



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

November 11, 1991

Ms. Diana Gamble
Enforcement Branch (6W-E)
U S Environmental Protection Agency
1445 Ross Avenue, Ste. 1200
Dallas, TX 75202-2733

Dear Ms. Buck:

Permit No. LA0000761 - Toxics Exceedance Report

In accordance with the NPDES Permit #LA0000761 Part III Section D.7.b.(3) reporting requirements, PPG Industries, Inc., Lake Charles Plant is hereby submitting the attached reports of the November 3, and November 5, 1991 exceedances of the daily maximum mercury limitation at Outfall 101.

If you have any questions regarding this report, contact me at (318)491-4450.

Sincerely,

A handwritten signature in black ink that reads 'Mark Wood'. The signature is written in a cursive, flowing style.

Mark Wood
Associate Research Chemist

MWW/mm

CERTIFIED MAIL

SL 026709

NPDES NON-COMPLIANCE REPORT

Company Name	PPG Industries, Inc.
Mailing Address	P. O. Box 1000 Lake Charles, LA 70602
Company Location	Columbia Southern Road Westlake, LA 70669
Permit Number	LA 0000761
Outfall Number	101
Outfall Parameter	Total Mercury
Date of Deviation	11-3-91
Time of Deviation	24-hr Comp. ending 11-4 (0700)
Maximum Discharge Limit	0.30 lb/day
Limit Deviation	+0.32 lb/day

Description of Incident:

An unknown process contaminant caused a serious upset to the Mercury Circuit Facility on Saturday morning, November 2, 1991. The amalgam denuders began foaming, causing liquids to accumulate in the hydrogen headers and resulted in excessive system backpressure. This necessitated an immediate emergency shutdown. This rapid shutdown, as well as the foaming liquids, hydraulically overloaded mercury wastewater treatment facilities.

When contamination of the carbon bed on the exit of treatment was observed, discharge was terminated and a fresh bed was placed into service. The second bed was subsequently contaminated, also. The process was not restarted until the problems had been corrected but sufficient discharge from treatment had occurred to exceed limitation.

The installation of an automated sampling, analysis, and alarm system is currently being installed immediately downstream of the combining of all Mercury Circuit wastewater. This equipment, in conjunction with an existing similar system on the influent to wastewater treatment, is expected to prevent any future occurrences.

Phone Notifications: 11-4-91

1. EPA, 3:16 pm, Diana Gamble
2. DEQ (Baton Rouge), 2:37 pm, Betty McMurrin

SL 026710

NPDES NON-COMPLIANCE REPORT

Company Name	PPG Industries, Inc.
Mailing Address	P. O. Box 1000 Lake Charles, LA 70602
Company Location	Columbia Southern Road Westlake, LA 70669
Permit Number	LA 0000761
Outfall Number	101
Outfall Parameter	Total Mercury
Date of Deviation	11-5-91
Time of Deviation	24-hr Comp. ending 11-6 (0700)
Maximum Discharge Limit	0.30 lb/day
Limit Deviation	+0.55 lb/day

Description of Incident:

Following the process upset and treatment problems outlined in the November 3, 1991 excursion report, additional wastewater grab samplings throughout the systems indicated mercury discharges were in control. The 24 hour composites analyses obtained the morning of 11-6, however, revealed a mercury exceedence occurred. This discharge was not from the treatment portion of the unit's wastewater but from the normally uncontaminated "trace sewer". Although grab sampling did not indicate treatable mercury discharge, it is believed slugs of wastewater stirred contaminated sediment from the containment system prior to discharge.

Upon determining the excursion, forward flow was ceased until the sediment was vacuumed and routed to treatment. Discharge was resumed after both the treated stream and the contained wastewater analyses were in control. Subsequent compliance sampling demonstrated discharge from both sources were below limitations.

The completion of installation of automated analytical instrumentation described in the preceding report is expected to prevent future exceedences.

Phone Notifications: 11-6-91

1. EPA, 2:36 pm, Diana Gamble
2. DEQ (Baton Rouge), 11:34 am, Betty McMurrin