary data for the semi-annual reporting period ending December 31, 2007. Deviations from the Title V Permit requirements are identified and included in this report. The required summary data is included in the attached semi-annual report from July 1, 2007, to December 31, 2007.

The following notations are the result of our on-going plant demolition activities. The HRA Process Area, for which a 502B10 notification was filed on June 18, 2007, has been removed from the Contents of Report section. On November 12, 2007, a 502B10 notification was submitted to remove numerous plant-wide storage tanks. The Neuphor process area was shut down on December 18, 2007, and a 502B10 notification will be submitted in 2008 to address the Neuphor process area shut down.

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

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

Sincerely,

RS Bolton

Rodney S. Bolton Plant Manager

Attachment(s)





Contents of Report

The Title V Operating Permit requires a semi-annual report by January 31 and July 31 of each year. This report, for the semi-annual reporting period of July 1, 2007 through December 31, 2007, contains the following sections:

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

Fuel Burning Equipment



FUEL BURNING REPORT SUMMARY

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

MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 5.A.4

YEAR 2007

GAS USAGE - MCF

	Totals	0	0	0			0	50 103.253	0	101 102 253
	DEC	0	0	0	0	0	0	15 2.650	0	5 2 650
	NON	0	0	0	0	0	0	31 3.315	0	315 3315
	OCT			0			0	5 7,961	0	5 7 961
	SEPT							5 9,105		5 9 105
	AUG	0	0	0			0	8 10,395		8 10.395
	JULY							9,948		948
2	JUNE	0	0	0	0	0	0	8,259	0	R 259
	MAY		0	0	0	0	0	9,568	0	9.568
	APR	0	0	0	0	0	Ō	9'795	0	967.6
	MAR	0	0	0	0	0	0	11,157	0	11 157
	FEB	0	0	0	0	0	0	9,691	0	9.691
	JAN	0	0	0	0	0	0	11,410	0	11.410
	N DESCRIPTION	Poly-pale nat. gas Dowtherm boiler	RAD nat. gas Dowtherm boiler	HRA nat. gas Dowtherm boiler	Rosin dist. nat. gas Dowtherm boiler	No. 5 package boiler	No. 6 package boiler	No. 7 package boiler	Carbon Reg.nat. gas Furnace	
	EMISSION <u>POINT</u>	AC001	AF001	AG001	AJ001	AM001	AM002	AM003	AN001	T5ngas

Kymene Process Area

ie.

KYMENE PROCESS AREA REPORT SUMMARY

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

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

Kymene Reactor Scrubber (AA-001)

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

Adipic Acid Dust Shaker (AA-002)

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

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

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

Deviations:

On 9/21/07, two open ended lines (no longer in use) were identified without caps. Quick connect hoses were removed and blind flanges were installed on both lines thus eliminating both open ended lines.

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

DATE	ETHYLE	NEOXIDE	EPICHLO	Rohydrin	TO	TAL
MYY	MONTHLY	12-MONTH	MONTHLY	12-MONTH	MONTHLY	12-MONTH
Apr-04	0.057	0.057	0 183	0.183	0.240	0.240
May-04	0.057	0.114	0.182	0.365	0.239	0.479
Jun-04	0.057	0.171	0.185	0.550	0.242	0.721
Jul-04	0.057	0.228	0.188	0.736	0.243	0.964
Aug-04	0.057	0.285	0.186	0.922	0.243	1.207
Sep-04	0.057	0.342	0.185	1.107	0.242	1.449
Oct-04	0.057	0.399	0.186	1.293	0.243	1.692
Nov-04	0.587	0.986	0.183	1.478	0.770	2.462
Dec-04	0.524	1.510	0.182	1.658	0.708	3.168
Jan-05	0.211	1.721	0.194	1.852	0,405	3.573
Feb-05	0.187	1.908	0.184	2.036	0.371	3.944
Mar-05	0.136	2.044	0.181	2.217	0.3/1	4.261
Apr-05	0.242	2.229	0.178	2212	0.420	4.441
May-05	0.056	2.228	0.179	2.209	0.235	4.441
Jun-05	0.056	2.227	0.179	2.203	0.235	4.437
Jul-05	0.000	2.170	0.178	2.195		
Aug-05	0.000	2.113	0.1/8	2.190	0.178	4.365
Sep-05		2.113			0.181	4 303
Oct-05	2 i si s		0.178	2.183	0.178	4.239
		1.999	0.184	2.181	0.184	4.180
Nov-05		1.412	0.182	2.180	0.182	3.592
Dec-05		0.888	0.183	2.181	0.183	3.089
Jan-06		0.677	0.182	2.169	0.182	2.846
Feb-08		0.490	0.180	2.165	0.180	2.655
Mar-08		0.354	0.179	2.163	0.179	2.517
Apr-08		0.112	0.182	2.167	0.182	2.279
May-08		0.056	0.178	2.166	0.178	2.222
Jun-08		0.000	0.188	2.175	0.188	2.175
Jul-08		0.000	0.187	2.184	0.187	2.184
Aug-08		0.000	0.187	2.190	0.187	2.190
Sep-08		0.000	0.186	2.198	0.188	2.198
Oct-06		0.000	0.183	2.197	0.183	2.197
Nov-08		0.000	0.181	2.198	0.181	2.196
Dec-08		0.000	0.177	2.190	0.177	2.190
Jan-07	The S COURSE MANY	0.000	0.183	2.191	0.183	2.191
Feb-07		0.000	0.179	2.190	0.179	2.190
Mar-07		0.000	0.180	2.191	0.180	2.191
Apr-07		0.000	0.187	2.196	0.187	2.196
May-07		0.000	0,180	2.198	0.180	2.198
Jun-07		0.000	0.184	2.194	0.184	2.194
Jul-07		0.000	0.179	2.188	0.179	2.186
Aug-07		0.000	0.181	2.180	0.181	2.180
Sep-07		0.000	0.181	2.175	0.181	2.175
Oct-07		0.000	0.178	2.175	0.178	2.175
Nov-07		0.000	0.185	2.174	0.185	2.174
Dec-07		0.000	0.188	2.185	0.188	2.174
000-01		0.000	0.100	2.002	0.100	
				2.002		2.002

AKD Process Area

AKD PROCESS AREA REPORT SUMMARY

Paracol Water Scrubber (AB-001)

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

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

Neuphor Process Area

NEUPHOR PROCESS AREA REPORT SUMMARY

Adduct Reactor Scrubber (AD-001)

Operator and mechanic maintenance checks were performed on the Adduct reactor scrubber.

On 12/18/07, the process area was shut down and is scheduled for future demolition. A 502B10 notification will be submitted in 2008.

Kymene LDAR Monitoring

KYMENE LDAR MONITORING

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

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

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

PERIODIC LEAK MONITORING REPORT July 1, 2007 through December 31, 2007

Hercules Incorporated Hattiesburg, Mississippi

KYMENE PROCESS AREA (AA-000)

- 1. Number of affected valves in HAP service for which leaks were detected as described in § 63.168(b), the percent leakers, and the total number monitored:
 - No affected valve was discovered leaking (V_L=0) during the referenced reporting period (>500 ppm);
 - $[V_I/V_T] * 100 = 0.00\%$ of total valves monitored were leaking; and
 - 103 total valves (V_T=103) were monitored.
- 2. Number of *valves* for which leaks were not repaired per § 63.168(f), identifying the number of those that are determined non-repairable:
 - None.
- 3. Number of affected *pumps* in HAP service for which leaks were detected as described in § 63.163(b), the percent leakers, and the total number monitored:
 - No affected pumps were discovered leaking (P_L=0) during the required monthly monitoring (>1,000 ppm);
 - [P_I/P_T] * 100 = 0.00% of total pumps monitored on a monthly basis were leaking as determined by § 63.163(d)(4); and
 - 3 affected pumps monitored 6 times for a total of 18 pumps (P_T=18) monitored.
- 4. Number of *pumps* for which leaks were not repaired per § 63.163(c):
 - None.
- 5. Number of affected *agitators* in HAP service for which leaks were detected as described in § 63.173(a) & (b):
 - The affected agitator did not leak during the referenced reporting period (>10,000 ppm);
- 6. Number of agitators for which leaks were not repaired per § 63.173(c):
 - None.

- 7. Number of affected *connectors* in HAP service for which leaks were detected as described in § 63.174(a), the percent leaking, and the total number monitored:
 - No affected connectors were measured at or above 500 ppm (C_L=0) during the referenced reporting period;
 - $[C_L/C_T] * 100 = 0.00\%$ of total connectors monitored were leaking; and
 - 0 total connectors ($C_T=0$) were monitored.
- 8. Number of *connectors* for which leaks were not repaired per § 63.174(d), identifying the number of those that are determined non-repairable:
 - None.
- 9. Explain any delay of repairs:
 - All applicable repairs were made in a timely fashion.
- 10. Results of all monitoring within semi-annual reporting period to show compliance with § 63.165(a), pressure relief device releases:
 - None.
- 11. Notification of a change in *connector monitoring alternatives* as described in §63.174(c)(1):
 - As allowed in §63.174(c)(1)(ii), Hercules Incorporated changed connector monitoring alternatives during the July 1 - December 31, 2000, semi-annual reporting period. Instead of monitoring opened or broken connectors for leaks within three (3) months of being returned to organic HAP service, Hercules chooses **not** to monitor connectors that have been opened or had the seal broken. It is realized that nonrepairable connectors can not be counted while complying with this alternative; therefore, in the percent leaking calculations C_{AN} will be set to zero.

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

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

SEMI-A UAL REPORT MONITORING SULTS

Total
10:
(

							Jul-Dec
	JUL	AUG	SEPT	OCT	NOV	DEC	Total
Pumps Monitored:							
KYMENE	3	3	3	3	3	3	18
Total	3	3	3	3	3	3	18
Pumps Leaking:	e stranover en sample en antipe en antipe en antipe en						
KYMENE	0	0	0	0	0	0	0
KYMENE Total	0	0	0	0	0	0	0

							Jul-Dec
	JUL	AUG	SEPT	OCT	NOV	DEC	Total
nectors Monitored:							
KYMENE	0	12	0	193	10	6	221
·····		12		193	10	6	221
Total	0	12		100	10]		
Total nectors Leaking:	0	0	0	0	0	0	0
nectors Leaking:	0	0	0		0	0	0
nectors Leaking:	0.00%	0	0		0.00%	0.00%	0

							Jul-Dec
	JUL	AUG	SEPT	OCT	NOV	DEC	Total
rewed Connectors							
KYMENE	0	٥	0	0	0	1	1
		0	0	0	0	1	1
Total	0	0	U			-	
Total rewed Connectors KYMENE		0	0	0	0	0	0
rewed Connectors	0	0	0	0	0	0	0

SEMI-A UAL REPORT MONITORING SULTS

								Jul-Dec
		JUL	AUG	SEPT	oct	NOV	DEC	Total
ig Mon	nitored:							
	KYMENE	1	1	1	1	1	1	6
		1	1	1	1	1	1	6
	Total							
∖g Lea	aking:							
\g Lea	<u>E </u>	0	0	0	0	0	0	0
Ag Lea	aking:	0	0	0	0 0	0	0	0 0
Ag Lea	aking: KYMENE	0	0	0	0	0	0	0 0 0.00%

							Jul-Dec
	JUL	AUG	SEPT	OCT	NOV	DEC	Total
ssure Relief Device							
KYMENE	0	2	0	0	0	1	3
			0	0	0	1	3
Total	0	2	0			÷	
Total ssure Relief Device KYMENE	0	0	0	0	0	0	0
ssure Relief Device	0	0	0	0	0	0	0

					0					6				C					
Malfunction Plan (SSM) Checklist Form A	Identify the event as a startup: shutdoor or multinulue and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.		AP 2 2 2 5 1 2 1	Deve and and the ser	PLAN SHUT DOWN	START UN RULDING HIS 1454	Plan shit decin	START ON BULDING HE LUIS -3:	Den Shirt Sector	Stinted up seculation twenter place 13:4 ;	hut sow	Starter 20 Searches - dette 1.	Winfund Shint den	Stated we be when while the	Plinned it to the	She & when he he	Plann Liter 1	5t. t. (5	, use the startup/shutdown date and time columns to record the duration of the event.
n Pla	Was There A Malfunction?	No	7	2]	7	7	7	1	7	\mathbf{X}	E.	1	7	7	à	7	7	d the di
inctio		Yes			-{	(<u>\</u>	4			<u>`</u>			~				to recol
	Was Form B Completed?	Yes No	7	<u> </u>	.7	۲.		7	7	7	<u>}</u>		7	7	È.	7	7	7	columns
, and																			d time
lown	SSM Plan Properly Followed?	Yes	7	7	7	7	7	1	7	7	\mathbf{i}	7	7	4		2	2	7	date an
Shuto	Initials		GRC	C.S.	MG	SW	せら	ちゃ	E.P.	р А	AA	150	SP.	A	116	GRO	CRC	4º	itdown (
Startup, Shutdown, and	Startup Time (AM or PM)			510	546	Hale 1 2: 25 MO		T'OCAN M.C.		:Net		1:0000	-	6 Am		GPIN		9.4	artup/shu
Sta	Startup Date			Sitter		7.246.7	~	5/22/07		6/4/07 11		U/11/27	-	118/67		43%		ro12	te the sta
	Shutdown Time (AM or PM)		V. BOAM	1	5AM	_34	4. AW	×, ×	12041		1 2		420		6 Par	-	Tam		c , us
	Shutdown Date		5/12/07	Stella	5/19/67	Side 187	5/21/07		10/20/01		6/9/07		Colice lor	\	10/ce/2		ro/1		For a

				0														j. Ve	
nd Malfunction Plan (SSM) Checklist Form A	Identify the event as a startup, shutdown, or malfuction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.		Plan Shit durber	Stort Kinnen 17.25	plan I decer	START IN RYMME IN 1	Planner Shink down 20	Plan Prant wo 26,20	Plenne Shut de un	See the relater 7 sec. 7 2000	F. Quinud rituit - Secure	Sider C. 2 KYMAN W. W. F. W. M. S.	Pump (Ruci) 2 EAK SEAL			Status 145 GPM	Permud Shut de men	1	, use the startup/shutdown date and time columns to record the duration of the event.
Pla		No	7	7	1	7	4	.]	, A	1	7	7		7	1	7		N	the du
ctior	Was There A Malfunction?	Yes									-		7						record
alfun	Was Form B Completed?	No	7	7	7	7	7	7	7	7	7	7			7	7	, A	1	mns to
M pt	Was Form B Completed?	Yes																	ne colu
'n, ar	SSM Plan Properly Followed?	No	ų		\	_			~		_		-			<u></u>			and tin
Mob		Yes	7	7	7	7	7	7	<u>د</u>	7	7	7	7	7	7	2	7	2	date
Shut	Initials		6.0	GR		MĠ		11	2 2	EP	AA A	R.B	R.B.	G	R	G	Â	Q 4	utdown
Startup, Shutdown, a	Startup Time (AM or PM)			9. In CRC		645		6 Pan		John 4: 201 EP	•	12:45		los	Ą	909 Gam		of the	artup/sh
Sta	Startup Date			r3/6/1		74/07		12/22/17		713ah	-	es/oldo	812.6.	3/1/27	1 1	Sliton	-	3 30 k 6	se the st
	Shutdown Tirne (AM or PM)		7-35AW		H'An1		1 pm		Am Am		3 mg		1:2600 2900		7 30m		7 28		n,
	Shutdown Date		7/2/07		7/14/07		7/21/07		19/2/2/2		10/4/8		c8/01/07		Sslille	, ,	Bliskon		For a

		Sta	irtup,	Shutd	own, a	nd Ma	alfun	ction Pla	Startup, Shutdown, and Malfunction Plan (SSM) Checklist Form A
Shutdown Date	Shutdown Time (AM or PM)	Startup Date	Startup Time (AM or PM)	Initials	SSM Plan Properly Followed?	Was Form B Completed?	orm B eted?	Was There A Malfunction?	Identify the event as a startup, shutdown, or malfaction and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.
			·		Yes No	Yes	Ŷ	Yes No	
70/1×18	11 23			P.D.	7		Ż	Ś	Flermed whit deren-
Children		9/4/07	4/07 720	SU.	7		7	/	Stort up
0/2/V	5 Am			GRi	7		7	7	Plannel St. Frh
		Cala/P	9 HS	CAR	Ż		7	7	Desus Dance Dana
9/15/12	12 An		60	19	7		\sum	7	Planned Adultation
		Cellin	10 100	Pip	2		7	<u>\</u>	START LI
9/23/07	1027			RE	7		7	7	Plannel abutcles
		T/all	751	an	7		7	7	Stert we
9/29/27	236	•			7		\mathbf{Z}	7	1 lan in Martellen
	~	ich 1	330	RIR	7		7	7	5.7.70 . S
Vc/6/07	7/50			ŚĽ	7		2	7	Shut dour
-		ic/s/c7	5:30.44	R.3,	\sum		7	7	START UP
10/13/07	7 12 Am	, ,		R	7		7	7	Shit down
		10/12/0	240	R	7		7	7	Planned Start up
10/20/01	13.00 AM	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	`		7		2	.)	SHE DOWN
-			WALL LIKEY CI	GRO	7		7	2	Pic word Start was
For a ma	Ifunction, t	ise the s	tartup/sh	utdown	date and t	ime colu	mns to	record the c	For a malfunction, use the startup/shutdown date and time columns to record the duration of the event.

Identify the event as a startup started to a graduate a and provide comments or Action(s) taken during SSM. Include scrubber water flowrate (gpm) at Startup.		uch Stutchen works il	mere Storten alber with	med Shughan	the the free after to certimical	D SHUT DENNE	a Har Rub	and Alectedic Yest the a	Sint u	*	Deter 2	are the freeze	Edit -		claws.	-ture
Identify the ∈ Was There A or Action(s) ⁽ Malfunction? Startup.	Yes No	V Tan	1 Kum	r Plan	1 Kin	T V Piano	~ Kim	v Wake) J	2	V SHU	V Kurne	1	- Ste	Shut	v sta
Was Form B Completed?	Yes No	7	7	7	7	2	7	7	7		7	7))	7	7
SSM Plan Properly Followed?	Yes No	7	2	2	2	1		X	7		7	2))	7	2
Startup Time (AM or PM) Initials	un l	00	12:45m GRO	198C	350 GRC.	P.B.	28m G20	30	W3n CR		R.B.	7 m GRU	CS	ton	ar a	AC ret
n or Startup Date			10/3/01	- La	14/5/41		Lyci/1		20) 1346/1	-		10/0/CI	•	- Joiki	24-45	12/12/07
Shutdown Shutdown Time (AM or Date PM)		20/07 6 Pm		14/3/07 4:30 Am		10-7 930AM		113/67 743		12/02/02	12/3/10-1 3AN		12/8/07 2 Am		2/5/17 443	

Deviations from Permit Requirements

DEVIATIONS FROM PERMIT REQUIREMENTS July 1, 2007 through December 31, 2007

Hercules Incorporated Hattiesburg, Mississippi

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

On 9/21/07, two open ended lines (no longer in use) were identified without caps. Quick connect hoses were removed and blind flanges were installed on both lines thus eliminating both open ended lines.