

<u>Checklist Name</u>	<u>Unit Name</u>
AIR COMPLAINT INVESTIGATION	Sitewide

Investigation Comments:

INTRODUCTION

Introduction

On August 25, 2015, the TCEQ Houston Region Office (TCEQ) received three (3) complaints, Incident Nos. 219399, 219402, and 219406. The complaints were received via email at 03:20 p.m., 12:36 p.m., and 11:29 a.m., respectively. The complainants alleged that Akzo Nobel Surface Chemistry was creating a foul smelling odor into the area as well as having alarms in the middle of the night. The complainants stated that it occurred in the evening of August 23, 2015. During the incidents, the meteorological conditions were as follows: 78.1 degrees Fahrenheit, 90% relative humidity, and winds were negligible. The source for meteorological conditions is Weather Underground Station I.D. KLVJ. On August 28, 2015, at approximately 09:30 a.m., the investigator initially contacted the complainants.

Investigation Narrative

On September 1, 2015, TCEQ Investigators, Mr. Seth Tate & Mr. Paul Brandes, arrived in the area at approximately 08:15 A.M. The investigators began conducting an odor survey of the area down wind of the alleged source, Akzo Nobel Surface Chemistry (Akzo Nobel). While conducting the odor survey, the investigators did not detect any odors. The investigators concluded the odor survey at approximately 08:45 A.M. See Attachment 1, Area Map. Meteorological conditions during the investigation are as follows: 77.0 degrees Fahrenheit, 84% relative humidity, wind direction was North East at approximately 3.5 miles per hour. The source for meteorological conditions is Weather Underground Station I.D. KLVJ.

The investigators then proceeded to the alleged source, Akzo Nobel. The investigators arrived onsite at approximately 09:00 A.M. and met with Mr. Sergio Sepulveda, Sr. Environmental Engineer for Akzo Nobel. The investigators proceeded into Mr. Sepulveda's office to discuss the complaints received concerning Akzo Nobel. During the discussion, Mr. Sepulveda stated that during the time of the incidents, Sunday, August 23, 2015 and Monday August, 24, 2015, there had been no known releases from Akzo Nobel. The investigators inquired about any alarms that had occurred during the night time hours on the dates. Mr. Sepulveda stated that there were no alarms recorded in the internal alarm tracking system, however, he would need to check with the operators during those days. The investigators also asked Mr. Sepulveda what products were being produced during the time period as well as which products were being loaded and unloaded. Mr. Sepulveda stated that while the records are maintained, that he did not currently have them on his person. The investigators left Mr. Sepulveda a records request for the following information: Records of loading and unloading occurring during on August 23 and August 24, 2015; production records; confirmation that there were no alarms on those dates; and a copy of the safety data sheets (SDS) for the products loaded, unloaded, and produced. The investigators thanked Mr. Sepulveda for his time and promptly left the facility at approximately 11:00 A.M.

On Thursday, September 3, 2015, the investigator received the information and began a record review. In the response, Mr. Sepulveda stated that Akzo Nobel does not handle/produce any chemicals/products that would have a sewage-like odor associated with them. To verify this information, the investigator reviewed the SDSs provided for the 13 products produced and the 11 products loaded and unloaded on August 23, 2015 and August 24, 2015. On the SDS, the odors of products handled by Akzo Nobel are as follows: Amine-like; hydrocarbonic; ammoniacal; sweet and ether-like; and solvent. Mr. Sepulveda also stated that on August 23, 2015 and August 24, 2015, two (2) of the plant Shift Leads working during those days told Mr. Sepulveda that they could sense a strong "rotten" smell coming from a nearby facility during their shifts. The alleged source of the operators is believed to be the Blue Ridge Landfill located south of Akzo Nobel. Additionally, Mr. Sepulveda stated that according to the facility's records, there were no unit upsets, releases, or spills that would have caused a sewage-like odor.

Mr. Sepulveda stated that, according to the facility's records, the site-wide emergency alarms were not activated during the periods alleged by the complainants. This alarm is activated in the event of releases, spills, medical emergencies, fires, or explosions. According to Mr. Sepulveda, this alarm is tested every Monday at approximately 11:00 a.m. and lasts for about 5 minutes. Mr. Sepulveda also stated that there are other audible alarms that can be heard. These alarms are unit/activity related alarms that indicate a change of the conditions that need to be acknowledged or acted upon by the operators, and do not imply a release or an emergency.

Facility Authorization Narrative

AKZO NOBEL SURFACE CHEMISTRY - HOUSTON

9/1/2015 Inv. # - 1275707

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Akzo Nobel operates under Federal Operating Permit (FOP) O-1328 as well as several New Source Review (NSR) Permits. Since the facility is considered a major source per 30 Texas Administrative Code Chapter 122, a comprehensive Title V compliance investigation was not conducted.

Exit Interview

An exit interview was not conducted since there were no alleged violations.

In addition, the complainants were contacted by phone with the results of the investigation on September 2, 2015 at approximately 11:00 A.M.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Akzo Nobel is a specialty chemicals plant that manufactures surfactants, emulsifiers, agrochemicals, and other specialty chemicals. A more detailed process description can be found in the Houston Regional Office 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

2011-0451-AIR-E

Prior Enforcement Issues

Based on a review of CCEDS and the regional office files, violations were issued by the TCEQ to the alleged source during the past five years. There are no repeat violations.

Complaints

Based on a review of CCEDS during the past five years, there was one industrial & hazardous waste complaint received on August 25, 2010 and investigated by the Region 12 Office. See Investigation No. 864912. The complaint was unconfirmed. In addition, there was one odor complaint received on November 9, 2011 and investigated by the Region 12 Office. See Investigation No. 969198. The complaint was 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

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

9/8/15

Signed


Supervisor

Date

10/29/15

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : GENCOMP

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

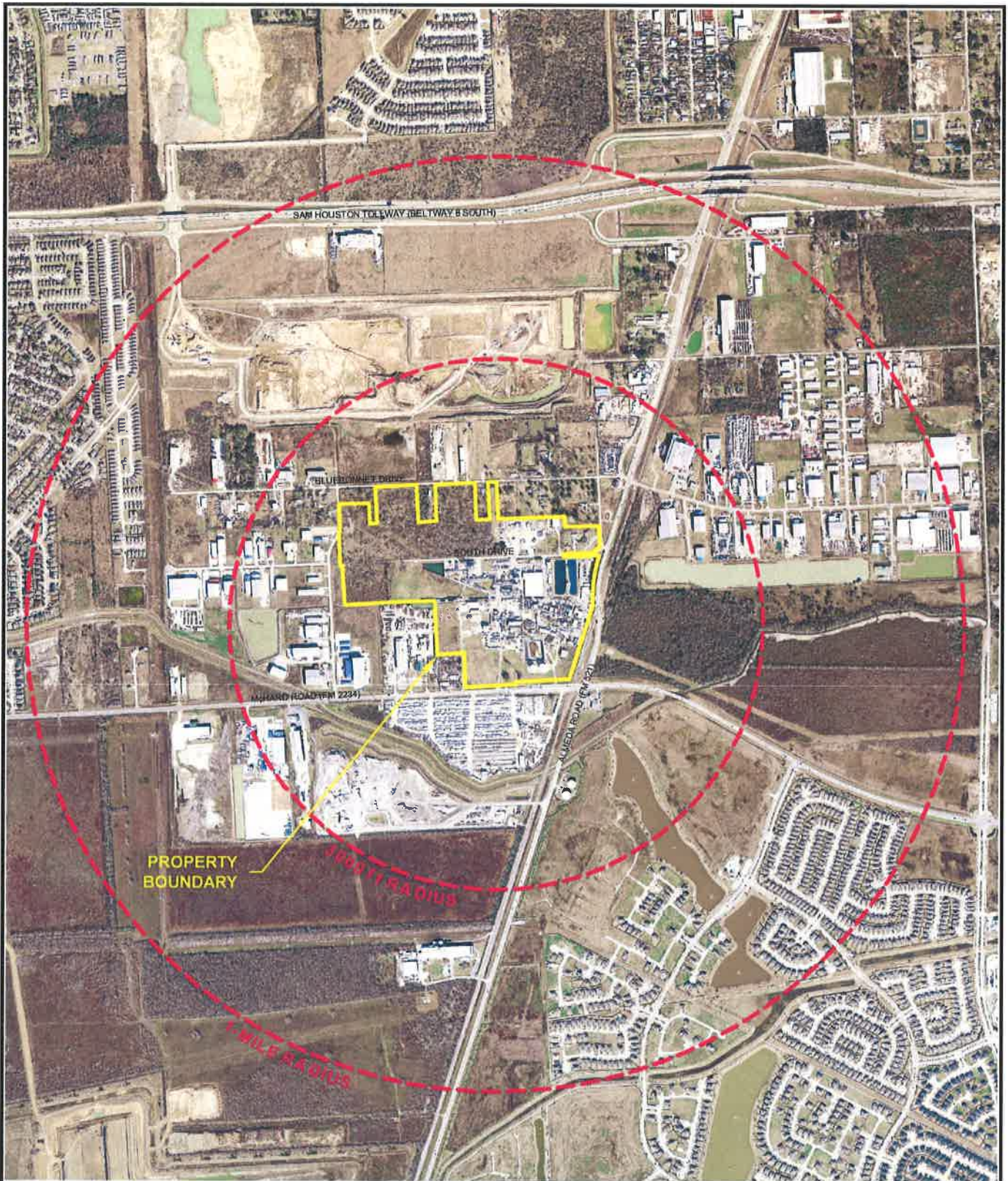
☐ Photographs

☐ Correspondence from the facility

☐ Other (specify) :

- Attachment 1, Area Map
 - FG-0042-L
- Akzo Nobel Surface Chemistry
 - September 1, 2015

File: K:\AirMod\Air.modeling\data\07\Draws\Acad\Blocks\Akzo Nobel\Cadd\Area Map - Akzo Nobel.dwg User: nortis_brown Plotted: Mar 15, 2011 - 4:21pm Layout: Area Map



0 1500 3000 ft

APPROXIMATE SCALE
COORDINATE SYSTEM: TEXAS STATE PLANES,
SOUTH CENTRAL ZONE, US FOOT (TXNAD83)

Investigation Type: *CMPL*

Air Account NO: *EG-0042-2*

SOURCE: AERIAL PHOTOGRAPH PROVIDED BY HCAO,
DATED 2010.

Attachment:

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URS

10550 RICHMOND AVE., SUITE 155
HOUSTON, TEXAS 77042
PH: (713) 914-6699
FAX: (713) 789-8404

Scale:

AS
NOTED

Drawn by:

NAB

Chk'd by:

SH

Date:

11-18-10

Date:

11-18-10

Title:

**AREA MAP
ITEM VIII.A**

Project:

PERMIT No. 9600
OXYLATION REACTOR UNIT
15200 ALMEDA ROAD
HOUSTON, HARRIS & FORT BEND COUNTY, TEXAS

Client:

AKZO NOBEL SURFACE CHEMISTRY LLC

Project No.:

25014276

File Name:

AREA MAP - AKZO
NOBEL.dwg

Figure:

1

Investigation Type: CMPL
Air Account NO: FG-0042-L
Attachment: 1
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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
October 29, 2015

Jos Claessen, Plant Manager
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
TCEQ ID No.: FG-0042-L, FOP No.: O-1328, Investigation No.: 1275707, Incident Nos.:
219-399; 219-402; and 219-406

Dear Mr. Claessen:

On August 26, 2015, the Houston Region Office of the Texas Commission on Environmental Quality (TCEQ) received three (3) complaints concerning activities performed at your facility. In response to these complaints, Mr. Seth Tate, investigator with the Air Section, conducted an investigation on September 1, 2015.

No violations were noted concerning the activities alleged in the original complaint; 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. Tate at (713) 767-3619.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Messick".

Amy Messick
Team Leader, Air Section
Houston Region Office

ASM/SWT/swf

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

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