



INDUSTRIES

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

December 2, 1983

Mr. Marion Fannally
Department of Natural Resources
Water Pollution Control Division
Office of Environmental Affairs
P.O. Box 44066, Capitol Station
Baton Rouge, LA 70804

Re: Compliance Order of 9/26/83

Dear Mr. Fannally:

On November 4, 1983 PPG Industries submitted to your office a detailed reply to the Notice of Violation and Compliance Order issued to PPG by the Office of Environmental Affairs on September 26, 1983. On the 4th of November, you requested that PPG furnish additional information concerning the TOC violation cited in the NOV/CO. In particular, you requested a copy of the analytical procedure presently used by PPG for determination of TOC and a comparison of results from the two methods utilized for TOC determinations.

Enclosed for your review is the information which you requested. In brief, the results from the comparison of analytical methods demonstrated that the two analytical methods produce similar results and all the purged VOC are being accounted for in the method presently utilized.

Marion, if you should have any further questions concerning any response made here, or in our original reply to the NOV/CO, please call me at 318/491-4576.

Sincerely,

Philip S. Trew
Environmental Control Specialist

Wood/T. Angelini

SL 045657

ACIDIFICATION/PURGE PROCEDURE*

1. Calibrate Instrument with 10mg/L std.
2. Prepare fresh 10mg/L std. each time calibration is necessary by diluting 10.0mL of 100mg/L std. to 100mL with carbon-free water.
3. Follow manufacturer's procedure for neutral or acidic samples, i.e., add 1 mL of 10% H_3PO_4 to 100mL sample.
4. Purge with nitrogen at a flow rate of 100mL/min for 20 minutes to remove dissolved CO_2 from solution.
5. Calculate purgable organic carbon contribution for the sample from VOA analysis (EPA Method 601) and add this to the TOC value.
6. Minimum reportable value for this calibration is 0.1mg/L.

NOTE: A reagent blank C1 mL 10% H_3PO_4 in 100mL water should be analyzed once per week. Reagent is suspect if TOC value is greater than 0.1mg/L.

* This is the analytical procedure currently being utilized to analyze for TOC.

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COMPARISON OF ANALYTICAL METHODS

<u>SAMPLE DATE</u>	<u>TOC CONCENTRATION (ppm)</u>	
	<u>Acidification</u>	<u>Acidification/Purge</u>
11/07/83	2.6	3.2
11/08/83	3.5	3.4
11/10/83	2.7	2.7
11/14/83	2.5	2.9
11/16/83	2.5	2.3
11/18/83	3.1	3.0
11/21/83	2.6	2.8

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