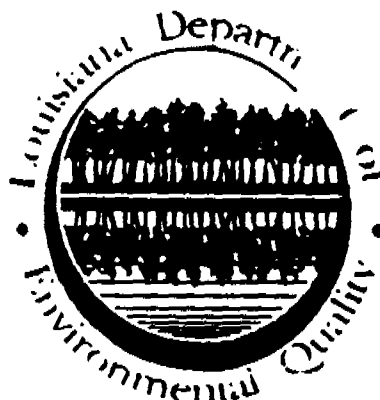




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MARTHA A. MADDEN
SECRETARY

OFFICE OF AIR QUALITY AND NUCLEAR ENERGY

GUSTAVE A. VON BODUNGEN
ASSISTANT SECRETARY

February 8, 1988

PPG Industries, Inc.
Lake Charles Complex
P. O. Box 1000
Lake Charles, LA 70602

Attention: Mr. Tom G. Brown, Works Manager

Dear Mr. Brown:

Re: Compliance Inspection
September 28, 29 and 30, 1987

During the week of September 28, 1987, Mr. Anthony Jones and Mr. William Coltrin of our Southwest Regional Office performed an inspection of PPG Industries, Inc., Lake Charles Complex. Their report indicates that at the time of their inspection, this facility appeared to be in compliance with applicable Louisiana Air Quality Regulations.

However, several deficiencies were noted. We would appreciate your immediate study of and attention to these areas of deficiency, which are as follows:

1. Oxygen monitors installed to comply with NSPS and PSD regulations or BACT on fossil-fueled steam generators should have low and high range alarm points. Opacity monitors should be maintained to read correct opacity and, if so equipped, have corresponding real time displayed or indicated on strip charts.

We request that PPG supply a listing of continuous emissions monitors installed to meet requirements of NSPS or PSD; also a listing of the BACT alarm limits of the monitors.

2. Mercury Cell

SL 025649

- a) Mercury was noted on the pillars and cross-ties under the mercury cell area. It is recommended that the cross-ties be sealed in some manner to prevent mercury from gathering in the cracks and areas

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We request that the company respond with a listing of the housekeeping practices they will employ to prevent recurrences of this kind.

- b. The exit temperature of the Mercury Fume System was higher than normal. Please provide in writing remedial action to be taken to keep fume system temperatures in the correct operating range.

3. Silicas Plant

- a. The opacity of the silicas furnace appeared to be at or above the permitted opacity limit. Meteorological conditions prevented a valid Method 9 determination. Please review the operation of the furnace and its opacity to determine if additional controls are necessary to maintain the permitted opacity limit (20% opacity).
 - b. PPG is requested to determine if mercury is being emitted from the silica plant emission points. The caustic used to make the "frit" is supplied by the Mercury Cell unit, and could conceivably contain mercury.
 - c. PPG is requested to improve maintenance and housekeeping in the baghouse and rail car loading areas. Spills of silica material were noted in the rail car area, and caked silica material was noted in the baghouse area, all indications of inadequate attention being given these areas. In addition, the curtains used to prevent fugitive particulate emissions were torn and in need of replacement or repair. A preventive maintenance log should be kept on the baghouses. A record of pressure drop across the baghouse should be kept to indicate the frequency of operational checks on the baghouse units.
4. Leak detection and elimination reports for VCM-II and Tri-Ethane II can be improved by implementing the following:
- a. Record the OVA reading when a leaking component is detected (i.e. 10 ppm).
 - b. Keep better records of the repairs made on a leaking component and log them.
 - c. After repairing a leaking component, re-check with an OVA and record the reading.
5. Fugitive dust problems from unpaved roadways

SL 025650

The potential for fugitive dust from the unpaved roads was noted. This becomes a problem the company should address in high traffic areas of the plant, e.g. the lab loop road. VCM II roads.

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We request that PPG consider using a dust suppressant, i.e. water spray, chemical treatment or paving, in these particular high traffic areas of the facility.

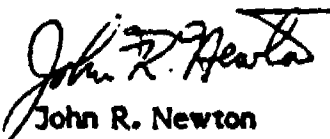
6. Asbestos in Chlor-Alkali production and demolition renovation projects

All asbestos practices conformed to the requirements of the Louisiana Air Quality Regulations. No deficiencies were noted at the time of the inspection.

3/9/88 - The various responses requested above are due to the Department within thirty (30) days after your receipt of this letter.

We appreciate PPG's continued support and cooperation in maintaining the quality of our State's environment.

Sincerely,


John R. Newton
Program Manager

JRN/WEC/mh

cc: Southwest Regional Office

SL 025651