



**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	02/27-28/2018		
Media:	Water		
Regulatory Program(s)	Clean Water Act / NPDES		
Company Name:	Akzo Nobel Functional Chemicals LLC		
Facility Name:	Akzo Nobel Battleground Site		
Facility Physical Location:	730 Independence Parkway South		
(city, state, zip code)	LaPorte, Texas 77571		
Mailing address:	730 Independence Parkway South		
(city, state, zip code)	LaPorte, Texas 77571		
County/Parish:	Harries County		
Facility Contact:	Quinn Alexander	Regional Environmental Manager	
	quinn.alexander@akzonobel.com		
FRS Number:	110000463374		
Identification/Permit Number:	TX0006688		
Media Number:			
NAICS:	325199		
SIC:	2869, 2819		
Personnel participating in inspection:			
Kenneth L. AuBuchon	USEPA/6EN-WMH	Environmental Engineer	281-983-2151
Quinn Alexander	Akzo Nobel Functional Chemicals LLC	Regional Environmental Manager	281-817-9211
Adam Myers	Akzo Nobel Functional Chemicals LLC	Environmental Specialist	281-817-9163
EPA Lead Inspector Signature/Date			
	Kenneth L. AuBuchon		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Kenneth L. AuBuchon arrived at Akzo Nobel Functional Chemicals LLC Battleground Site, La Porte, Texas at approximately 9:30 am on February 27, 2018 for an unannounced Compliance Evaluation Inspection (CEI). I met with Quinn Alexander, Akzo Nobel Battleground Site Regional Environmental Manager and Adam Myers, Akzo Nobel Battleground Site Environmental Specialist, 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 Akzo Nobel Functional Chemicals LLC Battleground Site 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

The Akzo Nobel Functional Chemicals LLC Battleground Site (Akzo Nobel Battleground Site) is located at 730 Independence Parkway South, LaPorte, Texas. The Site manufactures commercial organometallic compounds. These compounds are used as catalysts and co-catalysts for polymer manufacturing and pharmaceutical uses. The compounds also are used for semiconductor grade metal organics that are used for electronic and research applications.

The Akzo Nobel Battleground Site has internal Outfall 101 which is a 6,000 gpd sanitary package plant that is an extended aeration activated sludge process. The package plant consists of aeration, settling, and sludge return processes. When solids are removed, they are transported to Gulf Coast Waste Authority's Washburn Tunnel Facility for final treatment and disposal. The discharge from 101 is comingled with stormwater associated with industrial activity, cooling tower blowdown, and water generated from non-process external washing (Appendices 1 contains the facility Water Balance) into a 300,000gallon pond system. The 300,000gallon pond system is discharged thru Outfall 001 to segment 1005 of the Houston Ship Channel via Phillips Ditch and Santa Ana Bayou.

Section II – OBSERVATIONS

After introductions at the opening meeting were concluded and inspection objectives were discussed, I provided a list of documents to review as part of the inspection. Facility staff was able to provide all requested documents and information. At the conclusion of the day, a daily closing was conducted to request additional information not previously requested, discuss the activities for the next day, and discuss the following observations made.

- Operational logs maintained for discharge readings had flow reported in multiples of 100 gallons per day. The flow measurement device should be suitable to demonstrate compliance with permit limitations. Since daily maximum is only 'report' and daily averages did not appear to be exceeded, this was only noted as an observation.

- Daily operational logs did not document pond levels or pond observations to insure a minimum freeboard of one foot was maintained. See Section III Areas of Concern.

When I returned to the facility on 2/28/2018 and entered the guard shack, I was informed to shelter in place due to a fire. After the fire was contained, Mr. Myers accompanied me to a meeting room where the inspection continued.

A tour of the Outfalls and the 6,000 gpd sanitary package plant was conducted on 2/28/2018. During the tour the following observations were made:

- While reviewing the outfall 001 location, no freeboard markings were visible nor was there a staff gauge to demonstrate pond levels did not exceed the 1-foot freeboard requirement. See Section III Areas of Concern.
- Mr. Roop demonstrated a strong knowledge of the treatment and sampling processes of the sanitary package plant. The system appeared in good working order and operational logs indicated no issues. When asked about his current certification, Mr. Roop said 'that he held a wastewater treatment operator D state license'. See Section III Areas of Concern.
- Tank T-236 (Treated Waste Water tank) shown below is where treated domestic wastewater is held before discharge into the pond system via outfall 101. Mr. Roop explained that the tank is used to monitor the proper operation of the domestic wastewater treatment system. The tank is recirculated and discharged when needed. Chemicals may be added to the tank to insure proper treatment of the discharge. It was not clear if Tank-236 was part of the sanitary treatment process.



Section III – AREAS OF CONCERN

Requirement – TPDES Permit TX0006688, Other Requirements, 3. The pond (fire water reservoir, retention section, and north collection box) shall be operated in such a manner as to maintain a minimum freeboard of one foot.

Concern: At the time of the inspection, it could not be demonstrated that the pond was operated in such a manner as to maintain a minimum freeboard of one foot.

Requirement – TPDES Permit TX0006688, Other Requirements, 7. ... The domestic wastewater treatment facility must be operated by a chief operator or an operator holding a Category C license or higher...

Concern: At the time of the inspection, the domestic wastewater operator held a Category D license.

At the sanitary package plant I met with Mr. Jason Roop, the sanitary package plant operator. He explained the treatment and sampling processes and when asked about his current certification, Mr. Roop said 'that he held a wastewater treatment operator D state license'. I requested a copy of his license which is Appendices 2 of this report.

Section IV – FOLLOW UP

No follow up was required.

Section V – LIST OF APPENDICES

Appendices 1 - Water Balance

Appendices 2 - Mr. Jason Roop's State Operator Licensing Information

Appendix 1

Water Balance

Water Balance for TPDES YEAR	DAY
47 inches average rainfall/year	
22 acres of site drain to pond	
958,320 sq ft area	
28,075,582 gallons rainfall runoff/year	
76,919 Gallons per day,	
16,000,000 Well Intake	43,836
Makeup Water to CT, from	
7,094,207 Makeup file using tags	19,436
3,299,727 CT Evaporation	9,040
12,489	
CT Blowdown from CT	
3,794,480 Blowdown file using tags	10,396
Sanitary water usage, from	
1,051,200 water summary report	2,880
0 Water in waste shipments	
4,436,000 Measured Outfall	12,153

Appendix 2

Mr. Jason Roop's State Licensing Information

[Questions or Comments >>](#)[Search Page](#)[Search Results](#)[Search Options](#)[CR Query](#)[Licenses](#)[TCEQ Home](#)

TCEQ Search Licensing or Registration Information

License Detail

To report a change of address, phone number, or email address, please fill out the form located at <http://www.tceq.texas.gov/licensing/forms/contactupdate>.

CN: CN605241678
Name: ROOP, JASON J
Address: [REDACTED]
City: [REDACTED]
State: [REDACTED]
ZIP: [REDACTED]
County: [REDACTED]
Work Phone: [REDACTED]

License(s)

There were 1 licenses found.

Program	License Type and Level	License Number	Last Issued Date	Exp. Date	License Status	CE Hours
WWOL	WASTEWATER TREATMENT OPERATOR D	WW0056746	03/03/2017	03/03/2020	CURRENT	0

Note: The number of CE hours needed in order to renew a license is based on the term (length) of each license. Please go to the program page for the license you hold to determine the number of CE hours needed and to view the latest information and renewal requirements for your license.

Application(s) within the Last 2 Years

There were 1 applications found.

Program	Type and Level	App. Type	App. Status	App. Review Date	App. Expiration Date	Deficiency Letter Date	Total Hours
WWOL	WASTEWATER TREATMENT OPERATOR D	NEW	LICISSUED	03/03/2017	02/20/2018	No Deficiency	20

Course(s)

There were 1 courses found. **Note:** You may see the same course listed multiple times. This occurs because the course counted towards multiple license programs.

Program	Course Title	Course Code	Hours	Date	Provider
WWOL	(CORE) BASIC WASTEWATER OPERATIONS	59	20.0	02/01/2017	TEEX ITSI

Note: Approved training providers are responsible for submitting approved training to TCEQ. Please allow 30 days from the last date of the training session for a record to appear in the search results. If a course does not appear in your training record after that time, please contact the training provider of the missing course. You may find contact information for approved training providers at <https://www.tceq.texas.gov/licensing/training/AllTrainingProviders>.

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