



INDUSTRIES

PPG INDUSTRIES, INC. CHEMICAL DIVISION U.S. P. O. BOX 1000 LAKE CHARLES, LA. 70602

June 6, 1986

Mr. Gus VonBodungen
Department of Environmental Quality
Air Quality Division
Office of Environmental Affairs
P. O. Box 44096
Baton Rouge, LA 70804-4096

Re: LESHAP VCM Quarterly Report

Dear Mr. VonBodungen:

In accordance with Section 17.11 of the LESHAP regulations, PPG Industries' Lake Charles Complex submits the attached quarterly report for the period March 1, 1986 through May 31, 1986.

Attached as Exhibit I is a record of emissions in excess of 10 ppm (averaged on an hourly basis) which resulted from temporary by-passes of incineration. An estimated 81.6 pounds of VCM were released as a result of these 10 incidents.

Attached as Exhibit II is a record of sudden discharges of VCM which occurred during this reporting period. An estimated 179 pounds of VCM were released as a result of these 3 incidents. Written notification of these incidents was made within 7 days of their occurrence.

There were no emissions in excess of 10 ppm (averaged on an hourly basis) in the stack gases exiting the incinerators during this reporting period.

Respectfully,

Andy P. Plauche'
Environ. Control Specialist

APP:lr

Attachments

SL 026392

EXHIBIT I

Non-Incineration of VCM Vents
 March 1, 1986 - May 31, 1986

<u>Date</u>	<u>Time</u>	<u>Sources Not Incinerated</u>	<u>Estimated Quantity VCM Vented (lbs)</u>	<u>Comment</u>
3/1/86	28 min between 0409 & 0441	VC II, CSS	9.6	#1 Incinerator tripped due to a malfunction of the flame scanner.
3/20/86	1712 to 1751	VC II, CSS	25.6	#1 Incinerator tripped due to a malfunction of the natural gas regulator (natural gas fuel pressure became too high).
3/28/86	2220 to 2228	VC II, CSS	4.0	#1 Incinerator tripped due to loose electrical connections on the shutdown control system.
4/12/86	1218 to 1237	VC II, CSS	11.7	#1 Incinerator tripped due to loose connections on the Modicon (computer control system).
4/12/86	1602 to 1613	VC II, CSS	6.8	Same as above*
4/12/86	1637 to 1652	VC II, CSS	9.2	Same as above*
4/12/86	2058 to 2107	VC II, CSS	5.5	Same as above*
5/10/86	2041 to 2044	VC II	1.2	VC II vents were tripped out of #1 Incinerator in order to prevent the automatic shutdown of the incinerator due to a high temperature condition.

* The loose connections on the Modicon system were not located until after the 4th trip.

SL 026393

EXHIBIT I

Non-Incineration of VCM Vents
March 1, 1986 - May 31, 1986

<u>Date</u>	<u>Time</u>	<u>Sources Not Incinerated</u>	<u>Estimated Quantity VCM Vented (lbs)</u>	<u>Comment</u>
5/16/86	0852 to 0900	VC II, CSS	5.3	#1 Incinerator tripped due to operator error in over-correcting for a high temperature condition.
5/17/86	2014 to 2018	VC II, CSS	2.7	#2 Incinerator tripped due to flame failure when a thermocouple failed.

SL 026394

EXHIBIT II

Sudden VCM Discharges
March 1, 1986 - May 31, 1986

<u>Date</u>	<u>Time Duration</u>	<u>Estimated Quantity VCM Released (lbs)</u>	<u>Comment</u>
3/17/86	1700 to 1701 (1.25 minutes)	155	A hose being used to provide temporary recirculation to the TE-II VCM stripper reflux pump failed. (Written notification was made on 3/19/86.)
5/29/86	0950 to 0955 (5 minutes)	1	Low pressure HCl system accumulator was inadvertently blocked in with the HCl compressor recirculation line still open. The resulting pressure buildup caused the accumulator's SRV to relieve. (Written notification was made on 6/3/86.)
5/30/86	0300 to 0400 (60 minutes)	23	DCE Rx overfilled due to malfunction of the level transmitter and caused liquid organics to enter the HCl vent distribution header. The liquid caused an overpressurization downstream in the header at VC II causing the vents to be diverted to the VC II Emergency Scrubber. (Written notification was made on 6/3/86.)



PATRICIA L. NORTON
SECRETARY

OFFICE OF AIR QUALITY AND NUCLEAR ENERGY

December 16, 1985

GREG J. GASPERECZ
ASSISTANT SECRETARY

Mr. Grover C. Stricker
Plant Manager
PPG Industries, Inc.
P. O. Box 1000
Lake Charles, LA 70602

Dear Mr. Stricker:

The Air Quality Division is in receipt of your quarterly report dated December 9, 1985 which covers September, October and November 1985.

This report is complete in that it contains all of the information required in Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP).

We are pleased with the major reduction of incinerator by-passes and the poundage of vinyl chloride emitted over last quarter. Also, we appreciate the change in the reporting format showing more information as to the causes of the by-passes. We hope that this last quarter represents a real turning point in PPG's efforts to come into compliance with the vinyl chloride emission standards.

Sincerely,


William H. Davis
Chief, LESHAP Unit

WHD/CCJ/ba

cc: Southwest Regional Office

SL 026396

File: 35.40.9



PATRICIA L. NORTON
SECRETARY

OFFICE OF AIR QUALITY AND NUCLEAR ENERGY

GREG J. GASPERECZ
ASSISTANT SECRETARY

March 13, 1986

Mr. Andy P. Plauche
PPG Industries, Inc.
P. O. Box 1000
Lake Charles, LA 70602

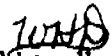
Dear Mr. Plauche:

We have received PPG's quarterly report on vinyl chloride for the period beginning December 1, 1985 and ending February 28, 1986. We summarize your report as follows:

- 1) In accordance with Sections 77.11(c)(1) and 77.4(a) of the Louisiana Air Quality Regulations, there were five excursions of the 10 ppm hourly average standard from the incinerators.
- 2) In accordance with 77.11(c)(1) and 76.18(d), there were twenty incidents of incinerator bypasses resulting in a total of 140.3 pounds of vinyl chloride being emitted to the atmosphere. The bypass on February 13, 1986, exceeding one hour, was handled in accordance with 76.18(b) and (c).
- 3) In accordance with 76.18(d), there were three incidents of relief valve discharges resulting in a total 1636.6 pounds of vinyl chloride being emitted to the atmosphere. These events were handled in accordance with 76.18(b) and (c).

Your report fulfills the requirements of Section 77.11(a). For any questions, please contact Chris Kuttruff of my staff at (504) 342-9046.

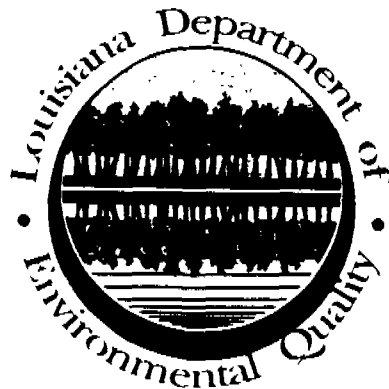
Sincerely,


William H. Davis
Chief, LESHAP Unit

WHD:CK:aa

File: 35.40.9

SL 026397



PATRICIA L. NORTON
SECRETARY

OFFICE OF AIR QUALITY AND NUCLEAR ENERGY

June 12, 1986

GREG J. GASPERECZ
ASSISTANT SECRETARY

Mr. Andy Plauche
Environmental Control Specialist
PPG Industries
P. O. Box 1000
Lake Charles, LA 70602

Dear Mr. Plauche:

We are in receipt of PPG's quarterly report for vinyl chloride emissions for the second quarter of 1986. During the period, ten bypass incidents resulted in the excess emission of 81.6 pounds of vinyl chloride. Three sudden discharges (two relief valves and one by-pass from an process upset) were also reported. Your submittal fullfills the requirements of Section 77.11 of Subpart B of Part IV of the Louisiana Air Quality Regulations for the second quarter.

Sincerely,

William H. Davis
Chief, LESHAP Unit

WHD:CK:aa

File: 35.40.9

SL 026398