

AIR CO\_100219393\_CO\_20150925\_INVESTIGATION 1282606  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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**Customer: Akzo Nobel Surface Chemistry LLC**  
**Customer Number: CN601580566**

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**Regulated Entity Name: AKZO NOBEL SURFACE CHEMISTRY**

**Regulated Entity Number: RN100219393**

**Investigation # 1282606**

**Incident Numbers**

223538	222715
223119	223249
223125	222480
222989	221278
222363	223251
222978	221250
222982	220585
223540	221247
223246	222980
222716	222418
223109	222413
222981	222422
222543	223294
222473	222951
223244	223536
222562	222428
222482	223232
222420	221182
222723	223248
221468	222541
223290	223114
220996	223293
222948	222719
221245	221006
221742	222987

**Investigator:** JOHN BREGGER

**Site Classification** MAJOR SOURCE

**Conducted:** 09/25/2015 -- 10/30/2015

**NAIC Code:** 325613

**SIC Code:** 2843

**Program(s):** AIR NEW SOURCE PERMITS

**Investigation Type:** Compliance Investigation

**Location:** APPROX 7 MI S OF I-610 LOOP ON  
ALMEDA RD

**Additional ID(s):** FG0042L  
9600

**Address:** 15200 ALMEDA RD,  
HOUSTON, TX , 77053

**Local Unit:** REGION 12 - HOUSTON

**Activity Type(s):** AIRCOMPL - AIR CMPL - AIR  
COMPLAINT INV  
AIR MNSR - MINOR SOURCE NEW  
SOURCE REVIEW

**Principal(s):**

**Role**

**Name**

RESPONDENT

AKZO NOBEL SURFACE CHEMISTRY LLC

**Contact(s):**

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	SITE DIRECTOR	MR JOS CLAESSEN	Phone (713) 434-4479 Fax (713) 433-5489
REGULATED ENTITY CONTACT	SENIOR ENVIRONMENTAL ENGINEER	MR SERGIO SEPULVEDA	Fax (713) 433-5489 Phone (713) 434-4430

**Other Staff Member(s):**

Role	Name
Investigator	SETH TATE
QA Reviewer	CARLOS GRIGGS
Supervisor	CORBETT BRINLY
Investigator	RICHARD BLACKNEY
Investigator	CARLOS GRIGGS

**Associated Check List**

<u>Checklist Name</u>	<u>Unit Name</u>
AIR COMPLAINT INVESTIGATION	BATCH PROCESS

**Investigation Comments:**

**INTRODUCTION**

**Introduction**

Between the dates of September 23, 2015 and November 10, 2015, the TCEQ Houston Region received 58 odor complaints by phone and email, including 5 from anonymous complainants. In particular, on October 29, 2015, 24 complaints were received.

All complainants were contacted by Mr. John Bregger and Mr. Carlos Griggs, between September 24 – November 23, 2015. General information relating to these complaints is listed below. For the specific incident numbers, please see the front page of the investigation report.

The original complaint received stated that an odor of offensive nature has been occurring in the area and alleged 3 separate regulated entities as the source: AkzoNobel Surface Chemistry (Akzo), Blue Ridge Landfill (Blue Ridge), and Delta Waste (Delta). Every complaint thereafter, alleged the odors were also coming from one of these sources, with a majority of the complainants alleging Akzo as the source of this odor. This particular investigation focused on Akzo, while separate investigations were opened associated with Blue Ridge. These investigations were ongoing at the time of this report. An area map has been provided with the locations of the three alleged entities. Please see Attachment No. 1.

Complainants allege that a strong, pungent odor has been pervasive in this area for some time, with some complainants alleging they have smelled this odor for years. The complainants stated that they smell the odors approximately 2-4 times a week. All complainants alleged the odor started around 6 p.m., throughout the night, and into the morning, usually ending before 8 a.m.. All complainants stated that the smell does not occur on any specific day of the week, nor does it occur during the day. Many specifically allege it occurs only at night.

In addition to using the incident reports detailing the smell, the investigator asked for a more detailed description of the odor and received the following comments from one or more of the complainants: Chemical, burning, stinky/foul, putrid, amine-like, rotting garbage/trash, sewage/human waste, sulfurous, and rotten eggs.

All descriptions of the odor were consistent with those listed above, but varied between complainants. The alleged odor smelled differently to various complainants, some of whom alleged that it was or wasn't a particular odor. The alleged odor also smelled differently at separate times to the same complainant. The investigators spoke with complainants alleging the odor always smelled like "a chemical smell" or "rotting garbage." The investigators also

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encountered complainants alleging that on some occasions the odor was "chemical in nature", "trashy in nature", and "biological (i.e. human waste) in nature", depending on the day. In addition, the investigators spoke with complainants who stated the odor was much stronger near Blue Ridge, while others stated the odor was much stronger near Akzo.

A consensus among the complainants is that the intensity of the odor has been growing in the past few months. Some expressed concerns that what they are breathing in may be toxic to their health. Some complainants have alleged the following health affects caused by the odor: eyes burning, hard to breathe, headaches, vomiting, respiratory inflammation, and unable to sleep. In order to make more information available to the complainants, the investigator supplied links to the TCEQ's Air Emissions Inventory Database, Continuous Air Monitoring Stations (CAMS) data, and Central Registry for those who were interested.

In addition to the health affects, the complainants have alleged the following property affects: unable to go/stay outside; the odor permeates inside of residences; and the odor lingers inside after it has stopped outside.

The range of meteorological conditions over the 14 different days these complaints were received are described below with a focus on any outliers that may have occurred. All data is taken from Weather Underground from the Shadow Creek Ranch – Cedar Station, unless otherwise specified. Temperatures ranged from 58 degrees to 85 degrees on the dates the complaints were received and/or the dates the alleged odor occurred. The only day that precipitation appears to have fallen is November 1, 2015. Otherwise, the cloud cover was either clear or overcast. The wind speed varied from calm to 12 miles per hour (mph), with some gusts above these speeds. The wind direction appears to have come from all directions over the course of these complaints. There was no prevailing direction that stood out to the investigator.

### Investigation Narrative

The investigators focused their odor surveys on Akzo and Blue Ridge, as they were the two regulated entities a majority of the complainants alleged as the source of the odor. Please see below for information regarding the odor surveys.

On September 25, 2015, Mr. Carlos Griggs conducted an odor survey of the area surrounding Akzo located in Houston, Ft. Bend County, Texas. Mr. Griggs arrived in the area around 2 p.m.

Meteorological data at the time of this investigation is as follows: temperature: approximately 90 degrees Fahrenheit (F); precipitation: none; cloud cover: scattered clouds to mostly cloudy; wind speed: between 4.6 mph – 8.1 mph; direction: E (East)/NNE (North NorthEast).

Mr. Griggs conducted a preliminary survey of the area by driving the perimeter of Akzo. After the initial survey was completed, Mr. Griggs drove to a complainant's place of residence to speak with the complainant concerning the odor issue. The complainant was not home at the time. Mr. Griggs conducted an odor survey outside of the residence for about 20 minutes, downwind of Akzo. The investigator was unable to confirm an odor.

Mr. Griggs then proceeded to conduct an odor survey on McIntyre Lane, which is directly alongside the perimeter of Akzo. Subsequently, Mr. Griggs performed two more odor surveys downwind of Blue Ridge, and Delta Waste. The investigator was unable to confirm an odor.

On October 2, 2015, a second odor survey investigation was conducted by Mr. John Bregger, Mr. Carlos Griggs, and Mr. Seth Tate, and Waste Section investigator Mr. Richard Blackney. This investigation covered the area surrounding both Akzo and Blue Ridge, which is located in close proximity to all complaints received. The investigators used a Kestrel Weather Meter during this investigation.

Meteorological data at the time of this investigation is provided at the respective locations below. Wind direction was determined at the time of the surveys conducted using a Kestrel Weather Meter.

The investigators arrived in the vicinity of Akzo and conducted a preliminary drive by of the area in an attempt to confirm an odor from the site. The investigators were unable to confirm an odor.

The investigators then proceeded to conduct odor surveys at 5 more locations in the area. Though some locations were upwind at the time of the investigation, they were chosen due to proximity of their location to Akzo and/or



Blue Ridge, as well as their proximity to the complainants. Information for each location is described below.

The investigators' first location was near a complainant's residence within a residential area. The temperature at the time of this survey was 68.0 degrees F with an ENE wind at 1-2 mph and clear skies. Based on the weather data available, this location was upwind of Akzo. The investigators conducted an odor survey in this location. The investigators were unable to confirm an odor.

The investigators' second location was also in a residential area upwind from Akzo. The temperature at the time of this survey was 71.1 degrees F with an ESE wind at 4-5 mph and clear skies. The investigators conducted an odor survey. The investigators were unable to confirm an odor.

The investigators' third location was downwind of Blue Ridge. The temperature at the time of this survey was 73.9 degrees F with an E/ESE wind at 2-3 mph and clear skies. It was in a more rural part of the area, with a mixed use of residential and forested land. Upon arrival, the investigators smelled what appeared to be spray paint coming from the direction of the landfill. Please see Attachment No. 2 for a survey location. The investigators performed an odor survey and kept an odor log for approximately 24 minutes. Please Attachment No. 3 for the odor log. The odor log was discontinued after the odor was no longer detected. The investigators determined that the odor was not related to the complaints received and was most likely the result of residential work being conducted near the location selected.

The investigators' fourth location was located to the west of both Akzo and Blue Ridge in a residential area. The temperature at the time of this investigation was 77.0 degrees F with an E/ESE wind at 2-3 mph and clear skies. Depending on the exact direction of the wind on a minute per minute basis, the site was potentially downwind from both sources. The investigators were unable to confirm an odor.

The investigators' final location was the Exxon gas station located at the intersection of FM 2234 and FM 521. The temperature at the time of of this survey was 79.0 degrees F with E/ESE Using a rangefinder, the investigators determined the gas station is approximately 230 yards from the Akzo plant and, at the time of this investigation, was directly downwind of the plant as evidenced by the windsocks located at the plant. The investigators were unable to confirm an odor.

At approximately 1:30 p.m., the investigators met on-site with Mr. Sergio Sepulveda, Senior Environmental Engineer at Akzo. Mr. Bregger explained the reason behind the TCEQ's visit to Mr. Sepulveda and indicated that several odor complaints had been alleged against Akzo.

Mr. Bregger and the other investigators discussed the complaints with Mr. Sepulveda, explaining that a reoccurring odor had been alleged by several different complainants. Mr. Bregger asked Mr. Sepulveda to explain the type of plant this facility is and how it operates. Mr. Sepulveda stated that the plant is a surfactant manufacturer, producing agents such as soaps and detergents. Depending on demand, the plant has the ability to run 8,760 hours a year and produce 475 different products in it's batch product operations. Mr. Sepulveda explained that there were no products produced that were required to only happen at certain times, such as during the day or at night. The type of loading and unloading done at the plant comes from client specifications on how they want and/or need their products to be handled. Akzo is capable of loading and unloading tanks, drums, railroad cars, and trucks using controls such as submerged loading techniques and scrubbers. Mr. Sepulveda disclosed that only one non-reportable emission event had occurred in the time period the complaints occurred, but no other known releases had occurred. Mr. Sepulveda also stated that, according to the internal alarm system, site-wide emergency alarms had not been activated during the time periods alleged by the complainants.

Mr. Bregger left Mr. Sepulveda with an Exit Interview Form after the meeting. In addition, a typed Exit Interview Form was emailed to Mr. Sepulveda for clarity on the requested records Mr. Bregger was asking to review. Please see Facility Narrative for discussion of records request.

On October 30, Mr. Bregger and Mr. Griggs conducted a third odor survey investigation of the area surrounding Akzo and Blue Ridge. Mr. Bregger and Mr. Griggs arrived in the vicinity of Akzo at approximately 6:30 a.m.

The temperature at the time of this investigation ranged from 70.7 to 75.2 degrees F with a wind direction of N/NNE/NNW at a speed of 5.8 to 12.7 mph and cloud cover/overcast sky.



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The investigators conducted odor surveys at several locations directly adjacent to Akzo. The investigators drove down several roads that line the perimeter of the facility, as well as stationed themselves at the Exxon gas station facility across from Akzo. The investigators were unable to confirm an odor.

The investigators then began to conduct surveys in various residential areas in close proximity of Akzo. As there were a large number of complaints filed the day before the investigation was conducted, the investigators chose several locations that were near clusters of complaints. After waiting in each location for lengthy periods of time, the investigators were unable to confirm an odor.

Investigators conducted odor surveys in two different areas that were not affiliated with the majority of complaints received. These locations were along Hiram Clarke Road and Chimney Rock Road. In both locations, the investigators were unable to confirm an odor.

The investigators performed another odor survey at the gas station located at the corner of South Post Oak and McHard street, directly west of Akzo and Northwest of Blue Ridge. The investigators were unable to confirm an odor.

The final locations of the survey conducted occurred along McHard Road, around Akzo. The investigators were unable to confirm any odors.

Before leaving the area, the investigators met with a complainant to discuss the associated complaint filed. The investigators detailed the current status of the report to the complainant and discussed the concerns of the complainant. The complainant stated that the odor is intermittent and can vary depending on the wind direction.

### Facility Authorization Narrative

On October 2, 2015, the investigator provided Mr. Sepulveda with an Exit Interview Form. Please see Attachment No. 4. The form contained the investigator's request for various operating records for the days of September 22, 23, 25, 26, 28, 29, and 30, 2015. These records included production records, loading and unloading records, operation and sitewide alarm records, and Maintenance, Startup, and/or Shutdown (MSS) records.

On October 8, 2015 Mr. Sepulveda provided a response to this records request. Mr. Sepulveda's response includes production logs, loading records, Plant Emergency Notification System (PENS) records, the makeup of the plant, and MSS records. As part of this response, Akzo stated that according to their records and to the best of their knowledge, there were no upsets, releases, spills, or any type of activity that occurred in the plant during the dates mentioned that could have caused a nuisance odor to reach neighbors. Akzo reported there were no site-wide alarms recorded in their PENS records, and any alarms were to alert operators of operational changes. Akzo also stated there was only one leak detected on September 29, 2015, that had no impact on any area outside the plant. In addition, only one facility, a storage tank (T-154) was out of service for inspections related to mechanical integrity. Akzo reported this was a routine MSS inspection and resulted in no impacts beyond the unit's area.

The investigator conducted a review of the records provided by Akzo. The primary focus were the products that Akzo reported using in their batch processes and the types of products that had been produced during the time the complaints were received. The investigator reviewed the production logs and the loading/unloading records to determine what products were used, created, or loaded/unloaded during dusk, night, and early morning hours. During the review, a total of 21 products were identified as needing a Safety Data Sheet (SDS) for further review. The investigator made the request for the associated SDSs on October 14, 2015. Mr. Jos Claessen, Site Director for Akzo, responded with the information on October 15, 2015.

After reviewing the SDSs provided, the investigator identified 9 confidential products of interest, listed in the production logs or loading/unloading records. On October 26, 2015, the investigator sent another records request to Mr. Sepulveda. The records requested include operational controls, the nature of the 9 confidential products, operation records, and a list of authorizations for the confidential products.

On October 26, 2015, Mr. Sepulveda provided a response to the records request above. A portion of the information received is confidential. In this response, Mr. Sepulveda provided records of spills, upsets, and emission events, process descriptions, and operational controls. In addition, Mr. Sepulveda stated that all of the confidential products identified in the previous records request are authorized by NSR Permit No. 9600.

The investigator reviewed the Special Conditions (SC) listed in NSR Permit 9600, specifically those relating to the controls of emission points scrubber (EPN EV4/V004) and storage tank (T-167). The investigator sent a final records request to Mr. Sepulveda and Akzo on November 10, 2015. This investigator requested records to show compliance with SCs 17 – 20.

Mr. Sepulveda provided a response to the investigator's records request on November 10, 2015. A portion of the information received is confidential. Their response included records that appear to show compliance with the applicable Special Conditions and exemptions claimed in Title V Permit No. 1328. In addition, Mr. Sepulveda provided an explanation for 3 separate instances where SC 19 requirements were not met. Please see the following sections for an explanation of the records reviewed.

Akzo is claiming an exemption under 30 TAC §115.118(a)(1) for T-167, as this tank stores a product with a vapor pressure less than 1.5 pounds per square inch absolute (psia) at storage temperature. Akzo appears to be in compliance.

Per the requirements of SC 17, EV4/V-004 must meet the appropriate removal efficiencies while in operation. Akzo stated that the removal efficiencies quoted in this special condition were calculated using models developed by Akzo based on scrubber manufacturing specifications. These models were presented to the TCEQ as part of a permit application/renewal package. Akzo stated the appropriate removal efficiencies are achieved by meeting the relevant parameters set forth in Special Conditions 18, 19, and 20. Please see the following sections for a discussion of these special conditions. The records for those special conditions appear to show compliance with the requirements listed. Akzo appears to be in compliance with Special Condition 17(A) – 17(C).

Per the requirements of SC 18, the vapor temperature in the EV4/V-004 Scrubber Stack is not to exceed 100 degrees F. Scrubber stack temperature records were reviewed and show no temperatures above the allotted value. Akzo appears to be in compliance with SC 18.

Per the requirements of SC 19, the scrubber fluid circulation for EV4/V-004 cannot fall below 185 gallons per minute (gpm). The records reviewed indicate the fluid circulation fell below the allotted value 3 times. The first instance started on October 10, 2015 at 9:00 a.m. and ended at 6:00 p.m. on October 19, 2015. Akzo indicated that all production units that vent to EV4 were down during this time. The second instance started at 10:00 a.m. on October 20, 2015 and ended at 11:00 p.m. on October 20, 2015. In this instance, Akzo reports they experienced a plant wide power failure in which it took all production units down. The third instance started at 6:00 a.m. on October 31, 2015 and ended at 12:00 p.m. the same day. Akzo reports having another plant wide power failure in which it took all production units down. Akzo appears to be in compliance with SC 19.

Per the requirements of Special Condition 20, the vapor exit temperature of the last condenser in the system may not go above 110 degree F. Records reviewed from October 2015 show that the system did not go above this temperature limit. Akzo appears to be in compliance with SC 20.

#### Exit Interview

On October 2, 2015, the investigator conducted an exit interview with Mr. Sepulveda. An Exit Interview Form was completed by the investigator and acknowledged by Mr. Sepulveda. The Exit Interview Form is provided in Attachment No. 4.

In addition, the complainants were contacted by phone or by email with the results of the investigation on December 2, 2015 between 1:40 p.m. and 3:00 p.m. The investigator informed the complainants that additional investigations have been opened concerning the complaints received regarding the same odor this investigation covered. The investigator also provided the Houston Region complaint line telephone number should future complaints be warranted. The anonymous complainants were not contacted.

#### GENERAL FACILITY AND PROCESS INFORMATION

##### Process Description

AkzoNobel Surface Chemistry is a batch chemical processing plant which specializes in producing surfactants, including soaps and detergents. A more detailed process description can be found in the Houston Regional Office



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files.

**BACKGROUND**

**Current Enforcement Actions**

Based on this investigation, no violations are being alleged.

**Agreed Orders, Court Orders, and Other Compliance Agreements**

Based on review of CCEDS and the regional office files, the following Agreed Orders (AO) were issued by the TCEQ during the past 5 years:

2010-0738-AIR-E  
2010-1709-AIR-E  
2011-0120-AIR-E

**Prior Enforcement Issues**

Based on a review of CCEDS during the past five years, there were 2 complaints received alleging odor from Akzo August 25, 2015 and November 9, 2011, investigated by the Region 12 Office, CCEDS Nos. 1275707 and 969198, respectively. The complaints were unconfirmed.

**ADDITIONAL INFORMATION**

**Conclusions and Recommendations**

No violations or areas of concern were noted during this investigation. A final letter will be mailed to the alleged source.

**Additional Issues**

No additional issues were noted during this investigation.

**REPORT ATTACHMENTS**

1. Area Map
2. Survey Route Maps from September 25, October 2, and October 30, 2015
3. Investigator's Odor Log – October 2, 2015
4. Exit Interview Form

**No Violations Associated to this Investigation**

Signed John Bugger  
Environmental Investigator

Date 12/18/2015

Signed Corbett Binkley  
Supervisor

Date 12-22-2015

**Attachments: (in order of final report submittal)**

- Enforcement Action Request (EAR)
- Letter to Facility (specify type): Compliance
- Investigation Report
- Sample Analysis Results
- Manifests
- Notice of Registration

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify):

- Attachment 1: Area Map
- Attachment 2: Survey Route Maps
- Attachment 3: Investigator's Odor Log
- Attachment 4: Exit Interview Form



**Attachment 1**

**Area Map with Alleged Sources**

**Akzo Nobel Surface Chemistry**

**Houston Plant**

**Account No. FG0042L**

**RN # 100219393**

**CN # 601580566**

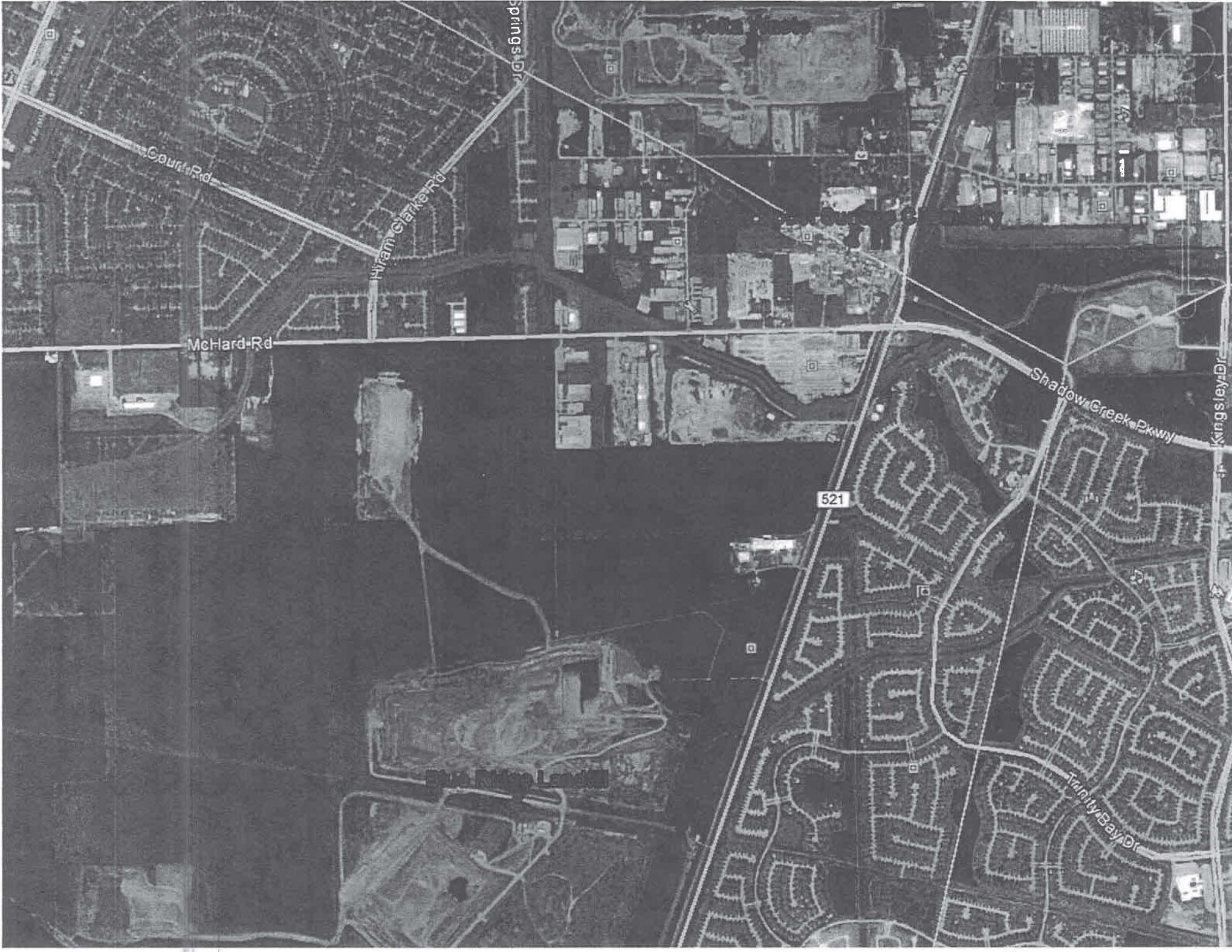
**Investigation No. 1282606**

**Investigation Date**

**September 25, 2015 – October 30, 2015**

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Court Rd

Hiram Clarke Rd

Springs Dr

McHard Rd

521

Shadow Creek Pkwy

Kingsley Dr

Trinity Bay Dr



**Attachment 2**

**Map of Odor Survey Areas 1, 2, and 3**

**Surveys Conducted on September 25, October 2, and October 30, 2015**

**Akzo Nobel Surface Chemistry**

**Houston Plant**

**Account No. FG0042L**

**RN # 100219393**

**CN # 601580566**

**Investigation No. 1282606**

**Investigation Date**

**September 25, 2015 – October 30, 2015**



Odor Survey 1 - September 25, 2015



Investigation Type: Cmplt  
 Air Account NO: FG-0047-L  
 Attachment: 2  
 Page 1 of 5



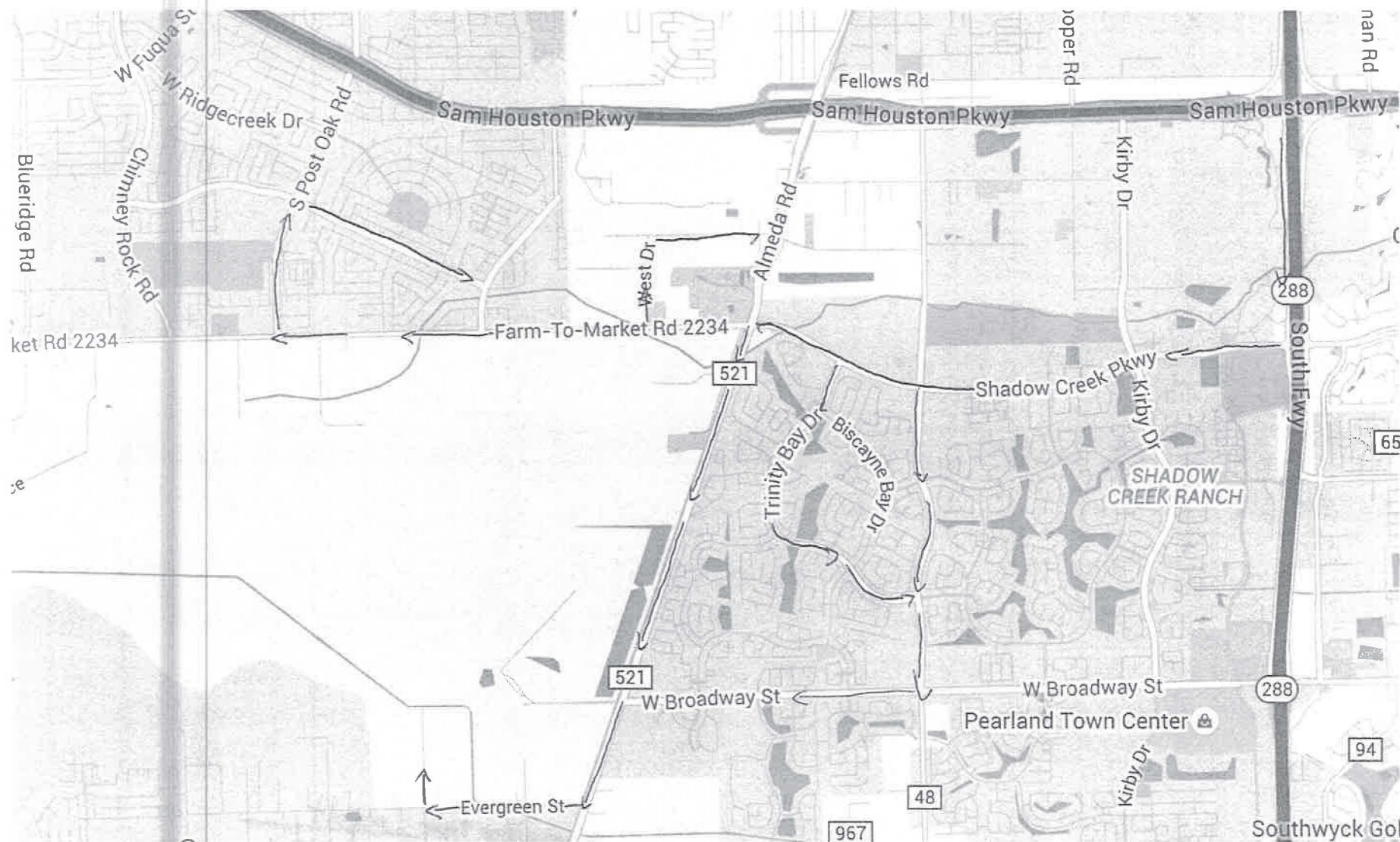
Investigation Type: Cmplt

Air Account NO: FG-0042-L

Attachment: 2

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Odor Survey 2 - October 2, 2015

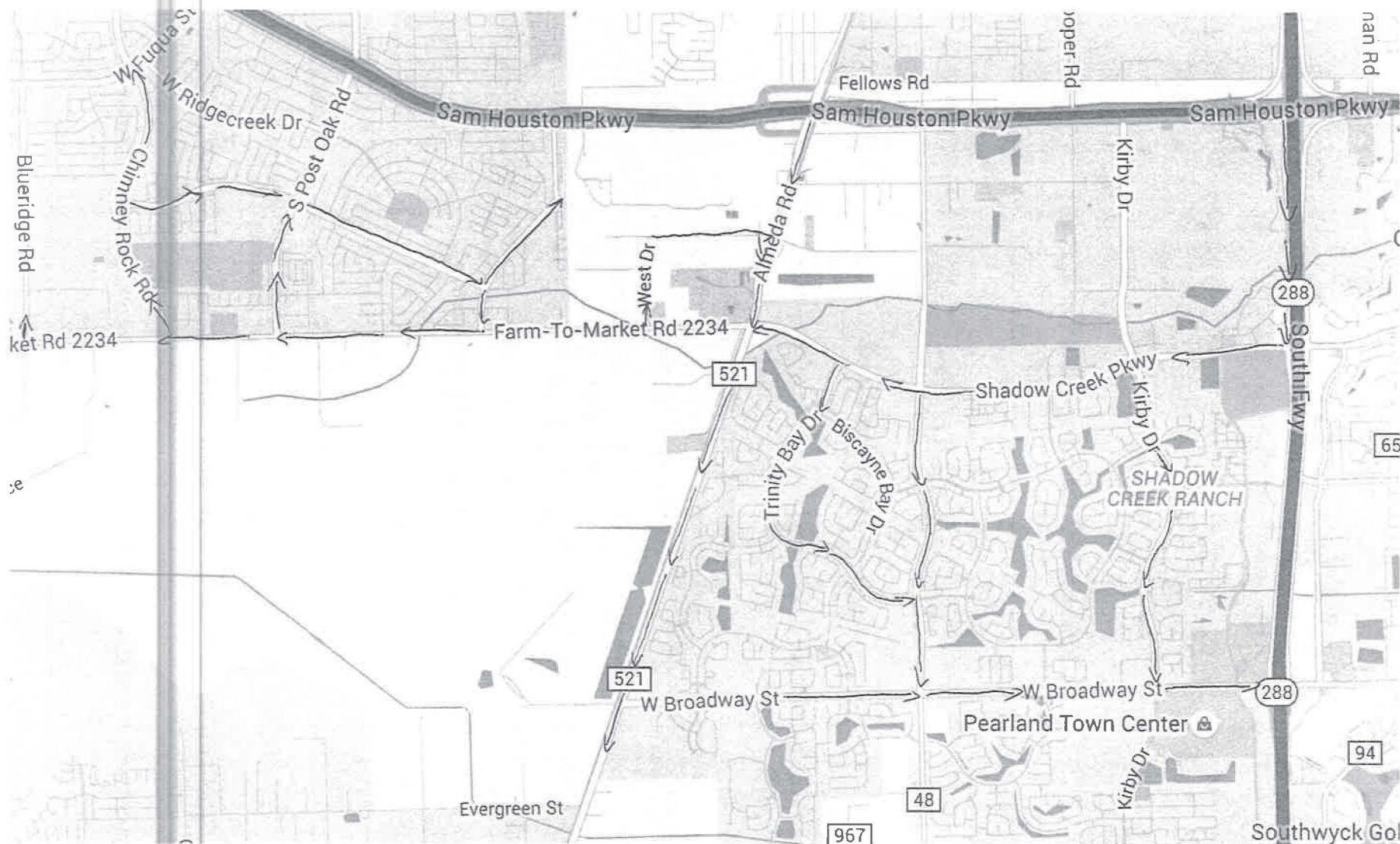


Investigation Type: Cmplt  
Air Account NO: FG-0042-L  
Attachment: 2  
Page 3 of 5

Investigation Type: CmpIt  
Air Account NO: FG-0042-L  
Attachment: 2  
Page 4 of 5



Odor Survey 3 - October 30, 2015



Investigation Type: Cmp/lt  
 Air Account NO: FG-0042-L  
 Attachment: 2  
 Page 5 of 5

**Attachment 3**

**Investigator's Odor Log – October 2, 2015**

**Akzo Nobel Surface Chemistry**

**Houston Plant**

**Account No. FG0042L**

**RN # 100219393**

**CN # 601580566**

**Investigation No. 1282606**

**Investigation Date**

**September 25, 2015 – October 30, 2015**

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## Investigator's Odor Intensity Time Log

Date of Investigation: 10/2/2015 Start Time 10:22  
 Name and Address of Alleged Source: Evugian St / Nail Rd  
 Investigator's Name: Print: John Braggier Sign: \_\_\_\_\_

Minutes	Odor Intensity VL, L, M, S, VS
1 min	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	VL
23	VL
24	M
25	L
26	S
27	VL
28	-
29	-
30	-

Minutes	Odor Intensity VL, L, M, S, VS
31 min	-
32	M
33	-
34	-
35	-
36	-
37	-
38	-
39	-
40	-
41	-
42	-
43	-
44	-
45	-
46	
47	
48	
49	
50	
51	
52	
53	
54	
55	
56	
57	
58	
59	
60	

Offensiveness: Highly Offensive Unpleasant Not Unpleasant

Dominant Odor Intensity For:

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						
1 Hour						

Investigation Type: CMPLT  
 Air Account NO: FG-0042-L  
 Attachment: 3  
 Date: 10/1

**Attachment 4**

Exit Interview Form

**Akzo Nobel Surface Chemistry**

**Houston Plant**

**Account No. FG0042L**

**RN # 100219393**

**CN # 601580566**

**Investigation No. 1282606**

**Investigation Date**

**September 25, 2015 – October 30, 2015**

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## EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	AkzoNoble Surface Chemistry	TCEQ Add. ID No. RN No (optional)	FG-0042-L
Investigation Type	Contact Made In-House (Y/N) No	Purpose of Investigation	Complaint Investigation
Regulated Entity Contact	Mr. Sergio Sepulveda	Telephone No.	713-434-4430
		Date Contacted	10/2/2015
Title	Senior Environmental Engineer	E-mail:	<a href="mailto:Sergio.Sepulveda@akzonobel.com">Sergio.Sepulveda@akzonobel.com</a>
		Date Emailed:	10/2/2015

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and *does not represent agency findings related to violations*. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	RR		Please provide production records for the batch processes that took place on the following dates – 9/22/2015, 9/23/2015, 9/25/2015, 9/26/2015, 9/28/2015, 9/29/2015, and 9/30/2015. Include the name(s) of the product(s) and the times each product was in production.
2	RR		Provide loading and unloading records, including times and quantities of the compounds associated with these actions, for the dates listed in No. 1.
3	RR		Provide records of any operational/site wide alarms that may have been triggered on the dates listed in No. 1.
4	RR		Provide a list of units that were experiencing Maintenance, Startup, and/or Shutdown (MSS) on the dates listed in No. 1.
			INVESTIGATION: <u>CMPLT</u> AIR ACCOUNT NO. <u>FG-0042-L</u>

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization? <u>1</u>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

John Bregger	10/2/2015	Sergio Sepulveda	10/2/2015
<b>Investigator Name (Signed &amp; Printed)</b>	<b>Date</b>	<b>Regulated Entity Representative Name (Signed &amp; Printed)</b>	<b>Date</b>

If you have questions about any information on this form, please contact your local TCEQ Regional Office.  
 Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

Investigation Type Cmplt  
 Air Account NO: FB-0042-1  
 Attachment: 4  
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Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 22, 2015

Mr. Jos Claessen  
Site Director  
Akzo Nobel Surface Chemistry  
15200 Almeda Road  
Houston, Texas 77053

Re: Complaint Investigation Conducted at:  
Akzo Nobel Surface Chemistry, 15200 Almeda Road, Houston, (Fort Bend County),  
Texas  
Regulated Entity No.: RN100-219-393, TCEQ ID No.: FG-0042-L, FOP No.: O-01328,  
Investigation No.: 1282606

Dear Mr. Claessen:

From September 23, 2015, and November 10, 2015, the Houston Region Office of the Texas Commission on Environmental Quality (TCEQ) received complaints concerning activities performed at your facility. In response to these complaints, Mr. John Bregger and Mr. Carlos Griggs, investigators with the Air Section, conducted an investigation on October 2, 2015.

No violations were noted concerning the activities alleged in the complaints; however, it should be noted that a comprehensive compliance investigation was not performed. This letter should not be interpreted as a blanket notice of compliance with state and federal regulations governing air quality.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you have any questions concerning this investigation, please contact Mr. Bregger at (713) 767-3754.

Sincerely,

A handwritten signature in cursive script that reads "Corbett Brinly".

Corbett Brinly, Team Leader  
Houston Region Office, Air Section  
Texas Commission on Environmental Quality

CB/JB/dgl

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cc: Mr. Sergio Sepulveda, Senior Environmental Engineer, Akzo Nobel Surface Chemistry,  
15200 Almeda Road, Houston, Texas 77053

Ms. Daisy James, Interim Bureau Chief, Bureau of Pollution Control and Prevention,  
Houston Department of Health & Human Services, 7411 Park Place, Houston, Texas  
77087

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