

AIR CP_104392626_CP_20160218_Investigation_1313510_.pdf
Texas Commission on Environmental Quality
Investigation Report

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Customer: INVISTA S.a r.l. OFFICE TO
Customer Number: CN602582231 MAR 11 2016

Regulated Entity Name: INVISTA SARL SABINE RIVER SITE
Regulated Entity Number: RN104392626

Investigation # 1313510	Incident Numbers
Investigator: JEANETTE MORRELL	Site Classification MAJOR SOURCE
Conducted: 02/18/2016 -- 02/18/2016	NAIC Code: 325199
	SIC Code: 2869
	SIC Code: 2819
Program(s): AIR NEW SOURCE PERMITS	

Investigation Type: Site Assessment	Location:
Additional ID(s): 1302 OCA002B	

Address: 3055A FM 1006, ORANGE, TX , 77630	Local Unit: REGION 10 - BEAUMONT
	Activity Type(s): AIR RECON - AIR RECON - RECONNAISSANCE INVESTIGATION

Principal(s):

Role	Name
RESPONDENT	INVISTA S A R L

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	PLANT MANAGER	MR DOUGLAS SPEERS	Phone (409) 988-7622 Fax (409) 670-4803
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	MR KHALID ALNAHDY	Work (409) 988-7588

Other Staff Member(s):

Role	Name
Supervisor	SARAH KIRKSEY
QA Reviewer	PAUL BLANTON

Associated Check List

<u>Checklist Name</u> AIR INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013	<u>Unit Name</u> MultiRAE Plus & GASFIND
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Investigation Comments:

INTRODUCTION

RECEIVED
MAR 15 2016
TCEQ
CENTRAL FILE ROOM

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On February 18, 2016, Ms. Jeanette Morrell and Mr. Paul Blanton, Environmental Investigators with the Beaumont office of the Texas Commission on Environmental Quality (TCEQ), conducted a visible emissions and odor (VEO) survey of Invista SARL Sabine River Site (Invista) in Orange (Orange County), Texas. Attached to this report is a copy of the survey checklist.

GENERAL FACILITY AND PROCESS INFORMATION

Invista is located at 3055A Farm to Market Road 1006 in Orange (Orange County), Texas. Invista owns and operates a nylon production facility. FOP O-01898 covers the Powerhouse Unit with 3 hazardous waste boilers, the Nitric Acid Unit, the Adipic Acid Unit, and the Hexamethylene Diamine (HMD) Unit. FOP O-01897 covers Adiponitrile (ADN) manufacturing with several component units and 2 hazardous waste boilers. A detailed process description can be found in the regulated entity's public files.

BACKGROUND

The TCEQ Beaumont Air Program routinely conducts VEO surveys of several companies operating in Orange County. The purpose of these VEO surveys is to ensure that emissions, both odorous and visible, are compliant with the Rules and Regulations of the TCEQ. The VEO surveys are conducted in such a way as to maximize the TCEQ presence in the community.

ADDITIONAL INFORMATION

During the VEO survey, there were no visible emissions or odors documented by the investigators. No significant readings were detected on the MultiRae Plus Multi-Gas Monitor and GasFind Infrared camera utilized during the VEO survey.

ATTACHMENT

1. Orange VEO Checklist

No Violations Associated to this Investigation

Signed Jeanette Morrell
Environmental Investigator

Date 2/23/2016

Signed Neel
Supervisor

Date 3/4/16

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Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

✓ EO Checklist



Visible Emissions/Odor Survey Checklist (Orange Area) - Revised 9/17/2015

Investigators: Jeanette Morrell / PAUL BLANTON
Primary Investigator (writes reports) Secondary Investigator (Q/As reports)Date: 2/18/16

FM 1006 South Orange Area

Start Time: 909 hrsEnd Time: 1051 hrs

Regulated Entity	VE	Offensive Intensity	Odor(s)/Emissions Description & Location	Time Duration	PPM M/V/J
Firestone Polymers RN100224468 OC0010U		VL/chemical UP	GAS FIND 12 CAMERA - FLARE 'S Hydrocarbon Trailing Intersection 1006 - E. Road 9:12 hrs - 919 - VID013 - 922 hrs		0
Chevron Phillips RN100215615 OC0012Q	NONE	NONE	1010 - 1022 hrs NONE		
PrintPack RN102076163 OC0005N			1025 hrs NONE		
Lanxess RN100825363 OC0004P		VL UP Sweet chemical	1029 hrs - styrene / rubber		
Honeywell International RN100217405 OC0001V	NONE	NONE	NONE		
Solvay Specialty Polymers RN102305505 OC0077L	NONE	NONE	NONE		
DuPont Sabine River Works RN100542711 OC0007J	NONE	NONE	NONE FLARING BUT CAMERA SHOWED FINE		
Invista SARL RN104392626 OCA002B	NONE	NONE	NONE FLARING BUT CAMERA SHOWED FINE		

Hwy 87 North Orange Area

Start Time: 1105 hrsEnd Time: 1140 hrs

Regulated Entity	VE	Offensive Intensity	Odor(s)/Emissions Description & Location	Time Duration	PPM M/V/J
Orange Carbon Black Plant (Orion) RN100209386 OC0020R	NONE	NONE	NONE up @ 1115 hrs		
International Paper Orange Mill RN100214428 OC0019C	NONE	NONE	1124 hrs		

**Visible Emissions/Odor Survey Checklist (Orange Area) - Revised 9/17/2015****Further Comments**

1. The following instrument(s) were used during this VEO Survey (Check the instruments used)

AreaRAE Multi Gas Monitor

Gas FindIR

MultiRAE Lite Multi-Gas Monitor

MiniRAE 2000 Photoionization Detector

☒ MultiRAE Plus Multi Gas Monitor

QRAE Multi Gas Monitor

QRAE 2 Multi Gas Monitor

Passivated Stainless Steel Canister(s)

VRAE Multi Gas Monitor

2. ☒ No significant readings were detected at any time during this VEO Survey (Check if correct)

OR

A reading of

PPM of

was detected at

WEATHER CONDITIONS (Refer to CAMS Data) - http://rhone.tceq.state.tx.us/cgi-bin/select_summary.pl?region10.gifCAMS Site: 9Conditions: partly cloudyTemp (EF): 63.2°FWind Direction: ESEWind Speed (mph): 9.3CAMS Site: partly cloudyConditions: partly cloudyTemp (EF): 70.8Wind Direction: SSEWind Speed (mph): 9.6**ODORS CATEGORIES - FIDO***If No Odors - Leave Offensive/Intensity Box Blank.*

Offensiveness: Highly Offensive (HO), Offensive (O), Unpleasant (UP), and Not Unpleasant (NU).

Intensity: Very Strong (VS), Strong (S), Moderate (M), Light (L), and Very Light (VL).