



PPG INDUSTRIES, INC. INDUSTRIAL CHEMICAL DIVISION P. O. BOX 1000 LAKE CHARLES, LA. 70501

T. C. TAYLOR
Technical Manager

September 23, 1974

Mr. Gus VonBodungen
Louisiana Air Control Commission
P. O. Box 60630
New Orleans, Louisiana 70160

Dear Gus:

When you visited with us on 9/17/74, you requested that we provide you with a list of alternatives relative to the problem that we have with our incinerator stack gases. Following is this list:

1. Continue what we are doing at the present and do everything possible to expedite the procurement and installation of a secondary weak caustic scrubber for the incinerator stack gases. Under this plan, we will be discharging to the air approximately 6 lbs./hr. of HCl and 17 lbs./hr. of Cl₂. We will be incinerating practically all of the liquid waste and will not vent to the atmosphere the chlorinated organics that are in the vent stream from our perchlor-trichlor reactors.
2. Continue to incinerate our liquid waste, the vent gases from the liquid phase EDC plant, and the vent gases from our OHC-EDC plant. Take the perchlor-trichlor reactor vent out of the incinerators and scrub it with water as we did prior to the start-up of the incinerators. This will drop the chlorine discharge from the incinerators from 17 lbs./hr. to approximately 7 or 8 lbs./hr. It will result in the discharge to the atmosphere of approximately 440 lbs./hr. of chlorinated organics consisting of the following:

Monochloroethylene	41	Lbs./Hr.
1, 1 Dichloroethylene	100	Lbs./Hr.
trans 1,2 Dichloroethylene	135	Lbs./Hr.
Cis 1,2 Dichloroethylene	80	Lbs./Hr.
1,1,2 Trichloroethylene	75	Lbs./Hr.
1,1,2,2 Tetrachloroethylene	10	Lbs./Hr.

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3. Incinerate only the vent gases from the liquid phase EDC plant and the OHC-EDC plant. Scrub the perchlor-trichlor reactor vent as described in alternate No. 2. Haul all heavy liquid waste to our dump area and keep it covered with a layer of water to minimize emissions resulting from sunlight decomposition. This will bring us into compliance on Cl_2 and HCl in the incinerator stack gases, but it will still leave us discharging the 440 lbs./hr. of chlorinated organics described in alternate No. 2.
4. Incinerate the vent from the liquid phase EDC plant, the vent from the OHC-EDC plant, and 50 to 75% of the vent from the perchlor-trichlor reactors. Dump the liquid waste as described in alternate No. 3. Scrub 25 to 50% of the perchlor-trichlor reactor vent as described in alternate No. 2. This will bring us well into compliance on HCl in the incinerator stack gases and will reduce the chlorine level from 17 to approximately 4 to 6 lbs./hr. With 50% or less of the perchlor-trichlor reactor vent being fed to the existing water scrubbers, we should be able to keep the organic emissions from the perchlor-trichlor reactors down to a satisfactory level.

Alternate No. 1 and alternate No. 4 are acceptable to us. If you desire for us to go with alternate No. 4, we will do excavation work to provide a suitable adequately-sized waste dumping pit. When the dumping pit is no longer needed, the residue will be covered with dirt to prevent emissions from sunlight decomposition.

As you know, we have been working on the design and procurement of a secondary incinerator stack gas scrubber. We placed a purchase order for this scrubber on Friday, September 20. The vendor has promised us a delivery date in late March or early April 1975. If an early April delivery date is met, we will have this secondary scrubber in operation by the end of May. We explained just how serious this situation is to the scrubber vendor, and their representative told us that they would do their best to meet this delivery date.

We are requesting that you grant us permission to operate as outlined in alternate No. 1 or alternate No. 4 until the end of May 1975. At or before this time we will have a secondary incinerator stack gas scrubber in service and will be in compliance with permit No. 163. Delays in promised equipment delivery dates is the only thing that will prevent us from achieving this compliance schedule. We will immediately notify you if equipment deliveries are delayed.

Respectfully,

T. G. Taylor

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