



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

June 12, 1991

Ms. Diana Gamble
U.S. Environmental Protection Agency
Water Management Division
Enforcement Branch (6WE)
1445 Ross Avenue
Dallas, TX 75202-2733

RE: May DMR - LA0000761

Dear Ms. Gamble:

Enclosed is the DMR for May, 1991. The daily average limitation for total nickel at Outfall 201 was exceeded for the month. An explanation is attached.

If you have any questions concerning this report, please contact Mark W. Wood at (318)491-4450.

Respectfully,

A handwritten signature in dark ink, appearing to read 'William J. Beard', written over a horizontal line.

William J. Beard
Manager, Laboratory Services/
Environmental Control

WJP/mm

SL 025015

ATTACHMENT I
EXPLANATION OF EXCURSIONS

<u>DATE</u>	<u>OUTFALL</u>	<u>PARAMETER</u>	<u>LIMIT</u>	<u>EXCURSION</u>
May 1991	201	Total Nickel, 24 hr. Comp.	10.2 lb/day	+5.0 lb/day

EXPLANATION

Nickel measurements at this outfall increased markedly about the first of May and remained above the daily average limitation throughout the month. A nickel investigation team comprised of technical and operational personnel from all areas discharging to Outfall 201 was formed to locate and control the nickel source. Findings thus far are as follows:

1. The system treating OCPSPF wastewater is effectively controlling Cu and Ni.
2. Chlor-alkali and Silicas operations are normal and potential nickel source points within these units (contributing wastewater streams) indicate no consistent, significant contributions of nickel to Outfall 201.
3. Samples of the treated influent water (Sabine River) at several points in the plant system were found to have significant nickel concentrations on an inconsistent basis. This water (utilized for process wash water, scrubbers, cooling tower make-up, and once-through cooling) is a major source of Outfall 201 discharge. The normal nickel concentration is below the MDL of 15 μ g/L.
4. Nickel discharges dropped to well below daily average limitation the first of June.

Although the nickel investigation team is continuing extra outfall and source streams monitoring on a daily composite basis, the only variable found to correlate with elevated nickel discharge is flood conditions in the Sabine watershed. The record rainfall during May has necessitated increased chlorination of incoming water. As is typical of high run-off periods, the natural pH buffering capacity of this influent is diminished.

We conclude higher residual chlorine and lowered pH within the water distribution system could have been corroding various nickel alloys throughout the Complex. Such corrosion is suspected to be the source of the elevated May discharges of nickel at this outfall.

SL 025016

PERMITTEE NAME/ADDRESS (Include facility Name/Location if different)

NAME _____
ADDRESS _____
CITY _____
LOCATION _____

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB 040-0004
Approval expires 12-31-87

(2-16)	(17-19)
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD					
FROM			TO		
YEAR	MO	DAY	YEAR	MO	DAY
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-45)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
SL 025017	SAMPLE MEASUREMENT									
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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319. Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 1 year.	TELEPHONE		DATE		
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

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facility Name/Location if different)

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CITY

LOCATION

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		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
	SAMPLE MEASUREMENT									
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SL 025019	SAMPLE MEASUREMENT									
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CITY
LOCATION

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		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT	1431 DAILY								
SL 025021	SAMPLE MEASUREMENT									
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COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

PERMITTEE NAME/ADDRESS (Include
Facility Name/Location/Parent)

NAME

ADDRESS

CITY

LOCATION

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		AVERAGE (54-55)	MAXIMUM (56-57)	UNITS (58-59)	MINIMUM (60-61)	AVERAGE (62-63)	MAXIMUM (64-65)			
SL 025022	SAMPLE MEASUREMENT	U								
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PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME _____
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CITY _____
LOCATION _____

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		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
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	PERMIT REQUIREMENT	REPORT DAILY	REPORT DAILY								
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	PERMIT REQUIREMENT	REPORT DAILY	REPORT DAILY								
SL 025023	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	REPORT DAILY	REPORT DAILY								
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DATE

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YEAR

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DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

PERMITTEE NAME/ADDRESS (Include
activity Name/Location/Owner)

NAME _____
ADDRESS _____
CITY _____
STATE _____
ZIP _____
ACTIVITY _____
LOCATION _____

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
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		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
SL 025024	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	REPORT DAILY	REPORT DAILY								
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 ADDRESS _____
 FACILITY _____
 LOCATION _____

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		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT	*****								
SL 025025	SAMPLE MEASUREMENT									
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	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED
AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED
ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR
OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION
IS TRUE ACCURATE AND COMPLETE I AM AWARE THAT THERE ARE SIG-
NIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING
THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND
33 USC § 1319. Penalties under these statutes may include fines up to \$100,000
and/or maximum imprisonment of between 6 months and 1 year.

SIGNATURE OF PRINCIPAL EXECUTIVE
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

TYPED OR PRINTED

AREA
CODE

NUMBER

YEAR

MO

DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)