PUBLIC HEARING

DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

FOR

PPG INDUSTRIES, INC. WESTLAKE, CALCASIEU PARISH, LOUISIANA

SEPTEMBER 4, 2008 6:05 P.M.

AT THE
WESTLAKE COUNCIL CHAMBERS
1001 MULBERRY STREET
WESTLAKE, LOUISIANA

NAT DOUGET COURT REPORTERS
Steno and Video Reporting
P O Box 3226
3207 Landfair Street (70601)
Lake Charles, LA 70602-3226
337/480-0080 FAX 337/480-0330
800/259-9900 FAX 800/259-5672

A P P E A R A N C E S:

HEARING OFFICER:

CHRIS MAYEUX
LOUISIANA DEPARTMENT OF
ENVIRONMENTAL QUALITY

FOR PPG:

JON MANNS
WORKS MANAGER
PPG LAKE CHARLES COMPLEX

COMMENTERS:

MR. HAROLD ARENO
MR. MICHAEL TRITICO

REPORTED BY:

RAMONA MORRIS, CCR, RPR

PROCEEDINGS:

Let the record reflect that the time is 6:05 p.m. My name is Chris Mayeux. I am an employee of Louisiana Department of Environmental Quality. I will be serving as your hearing officer this evening, Thursday, September 4, 2008.

This hearing is scheduled to accept public comments concerning the Draft Hazardous Waste Operating Renewal Permit for PPG Industries, P. O. Box 1000, Lake Charles, Louisiana 70602 for the Westlake Facility, Agency Interest Number 1255, Permit Number LAD008086506-OP-RN-1 and Activity Tracking Number PER19990002. The site is located at 1300 PPG Drive, Westlake, Calcasieu Parish.

PPG Industries requested a hazardous waste permit renewal governing the operation of a halogen acid furnace, two incinerators, storage tanks and container storage areas at the Westlake Facility. The Westlake Facility is involved in the manufacture of chlorine, caustic and chlorinated hydrocarbons as industrial chemicals. The products produced at the Westlake Facility are used by other facilities in the manufacturing of final products. The proposed permit will be issued to manage their onsite treatment and storage of waste produced by the Westlake Facility.

Three tanks are operated for the storage of chlorinated

hydrocarbons. The tanks serve as feed to the combustion units. Another tank will be permitted for the storage of chlorinated waste serving as backup feed for the three main storage tanks. PPG also operates and maintains four container storage areas. Two container storage areas hold waste that cannot be processed by the permitted combustion -- two container storage areas hold waste that cannot be processed by permitted combustion units onsite and must be disposed of offsite at a commercial waste facility. Two other container storage areas store mercury contaminated waste from which the metal is reclaimed. The proposed permit would finalize the conditions under which PPG Industries would operate all the hazardous waste management units.

This hearing is not being conducted in a question and answer format. Please remember that the purpose of this public hearing is to allow you, the public, an opportunity to express your thoughts concerns -- concerning the draft permit. I will allow all interested parties reasonable opportunity to comment unless testimony is not related to the purpose of this hearing.

This hearing is being held to give all individuals a chance to be heard regardless of their position on the draft permit. Courteous behavior is expected of everyone at all times. You may speak in support of, in opposition to, or simply to provide

additional information. Your comments will be evaluated and addressed in the Department's written response.

A public notice advertising this public hearing and request for public comment on the draft permit was published in the American Press of Lake Charles -- the American Press of Lake Charles, Louisiana and The Advocate of Baton Rouge, Louisiana, on Thursday, July 17, 2008.

The Draft Hazardous Waste Operating Renewal Permit Fact Sheet and the associated material are available for inspection and review at LDEQ, Public Records Center, Room 127, 602 North Fifth Street, Baton Rouge, Louisiana. Viewing hours are 8:00 p.m. -- 8:00 a.m. to 4:30 p.m., Monday through Friday, except holidays. The available information can also be accessed electronically on the Electronic Data Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.

Additional copies are also available for review at the Calcasieu Parish Library - Westlake Branch, 937 Mulberry Street, Westlake, Louisiana 70669-4601, and the Calcasieu Parish Library - Sulphur Regional Branch, 1160 Cypress Street, Sulphur, Louisiana 70663-5111.

In addition, copies of the public notice were mailed to the individuals who are -- who have requested to be placed on a mailing list maintained by the Office of Environmental

Services on July 15, 2008.

In accordance with Louisiana Administrative Code, Title 33, Part 5, Section 715A, comments received by 12:30 p.m., Monday, September 8, will be considered prior to the final decision. All oral comments received and transcribed during the hearing and written comments received before 12:30 p.m., Monday, September 8, shall be retained by the Department and considered in determining whether to issue or deny the final permit -- the draft permit.

Written comments on the draft permit may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permit Support Services Division, P. O. Box 4313, Baton Rouge, Louisiana 70821-4313. Under Louisiana Revised Statutes 30:2017, as revised by the Legislature in the 2004 session, the Department is required to follow the following order, with the provisions that the presiding officer may give preference to public officials to speak at any time during the hearing. However, any time limit set for citizens' testimony shall apply to the public officials.

The Department is required to provide up to 30 minutes to the permit applicant for an introductory presentation. Thereafter, preferences for speaking up to one hour is given as follows:

For the first hour, those citizens who live within a two-mile radius of the location of the facility.

For the second hour, those citizens who work within a two-mile radius of the location of the facility.

And for the third hour, those citizens who live within the parish of the location of the facility.

Thereafter, each hour of the hearing shall alternate between those who are in support of the draft permit and those who oppose.

The order of tonight's hearing will be based on the information provided by the speaker on the registration form. Anyone who registered to speak but did not provide the necessary information will be given an opportunity to speak. However, they will be called last in the order of registration.

This hearing is being transcribed. Therefore, I will ask that each speaker begin by stating for the record their name, address and any organization that he or she may represent.

I remind you to please turn off your cell phones. Thank you.

At this time I would like to ask the permit applicant's representative, Mr. Jonathan Manns, to come forward and make your presentation, sir.

PRESENTATION BY MR. JONATHAN MANNS:

Okay, I'm Jon Manns -- Jonathan Manns, 4310 Indigo Place, Lake Charles, Louisiana 70605, and I represent PPG Industries. On behalf of PPG Industries I would like to thank all of you for your participation in the public hearing conducted by LDEQ to receive comments on the draft application Hazardous Waste Operating Permit. My name is Jon Manns. I am Works Manager for the PPG Lake Charles Complex. We are located at 1300 PPG Drive, Westlake, Calcasieu Parish. The site is located on a thousand acres. Almost half of that is developed land. The plant was started up in 1947 and currently consists of approximately 1300 people. The site produces three highly integrated product business lines with chlor alkali derivatives and silica. I know most of you in the room are very familiar with our site. But for those that are maybe new to the area I'd like to give a little more explanation of PPG, what we're committed to. On one level we have a strong commitment economically to the area. Last year $670,000,000 was part of our economic impact to the area. That includes wages, products, services, utilities and taxes. Taxes -- state and local taxes $27,000,000 last year. But as I mentioned earlier, this site was established in 1947. For over 60 years we've been located

here, so it's easy to understand our commitment for the employees that live here and the children raised here in this community. We understand that it's critical to be considered a good neighbor. Each year several thousand hours of volunteer work to local civic organizations, schools, churches and charities, mostly directed through our PPG Friends organization -- but we also have a PPG Plus One organization that works with underprivileged children. Another commitment, we're proud of our history with occupational safety, but we want people to understand our focus on process safety. Environmental: Ongoing programs for waste minimization, pollution prevention. Our site has had 90 percent SARA chemical reductions since the program began. Committed to American Chemistry Council Best Practices and our Responsible Care Program. Talking about environmental, our purpose here today is an environmental element, and that's our Hazardous Waste Permit for PPG. LDEQ is proposing to reissue PPG's RCRA Hazardous Waste Permit. The permit regulates the following in terms of treatment units and storage facilities. Treatment units, we have two incinerators and one halogen acid furnace. We have four aboveground storage tanks and four container storage areas. I want

to emphasize the permit is not involving any new facilities being built, installed or regulated. The permit requirements for RCRA Management -- this is overall oversight of the facilities, the operations, training, records keeping, documentation. Also includes inspection and containment. In summary, this permit issue will cover two incinerators, one halogen acid furnace, four aboveground storage tanks, four container storage areas. And I emphasize again, no new facilities. In closing, I'd like to make a comment that PPG recognizes its responsibility to preserve and to protect the environment in which we operate. To this end we run our business using sound environmental, health, safety, and product stewardship practices, while producing product solutions that reduce energy consumption and minimize the environmental impact. Thank you.

HEARING OFFICER, CHRIS MAYEUX:

I will now begin by allowing all persons who have signed up to speak five minutes in which to present their comments. Anyone who needs more than five minutes will be allowed to finish his or her comments after all registered speakers have had an opportunity to speak. The first to speak will be the citizens who live within a two-mile radius of the

facility. The first speaker I have registered is Mr. Harold Areno.

HAROLD ARENO:

I'm unable to speak.

MICHAEL TRITICO:

Mr. Areno is going to let me speak in his place.

MR. MAYEUX:

Okay, sir, would you come and give us your name, your address. Come to the podium.

MICHAEL TRITICO:

Is there anybody else that lives close? Because I'm probably going to take more than five minutes.

MR. MAYEUX:

Are you Mr. Michael Tritico? You're the only other speaker who has registered. So if you need additional time, we'll -- we'll give it to you, sir.

MR. TRITICO:

All right.

COMMENTS BY MR. MICHAEL TRITICO:

My name's Michael Tritico, and I live at 512 Goodeau Road in Longville, Louisiana. My mailing address is P. O. Box 233, Longville 70652. I appreciate the chance to speak tonight. In years past a lot of us have reviewed the

materials and submitted comments. Some of the things that we were concerned about have been addressed and some seem to still be unaddressed. I remember, it must be 15 or 20 years ago, we reviewed all the incinerator parameters and requested things. One of the things that we requested in the new materials -- I can't be sure if it's been addressed or not -- and that is, the request for continuous monitoring of specific hydrocarbons. I see that there is a QC that is dedicated to incinerators one, two and three that's part of a continuous emissions monitoring system, but I'm not sure that it runs all the time. That's one of the opening things that, before I can really finish my comments which I hope to be able to do by September 8, I would like to know whether or not it runs all the time. Another thing that is sort of open-ended that I would like to have information about before I submit my written comments is the upset that occurred in 2004 after the trial burn. You can look on EDMS, the DEQ Document Management System, and see that there was an upset, but I cannot find out the magnitude of what was released, how much, the duration, that sort of thing. So I think I should give you a copy of what I did find so that somebody can maybe send me information maybe -- I don't know how you're

going to get it to me fast with the hurricane at all. But this is what led me to have a question about this incinerator upset.

MR. TRITICO:

Who do I give this to?

MR. MAYEUX:

Would you like to submit that as an exhibit?

MR. TRITICO:

Yes, I could not find in the EDMS a followup to that. And so I have no idea what to make of it. And I think that since it's relevant to the operation of the three incinerators that we should see the details before finalizing our comments.

BY MR. TRITICO:

There was another document that I did find that concerned me, and that was during the Comprehensive Performance Test the VOST system. I remember years ago the Volatile Organic Sampling Train failed and yet there was a declaration that the trial burn was a success. Now how the VOST system could fail and still lead to a successful trial burn I've never understood. This one apparently didn't fail, but it had a 50 percent plus -- plus or minus 50 percent for each compound being monitored. It could vary that much

and still pass, which to me sounds like an awful lot of slack. It's not very reassuring. Perhaps I don't understand the idea. But on the surface it looks like if you've got a -- if you can vary 50 percent plus or minus and still pass, it's not much of a test. I would like to submit this also. Maybe this could be clarified somehow.

Also I saw in reviewing the new materials that the PSD Review, Prevention of Significant Deterioration Review, is not required since there are no physical or operational changes associated with the permit modification. If that's so, why are the particulates, oxides of nitrogen, and the chlorine emissions going up by over 34 tons a year? I mean, if there's nothing being changed and yet we have a 34-ton increase, to me that doesn't add up. And I think that there should be a PSD Review.

Another point, even though the modeling showed no violations of the Louisiana or National Air Quality Standards, there were 546,360 pounds a year of air pollution put out by PPG. And that would fill the lungs of 389 million people. Since we only have a quarter of million people around here, each person's share would be about 1,550 breathes for at least two hours a year breathing

not air, but contaminated toxic smoke particles. I realize that's not the way you calculate risk, but the point is it's not clean air. There's a lot of it. Another thing I noticed and this continues to seem to go up year after year, not just at PPG, but the air is also being heated up very significantly. PPG apparently, according to what of could read, has about 1.88 trillion British Thermal Units a year of heat that it introduces into our atmosphere. If the average household window unit air conditioner can offset 10,000 of those BTUs per hour, it would take 21,400 window units operating 24 hours a day year round to negate what PPG is doing to our local heat budget. That's an awful lot of hot air that has to be negated, or that contributes to global warming. I realize not all the heat goes from PPG stacks into somebody's bedroom, but it does go somewhere. And it's high time the DEQ and EPA begin worrying about our local, national and global heat budget. I first brought that up -- it must have been over a quarter of a century ago. I wrote an article for a newspaper in New Orleans, the Vieux Carre Courier, and I did a bunch of calculations and showed that we could likely see an increase in the frequency and intensity of hurricanes. And, of course,

nobody -- nobody thought that would happen, but I think it is happening.

I still see no meaningful response by PPG or anybody else, and this is a complaint against DEQ for not enforcing a sensible answer to the IT questions, particularly about storm surge vulnerability. Maybe the continuing rise in sea level, combined with some updated National Hurricane Center SLOSH models, might eventually get through to somebody. The SLOSH model for here shows that there's a potential for over 25-foot storm surge at PPG. Maybe if we ever get one that actually comes in on the path that does something like that, we're going to have something like what happened in Monroe, Louisiana during Katrina. The whole town covered with -- in this case not crude oil, but hazardous chemicals. Since there are going to be greater than 1700 drums of hazardous chemicals stored onsite -- that's from Appendix C of the 2008 Responses to EPA's Comments, 1700 drums of hazardous waste -- that could be a problem, especially since that same Appendix says that should the storm surge be less than ten feet, there should be no problem; it should be manageable without major damage to plant facilities. Well, the implication is anything greater than ten feet might create a problem

for plant facilities. I can just see 1700 drums of hazardous waste floating out through neighborhoods. And that looks like to me a problem that should be addressed by the causing company, and all the other companies to address the possibility that there could be a storm surge of 25 or 30 feet in this area.

This one, again, doesn't have to do with PPG as much as with EPA allowing surrogates that I feel, as I've said in previous hearings on these incinerators, when you just have a surrogate that is a simple molecule compared to some that are being burned, yes, it might be possible with a 3.3 second residence time to burn all the monochlorobenzene out of carbon tet or tetrachloroethene. But when you have something like dowtherm or chlorinated biphenyls, I don't see that a surrogate that's much smaller and simpler suffices. So I feel that even though the company has done what the regulations say that there is a problem that could impact the people. I feel that this needs to be looked into and revised.

Again, I thank you for letting me speak here. And Mr. Harold Areno is a resident that lives within two miles, and off and on he's had problems. And what we did is we set up a few years ago a system for him to be able to take

air samples. And I just want to let you know if Mr. Areno will show you what he's got here. It's called a Summa canister vacuum. It's a vacuum device and he's still standing by ready to take samples. We did take some and submitted them to the EPA Lab. But it's -- he's still ready to take some more. I just wanted him to bring and show you the Summa canister. We don't want to introduce it as an exhibit because we want to keep it for the next time a cloud comes through.

And again, I thank you for letting me speak here tonight.

MR. MAYEUX:

Mr. Areno, would you care to speak at this time?

COMMENTS BY MR. HAROLD ARENO:

I'm Harold Areno. I live on 2249 Bayou D'Inde, around Westlake.

I've been living there all my life. And I have noticed clouds and different stuff that have blown over where I live, and there have been some odors that I didn't really prefer to have. But I've lived there all my life, and where can I go until I get some other place to go. I have to put up with whatever comes my way. And in the mornings I look out over towards PPG. I can see in the early morning, I can see red residue of the stuff in the air

and the stuff finally disintegrates when the sun hits it -- as the morning as the sun gets hotter. I know there's something coming out in the night hours that is in the air. And sometimes I -- I don't have no way of really knowing what it is. But I don't -- because I don't smell anything, sometimes I don't worry about taking the thing. But I have not long ago did smell some stuff, but I didn't take no samples.

But anyway, I live out there. I didn't have a deal that I can take an air sample when it gets bad. And so I'm hoping that they'll take into consideration if you have to live where I live make the air as clean as possible. I'd appreciate that.

MR. MAYEUX:

Thank you, Mr. Areno. Are there any other speakers who would like to take this opportunity?

(NO RESPONSES)

BY MR. MAYEUX:

Since we are finished with our speakers, we customarily keep the hearing for an hour. And right now it's 6:34. We can suspend the hearing until 7:00 to assure that there are no other speakers that are in transit or who are coming to the hearing. So if you would, we'll shut it down for now and reopen

it at 7:00. Thank you.

(PROCEEDINGS ADJOURNED AT 6:34 P.M.)

(PROCEEDINGS RECONVENED AT 7:00 P.M.)

CLOSING REMARKS:

MR. MAYEUX, HEARING OFFICER:

I would like to remind you that the comment period for this Draft Hazardous Waste Operational Renewal Permit for PPG Industries, Incorporated ends at 12:30 p.m., Monday, September 8, 2008.

All comments received, requests for notification of the final decision and transcripts from the hearing are processed by the Public Participation Group and are available through EDMS.

The permit writer reviews all comments and uses any additional information that is important to update the draft permit.

The names and addresses of all commenters, speakers and those requesting to be notified of the final decision are added to the Public Comment Database.

A final revision of the draft permit and the response to the public comments are prepared and forwarded to the OES Assistant Secretary for final decision.

Upon the issuance or denial of the permit, a letter is

mailed to all commenters, speakers and those who represent -- who requested to be notified of the final decision. The final decision letter includes information regarding the appeal process, the basis of decision and their response to all public comments received.

I have received a total of two (2) exhibits during this hearing regarding this Draft Permit.

If there are no other comments, I would like to thank you for your attention and participation in this hearing.

Let the record reflect that the time is 7:02 p.m.

This hearing is closed. Thank you.

******