

**HERCULES**

#2096

Hercules Incorporated  
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(601) 545-3450  
Fax: (601) 584-3226  
www.herc.com

October 25, 2005

**CERTIFIED MAIL- RETURN RECEIPT REQUESTED**  
**CERT. NO.: 7004 0750 0001 6606 7940**

RECEIVED  
OCT 31 2005  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Ms. Carla Brown  
Chemical Manufacturing Branch  
Environmental Permitting Division  
Mississippi Department of Environmental Quality  
P.O. Box 10385  
Jackson, MS 39289-0385

Re: Hercules, Inc.  
Water Ref. No. MSP091286  
Hattiesburg, Mississippi  
Forrest County

Dear Mrs. Brown:

Following recent discussions between MDEQ and Hercules Incorporated, please find the following proposed wastewater treatment plan for your concurrence. The purpose is to address wastewater issues as a result of major demolition work scheduled at the Hattiesburg, Ms., facility, and the recent applicability of OCPSF pretreatment guidelines.

Attached are three schematics which outline:

- 1) The current wastewater treatment system;
- 2) A proposed phase-one wastewater system; and
- 3) A proposed phase-two wastewater system.

Also attached are two previous letters, May 20, 2005, and July 29, 2005, addressing these issues.

As you are aware major portions of the Hattiesburg facility have been permanently shutdown. This downsizing & scheduled demolition, resulted in a change in SIC code reporting. This change, OCPSF applicability, has a toluene limit which our previous permitted discharge did not have. Additional sampling indicates the original source of toluene to be from previous identifiable operations that are no longer in operation. Additionally, there is apparent bleed-out from our plant effluent treatment

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wastewater sludge in the Impounding Basin (I.B.) and the equalization tank (ET-10), both of which were previously in contact with past operation wastewaters.

Other sampling of the remaining current plant wastewater area discharges shows None Detected analysis for toluene in the remaining combined current plant wastewater area discharges.

Based upon this other sampling data, of the remaining current plant wastewater area discharges, we are proposing the following wastewater treatment plan.

- 1) Current wastewater treatment system –  
The current system utilizes the I.B. for all process wastewater and potential contaminated storm water from all areas. We propose to acquire capital money for CY-2006 budget to initiate the phase-one proposal outlined below. We also request the sampling for OCPSF compliance be the combination of the remaining combined current plant wastewater area discharges prior to entering the I.B. Once the above ground tank is utilized, as outlined below in phase-one, the sampling for OCPSF compliance would be the tank discharge.
- 2) Proposed phase-one wastewater system- (3/31/06 to 12/31/06)  
Prepare a capital project (CY2006) to route all remaining process wastewaters into an above ground tank, thus bypassing the I.B with industrial wastewater. There will be interchangeable tanks in the system to facilitate any cleaning/removal of solids/sludge. The only remaining flow to the I.B. would be potential contaminated rainfall, mostly gravity flow, from the active demolition areas. This would allow the pumping of potential contaminated rainfall into the industrial sewer system until demolition is completed. Demolition is scheduled to start in November, 2005 and is anticipated to finish by the end of 2006. This proposal would also allow ET-10 to be taken out of service. Initial data referred to in the 7/29/05 letter indicates taken ET-10 out of service will reduce the toluene more than half.
- 3) Proposed phase-two wastewater system- (3/31/07 to 12/31/07)  
Prepare a capital project (CY2007) to bypass the I.B. with all rainfall which is no longer potentially contaminated once demolition is completed. This would be accomplished by completion of all scheduled demolition activities by the end of CY-2006. The rainfall from these areas would then be directed to the existing storm water outfalls covered in our Storm Water Baseline General Permit. This proposal would also allow us to include taking the I.B. out of service in the capital project (CY2007). Taking the I.B. out of service, coupled

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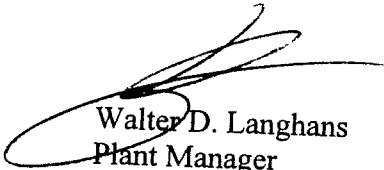
with taking ET-10 out of service, will eliminate the toluene issue in our waste water effluent discharged to the POTW.

We feel this approach, which would take both the I.B. and ET-10 out of service, would be the best approach going forward. If I can answer any additional questions or provide any additional information, please contact Charles Jordan at 601 584 3360.

Based on this information and belief formed after reasonable inquiry, the statements contained herein are true, accurate, and complete.

Sincerely,

HERCULES INCORPORATED



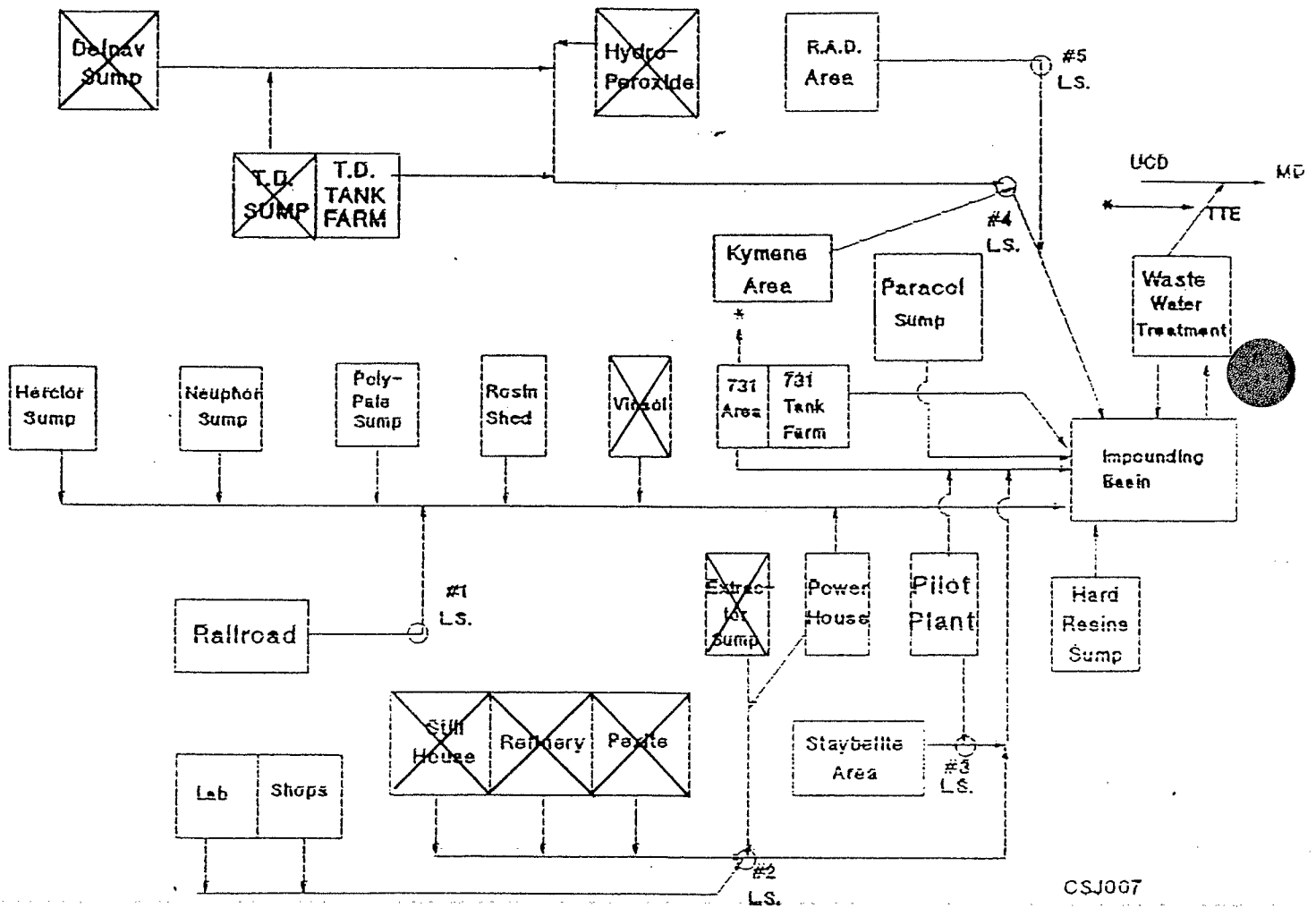
Walter D. Langhans  
Plant Manager

WDL/

Attachments:

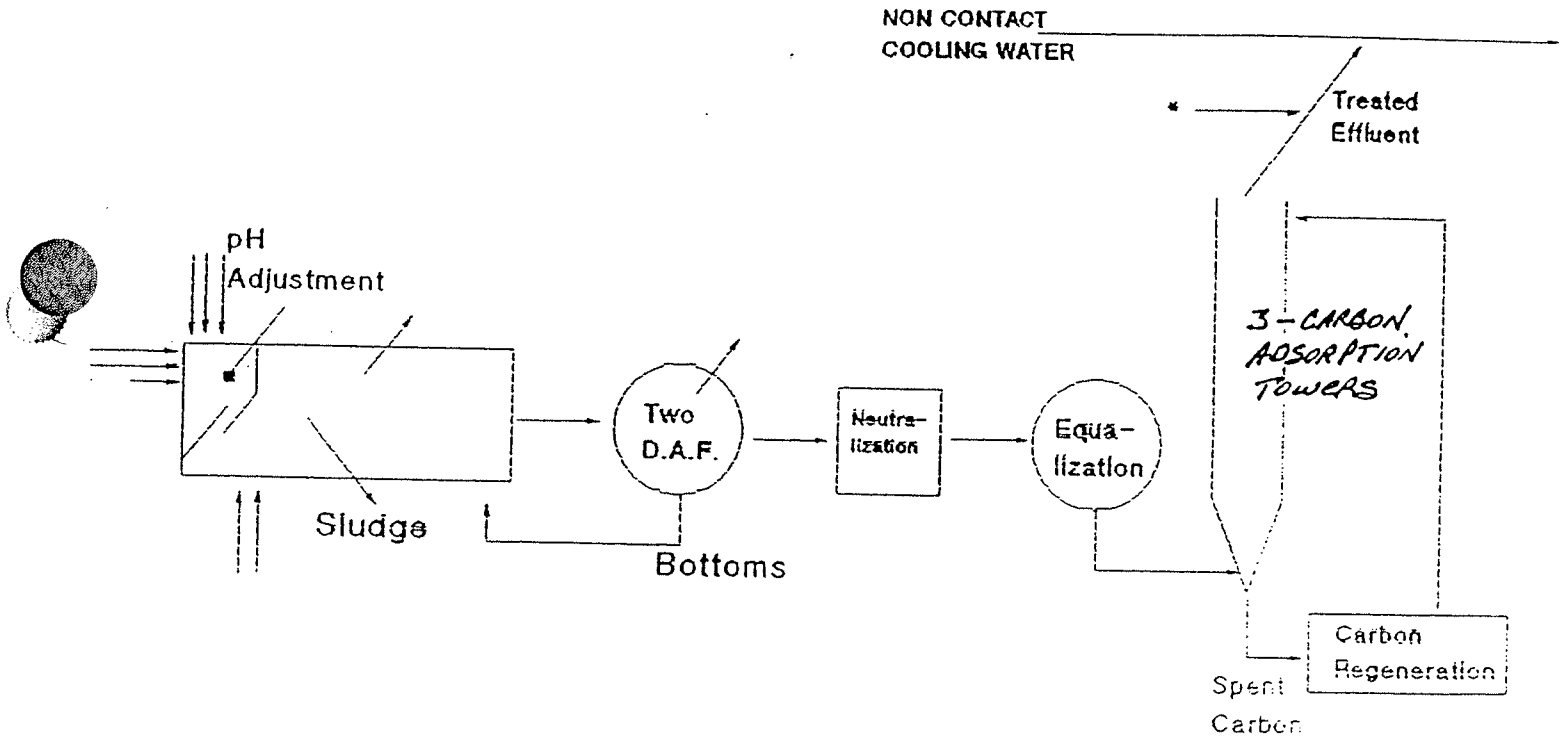
cc: Toby Cook, MDEQ  
Rick Sumrall, MDEQ  
Jan Patton, MDEQ  
Roger Moore, Hercules Incorporated  
Charles Jordan, Hercules Incorporated

# AREA WASTEWATER FLOWS



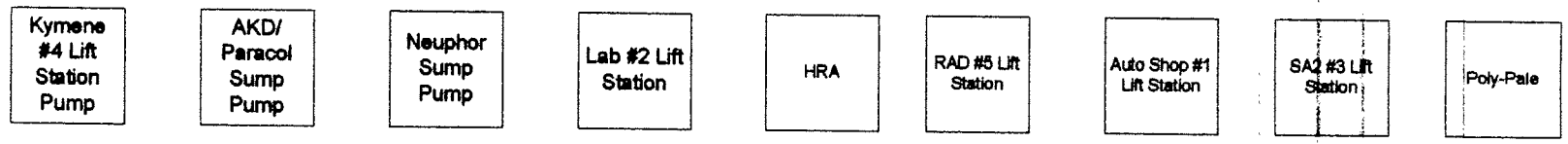
CSJ007

# WASTEWATER AREA



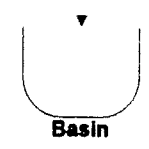
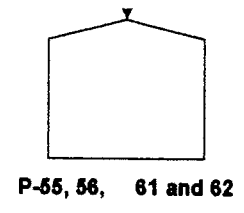
CSJ006

**Phase I**  
**3-31-06 to 12-31-06**

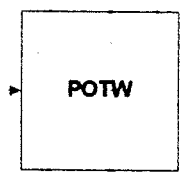
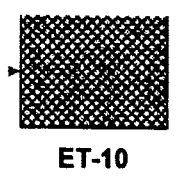
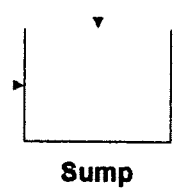


Storm Water and Process Water

Storm Water



ET-10 to be bypassed



Phase II  
3-31-07 to 12-31-07

Kymene  
#4 Lift  
Station  
Pump

AKD/  
Paracol  
Sump  
Pump

Neuphor  
Sump  
Pump

Lab #2 Lift  
Station

HRA

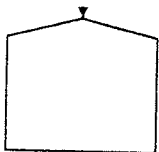
RAD #5 Lift  
Station

Auto Shop #1  
Lift Station

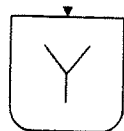
SA2 #3 Lift  
Station

Poly-Pale

Storm Water and Process Water



P-55, 56, 61 and 62



pH Mixer

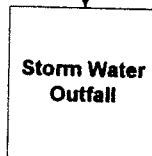
As demolition  
proceeds each of  
these lift stations  
will be routed to  
stormwater  
(NPDES)

Storm Water

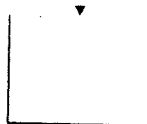


Basin

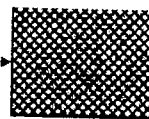
Basin to be taken  
out of service)



Storm Water  
Outfall

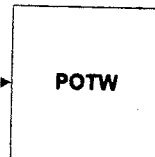


Sump



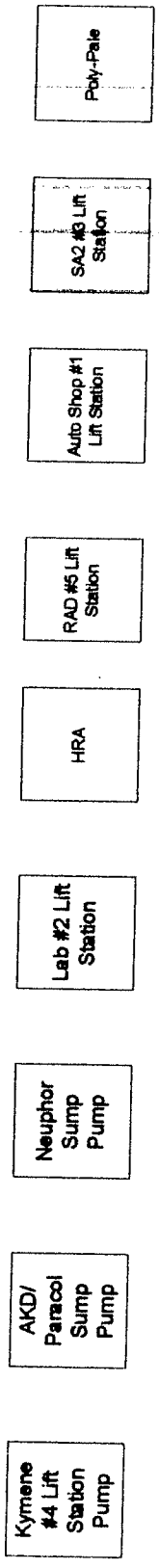
ET-10

ET-10 to be taken  
out of Service



POTW

**Current**



**Storm Water and Process Water**

