



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

December 12, 1991

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

RE: November DMR - LA0000761

Dear Ms. Gamble:

Enclosed is the DMR for November, 1991. There were three violations of the total mercury daily maximum limitation at Outfall 101. The daily average for this parameter was also exceeded. Explanations are attached.

Also enclosed are corrected DMR pages for July, August, September, and October, 1991, for Outfalls 002, 003, 301, and 401. These reports reflect the additional flow data required in PPG's July 1991 permit modification. We apologize for the inconvenience our oversight has caused in this matter.

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

Respectfully,

A handwritten signature in cursive script, appearing to read 'David C. Angell', is written over the typed name.

David C. Angell
Works Director, Environmental Assurance

CERTIFIED MAIL

SL 024945

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	101
Outfall Parameter	Total Mercury
Date of Deviation	11-3-91
Time of Deviation	24-Hour Composite ending 11-4 (0700)
Maximum Discharge Limit	0.30 lb/day
Limit Deviation	+0.32 lbs/day

Description of Incident:

An unknown process contaminant caused a serious upset to the Mercury Circuit Facility on Saturday morning, November 2, 1991. The amalgam denuders began foaming, causing liquids to accumulate in the hydrogen headers and resulted in excessive system backpressure. This necessitated an immediate emergency shutdown. This rapid shutdown, as well as the foaming liquids, hydraulically overloaded mercury wastewater treatment facilities.

When contamination of the carbon bed on the exit of treatment was observed, discharge was terminated and a fresh bed was placed into service. The second bed was subsequently contaminated, also. The process was not restarted until the problems had been corrected by sufficient discharge from treatment had occurred to exceed limitation.

An automated sampling, analysis, and alarm system is currently being installed immediately downstream of the combining of all Mercury Circuit wastewater. This equipment, in conjunction with an existing similar system on the influent to wastewater treatment, is expected to prevent any future occurrences.

Phone notifications: 11-4-91

1. EPA, 3:16 pm, Diana Gamble
2. DEQ (Baton Rouge), 2:37 pm, Betty McMurrin

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	101
Outfall Parameter	Total Mercury
Date of Deviation	11-5-91
Time of Deviation	24-hr Comp. ending 11-6 (0700)
Maximum Discharge Limit	0.30 lb/day
Limit Deviation	+0.55 lb/day

Description of Incident:

Following the process upset and treatment problems outlined in the November 3, 1991 excursion report, additional wastewater grab samplings throughout the systems indicated mercury discharges were in control. The 24 hour composites analyses obtained the morning of 11-6, however, revealed a mercury exceedence occurred. This discharge was not from the treatment portion of the unit's wastewater but from the normally uncontaminated "trace sewer". Although grab sampling did not indicate treatable mercury discharge, it is believed slugs of wastewater stirred contaminated sediment from the containment system prior to discharge.

Upon determining the excursion, forward flow was ceased until the sediment was vacuumed and routed to treatment. Discharge was resumed after both the treated stream and the contained wastewater analyses were in control. Subsequent compliance sampling demonstrated discharge from both sources were below limitations.

The completion of installation of automated analytical instrumentation described in the preceding report is expected to prevent future exceedences.

Phone Notifications: 11-6-91

1. EPA, 2:36 pm, Diana Gamble
2. DEQ (Baton Rouge), 11:34 am, Betty McMurrin

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	101
Outfall Parameter	Total Mercury
Date of Deviation	11-25-91
Time of Deviation	24-hr Comp. ending 11-26 (0700)
Maximum Discharge Limit	0.30 lb/day
Limit Deviation	+0.015 lb/day

Description of Incident:

The cause of the Hg violation on 11-25-91 is still under investigation. Internal outfall 111 (flows into 101) showed higher than normal Hg levels at times during the day of the violation. Streams flowing into 111 were sampled and seal water streams (liquid seals) were found to be above normal. These streams were diverted from the 111 outfall to the Hg treatment system. Although Hg levels returned to normal in these streams they will remain diverted until repeated sampling indicates that the Hg levels will remain low. An on stream analyzer (with an alarm) is in the process of installation and performance evaluation. This analyzer is located downstream of 111 and should enable a more rapid response should such an incident occur in the future.

Phone Notifications: 11-26-91

1. EPA, 3:13 pm, Diana Gamble
2. DEQ (Baton Rouge), 3:28 pm, Camille Bastille

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	101
Outfall Parameter	Total Mercury
Date of Deviation	November 1991
Time of Deviation	Not Applicable
Daily Avg Discharge Limit	0.13 lb/day
Limit Deviation	+0.05 lb/day

Description of Exceedence:

In addition to the three previously reported daily maximum excursions occurring in November, higher than normal concentrations were recorded in the Mercury Circuit Trace discharge. Extensive investigations determined contaminated water from the treatment collection sump was occasionally backing up through the process well water system into the seal water. This stream, not normally contaminated, then flowed to the trace discharge. When this situation was discovered on November 25, 1991, it was corrected and the discharge of mercury returned to normal control.

Double block and bleed valving has been installed to prevent recurrence.