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HERCULES

Hercules Incorporated
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Hattiesburg, MS 39401
(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

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

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

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

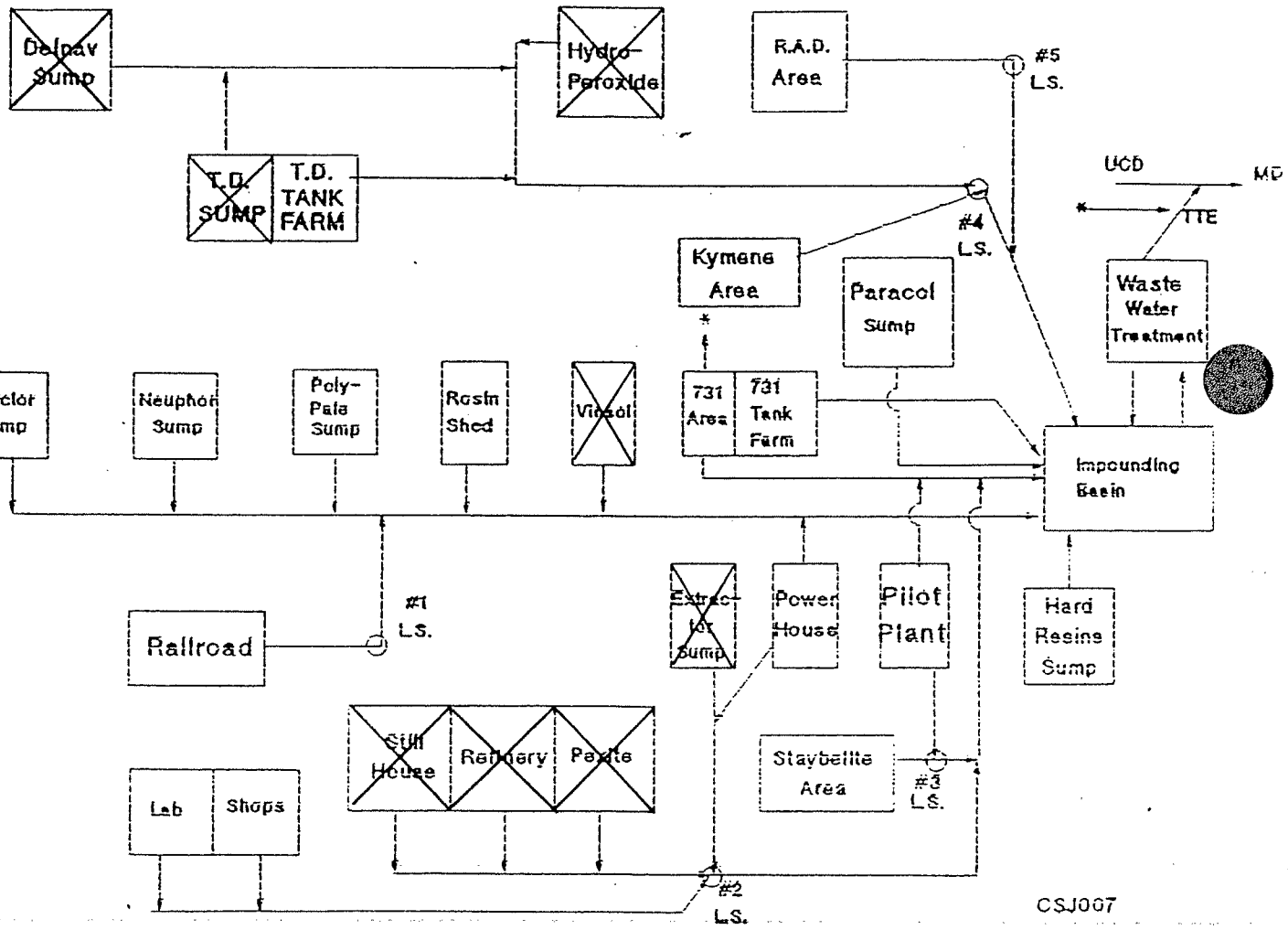
Walter D. Langhans
Plant Manager

WDL/

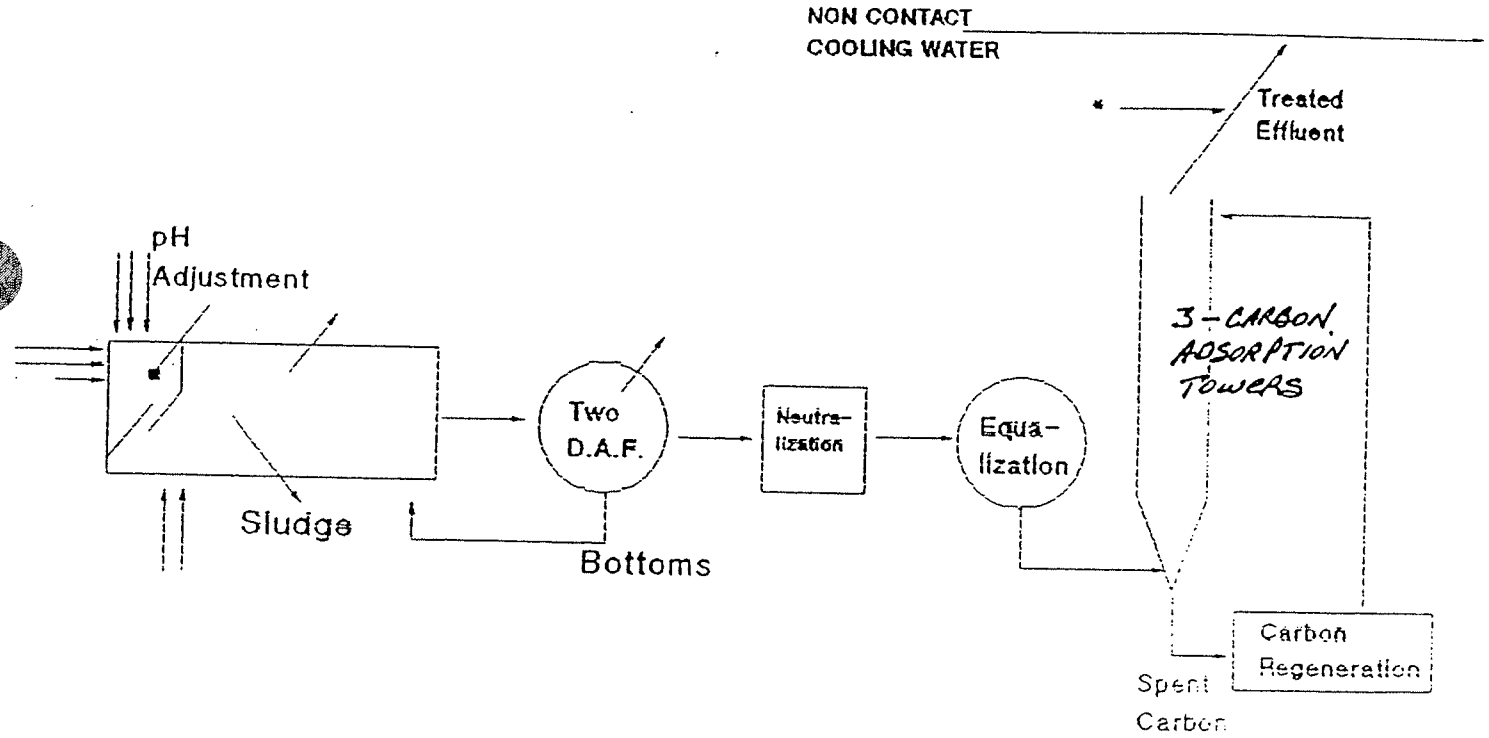
Attachments:

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

AREA WASTEWATER FLOWS

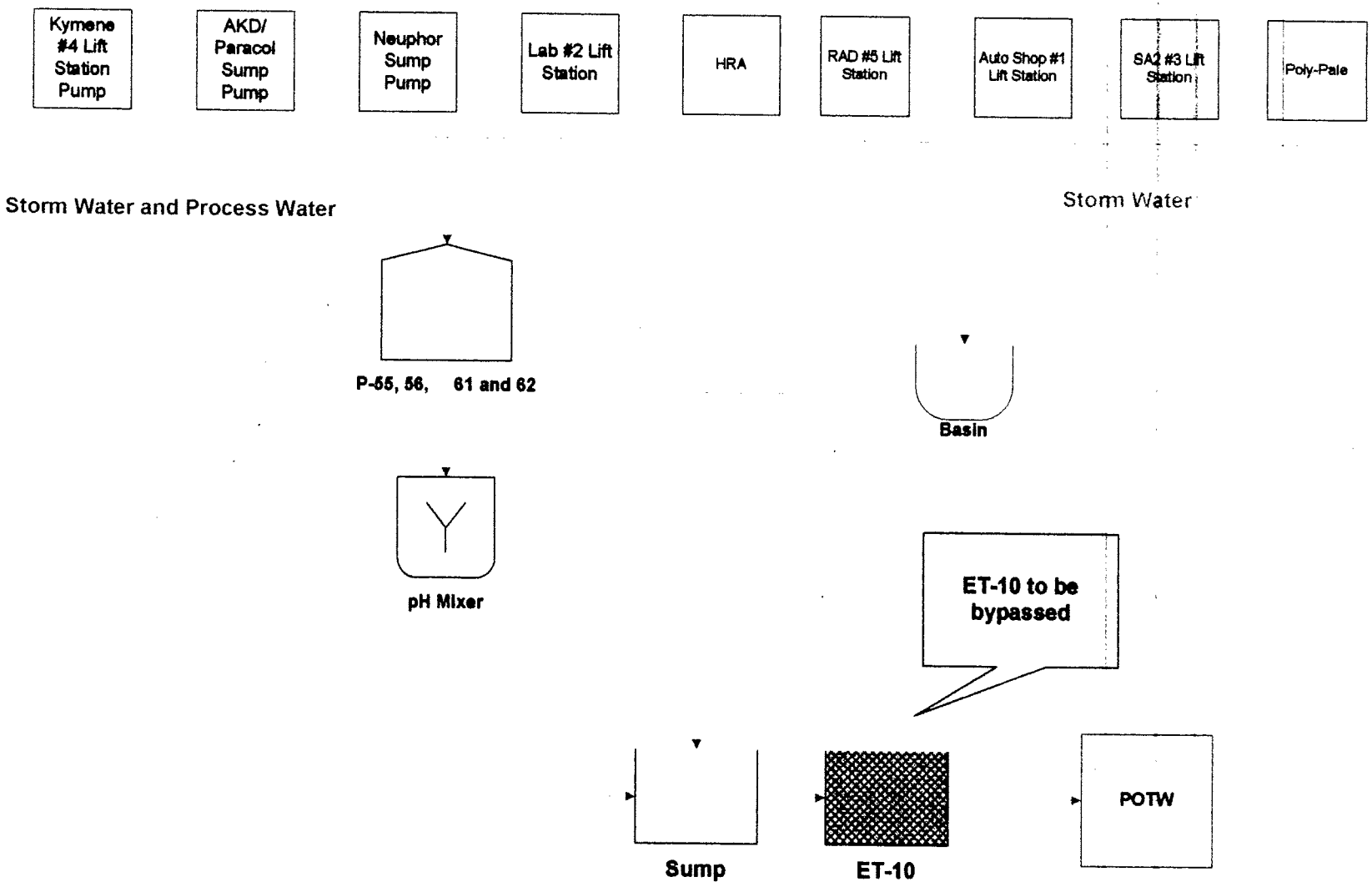


WASTEWATER AREA

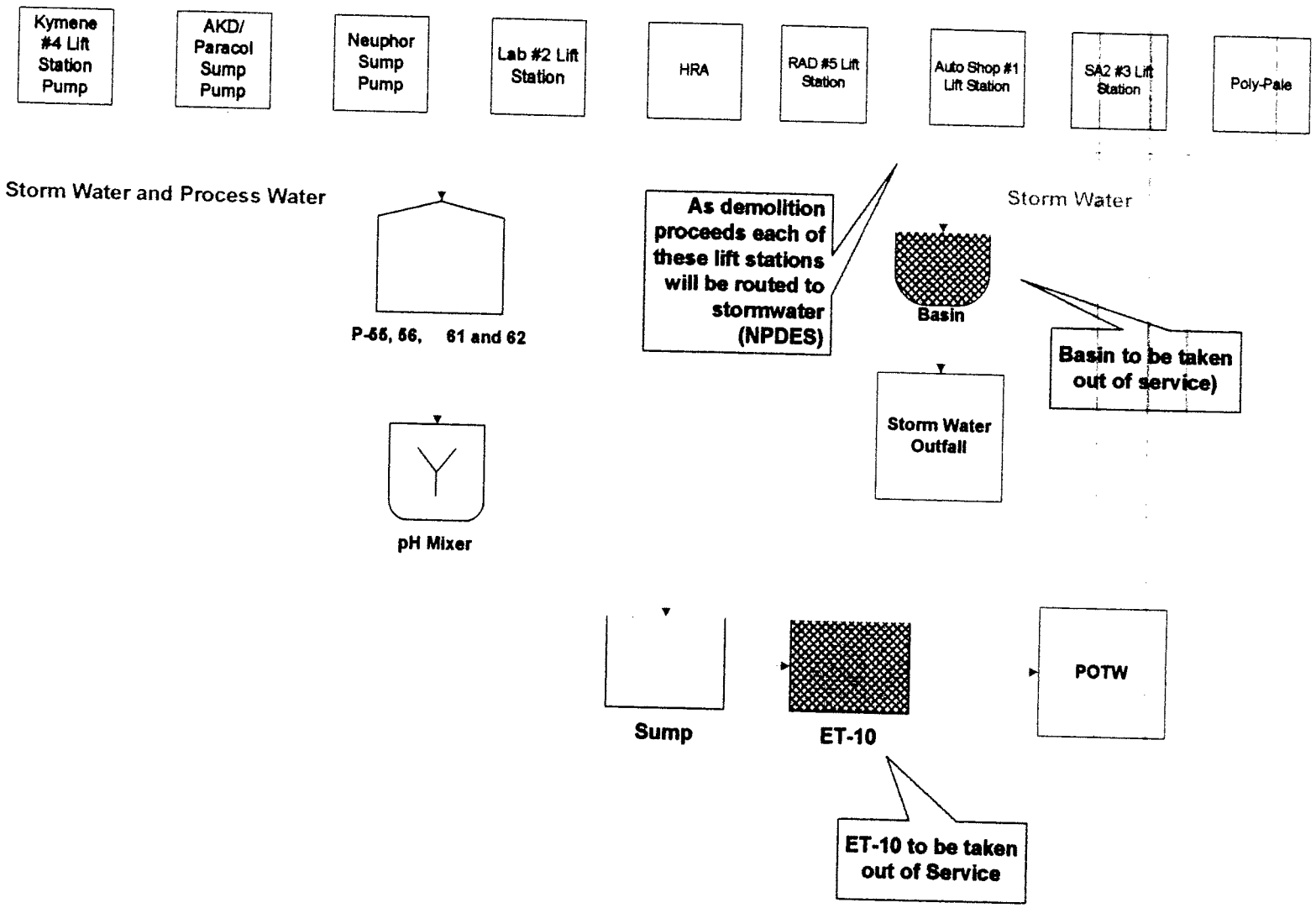


CSJ006

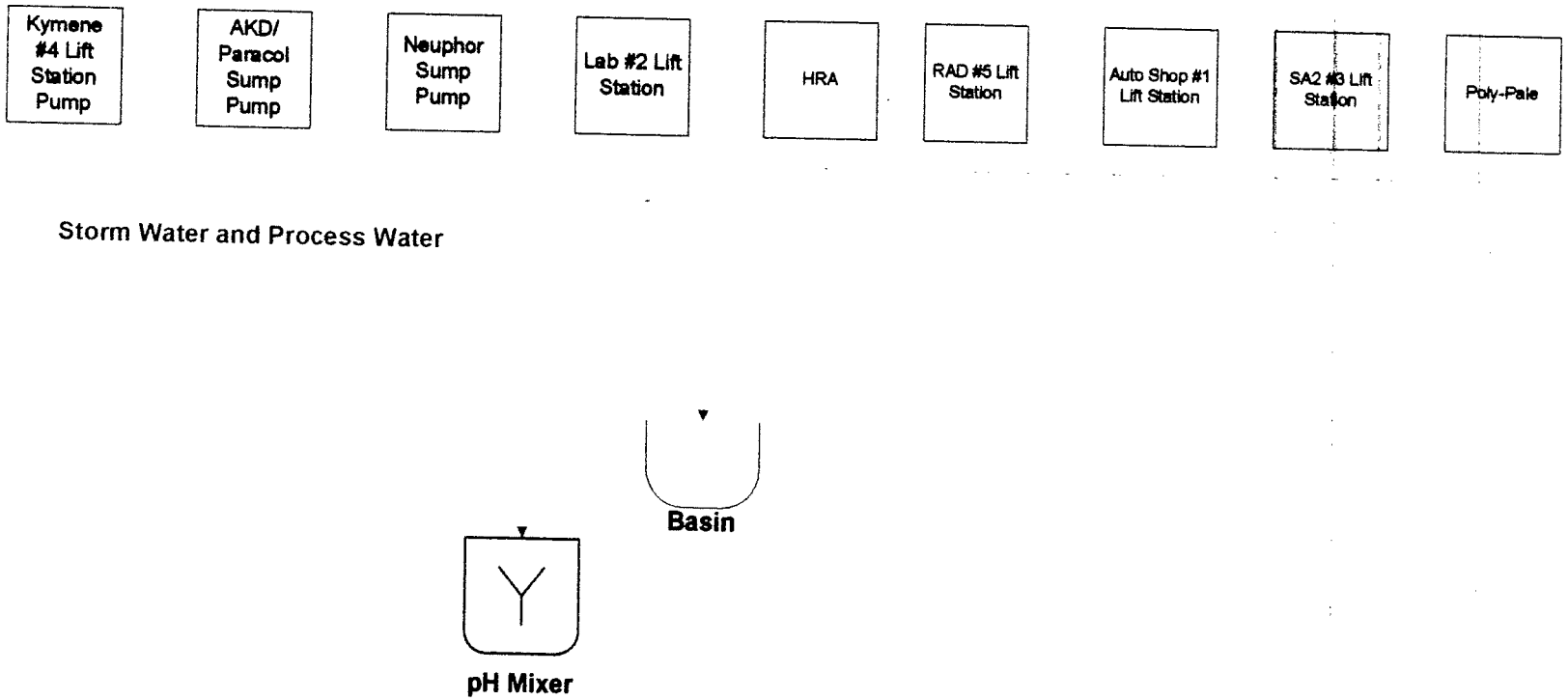
Phase I
3-31-06 to 12-31-06



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



Current


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
Basin
pH Mixer
Sump
ET-10
POTW