Hercules, Inc. 110-0800-00001 Forrest County

Don Watts Trip Report

On November 2, 1981, Warren Gardner and I met in Hattiesburg in response to some recent complaints.

We first canvassed the neighborhood to locate any possible sources of pollution. This was done on a city map. Additionally, the complainants will be located on the map.

We then went to Hercules and met with Mr. Charles Jordan, the plant engineer, Mr. Harold Buckley, the plant manager, and Mr. Bob Ferguson, the power superintendent.

Mr. Ferguson carried us to the power house and explained the operation to us. The following is a summary of what we learned:

- There are four wood-waste boilers. No. 1 and No. 2 boilers vent to the North stack and No. 3 and No. 4 boilers vent to the South stack.
- 2. Each boiler is cleaned once per shift. This necessitates building a new fire in the boiler. Fresh wood is added to each boiler twice (once for each cell in the boiler).
- 3. Each boiler has a cyclone to remove particulate greater than 5 microns in size.
- 4. Each boiler is equipped with a Smoke Density Meter. The meter is set up on the Ringelman Numbers (1-5). An alarm is set to go off any time the density exceeds 2 on the meter. Additionally, two timers (one for each stack) measure the number of minutes that the density exceeds 2. A TV camera is trained on the stacks. The monitor is located in the power house control room to provide visual control of the stacks.
- 5. Each shift keeps a Boiler Room Log Sheet. Of particular interest is the recording of the time and duration of the cleaning of each boiler and the number of minutes the density exceeds 2 during that shift.

Jerry Banks and I will be locating a Hi-Vol sampler in the area of Hercules in the near future.

Further actions will be dependent on the results of the Hi-Vol analysis and our continued inspections and discussions with Hercules.



# MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES Bureau of Pollution Control

P. O. Box 10385 Jackson, Mississippi 39209 (601) 354-2550



TO:

DON WATTS

FROM:

MARGARET HASE

SUBJECT:

HERCULES, INC. - FORREST COUNTY (0800-00001)

DATE:

OCTOBER 27, 1981

On the above date, I went to Hercules, Inc., in Hattiesburg. I was unable to do a V. E. Evaluation because of the weather. The opacity appeared to be a steady 10-15% on both stacks.

I tried to contact Charles Jordan, but he was not at the facility. I left a message for him with the receptionist.

There did not appear to be any problems at the facility.

If you have any questions, please contact me.

MARGARET HASE



RECEIVED

SEP 22 1981

DEPT OF NATURAL RESOURCE BUREAU OF POLLUTION CONTROL

#### COMMITTEE ASSIGNMENTS:

Executive Contingent Fund,
Vice Chairman
Forestry, Vice Chairman
Appropriations
Fees, Salaries & Administration
Insurance
Oil, Gas & Other Minerals

SENATOR DAVID M. SMITH

46th District
Forrest-Harrison-Perry-Stone Counties
813 Glenwood Drive (Rt. 1), Hattiesburg 39401

September 18, 1981

Member

Central Data Processing Authority

Mr. Charles H. Chisolm, Director Bureau of Pollution Control Southport Mall Jackson, Mississippi

Dear Mr. Chisolm:

Enclosed is a copy of a letter I received from Mr. Joe Goldsmith. He has been in touch with your department concerning particles of wood fiber in the Hattiesburg area. In his letter, he requested the answer to four questions which I am asking you to please answer and let me know your findings. The questions are as follows:

- 1. What is the procedure for taking, handling and testing air and solid samples?
- 2. What type of test would the Bureau of Pollution Control run here locally to determine air quality?
- 3. Would the Bureau run such a test here? If not, why?
- 4. To whom does the Bureau report its findings?

I find it hard to believe that a team sent by the Department of Natural Resources to pick up a sample in Hattiesburg would come to Hattiesburg without any equipment and then, upon taking a sample, lose it before they get back to Jackson.

Would you please respond to Mr. Goldsmith's letter so that I may answer his questions.

Best personal regards,

Smith

David M. Smith

DMS/f encls.

cc: Mr. Charles Blalock, Executive Director Department of Natural Resources Senator Smith 813 Glenwood Drive Hattiesburg Mississippi 39401

#### Senator Smith;

r. J. 1.

For two months, my neighbors car was left unattended in the carport while she was in the hospital. During this time I noticed a build up of debris accumulating on her car. Upon inspection, I noticed that the debris looked unusual. I collected a sample of the debris from the car to U.S.M. for study under a microscope. I confirmed the sample to be minute particles of wood fiber. I assumed the fiber to be from Herculues as wood is used for fuel. Obviously, we are having to breathe this foreign material.

The Mississippi Department of Natural Resources Bureau of Pollution control was notified about this problem. I requested that a sample be taken from my neighbor's car and analyzed to confirm my findings. A team headed by Mr. Don Watts arrived a few days later and secured a sample from the car. Mr. Watts said that he would call me back within a week informing me of the results. Three weeks to a month later I re-called Mr. Watts only to hear that the sample was lost and that no further action had been taken.

The seriousness of this problem was apathetically overlooked by this team. The team knew that their mission here was to take a sample yet brought nothing to take a sample with or even to put the sample in. On the side, the team consisted of three people and two vehicles. Is this not a waste of tax money just to take a solid sample?

Acquiring another sample like the one lost would require a length of time. I would suggest that the bureau conduct a test in the immediate area during a dry period. I must stress that the test be conducted locally due to the weight of the Ad. En

debris in the air. Mr. Watts mentioned that there was an air quality device a few miles south of here. This cannot be used as it is too far away. A simple test to measure this problem w would be to run a handkerchief up a pole for two weeks and analyzed for content.

I am asking you, Senator Smith, to interceed on my hehalf.
I would like to have the following questions answered:

- 1). What isetheeprocedurenfor taking, handling and testing air and solid samples?
- 2). What type of test would the bureau of air and water run, here locally, to determine air quality?
  - 3). Would the bureau run such a test here? If not why?
  - 4). To whom does the bureau report their findings?

Your personal attention inti this matter would be greatly appreciated. I will be awaiting the bureaus response.

Joe Goldsmith

210 W. 7th St. Hattiesburg MS. 39401



# MISSISS PI DEPARTMENT OF NATURAL RE **Bureau of Pollution Control** P. O. Box 10385

Jackson, Mississippi 39209 (601) 961-5171



#### **MEMORANDUM**

TO:

DON WATTS

FROM:

MARGARET HASE

SUBJECT: HERCULES, INC. - HATTIESBURG, FORREST COUNTY

DATE:

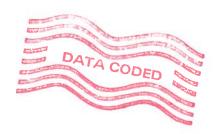
AUGUST 17, 1981

110-0800-1

On the above date, I went to Hercules, Inc., in Hattiesburg for a monthly V.E. Evaluation, a copy of which is attached. I met with Mr. J. C. Funderburk at the facility. There were no problems at the plant during my inspection.

If you have any questions, please contact me.

MARGARET HASE



Hercules.
FILE COPY
Jonest County

#### MEMORANDUM

TOP

Phil Bass

FROM:

Don Watts

SUBJECT:

Enclosed Sample

DATE:

July 29, 1981

Please have a qualitative analysis done on the enclosed sample as to type of materials present.

Please send the results to me.

If you have any questions, please call.

DWshdb Enclosure cc: Don Scott





HATTIESBURG, MISSISSIPPI 39401

July 21, 1981

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

Dean Don:

Re our Vinsol Rosin Melter application, this project has been delayed a couple of years because of lower production requirements.

If you have any questions, please let me know.

Very truly yours,

HERCULES INCORPORATED

C. S. Jordan

CSJ:p

RECEIVED

JUL 2 3 1981

DEPT OF NATURAL RESOURCE BUREAU OF POLLUTION CONTROL July 9, 1981



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

Dear Mr. Jordan:

Re: Rosin Melter Application Facility No. 0800-00001

Em P4 037

In reviewing the application for the rosin melter, several questions have arisen which must be answered prior to any issuance of a permit.

We feel that the best way to obtain this information is to have you complete Page 2 of the Manufacturing Process Operations Section in full for the scrubber. Therefore, I have enclosed your application. Please complete and return it as soon as possible.

If you have any questions, please contact us.

Very truly yours,

Don Watts South Air Emissions Section

DW:hdb Englosure

Forest June 2, 1981 Mr. Charles Jordan Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401 Dear Mr. Jordan: Re: Facility No. 0800-00001 Hattiesburg, Mississippi On May 21, 1981, a visible emissions evaluation of the two boiler stacks was performed by Margaret Hase of our South Regional Office. The results of her visible emissions evaluation indicate that one stack was borderline with respect to compliance. We will be observing the situation closely to ensure that Hercules stays in compliance. In another matter, we have received your application for a permit to construct a rosin melter. This application is under review. If you have any questions, please contact us. Very truly yours, Don Watts South Air Emissions Section DW: ls



# HERCULES INCORPORATED

HATTIESBURG, MISSISSIPPI 39401

May 26, 1981

Department of Natural Resources Bureau of Pollution Control P. O. Box 10385 Jackson, MS 39209

Attn: Mr. Don Watts:

Dear Don:

Re my 4/2/81 letter, please find the attached permit application and drawings for the rosin melter.

If I can answer any additional questions, please let me know.

Very truly yours,

HERCULES INCORPORATED

Charles Jordan

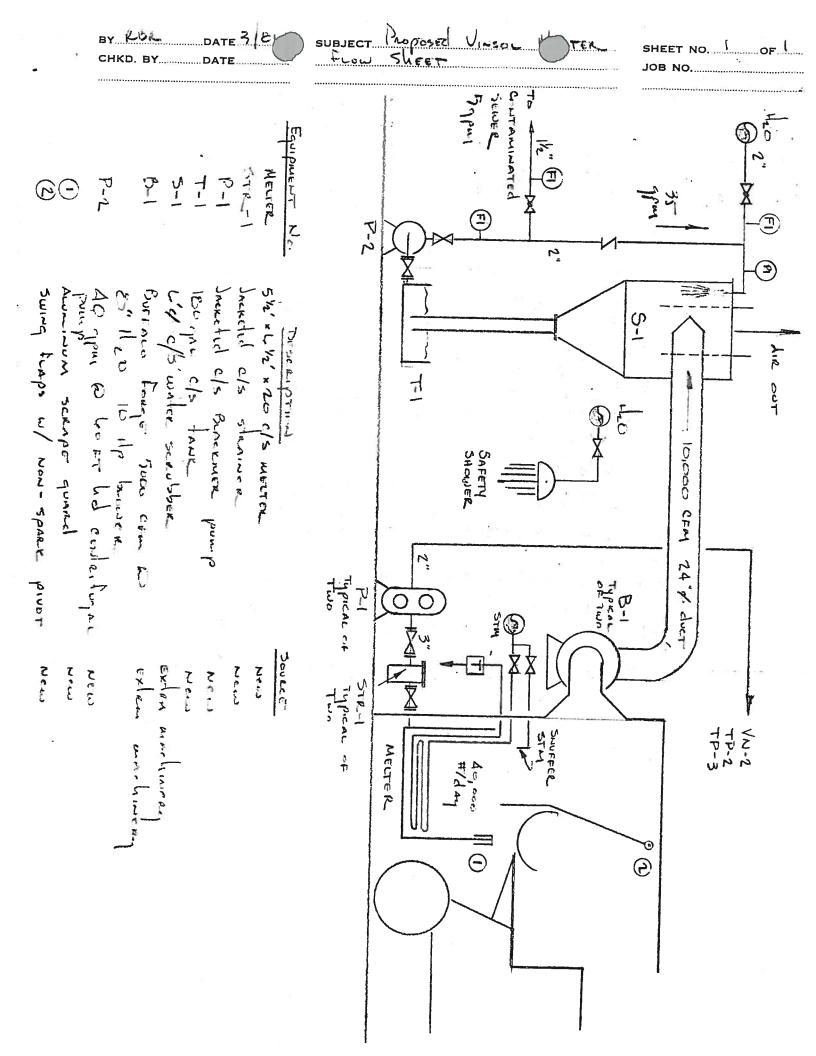
Senior Chemical Engineer

CJ:p

Enclosure

RECEIVED MAY 27 1981

DEPT OF NATURAL RESOURCE BUREAU OF POLLUTION CONTROL



BY RBL DATE 11/9 SHEET NO. JOB NO..... SERUSSER SERUSSER PRINSFORMER ENCLOSURE EXISTIM FINDENCYT NOW Edulation **HM-27** Pump P. 2 Pump 0 0 VINSOL FLAKING BUDG B-1 Typicas 2091 NEW CURE TO BLOWER UNCLER STAIRS **イ**Z-(CAE SPACE) New Pumps V TP-3 PROCESS 2020 VINSOL MELTER



### MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

**Bureau of Pollution Control** P. O. Box 10385 Jackson, Mississippi 39209 (601) 354-2550



TO:

DON WATTS

FROM:

MARGARET HASE

SUBJECT: HERCULES, INC. - HATTIESBURG - FORREST COUNTY

DATE:

MAY 21, 1981

On the above date, I went to Hercules, Inc., in Hattiesburg and met with Mr. Charles Jordan. A V.E. was performed on both stacks, copies of which are attached. As noted of the V.E. Form, one of the two boilers on the south stack was started up at 1:10pm after routine maintenance was done. was Mr. Jordan's opinion that this was responsible for the excessive emissions. The overall average for the south stack was 42.4% and the north stack was 16.6%.

If you have any questions, please call.

MARGARET HAS

Lees Hase



May 14, 1981

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

Dear Mr. Jordan:

Re: Carbon Regeneration Furnace Scrubber

As we discussed previously, if the new scrubber will be a replacement in kind, i.e. the same type of scrubber handling the same amount of gas using the same flow rate of water with the same efficiency, then a permit is not necessary.

An engineering report containing the vendor specifications and a demonstration that the replacement will be a replacement in kind will be needed prior to the determination of the necessity of obtaining a permit. The information that has been submitted is not sufficient to make such a determination.

If you have any questions, please contact us,

Very truly yours,

Don Watts South Air Emissions Section

DW:els



# MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES Bureau of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209 (601) 961-5171



#### **MEMORANDUM**

TO:

DON WATTS

FROM:

MARGARET HASE

SUBJECT:

HERCULES IN HATTIESBURG - FORREST COUNTY

DATE:

JULY 28, 1981

On the above date, John Supan and I returned to Hercules in Hattiesburg. I performed V.E.'s on the two woodwaste boiler stacks, copies of which are attached. We spoke briefly with Mr. Charles Jordan at the facility. I told him that you would be contacting him concerning the complaints we have received.

If you have any questions, please contact me.

110-0800-1

MARGARET HASE

# MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

# COMPLAINT FORM

		JULY 21,	1981 9:00am	Xair	□Water
	70	Date	T	ime	
PERSON RI	EPORTING:	Mmr. □Hs.	JOE GOLDSMITH	9	
ADDRESS:	HATTIESBU	RG FORREST	210 WES	ST 7th	544-8046
. (	City "	County	Street o	r P: O. Box	Phone
COMPLAINS	r SITE:	HERCUL	ES	9	
TEXT OF	COMPLAINT	BLACK S	MOKE; CAR COVER	ED WITH SOOT; W	ORSE ON
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July 31, 1981

FILE COPY

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

Dear Mr. Jordani

Rei Facility No. 0800-00001 Hattiesburg, Mississippi

We have received the report on the Pilot Plant work from January 1, 1981, through June 30, 1981. This information appears to be in order, and no further information is needed for this report.

Also, I have enclosed a copy of the PSD regulation and a copy of an article summarizing the regulation.

As you are aware, we have recently received complaints concerning heavy black smoke and flyash being emitted from the woodwaste boilers. The complainants indicate that this occurs more frequently at night, on weekends, and on holidays.

On July 28, 1981, Margaret Hase and John Supan from our South Regional Office and I were in Hattiesburg to investigate a complaint. I have enclosed copies of VE's done by Ms. Hase and myself. As you can see, both stacks were in good operating condition at the time.

Please be aware that we will be monitoring this situation closely, and we request that you also look into this matter to ensure that the boilers are being operated as efficiently as possible.

If you have any questions, please contact me.

Very truly yours,

Don Watts South Air Emissions Section

DW:cm Enclosures

FILE COOL May 5, 1981 Is. Judy Woods 1417 Aztec Street Nattiesburg, Nississippi 39401 Dear Ma. Moods: Your Complaint Against Termiles, Inc. On April 1, 1381, we received your complaint from the TPA office in Atlanta. On April 2, 1931, our personnel made un inspection of the Mercules facility. A visible emissions evaluation was performed on both stacks. The results showed both units to be operating within the allowable limits of 40% opacity. A water sample from Mercules' discharge point was also taken. The results of this sample are being evaluated. The Industrial Mater Section of the Bureau. will be following up on this matter. On April 21, 1981. I inspected the Hercules facility. I observed the stacks for about an hour. During that time there was one five minute period of heavy black smoke from the North stack. During the rest of the hour, there were no visible emissions from the North stack. The South stack was operating within the 40% opecity limit the entire hour. I also went to Hervales' effluent ditch and to Green's Greek. I could see no evidence of anything amiss. We will continue to ronitor Mercules and their compliance with our regulations. If you have further comments or questions, please contact us. Yery truly yours. Don Watts Couth Air Reissions Jection DW179 co: fr. John Lank, TPA







### HERCULES INCORPORATED

HATTIESBURG, MISSISSIPPI 39401

April 2, 1981

Department of Natural Resources Bureau of Pollution Control P. O. Box 10385 Jackson, Ms. 39209

APR U 6 1981

DEPT OF NOTURAL REGIO LUREAU OF A JELUTION JUNE DE

ATTN: Don Watts

Dear Don.

This letter is in reply to your 3/31/81 letter concerning additional information on the rosin melter described in my 3/11/81 letter.

Chemically what will occur is no chemical reaction. Heat is used to change rosin from a solid to a liquid state.

The potential for odors will be minimal and should be for all practical purposes non-existent. Any potential odors would be associated with the volatile organic compounds discussed next.

The volatile organic compounds produced should also be minimal. The reason for this is that the rosin has already gone through a refining process at elevated temperatures which includes steam sparging the rosin under vacuum to remove volatile organics. The exhaust fan and water scrubber used to eliminate any possible dust problems should adequately handle any potential volatile organics.

The rosin will be heated with non-contact steam using steam heating coils in the bottom of the melter. The rosin will be placed on the coils for melting.

The source of the heat is steam produced in our power house steam generating boilers.

A tentative operating schedule will be an intermittent operation. The remelting should start in early 1982 on day shifts only. The melter is designed to remelt 40,000 lbs./day of rosin but will only be used to supplement current production in order to meet sales requirements.

If I can answer any additional questions please contact me.

Very truly yours,

Charles Jordan

Senior Chemical Engineer

intes accur



#### MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

#### Bureau of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209 (601) 961-5171



March 31, 1981

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

Dear Mr. Jordan:

In regard to your letter of March 11, 1981, we cannot determine the necessity of a permit for the melter from the information given.

Please provide additional information on the melter defining:

- 1. Chemically what will occur.
- 2. The potential for odors.
- 3. The volatile organic compounds produced.
- 4. How the rosin will be heated.
- 5. The source of the heat.
- A tentative operating schedule.

After reviewing the additional information, we will determine the permit applicability of the melter project.

If you have any questions, please contact us.

Very truly yours,

Don Watts

Air Emissions Section

DW:hdb



# HERCULES INCORPORATED

HATTIESBURG, MISSISSIPPI 39401

March 11, 1981

Department of Natural Resources Bureau of Pollution Control P.O. Box 10385 Jackson, Ms. 39209

Attn: Don Watts

Dear Don,

We plan to construct a melter to remelt rosin stored in bulk for repackaging. In order to eliminate any possible dust problems which might occur during charging of the melter, we plan to put a hood over the melter equipped with an exhaust fan and a water scrubber.

Since this is a very simple piece of equipment and will operate only intermittently, we respectfully request under Permit Regulations for the Construction and/or Operation of Air Emissions Equipment, Regulation APC-S-2 amended January 23, 1979, in section 5.0, Exclusions and Variances, paragraph 5.1, that the commission specify this piece of equipment as being exempt from the requirements to obtain a permit to construct.

If I can answer any questions, please call me.

Very truly yours,

Charles Jordan

Senior Chemical Engineer

CS:bsj

BCC: H. R. Buckley

P. W. Kirkendall

W. R. Keen

D. T. Smith, Jr.

J. B. Rester

J. C. Funderburk





# MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES Bureau of Pollution Control P. O. Box 10385

Jackson, Mississippi 39209 (601) 354-2550



TO:

DON WATTS

FROM:

MARGARET HASE

SUBJECT:

HERCULES - HATTIESBURG - FORREST COUNTY

DATE:

APRIL 2, 1981

On the above date Rick Sherrard and I went to the Hercules, Inc., in Hattiesburg. We were unable to contact Mrs. Woods at her residence behind the plant. We did note that the open effluent ditch runs behind her house.

We met with Mr. H. A. Russ at the plant. He told us that there had not been any upsets or accidents to his knowledge. A 24-hour composite sampler was set out and I did a V.E. on both stacks simultaneously (a copy of each is attached). We did not detect any problems at the plant during our inspection or the following day when we picked up the sampler.

If you have any questions, please contact me.

DATA CODED

MARGARET HASE

#### MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

# COMPLAINT FORM

Date Time  PERSON REFORTING:		April 1, 19	981 1:30pm	Ai	r 🗆 Water
PERSON REPORTING:	th (50)				
ADDRESS: HATTIESBURG FORREST 1417 AZTEC ST.  City County Street or P. O. Box Phone  COMPLAINT SITE: HERCULES  TEXT OF COMPLAINT: EMITTING BLACK PLUME  COMPLAINT TAKEN BY: MARGARET HASE  REFERRED TO: Mame Worth Regional Office Other Charles Regional Office  Countral Regional Office Referred By: Margaret Regional Office Other Charles Regional Office Referred By: Mamber Regional Office Referred By: Margaret Regi	V to		+ a		
City County Street or P. O. Box Phone  COMPLAINT SITE: HERCULES  TEXT OF COMPLAINT: EMITTING BLACK PLUME  COMPLAINT TAKEN BY: MARGARET HASE  REFERRED TO: Name Worth Regional Office Contral Regional Office Contral Regional Office Contral Regional Office Referred BY: Manager Don Watts Date  REFERRED TO R.O. BY: DON WATTS DATE  RESOLUTION:	PERSON REPORTING:	dr. ⊠Ms.	JUDY WOODS		
COMPLAINT SITE: HERCULES  TEXT OF COMPLAINT: EMITTING BLACK PLUME  COMPLAINT TAKEN BY: MARGARET HASE  Name North Regional Office Other South Regional Office Other South Regional Office REFERRED BY: Mail Courier ROUTED TO R.O. BY: DON WATTS DATE  RESOLUTION:	ADDRESS: HATTIESBURG	FORREST	1417 AZTEC S	T.	5
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#### MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

# COMPLAINT FORM

	APRIL 1, 19	81 1:30pm	O Air	□Water
1.5%	Date	Time		
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PERSON REPORTING	: Mr. Ms.	JUDY WOODS		<del></del>
ADDRESS: HATTIESB	URG FORREST	1417 AZTEC	STREET	
City	County	Street or P	O. Box	Phone
COMPLAINT SITE:_	HERCULES	es		10
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Jonest County

MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

COMPLAINT FORM
4/1/8/ 1:20 PM BAir Bwater
Date Time
PERSON REPORTING: Mr. Mms. Judy Woods
ADDRESS: Hathesburg Forcest 1417 Aztec St.
City County Street or P. O. Box Phone
COMPLAINT SITE: Hercules, Inc
TEXT OF COMPLAINT: Emitting dark plume + odors.
Also, dumping of chemical waste
COMPLAINT TAKEN BY: Jerry Banks (From Rufus Brown EPA)
REFERRED TO:  Name  North Regional Office  Central Regional Office Other Bill Barnett  South Regional Office
REFERRED BY: Phone Mail Courier
ROUTED TO R.O. BY: Don Watto DATE 4/1/81
RESOLUTION: Both SRO + I investigated the complaint. We
could find no evidence of anything being out of
compliance (air-wise). A letter has been
sent to ms. Woods explaining our findings and
very to the second of the second of the second of
assuring her we will continue to monitor Hercules.

FILE COPY March 31, 1981 Mr. Charles Jordan Senior Chemical Engineer Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401 Dear Mr. Jordan: In regard to your letter of March 11, 1981, we cannot determine the necessity of a permit for the malter from the information given. Please provide additional information on the melter defining: Chemically what will occur. 2. The potential for odors. The volatile organic compounds produced. How the rosin will be heated. 4. 5. The source of the heat. A tentative operating schedule. After reviewing the additional information, we will determine the permit applicability of the melter project. If you have any questions, please contact us. Very truly yours. DAW Don Watts Air Emissions Section DW:hdb

FILE CODY March 12, 1981 Mr. John Floyd 615 West 4th Street Hattiesburg, Mississippi 39401 Dear Mr. Floyd: Complaint Against Hercules This letter is to inform you of the status of the complaint investigation of Hercules. At this time, there is no evidence to indicate that Hercules is willfully emitting heavier emissions from their woodwaste boilers at one time than at another. There will be occasional periods of dense smoke when Hercules cleans the grates of their boilers or when a sudden heavy steam demand We will be watching the situation at Hercules, and we will be prepared to take action should a persistent problem develop. If a problem which you feel is caused by Hercules occurs, please contact us as soon as possible. If you have any questions or if we can be of further assistance, feel free to contact us. Very truly yours, Don Watta Air Emissions Section DW:els



#### HERCULES INCORPORATED

HATTIESBURG, MISSISSIPPI 39401

March 11, 1981

Department of Natural Resources Bureau of Pollution Control P.O. Box 10385 Jackson, Ms. 39209

Attn: Don Watts

Dear Don,

We plan to construct a melter to remelt rosin stored in bulk for repackaging. In order to eliminate any possible dust problems which might occur during charging of the melter, we plan to put a hood over the melter equipped with an exhaust fan and a water scrubber.

Since this is a very simple piece of equipment and will operate only intermittently, we respectfully request under Permit Regulations for the Construction and/or Operation of Air Emissions Equipment, Regulation APC-S-2 amended January 23, 1979, in section 5.0, Exclusions and Variances, paragraph 5.1, that the commission specify this piece of equipment as being exempt from the requirements to obtain a permit to construct.

If I can answer any questions, please call me.

Very truly yours,

Charles Jordan

Senior Chemical Engineer

CS:bsj

Form PC 105

# State Of Mississippi Department of Natural Resources BUREAU OF POLLUTION CONTROL P.O. Box 10385 Jackson, Mississippi 39209



REPORT OF	FIELD INVESTIGATION	File No:		
Date:	FEBRUARY 24, 1981	= 2		
Subject:	FLY ASH - HEAVY BLACK SMOKE			
Complainant:	JOHN FLOYD - 615 WEST 4TH STREET, HATT	riesburg, ms		
тО•	DON WATTS			

On the above date I checked on the complaint made by Mr. John Floyd. Mr. Floyd's complaint is that Hercules, Inc., of Hattiesburg produces fly ash which is a problem to his health as well as an eye sore to his property.

Mr. Floyd has lived in Hattiesburg for 18 years. He informed me that he has had problems with fly ash for as long as he has been living there. He says that Hercules produces thick black smoke out of their stacks during overcast skys, rains, and starless nights. He said that because of the times they are releasing the smoke it almost seems as if they are trying to hide it.

Mr. Floyd had washed a white camper on February 22nd. He told me that the camper had not been moved. On the campers sides were streakes of black powder. Mr. Floyd has had problems with his lungs, they have collasped four times in the past few years. He is worried about breathing the fly ash.

He informed me that the odors from Hercules has not been as frequent as they have been in the past. When the odor occurs it is strong.

I told Mr. Floyd that a letter would be sent to the Jackson office where it will be put on file. I told him that any further action will be decided upon by the main office.

I then went by and talked to Mr. Charles Jordan of Hercules. Mr. Jordan informed me that they do not produce any more black smoke or fly ash at night during overcast or when it rains. He told me that the only time when a dark cloud of smoke leaves the stack is when they fire the boilers or when they pull ash.

The emissions were below 40% opacity during and before the interview with Mr. Jordan.

If I can be of further help, please call.

Stanley Carlisle

#### MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

# COMPLAINT FORM

		2/20/81	4:45pm		☑ Air	□Water
	•	Date	•	Time		22
PERSON RE	:porting:_ <b>_</b>	dMr. □Ms.	JOHN FLOYD		\$ 	
ADDRESS:	HATTIESBURG	FORREST	615	WEST 4TH	H ST	583-3485
C	ity C	County	Street	or P: C	). Вох	Phone
COMPLAINT	SITE:	HERCULES	挺			34
	<del></del>	(1)			5	
	<u> </u>					UZV 25
TEXT OF C	OMPLAINT:_	FLY A	SH ALL OVER E	VERYTHING	G. HEAVY F	SLACK SMOKE.
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COMPLAINT	· TAKEN BY:	STANLEY CAR	LISLE		5	<u>·</u>
REFERRED	то:	Name North Regio Central Reg South Regio	ional Offic	e Othe	er	(5) (2)
; . REFERRED		Phone			Courier	··.
	N P O BY	DON WATTS	•		DATE	•
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RESOLUTIO	) n :		E		9	: ·
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# MISSISSIPPI AIR & WATER POLLUTION CONTROL COMMISSION

	COMPLA	AINT FORM	
	2/20/81	1 4:45 P.M. Air	□Water
* * I <sub>k</sub> .	Date	Time	,
PERSON REPORTING	G:_⊠Mr. □Ms.	John Floyd (Anon	ymity Requested
ADDRESS: Hatties	Sburg Forcest	615 W. 4th st.	CO M
City	County	Street or P. O. Box	Phone
COMPLAINT SITE:	Hercules	<u> </u>	
	(5)		
TEXT OF COMPLAIN	VT: Flyash &	from the woodwaste	boilers
is on every	thing Mi 3	though said he was	having to
	0	also, there are le	
seriors of	Reavy black	smoke about 3 time	Lweek.
usually at		ring overcast period	
. 0	. 0		11 342
		i ĝ e	7/ gt
COMPLAINT TAKEN	BY: Don W	atts	
REFERRED TO:	Name North Region Central Region South Region	onal Office Other	
REFERRED BY:	Phone		
ROUTED TO R.O. B	y: Don W	DATE 2	123/81
RESOLUTION: In	spection by Si	RO inconclusive. See	
letter tomr. F	loyd concerning	a situation	
1981	/	,	
			N .
			20
	v	3	

# Fornet FILE COPY

#### February 18, 1981

Mr. Dick Heller Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401

Dear Mr. Heller:

The purpose of this letter is to notify you of the effectiveness of the "Bubble" Policy and its availability to you as an alternative approach to control of emissions and compliance with emission regulations.

The Bubble Policy provides an opportunity for air pollution sources which consist of more than one (1) emission point to apply an alternative control strategy such that each stack is not necessarily required to meet a specific emission limit but, rather, trade-offs may be made between the stacks to optimize the economy and operation of control.

There are several limitations on the application of this policy, many of which must be interpreted on a case-by-case basis; however, the primary points which would apply include the following:

- The air pollution source wishing to apply the Bubble Policy 1. must initiate the proposal for such control.
- The air quality standards must be met in all cases. That is, application of an alternative strategy may not cause a violation of air quality, regardless of how the alternative approach compares with the emission limits currently in effect. source must demonstrate in its proposal that ambient air quality will not be adversely affected by this change.
- All emissions under an alternative approach must be quantifiable and the trade between two or more stacks must be equal.
- The pollutants which are considered under an alternative proposal must be comparable. That is, particulate matter may be traded for particulate matter, SO, for SO, but SO, may not be traded for hydrocarbons.
- The source must be in compliance with applicable regulations. 5.
- The Bubble Policy cannot be used to preclude a facility from б. complying with New Source Performance Standards.

Mr. Dick Heller Hercules, Inc. February 18, 1981 Page -2-

If you feel this policy would be of benefit to you and would like to further discuss details concerning restrictions or other applications of the definitions within this policy, please contact us.

Very truly yours,

Don Watts Air Emissions Section

DW:la



# Air & Water Pollution Control Commission

STATE OF MISSISSIPPI



TO:

DON WATTS

FROM:

STANLEY CARLISLE

SUBJECT: HERCULES, INC. - FORREST COUNTY

DATE

FEBRUARY 3, 1981

ON THE ABOVE DATE I DID A VISIBLE EMISSIONS TEST ON HERCULES, INC., LOCATED IN FORREST COUNTY.

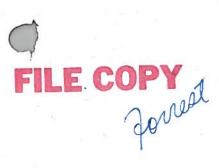
THE TOTAL AVERAGE OF THE THREE RUNS ON THE NORTH WOOD BOILER STACK WHICH WAS 30.46. THE TOTAL AVERAGE OF THE THREE WHICH RUNS ON THE SOUTH WOOD BOILER STACK WAS 27.3% OPACITY.

DURING THE THIRD RUN OF THE SOUTH STACK THE SMOKE CHANGED FROM THE WHITE SMOKE WAS NOT STEAM. MR. CHARLIE JORDAN BLACK TO WHITE. TOLD ME THAT THEY WERE BURNING WASTE WATER.

IF I CAN BE OF FURTHER ASSISTANCE, PLEASE CALLL.

ly Carlisle EY CARLISLE





January 9, 1981

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

Dear Mr. Jordan:

On December 29, 1980, Mr. Richard Jones of our South Regional Office performed a visible emissions evaluation of your woodwaste boilers.

The north stack was well in compliance, but the south stack was producing black smoke of about 59% opacity. As you are aware, the limit is 40% opacity. Therefore, please take whatever steps are needed to correct the problem immediately. Since this was the first time the problem has occurred in quite a while, no further action will be taken if the problem is corrected.

If you have any questions, please contact us.

Very truly yours,

Don Watts Air Emissions Section

DW:els



STATE OF MISSISSIPPI



TO:

DON WATTS

FROM:

RICHARD L. JONES

SUBJECT: HERCULES IN HATTIESBURG - FORREST

DATE

DECEMBER 29, 1980

ON THE ABOVE DATE, I INSPECTED THE HERCULES FACILITY IN
HATTIESBURG. AT THIS TIME ALL FOUR BOILERS WERE OPERATING
AT A STANDARD LOAD OF 40,000LBS WITH 80,000LBS TO EACH STACK.
VISIBLE EMISSION EVALUATION RECORDS ARE ATTACHED FOR EACH STACK
OBSERVED.

IF MORE INFORMATION IS NEEDED PLEASE CALL.

RICHARD L. JONES



December 8, 1980

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

Dear Mr. Jordan:

On November 25, 1980, a visible emissions evaluation was performed by Richard L. Jones of your woodwaste boilers. The results indicate no current air pollution problems.

If you have any questions, please contact us.

Very truly yours,

Don Watts

Air Emissions Section

DW:18

### Air & Water Pollution Control Commission

STATE OF MISSISSIPPI



TO:

DON WATTS

FROM:

RICHARD L. JONES

SUBJECT: HERCULES IN HATTIESBURG

DATE

NOVEMBER 25, 1980

(10-0800-0000)

ON THE ABOVE DATE, I INPSECTED THE HERCULES FACILITY IN HATTIESBURG. AT THIS TIME ALL FOUR BOILERS WERE OPERATING AT A STANDARD LOAD OF 40,000LBS WITH 80,000LBS TO EACH STACK. A VISIBLE EMISSION EVALUATION RECORD IS ATTACHED FOR BOTH NORTH AND SOUTH STACKS.

IF I CAN BE OF FURTHER HELP, PLEASE CALL.

RICHARD L. JONES



Jovest

Hercules 110-0800-00001 Forrest County Don Watts Regular Inspection 10/20/80

On October 10, 1980, I inspected the referenced facility. Mr. Charles Jordan, senior chemical engineer, is the plant contact.

Hercules operates a chemical plant in which most of the products are derivitives of pine resin. They also produce a synthetic rubber and a pesticide. For a more detailed description of all the processes, see my report of April 21, 1980.

Power and steam are provided by four (4) woodwaste boilers and one package boiler. The woodwaste boilers are grouped so that two boilers share a stack. When I arrived one stack was emitting heavy black smoke of 100% opacity. Emissions were not noticeable from the other stack. Shortly after I arrived both stacks were emitting 100% black smoke. However, before Mr. Jordan and I could reach the boilers, the opacity had cleared up to less than 30%. Subsequently, we found that workers were cleaning off the grates in the boilers. Doors were opened so that the grates could be cleaned off. This caused more air to enter the boiler, which in turn caused the black smoke. This cleaning occurs about once per shift. Duration of the black smoke varies, but it is not of sufficient duration to cause a real problem. A VEE was not done since I was not certified at the time.

There was no odor noticeable at the Delnav plant. The flare was lit and visible.

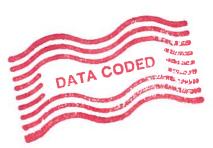
The Herchlor plant was shutdown. Hercules is in the midst of tieing in some of the new equipment being installed in the Herchlor expansion project.

The sludge pond, which is a part of the wastewater treatment system, was being dredged. There was a slight odor in this area. The odor was much like turpentine.

Other than the black smoke from the boilers, no problems were noted. As previously mentioned, the boilers should not be a real problem since the cleaning occurs only three to four times a day for a short period of time.

I feel this facility is within compliance and our present schedule of VE's monthly and inspections from the Jackson office quarterly is adequate.

DW:els





#### PI DEPARTMENT OF NATURAL RESURCES

**Bureau of Pollution Control** P. O. Box 10385 Jackson, Mississippi 39209 (601) 961-5171



#### **MEMORANDUM**

TO:

DON WATTS

FROM: **SUBJECT:**  MARGARET REES

110-0800-00001 HERCULES, INC. - HATTIESBURG, MS - FORREST COUNTY

DATE:

JULY 2, 1980

On the above date I went to Hercules, Inc. of Hattiesburg, for a Visual Emissions Evaluation.

The results for boilers #1 & #2 are on the attached sheet.

The emissions from the stack for boilers #3 & #4 were less than 5% during my evaluation.

If you have any questions, please call.





#### MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

Bureau of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209 (601) 961-5171



June 20, 1980

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

Dear Mr. Jordan:

Enclosed is the additional page which was inadvertently omitted from your Permit to Operate. This page is for Emission Point 012 and expires at the same time as the rest of your permit, May 1, 1983.

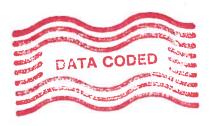
If you have any questions, please contact us.

Very truly yours,

Donald A. Watts

Air Emissions Section

DAW:sr Enclosure



PART II

Page11Aof 34 Permit No. 0800-00001

#### PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning May 13, 1980, and lasting until the permittee is authorized to operate air emissions equipment and emit air contaminants from the pitch blowing facility, Emission Point 012.

Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

FILE COPY June 5, 1980 Mr. Charles Jordan Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401 Dear Mr. Jordan: On May 28, 1980, a visible emissions evaluation was performed by Margaret Rees of your two woodwaste boilers. The results indicate no current air pollution problems. If you have any questions, please contact us. Very truly yours, Don Watts Air Emissions Section DW:els



## MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES Bureau of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209 (601) 961-5171

S NATURAL PROPERTY OF NATU

May 19, 1980

Mr. Richard H. Heller Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401

Dear Mr. Heller:

Re: Operating Permit No. 0800-00001

Enclosed please find Operating Permit No. 0800-00001 issued for the operation of the air emissions equipment at the above referenced facility. This permit should be displayed prominently at the facility. Operation of the air emissions equipment at the facility shall be in accordance with the conditions of the permit.

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

This permit expires on May 1, 1983. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit.

If you desire that a Permit Board hearing be held regarding this permit, you should make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final.

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

Very truly yours,

Don Watts Air Emissions Section

DW:1s Enclosure

former May 19, 1980 Mr. Richard H. Heller Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39401 Dear Mr. Heller: Re: Operating Permit No. 0800-00001 Enclosed please find Operating Permit No. 0800-00001 issued for the operation of the air emissions equipment at the above referenced facility. This permit should be displayed prominently at the facility. Operation of the air emissions equipment at the facility shall be in accordance with the conditions of the permit. Any significant modification to this process or facility which will alter the rate or composition of air pollutant emissions will cause this permit to become invalid. Should you wish to make such a modification, it will be necessary to submit a new application for a construction permit. This permit expires on May 1, 1983. A new permit application must be submitted one hundred and eighty (180) days prior to this date in order to renew this permit. If you desire that a Permit Board hearing be held regarding this permit, you should make written application to the Permit Board within thirty (30) days after receipt of this notice; otherwise, the terms, conditions and limitations in the permit shall become final. If you have any questions or if we can be of service, please let me know. Very truly yours, Don Watts Air Emissions Section DW:18 Enclosure

Jonest Jonest April 24, 1980 Mr. Richard H. Heller Hercules, Inc. P. O. Box 1937 Hattlesburg, Mississippi 39401 Dear Mr. Heller: Tall Oil Plant, Emission Re: Point 003 Union Iron Works Boilers. Emission Point 004 Column 5 - Tall Oil Plant, Emission Point 034 It is our understanding that the above referenced emission points have not been operated for a period greater than eighteen (18) months. According to Section 1.7.3 of the APC-S-2, these units are not eligible for issuance of a permit to operate, and they will not be eligible until evidence of a firm startup date has been submitted. If these units are to be operated, they must first be reviewed by us as new sources, and emission data must be supplied using the expected operating parameters. If you have any questions, please contact us. Very truly yours, DAW Don Watts Air Emissions Section DW:els

February 1, 1980

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

Dear Mr. Jordan:

Re: New Permit Applications

This letter is to confirm our agreement that all permits which expire.

This letter is to confirm our agreement that all permits which expire from January 28, 1980, to April 1, 1981, will have new permit applications submitted prior to March 8, 1980. This will allow all permits to be issued on the same day.

If you have any questions, please contact us.

Very truly yours,

Don Watts

Industrial Air Emissions Section

DW:els



# HERCULES INCORPORATED

January 25, 1980

Mr. Don Watts Industrial Air Emissions Section Department of Natural Resources Bureau of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209

New permit applications to renew existing permits

Dear Don:

This letter confirms our 1/24/80 phone conversation with Mr. Wayne Anderson concerning permit renewal. As previously discussed, since we have 34 permit expiration dates ranging from 1/28/80 to 4/1/81 (31 expire 3/8/80), we have agreed to submit new permit applications for all facilities prior to 3/8/80 in order to have all permits on the same date. It is necessary to go beyond the 1/28/80 date in order to supply 1979 year end data for all permits.

If you have any questions, please contact me.

Very truly yours,

Charles Indon

Charles Jordan

Senior Chemical Engineer

CJ/nb

FILE CO January 14, 1980 Mr. Charles Jordan Hercules, Inc. P. O. Box 1937 Hattlesburg, Mississippi 39401 Dear Mr. Jordant This is to confirm our telephone discussion of last week. The Bureau of Pollution Control sees no need for further monitoring for SO, by Herculas. Therefore, it is acceptable to us if you drop the monitoring program. If you have any questions, please contact us. Very truly yours, Don Watts Industrial Air Emissions Section DW:hdb