EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	02/13-14/2018		
Media:	Water		
Regulatory Program(s)	Clean Water Act / NPDES		
Company Name:	**Metton America, Inc.**		
Facility Name:	**Metton America LaPorte**		
Facility Physical Location:	2727 Miller Cut-Off Road		
(city, state, zip code)	LaPorte, Texas 77571		
Mailing address:	2727 Miller Cut-Off Road		
(city, state, zip code)	LaPorte, Texas 77571		
County/Parish:	Harries County		
Facility Contact:	Gwendolyn McNeill	Safety & Environmental Coordinator	
	gmcneill@metton.com		
FRS Number:	110000463677		
Identification/Permit Number:	TX0084808		
Media Number:			
NAICS:	325211		
SIC:	2821		

Personnel participating in inspection:			
Kenneth L. AuBuchon	USEPA/6EN-WMH	Environmental Engineer	281-983-2151
Hisanori (Hisa) Ueki	Metton America, Inc.	New Technology Development Manager	281-479-8078 ext.117
Masanori (Nori) Abe	Metton America, Inc.	Technical GM	281-479-8078 ext.102
Beau West	Metton America, Inc.	Production Manager	281-479-8078 ext.103
Gwendolyn McNeill	Metton America, Inc.	Safety and Environmental Coordinator	281-479-8078 ext.111

EPA Lead Inspector Signature/Date	KENNETH AUBUCHON Digitally signed by KENNETH AUBUCHON DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=KENNETH AUBUCHON, dnQualifier=0000014523 Date: 2018.03.20 13:55:39 -05'00'	
	Kenneth L. AuBuchon	Date
Supervisor Signature/Date	CAROL PETERS-WAGNON Digitally signed by CAROL PETERS-WAGNON DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=CAROL PETERS-WAGNON, dnQualifier=0000009981 Date: 2018.03.20 14:51:37 -05'00'	
	Carol Peters	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Kenneth L. AuBuchon arrived at Metton America, Inc., La Porte, Texas at approximately 9:00 am on February 13, 2017 for an unannounced Compliance Evaluation Inspection (CEI). I met with Beau West, Metton America, Inc. Production Manager, Masanori Abe, Metton America, Inc. Technical GM and Hisanori Uebi, Metton America, Inc. R&D Manager, at the opening conference. I presented my credentials to all present at the opening conference and explained that this was an EPA inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

This report is based on information supplied by Metton America, Inc. representatives (the permittee), observations made by the U.S. EPA inspector, and records and reports maintained by the permittee, the State of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Metton America, Inc.is a plastics company that manufactures Metton LMR. Metton LMR is a tough and durable engineering plastics material used to produce large or thick molded parts for many diversified applications. Metton LMR provides design freedom with integrated functionality similar to injection molding for replacement of traditional materials, such as wood and metal. Metton LMR is supplied in closed containers in various sizes from 55 to 5,000 gallons to bulk on-site storage. Houston is the company's headquarters. The company has an affiliate, Metton Europe, in Dusseldorf, Germany. Sojitz is a worldwide trading company that supplies Metton LMR to many international molders.

Metton America, Inc. LaPorte Plant (Metton) is a liquid organic resin manufacturing facility located in LaPorte, Texas. Dicyclopentadiene (DCPD) is the primary chemical feedstock used to make two Metton products - Components A & B. Component A is the polymer activator, made of DCPD, a copolymer, and an aluminum alkyl. Component B is polymer catalyst, made of DCPD, a copolymer, and an organotungsten catalyst. Components A & B are shipped separately to customers to be used in injection at the customer's facilities. The final mixing of the Components A & B produce the final product which is polymerized Metton DCPD (Metton LMR).

Metton discharges wastewater to segment 1005 of the Houston Ship Channel via Phillips Ditch and Santa Ana Bayou. Approximately 90% of the process wastewater stream is generated from noncontact cooling water. The balance of the process wastewater (~ 10%) is generated from washdown of process areas and equipment. There is no direct contact process water used at Metton, La Porte. Prior to discharge of wastewater through process Outfall 001, all wastewater is pumped through an activated carbon unit (7 ,000-gallon tank with approximately 4,000 lbs. of activated carbon). Wastewater resulting from the resin production area of the Plant is non-contact cooling water and wash-down water of process areas and equipment. These wastewaters, in addition to stormwater from this area, is sent to the carbon unit for treatment and discharged via Outfall 001.

Stormwater discharged via Outfalls 003 and 004 is non-contact stormwater only. Stormwater that is discharged via Outfall 004 has stormwater that has come into contact with process areas of the Plant, such as the DCPD tank farm and Container Handling area. This stormwater is monitored prior to discharge. If contamination is observed, it can be sent to the carbon treatment unit and discharged via Outfall 001. See Appendices 1for the Process and Non-Process Wastewater Flow Diagram and Water Balance.

Section II – OBSERVATIONS

During the review of the facility's required paperwork, it was explained that Ms. Gwendolyn McNeill, the Environmental Coordinator, was out with the flu and she maintained all the TPDES paperwork for the facility. Facility staff was able to provide most of the requested documents and information. After the onsite portion of the inspection, Ms. McNeill was e-mailed and paperwork and information that was not provided was obtained.

During the review it was noted that the facility's permit has a Daily Maximum (mg/L) limit for Hexachlorobenzene at .00033 ppm (.33 ppb). The facility is reporting a ZERO value for Hexachlorobenzene due to an established minimum analytical level (MAL) of .01ppm (10ppb). Other Requirements #2 in the permit has listed established MALs and states "Test methods utilized shall be sensitive enough to demonstrate compliance with the permit effluent limitations. Permit compliance/noncompliance determinations will be based on the effluent limitations contained in this permit with consideration given to the minimum analytical level (MAL) for the parameters specified". A review of the test results for Hexachlorobenzene show that the test method used is not sensitive enough to demonstrate compliance with permit effluent limitations for Hexachlorobenzene but, due to consideration given to established MALs for parameters specified in the permit (Hexachlorobenzene), ZERO values are used in calculations and reporting requirements.

A tour of the Outfalls and the carbon bed filters was conducted on 2/14/2018. It was explained that there was no flow occurring through Outfall 001 during the visit due to an equipment failure (Appendices 2 - Notification for not being able to discharge water). A section of pipe and the flow meter were damaged by a hard freeze on January 16 and 17, 2018. The system shutdown did not appear to have adverse effects on the operations of the facility.

Section III – AREAS OF CONCERN

Concern: TPDES Permit No. TX0084808 has a Daily Maximum Limit of 0.00033mg/L for Hexachlorobenzene that is based on Water Quality Criteria. However, permit compliance/noncompliance determinations is based on a minimum analytical level (MAL) for Hexachlorobenzene that is 30 times greater (0.01mg/L).

At the time of the inspection, Metton America was in compliance with Hexachlorobenzene permitted reporting requirements.

Section IV – FOLLOW UP

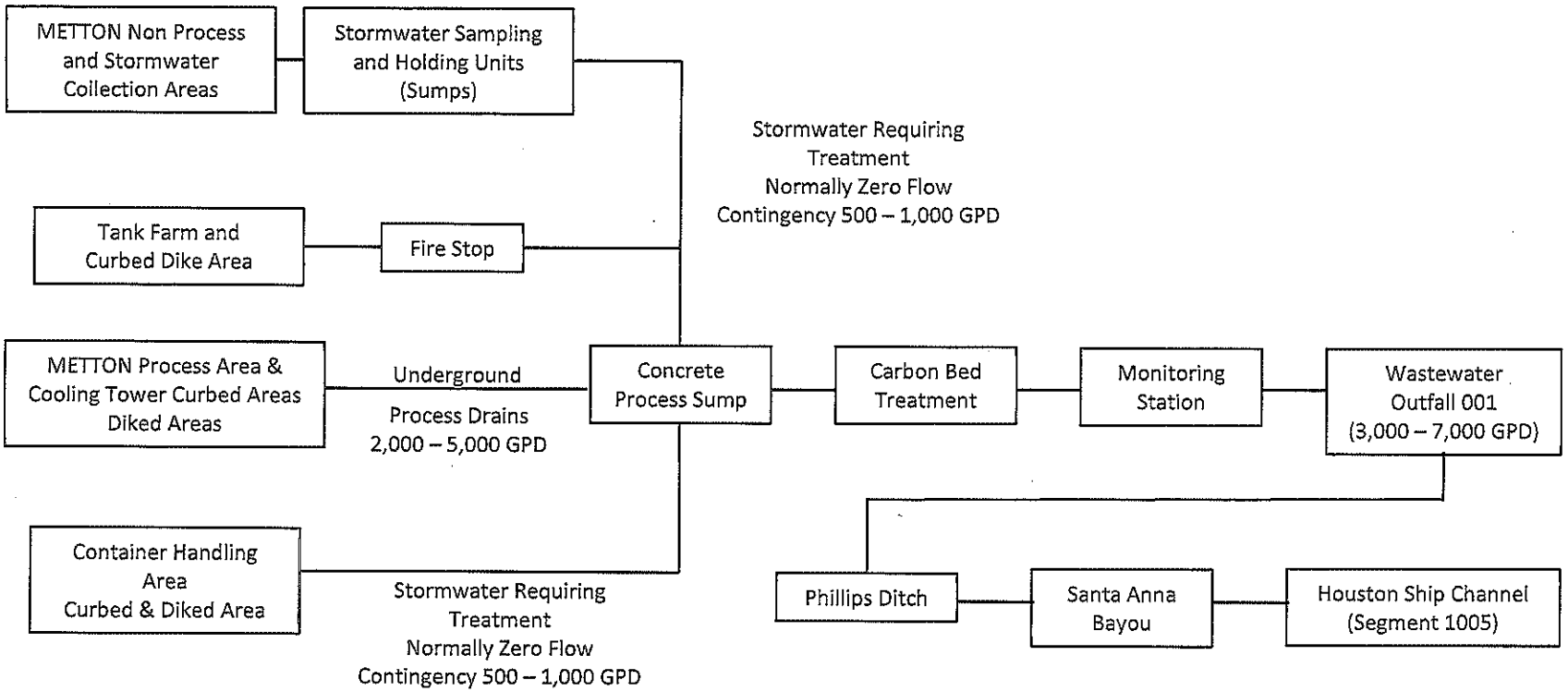
3/08/2018 – E-mailed Ms. McNeill for documents and information not received during site visit.

3/08/2018 – Reply E-mailed from Ms. McNeill containing requested documents and information not received during site visit.

Section V – LIST OF APPENDICES

Appendices 1 - Process and Non-Process Wastewater Flow Diagram and Water Balance
Appendices 2 - Notification for not being able to discharge water

Appendix 1
Process and Non-Process Wastewater Flow Diagram and Water Balance



Attachment H	
Revision No.: 0	Process and Non-Process Wastewater Flow Diagram and Water Balance Metton America, Inc. – La Porte Plant
Date: November 2017	
Permit No.: WQ0002406000	

Appendix 2
Notification for not being able to discharge

Doc #1

METTON AMERICA, INC.

2727 Miller Cut off Rd.
La Porte, TX 77571

TCEQ Region 12
Water Quality Division

Notification for not being able to discharge water

Mr. Isaiah Longoria,

As per our telephone conversation, Metton America, Inc. was not able to flow water through outfall 001 this week due to equipment failure. A section of pipe and the flow meters were damaged by the hard freeze we experienced on Tuesday January 16, 2018 and Wednesday January 17, 2018. Our system is blocked in, so the water is maintained on our plant sight. Once the meters are replaced, I can then continue with the normal discharge and sampling schedule. I will notify you once our system is up and running. Thank you for your time and help.

Best Regards,

Gwendolyn McNeill
Metton America, Inc.
2727 Miller Cut off Road
La Porte, TX 77571
281-479-0878 ex: 111