

ATTACHMENT I

pH CONTROL (Outfall 001). There were eight excursions in May, reported as follows:

May 3, 1984 for 2 hr. 15 min. - pH +0.3. Process upset caused caustic overflow in Plant A which exceeded the capacity of the pH neutralization system. To prevent reoccurrence several Work Orders have been written to deal with this particular type of upset.

May 6, 1984 for 3 hr. 15 min. - pH +0.2. During by-pass of Outfall 018 (reported in our April 25 letter to you) the plant pH control system must be operated manually in order to deal with those streams by-passing the neutralization system. A misjudgment by the Operator in adding too little acid reagent caused this excursion.

May 7, 1984 for 1 hr. 5 min. - pH +1.6. "Upset Condition": this incident occurred when a teflon expansion joint on the discharge of the Caustic transfer pump suddenly and unexpectedly failed allowing caustic soda to enter the main outfall point. Immediate response by Operations was taken in isolating the pump. The exact cause is being investigated. This excursion was reported as an "upset" to R.S. Ramesh of Region VI EPA by phone on 5/8/84.

May 14, 1984 for 1 hr. 22 min. - pH +0.3. High pH material was inadequately neutralized due to the by-pass of Outfall 018 (reported in our April 25 letter to you). Repairs to Outfall 018 sewer are being expedited.

May 15, 1984 for 1 hr. 17 min. - pH +0.9. Inadequate neutralization caused in part by the Outfall 018 outage and in part by a storm caused power outage in Plant A which resulted in an abnormal amount of caustic to be discharged to the neutralization system as well as temporary loss of acid for neutralization.

May 17, 1984 for 6 min. - pH -3.2. Acid regeneration of an ion exchange unit temporarily exceeded neutralization capacity of pH control.

May 25, 1984 for 1 hr. 18 min. - +0.2. Due to the diversion of Outfall 018 (reported in our April 25 letter to you) the overflow from a dilute waste caustic tank in Plant C was inadequately neutralized.

May 26, 1984 for 1 hr. 3 min. - +0.3. The exact cause of this violation has not been determined; however, one possible explanation is inadequate neutralization taking place due to the by-pass of Silicas/Plant C process effluent around the final pH control system (Outfall 018 diversion) compounded by a high tide.

NOTE: Diversion of Outfall 018 was terminated 6/8/84.

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