



PPG Industries, Inc. Chemicals P.O. Box 1000 Lake Charles, Louisiana 70602

September 12, 1991

Mr. Gus Von Bodungen
Department of Environmental Quality
Air Quality Division
P O Box 82135
Baton Rouge, LA 70884-2135

Dear Mr. Von Bodungen:

Re: LESHAP VCM Quarterly Report

In accordance with LESHAP requirements contained in LAC 33:III. 2561, PPG Industries' Lake Charles Complex submits the attached Quarterly Report for the period June 1, 1991 through August 31, 1991.

Emissions in excess of 10 ppm (averaged on an hourly basis) in the stacks exiting the incinerators are listed in Exhibit I. There were no (0) such incidents this quarter.

Exhibit II is a record of emissions in excess of 10 ppm which resulted from a temporary by-pass of incineration. There were two (2) incidents this quarter resulting in an estimated total release of 0.065 pounds of vinyl chloride.

Exhibit III is a record of sudden discharges of vinyl chloride during the quarter. There was one (1) such incident this quarter resulting in an estimated total release of 4.7 pounds of vinyl chloride.

Respectfully,

Esther S. Liggio

Esther S. Liggio
Environmental Engineer

SL 026579

EXHIBIT I

CONTINUOUS STACK EMISSION RESULTS > 10 PPM VCM

<u>DATE</u>	<u>STACK NO.</u>	<u>HOUR ENDING</u>	<u>HOURLY AVG PPM</u>	<u>3-HOUR* AVG PPM</u>	<u>COMMENTS</u>
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NONE FOR THIS QUARTER

EXHIBIT II

NON-INCINERATION OF VCM VENTS

<u>DATE</u>	<u>TIME</u>	<u>SOURCES NOT INCINERATED</u>	<u>EST. QUANTITY VCM VENTED, LBS.</u>	<u>COMMENTS</u>
06/06/91	8:55	VCII	0.045	SEE BELOW

No. 2 Incinerator shutdown due to a large amount of liquid in the vent header. The increased heat load on the incinerator could not be reacted soon enough to prevent a high temperature shutdown. The No. 4 Incinerator (which the VCII vents are normally routed to) was down for maintenance work at the time of the incident. The No. 1 Incinerator had been tagged out for repairs to a flange. After the shutdown of No. 2 Incinerator, the VCM vents were able to be contained until 9:09 AM when the emergency scrubber pressure control valve opened for one minute. At this time, the No. 1 Incinerator became available and the VCII vents were introduced at 9:10 AM.

The source of the liquid which caused the shutdown of No. 2 Incinerator was the DH system in OHC I. An inspection of the DH system vent piping revealed a restriction in the vent header condensate drain line. In order to prevent a recurrence, the DH system vent header condensate drain piping was disassembled and unplugged.

<u>DATE</u>	<u>TIME</u>	<u>SOURCES NOT INCINERATED</u>	<u>EST. QUANTITY VCM VENTED, LBS.</u>	<u>COMMENTS</u>
08/26/91	20:05	VCII	0.02	SEE BELOW

On August 26, 1991, Nos. 1 and 4 Incinerators were down for maintenance work. No. 3 Incinerator was running at capacity at the time the No. 2 Incinerator became overloaded due to the quantity and "hot" nature of the vents routed to it. The incinerator shutdown due to high temperature. After the shutdown of No. 2 Incinerator, the Tri-Ethane II vents were immediately moved to No. 3 Incinerator. Radio communication problems at the Waste Treatment Unit resulted in the VCM II/CSS vents not being moved immediately to the No. 3 Incinerator. This bypass condition lasted one (1) minute.

The installation of flow and pressure indications on the VCI/Shipping and EDC vent headers will be investigated. The purpose of these would be to assist the Incinerator Operator in determining an abnormal flow from these "hot" vent sources. Also, an increase in flow could be observed before an Incinerator reaches an alarm condition.

A radio communication problem between the Waste Treatment Unit and the Shipping Department has already been addressed. The radio communication problem at the Waste Treatment Unit during this incident will be discussed with the personnel involved.

EXHIBIT III

SUDDEN DISCHARGES OF VCM

<u>DATE</u>	<u>TIME/DURATION</u>	<u>ESTIMATED QUANTITY VCM RELEASED, LBS.</u>	<u>COMMENTS</u>
6/28	07:45/15 Minutes	4.7	SEE BELOW

A gasket leak developed between two flanges under insulation on a heat exchanger in the VCM II unit. The heat exchanger was taken out of service, isolated, and cleared for maintenance.

In order to prevent a reoccurrence, the flange surfaces were repaired as necessary and the gasket replaced. Work orders have been written to inspect flanges on other insulated coolers during the next major VCM II maintenance shutdown.

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