



Region 6 Compliance Assurance and Enforcement Division INSPECTION REPORT

Inspection Date(s):	06/21/2018		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	Lion Elastomers		
Facility Name:	Lion Elastomers		
Facility Physical Location:	1615 Main Street		
(city, state, zip code)	Port Neches, TX 77651		
Mailing address:	P.O. Box 667		
(city, state, zip code)	Port Neches, TX 77651-3039		
County/Parish:	Jefferson County		
Facility Contact:	Derwin K. Poindexter	Environmental Manager	
	409-721-1573		
FRS Number:			
Identification/Permit Number:	TX0062448		
Media Number:			
NAICS:	325212		
SIC:	2822		
Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Derwin K. Poindexter	Lion Elastomers	Environmental Manager	409-721-1573
David Baggett	Lion Elastomers	Environmental Coordinator	409-724-8843
EPA Lead Inspector Signature/Date			
	Michael D. Williams		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at Lion Elastomers. at 10:55 am on June 21, 2018 for an unannounced inspection. I met with the Environmental Manager, Derwin K. Poindexter. I presented my credentials to Mr. Poindexter and informed him that this was an EPA lead Compliance Evaluation inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act. The scope of the inspection was with permit TX0062448, facility operations and maintenance under the Clean Water Act. The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

The information presented in this report is based on the materials and information supplied by Huntsman, representatives (the permittee), observations made during the inspection and records and reports maintained by the permittee.

FACILITY DESCRIPTION

Lion Elastomers is located at 1615 Main Street, Port Neches, Texas. The Lion Synthetic Elastomers plant in Port Neches produces styrene butadiene rubber by the emulsion process. Product is packaged as bales or in boxes. The rubber produced is used to manufacture all manner of rubber products including tires. Styrene and butadiene are combined in one of five reactor trains and partially reacted to produce latex. Unreacted butadiene and styrene are then recovered and recycled in one of five recovery units where these monomers are compressed, condensed into liquid and stored for reuse as feedstock. The final recovery step for the latex is stripping of residual styrene. This is a critical process step for control of downstream emissions. The MACT regulation for the SBR industry requires less than 0.04 % residual styrene in latex. Latex is stored briefly before being processed by one of ten finishing lines. Each finishing line consists of coagulation, dewatering, drying and packaging. In coagulation the latex is converted into crumb rubber by reducing the pH to about 3.5 su. The crumb rubber is then physically pressed to remove water and broken into small pieces. It is then pneumatically conveyed onto the apron of a steam heated air dryer. Volatiles are removed from the crumb rubber and emitted from stacks. The rubber is then conveyed, weighed, baled and packaged. It is then either shipped to a customer or stored in a warehouse.

Lion Elastomers is one the partners in the joint wastewater treatment plant (JWWTP) at Huntsman Chemical, that receives process wastewater streams from the TPC Group and Lion Elastomers. JWWTP has four primary clarifiers, equalization basin, two storm water basins, two aeration basins, three final clarifiers, and a polishing pond prior to discharging into the wetlands area which discharges out of outfall 001 to the Neches River under permit TX0005070.

Lion Elastomers permit TX0087602 allows for noncontact storm water on site to be discharged. The site is graded to drain towards the west along East Loop Road. There is catch basins and the drainage ditch along the East Loop Road. The storm water is monitored and discharged to the Neches River.

Section II- Observations

This inspection revealed the following observations:

- On the day of the inspection, process areas (Carbon Black sump, propane tank and railroad crossing area) did not have the grading or barrier to prevent process material or contact storm water from flowing or being tracked into the non-contact area East Loop Road drainage ditch/storm channel. Process materials were observed in the drainage ditch on the day of the inspection.
- Lion Elastomers had a spill occur on June 16-17, 2018 the weekend before this inspection. The spill occurred in the Tank 9 Dark Extender Oil storage tank area. On the day of the inspection, the tank area looked as if it still needed cleaning to prevent sheet flow of contaminated storm water from commingling with non-contact storm water discharge. Lion Elastomers housekeeping did not appear adequate.

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

Proper Operation

- The permittee had two releases from their facility within the past year. The release in January 2018 contributed to a fish kill during rain event. The site does not have the barriers or is designed to contain all storm water runoff from the process area. The site isn't permitted to discharge commingled storm water.

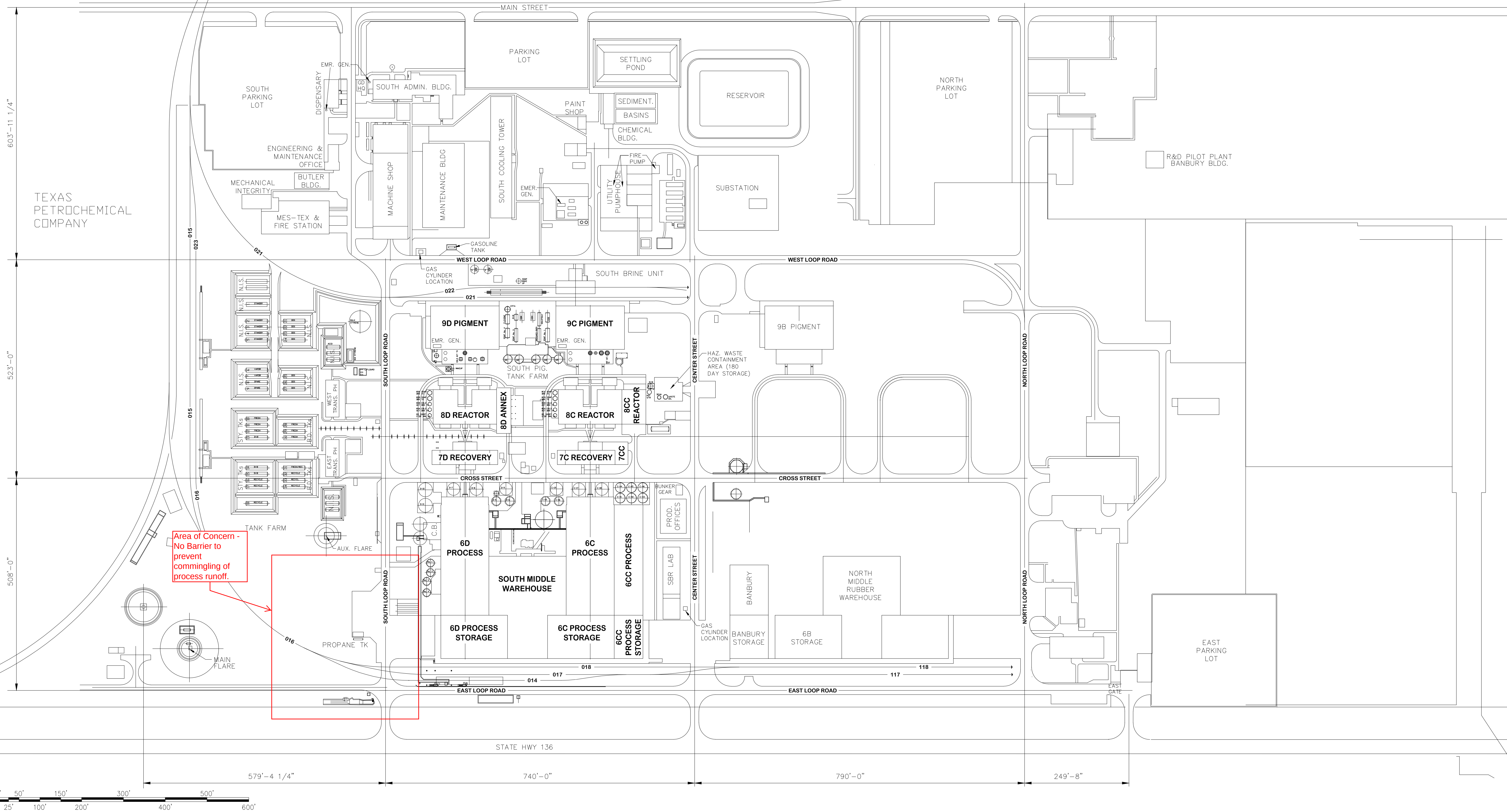
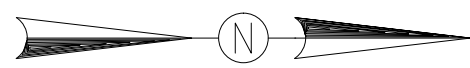
Section IV – LIST OF APPENDICES

- Appendix A –Lion Elastomers – Site Map
- Appendix B – 30 Day Follow-up Spill Summary

Appendix A

Lion Elastomers – Site Map

D-3142-001



REVISION	REV "A" ISSUE TO FIELD		WDB 01/15/97
	REV "B" ISSUE FOR GENERAL CHANGES		
	REV "C" ADD. BOLLERS		
	MAC 11/03/05		
REFERENCE DRAWINGS			
GEN. ARR. P4P 183-4-5011			
DET. DRWGS. BFG PN-G-3116			
SYMBOLS 101-1-31			
j:\engineering\dwg\3000\3142001.dwg..11/25/2013			
THIS DRAWING IS THE PROPERTY OF PORT NECHES ELASTOMERS FACILITY, HEREINAFTER CALLED THE COMPANY. THIS DRAWING IS LOANED WITH THE EXPRESSED AGREEMENT THAT THE DRAWINGS AND INFORMATION THEREIN CONTAINED ARE THE PROPERTY OF THE COMPANY AND WILL NOT BE REPRODUCED, COPIED, OR OTHERWISE DISPOSED OF, DIRECTLY OR INDIRECTLY, AND WILL NOT BE USED IN WHOLE OR IN PART TO ASSIST IN MAKING OR TO FURNISH ANY INFORMATION FOR THE MAKING OF DRAWINGS, PRINTS, OR OTHER REPRODUCTIONS THEREOF, OR FOR THE MAKING OF APPARATUS OR PARTS THEREOF, EXCEPT UPON WRITTEN PERMISSION OF THE COMPANY FIRST OBTAINED AND SPECIFIC AS TO EACH CASE. THE ACCEPTANCE OF THIS DRAWING WILL BE CONSTRUED AS AN ACCEPTANCE OF THE FORGING AGREEMENT.			
Drawn By WDB		Checked By	
Date 01/15/97		Date	
Scale 1" = 120'-0"			
DEPT		BLDG	
APPROVED		FLR	
		ISP ELASTOMERS	
		PLANT MAP	

Appendix B

Lion Elastomers – 30 Day Follow-up Spill Summary



LION ELASTOMERS

1615 MAIN STREET
PORT NECHES, TEXAS 77651
WWW.LIONELASTOMERS.COM

February 16, 2018

Certified Mail No. 7011 0470 0000 3375 1085

Texas Commission on Environmental Quality
Region 10, Beaumont Regional Office
3870 Eastex Freeway
Beaumont, TX 77703-1830

Re: Lion Elastomers LLC
Port Neches Synthetic Rubber Plant
30 Day Follow-up Spill Summary

Dear Ms. Bourg:

Please find attached the 30 Day Follow-up summary regarding the spill which occurred on January 17, 2018. Additionally, we have enclosed all available supporting information pertinent to spill remediation including disposal records, analytical data, map of sample locations and a chart summarizing the analytical results.

The excavation of the soil in and around the spill areas has been temporarily halted due to excessive rain. We are hopeful that full remediation effort can resume during the week of February 19th.

If you have any questions or concerns please contact me at (409) 721-1573.

Sincerely,

A handwritten signature in blue ink that reads "Derwin K. Poindexter". The signature is written in a cursive, flowing style.

Derwin K. Poindexter
Environmental Manager

Enclosure

Lion Elastomers 30 Day Follow-Up Spill Report

1. Information from the [initial notification](#), and a statement that the response to the discharge or spill has been completed and a description of how the action was conducted.

Date and Time the incident began: 1/17/2018, 2:56 pm

Incident Summary: The two inch drain line on Styrene Tank 13 froze and subsequently ruptured. The rupture of the drain line resulted in the spillage of 102,483 lbs of styrene to secondary containment in the Monomer Tank Farm. In addition, 2,525 lbs of butadiene were also spilled as a result of the drain line rupture.

To mitigate the spill, the drain line was plugged. The upstream valve which malfunctioned during the event will be repaired.

All standing liquid was placed into 8 frac tanks for disposal. The facility used the support of Wastewater Industrial Services to assist with spill remediation. Vacuum trucks were used for a total of 24.75 hours to collect all spilled material and transfer to frac tanks.

Date and Time the incident began: 1/27/2018, 5:35 am

Incident Summary: The facility received approximately 6" of rainfall on January 27, 2018. The volume of rainfall resulted in flooding in and around the Monomer Tank Farm (MTF), Flare, and areas south of South Loop Road. The flooding was not contained by the current Stormwater Management System. The excess stormwater was contaminated with styrene that likely originated from the process piping and flame traps on the south end of the MTF.

Initial Action Taken: Systems to minimize offsite migration were deployed. Vacuum trucks were used to collect spilled styrene. All collected material was routed to JWWTP or frac tanks for temporary storage.

Additional information to include:

Response Chronology. A chronology, listing times and dates, of the responses by the responsible person, as well as:

- the nature of the responses, along with the name, address, and phone number of the response contractor as well as the name of a contact, if different than the responsible person

- Response Contractor: Wastewater Specialties Inc., Manuel Orta, 4425 Westpark Ave. Beaumont, TX 77705; (409) 724-0095

1-17-18 Styrene Tank 13 Event Occurred at 2:56 pm. The vacuum trucks arrived on site at 5 pm. All of the spilled material was contained within secondary containment.

Liquid Vacuum Service (70 barrell) for 16.75 Hrs.

1-18-18

Liquid Vacuum Service (70 barrell) for 8 Hrs.

Two Operators and a Technician along with the Tank Farm Operators responded to the spill and assisted with mitigation measures.

- Response Contractor: Evergreen Environmental Services, Anthony Kennerson, 7888 Beauxart Garden Road, Nederland, TX 77627; (409) 679-7856,

- the date and time of the first containment actions and the name of the individuals or company conducting these activities

- Lion Elastomers Employees involved in the response and/or containment actions:

- Richie Lind
 - Bob Griggs
 - Robert Burnett
 - Glen Judice
 - Derwin Poindexter

- A detailed description of the containment equipment and personnel used and a description of the effectiveness of the initial response actions; etc.

- Vacuum trucks
 - Roll-off boxes
 - Containment booms

Meteorology. Describe weather conditions during the incident and include a discussion of how the weather may have helped or hindered the cleanup.

1. See Attached printout of the weather from that day (including before, during, and after the event)

Reported Injuries. Describe any injuries or fatalities.

1. None

Remediation of Contamination. Describe actions taken to remove or neutralize the substances discharged or spilled including:

- The amounts of substances recovered and contained.

A total of 168,000 gallons of styrene and water were recovered and contained in frac tanks. Approximately 15,000 gallons of styrene spilled, the remaining water was generated as a result of freeze protection measures.

During the time of this event we were purposely operating safety showers, eyewash stations and other systems that contained potable water.

- The amounts of substances lost to the environment.

During the initial spill it is not believed that there were losses to the environment. However, during the torrential rain event (1/27/18), it is believed that less than 50 gallons of styrene may have been loss to the environment.

- If soil was affected, the amounts of substances removed. Include a scaled map indicating the lateral and vertical extent of excavation.

Soil excavation has not been completed due to weather conditions. Excavation volume will be provided once that effort is complete.

- The disposition of any excavated substances, any recovered substances, and any additional wastes generated from the cleanup, including any on-site or off-site storage, processing, or treatment. If the material is stored off-site, the responsible person must give the name, physical address, and phone number for the storage facility.

Excavation has not commenced – The facility does have an open waste profile with Waste Management Newton County Landfill. Appropriate information will be provided once clean-up is complete.

Sampling and Analysis. A description of all sampling activities including:

- A list of the persons collecting the samples.
All samples were collected by David Baggett.
- A scaled map indicating the lateral and vertical location of the sampling locations.
A map has been included which reflects sampling locations.
- A tabulation of the analyses performed and the analytical methods used.
A summary of the analyses performed is provided for review.
- The name and address of the laboratory conducting the analytical work.
TestAmerica Laboratories
TestAmerica Houston
6310 Rothway Street
Houston, TX77040
- The name and address of the supplier of the sample containers.
TestAmerica Laboratories
TestAmerica Houston
6310 Rothway Street
Houston, TX77040
- A copy of the analytical results as reported by the laboratory to the responsible person.
Analytical is provided for review.

Waste Classification and Disposal. List the U.S. EPA and TCEQ waste-classification and waste-code numbers, along with—

- Copies of any analytical results used to obtain the waste classifications as well as any correspondence from the TCEQ.

- A list of any temporary generator or transporter numbers used, if applicable.
- Copies of the manifests for the shipment of the wastes.
 - All manifest generated to date are being provided.
- The name, address, and phone number of the facility receiving the waste.
 - Ecoserv, 26400 Wilber Road, Winnie, TX 77665. (409) 794-3455 (for styrene contaminated wastewater)
 - Waste Management, Newton County Landfill, 2372 County Road 3870, Deweyville, TX 77614. (409) 746-9920 (for styrene contaminated soil)

Rules

30 TAC 327.1-5 