



INDUSTRIES

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

September 18, 1989

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

Dear Ms. Buck:

Permit No. LA0000761 - Non-Compliance Report

In accordance with the NPDES Permit #LA0000761 Part II Section D reporting requirements, PPG Industries, Inc., Lake Charles Plant is hereby submitting the attached report of a chlorinated hydrocarbon permit limit violation which occurred on September 12, 1989.

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

Sincerely,

Mark W. Wood
Associate Research Chemist

MWW/ce

Attachment

CERTIFIED MAIL (P105 355 985)

SL 026731

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: 201
Outfall Parameter: Chlorinated Hydrocarbons
Date of Deviation: September 12, 1989
Time of Deviation: 24-hour Composite ending
September 13, 1989 at 7:00 am
Maximum Discharge Limit: 198 lbs/day
Limit Deviation: +2267 lbs/day
Description of Incident:

For unknown reasons, an emulsion that occasionally forms failed to separate in the feed tank of the Central Steam Stripper Unit. This condition caused two malfunctions - erroneous flow indication and stripper bed blinding. These problems resulted in the discharge of phased organics from the strippers. When the conditions were detected and comprehended, the strippers were placed on recycle and downstream tankage was isolated to minimize the discharge.

Almost coincidentally, one of the WTU Steam Strippers, both of which has been on 100% recycle, was placed in service. An improper valving configuration then allowed the discharge of some stripper feedwater with the treated stream. When the improper valving was corrected, proper discharge control was restored.

In summary:

1. An upset occurred within the Central Steam Stripper System.
2. Improper valving discharged some untreated wastewater from the WTU Steam Stripper System.
3. The timing of the two incidents exacerbated the problems of recognition.

The following actions are being taken to prevent recurrence:

1. Relocate routine sampling locations.
2. Review incidents with operators.
3. Chain and lock misaligned valve.
4. Write Standard Operating Procedure to address investigations of substandard treatment operations.

Phone Notifications: September 13, 1989, by M. Wood

1. EPA, 3:26 pm, D. Buck; 9:05 am (9-14-89) Follow-up
2. DEQ (Baton Rouge) 3:30 pm, S. Rothman