To: Diem, Art[Diem.Art@epa.gov]; Smith, Darcie[Smith.Darcie@epa.gov]
From: Casso, Ruben
Sent: Thur 10/29/2015 8:39:09 PM
Subject: RE: FYI - annual DuPont facility-wide chloroprene emissions 1991-2014

Art & Darcie:

Ex. 5 - Deliberative Process

From: Diem, Art
Sent: Thursday, October 29, 2015 2:49 PM
To: Casso, Ruben
Cc: Strum, Madeleine; Smith, Darcie; Rimer, Kelly; Palma, Ted
Subject: RE: FYI - annual DuPont facility-wide chloroprene emissions 1991-2014

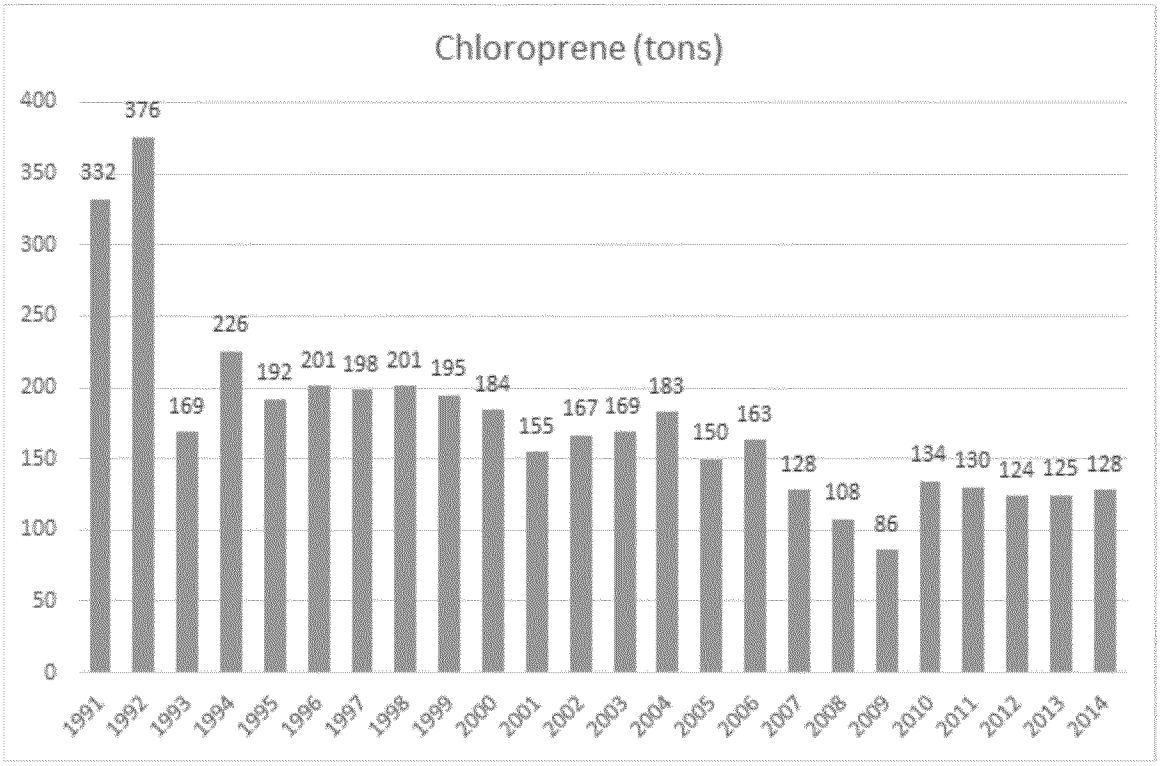
Hi Ruben,

Thanks for sending that sheet! Below is a bar chart.

Ex. 5 - Deliberative Process

Thanks,

Art



- -

Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division, Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185

From: Casso, Ruben
Sent: Thursday, October 29, 2015 2:45 PM
To: Rimer, Kelly; Palma, Ted
Cc: Strum, Madeleine; Smith, Darcie; Diem, Art
Subject: FYI - annual DuPont facility-wide chloroprene emissions 1991-2014

Kelly & Ted – It was great to see y'all again and to meet Darci, Madeline & Art.

Ex. 5 - Deliberative Process

Parameter	Risk	Facility Emissions (lb)	Emission sData Source	State Submitted
Cancer risk (per mil)	9,457.0	517.50000	2011EPA_chrom_split	2070.00 (Chromium)
Cancer risk (per mil)	1,670.2	83.30000	2011EPA_chrom_split	85.00 (Chromium)
Cancer risk (per mil)	1,183.4	618.80000	2011EPA_chrom_split	1200.00 (Chromium)
Cancer risk (per mil)	2,402.9	31880.30080	2011 IL EPA	31880.30080
Cancer risk (per mil)	1,816.0	260155.00000	2011 LADEQ	260155.000
Cancer risk (per mil)	3,985.2	5212.87990	2011EPA_chrom_split	15332.000 (Chromium)
Cancer risk (per mil)	1,196.9	137074.14060	2011 OHEPA	137074.1406
Cancer risk (per mil)	5,507.0	92.00000	2011 OHEPA	92.000
Cancer risk (per mil)	264,150.1	289880.00000	2011 OHEPA	289880.00000
Cancer risk (per mil)	1,566.2	4664.00000	2011 PADEP	4664.0000
Cancer risk (per mil)	1,026.6	11120.00000	2011 PADEP	11120.00
Cancer risk (per mil)	1,282.5	34495.01950	2011 WVDAQ	34495.01950
Cancer risk (per mil)	2,166.9	153.72400	2011 CARB	153.724000

Pollutant	Facil ID	Agency ID
Chromium (VI)	982611	0014
Chromium (VI)	1092211	10730166 (ALJCBOH
Chromium (VI)	7332111	069015AAI
Coke Oven Emissions	8191211	119813AAI
Chloroprene	8026611	38806
Chromium (VI)	723711	00001
Vinyl Chloride	92373	110372030210
7,12-Dimethylbenz[a]An	92694	110448010370
Nickel	93021	111431370790
Nickel	4104011	421290010
Naphthalene	7873611	420450025
Coke Oven Emissions	4864311	0002
Chromium (VI)	158433	113914307709

Name	County	State
Pemco World Air Services	Dale	AL
CHROME DEPOSIT CORP ROLL FINISHING DIVISION	Jefferson	AL
Prince Minerals Inc	Hardin	IL
US Steel Granite City	Madison	IL
E I DuPont de Nemours & Co - Pontchartrain Site	St. John th	LA
Tyson Fresh Meats Inc	Dakota	NE
Style Crest Enterprises, Inc. (0372030210)	Sandusky	OH
Tembec BTLSR Inc (0448010370)	Lucas	OH
FUSITE DIVISION-EMERSON ELECTRIC CO. (1431370790)	Hamilton	OH
DURALOY TECHNOLOGIES/SCOTTDALE	Westmore	PA
SUNOCO INC (R&M)/MARCUS HOOK REFINERY	Delaware	PA
MOUNTAIN STATE CARBON, LLC	Brooke	WV
RECOLOGY GROVER ENVIRONMENTAL PRODUCTS	San Joaqui	CA

Address listed as various locations with county centroid lat/lon

Parameter	Risk	Facility Emissions (lb)	Emissions Data Source	Pollutant	EIS ID
Cancer risk (per mil)	1,117.3	108995.00000	2011EPA_TRI	Nickel	3102011
Cancer risk (per mil)	1,343.5	346.27000	2011EPA_TRI	Chromium (VI)	3105711
Cancer risk (per mil)	4,108.7	125.73000	2011EPA_TRI	Chromium (VI)	3122011
Cancer risk (per mil)	15,329.8	816.64000	2011EPA_TRI	Chromium (VI)	3122411
Cancer risk (per mil)	2,538.1	3380.23000	2011EPA_TRI	Nickel	3122411
Cancer risk (per mil)	1,296.9	1146.63000	2011EPA_TRI	Nickel	8223711
Cancer risk (per mil)	1,301.1	3116.00000	2011EPA_TRI	Nickel	9209911

TRI ID	Name	County	State
38301TLPRD825LO	Intermet Jackson Plant	Madison	TN
67648GRTPL240SO	GREAT PLAINS MANUFACTURING, INC.	Russell	KS
67401GRTPL244NO	GREAT PLAINS MANUFACTURING, INC.	Saline	KS
67401GRTPL601ID	GREAT PLAINS MANUFACTURING, INC.	Saline	KS
67401GRTPL601ID	GREAT PLAINS MANUFACTURING, INC.	Saline	KS
47802GRTLN330GR	GARTLAND FOUNDRY COMPANY	Vigo	IN
16505THRCR3120W	Erie Ceramic Arts Co LLC	Erie	PA

To: Shinkman, Susan[Shinkman.Susan@epa.gov]; Blevins, John[Blevins.John@epa.gov]; Kelley, Rosemarie[Kelley.Rosemarie@epa.gov]
Cc: Starfield, Lawrence[Starfield.Lawrence@epa.gov]; Gilrein, Stephen[gilrein.stephen@epa.gov]; Seager, Cheryl[Seager.Cheryl@epa.gov]; Brooks, Phillip[Brooks.Phillip@epa.gov]; Chapman, Apple[Chapman.Apple@epa.gov]; Fried, Gregory[Fried.Gregory@epa.gov]; Messina, Edward[Messina.Edward@epa.gov]
From: Smidinger, Betsy
Sent: Fri 12/4/2015 9:10:54 PM
Subject: RE: DuPont Pontchartrain

Ex. 5 - Deliberative Process

From: Shinkman, Susan
Sent: Friday, December 04, 2015 2:25 PM
To: Blevins, John <Blevins.John@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Brooks, Phillip <Brooks.Phillip@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Subject: RE: DuPont Pontchartrain

Ex. 5 - Deliberative Process

From: Blevins, John
Sent: Friday, December 04, 2015 8:23 AM
To: Shinkman, Susan <Shinkman.Susan@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Fwd: DuPont Pontchartrain

Ex. 5 - Deliberative Process

I am out today and Monday but have my phone if we need to talk.

Thanks

John

Subject: FW: DuPont Pontchartrain

2011 National-scale Air Toxics Assessment

Frequently Asked Questions

General Background Questions

1. What are air toxics and what health effects are caused by exposure to them?
2. What is the National-scale Air Toxics Assessment?
3. How can NATA information be used?
4. How should I NOT use NATA results?
5. Are there any risks from exposure to air toxics that are not covered by NATA?
6. Who is responsible for controlling air toxics?
7. What should I do if I am concerned about air toxics in my area?
8. How does NATA differ from other screening tools used by EPA?
9. How do I know which screening tool to use?

Emissions, Modeling, Methods Questions

1. Which air toxics are included in NATA?
2. What are the steps in the National-scale Air Toxics Assessment?
3. What is CMAQ and how was it used in the 2011 NATA?
4. Why were Alaska, Hawaii, Puerto Rico, the Virgin Islands, and other territories not included in the CMAQ modeling?
5. Why are all the estimates from 2011 and not more recent?
6. Why is EPA using computer modeling techniques instead of actual measurements to estimate concentrations and exposures?
7. What improvements have been made in the 2011 NATA?
8. What kind of changes were made in the 2011 NATA as a result of the review by the States?
9. How did EPA characterize risk from modeled 2011 exposure estimates?
10. How does EPA estimate cancer risk?
11. Why are primary biogenic emissions not included from Alaska, Hawaii, Puerto Rico, and the Virgin Islands?
12. A portion of the estimated risk is due to "background". What is background?
13. A portion of the estimated risk is due to secondary formation, and it varies across the country. What is it?

Risk Background Questions

1. What does "1-in-1 million" cancer risk mean?
2. What does EPA believe constitutes an acceptable level of risk?
3. How were the cancer risk estimates affected by EPA's Guidelines for Carcinogen Risk Assessment (EPA/630/P-03/001F) and Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens (EPA/630/R-03/003F)?
4. Why did the EPA use the (higher) unit risk estimate (URE) for formaldehyde reported in the Agency's Integrated Risk Information System (IRIS)?
5. Why aren't results for dioxins included?

Results Questions

1. Does the assessment show that the risk is high?
2. What do these estimates mean to me?
3. How accurate is the assessment?
4. How does the cancer risk identified in this assessment compare to a lifetime cancer risk from all causes?
5. Risk data is shown down to the census tract level. Are the results accurate enough to draw conclusions at this scale?
6. Based on this NATA, can EPA determine which areas or populations are at greatest risk from air toxics?
7. How does this assessment of 2011 air toxics data compare to previous national-scale assessments?
8. Has air quality improved?
9. Can NATA be used to evaluate exposures at specific points of interest, e.g., near schools, day care centers, hospitals, etc.?
10. I am able to locate a specific facility location from the map and get a risk at that location. How accurate is that risk value?

11. Why is there risk from biogenic emissions?

Fire Questions
1. How did EPA treat fires in the 2011 NATA?
2. What does NATA show regarding impacts of wildfires, prescribed fires and agricultural burning?
3. What are the uncertainties in risks from emissions from fires?
4. What is being done to reduce air pollution from wildfires and prescribed fires?

Mobile Source Questions
1. How accurate are risk estimates for mobile sources in my census tract?
2. Onroad and nonroad mobile sources are large contributors to overall risk in the 2011 assessment. What is the EPA doing to reduce emissions of mobile source air toxics?
3. Why are only noncancer risks calculated for diesel PM? Isn't there a cancer unit risk available?
4. There has been increased concern about the health effects associated with pollution near roads. What can the 2011 NATA tell us about communities potentially at greater health risk from exposure to near-road pollution?
5. NATA results show significant risks associated with a port in my community. How accurate are the risk estimates associated with ports, and what can be done to reduce these risks.
6. What does the 2011 NATA say about airport risks?

General Background Questions

1: **What are air toxics and what health effects are caused by exposure to them?**
A: Air toxics, also known as toxic air pollutants or hazardous air pollutants, are those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects.

Examples of toxic air pollutants include benzene which is found in gasoline; tetrachloroethylene which is emitted from some dry cleaning facilities; and methylene chloride which is used as a solvent and paint stripper by a number of industries. Section 112 of the Clean Air Act identifies 187 air toxics emitted from stationary and mobile sources and subjects the sources of their emissions to regulations in order to protect public health. Through appropriate rulemaking, the Clean Air Act list may be modified. For more information on the Clean Air Act, see http://www.epa.gov/air/caa/. For more information on air quality, see www.epa.gov/air/basic.html

The EPA has classified many of these substances as "carcinogenic to humans," "likely to be carcinogenic to humans," or "suggestive evidence of carcinogenicity to humans." Air toxics are associated with a wide variety of noncancer adverse health effects that include neurological, cardiovascular, liver, kidney, and respiratory effects as well as effects on the immune and reproductive systems. The seriousness of the harm can range from headaches and nausea to respiratory arrest and death. Severity varies with the amount and length of exposure, the nature of the chemical itself (e.g., how it interacts with various organs and organ systems), and the unique behaviors and sensitivities of individual people. Some chemicals pose particular hazards to people of certain ages or genetic backgrounds.

2: **What is the National-scale Air Toxics Assessment?**
A: The National-scale Air Toxics Assessment (NATA) is EPA's comprehensive evaluation of air toxics in the United States, based on modeled air quality. EPA developed the NATA as a tool for EPA and State/Local/Tribal Agencies to prioritize air toxics, emission sources, and locations of interest for further study in order to gain a better understanding of risks. NATA is a state-of-the-science screening tool that does not incorporate refined information about emission sources, but rather, uses general information about sources to develop estimates of risks using analytical methods. NATA assessments provide screening-level estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types, and locations that are of greatest potential concern in terms of contribution to population risk. This in turn helps air pollution experts focus limited analytical resources on areas or populations where the potential for health risks are highest. NATA provides a snapshot of the outdoor air quality and the risks to human health that would result if air toxic emission levels remained unchanged. A more detailed explanation of NATA and the methods used may be found in the Technical Support Document.

3: **How can NATA information be used?**
A: Specifically, EPA uses NATA results to:

- identify pollutants and source categories of greatest concern,
- improve understanding of health risks posed by air toxics,
- help set priorities for the collection of additional information,
- set priorities for improving emission inventories,
- expand and prioritize EPA's air toxics monitoring network,
- support communities in designing their own local assessments,
- enhance targeted risk reduction activities,
- link air toxics to the Criteria Pollutant Program, and
- help inform community and local air toxics programs

4: How should I NOT use NATA results?
A: NATA assessments should <u>not</u> be used for the following:

- as a definitive means to pinpoint specific risk values within a census tract,
- to characterize or compare risks at local levels such as between neighborhoods,
- to characterize or compare risks between states,
- to examine trends from one NATA year to another,
- as the sole basis for developing risk reduction plans or regulations,
- as the sole basis to control specific sources or pollutants, or
- as the sole basis to quantify benefits of reduced air toxic emissions.

It should also be noted that although results are reported at the census tract level, average risk estimates are far more uncertain at this level of spatial resolution than at the county or state level. Even though some of the methods used to conduct NATA are similar to those used in air-related risk assessments conducted under the Clean Air Act mandate (such as residual risk assessments of hazardous air pollutant (HAP) emissions from point sources, or assessments of exposures to criteria pollutants for evaluations of National Ambient Air Quality Standards), NATA fundamentally differs from such assessments in that it is not a refined assessment, and it is not used as the sole source of information leading to regulations or guiding the enforcement of existing rules.

5: Are there any risks from exposure to air toxics that are not covered by NATA?
A: This assessment is focused on characterizing one piece of the air toxics risk picture at a particular point in time. NATA looks at human health impacts from estimated, chronic, inhalation exposure due to outdoor sources of air toxics, assuming the emissions upon which NATA are based remain constant throughout one's lifetime, not today's levels or projected levels. NATA does not include:

- Cancer risks associated with diesel particulate matter, which are likely to be substantial (see question 3 below in the Mobile Sources Section).
- Non-inhalation exposures, such as ingestion and dermal exposures. These additional pathways are especially important for pollutants that persist in the environment and bioaccumulate (e.g., mercury and polychlorinated biphenyls).
- Exposures and risk very near to specific sources or highly-localized hotspot levels, such as some types of occupational or near roadway-related exposures.
- Individual extremes in exposure. All risk estimates are based on exposure estimates for the median individual within each census tract. EPA considers this exposure to be a "typical" exposure for that tract. Some individuals may have substantially higher or lower exposures based on where they live within that tract or spend the majority of their time.
- Emissions from indoor sources of air toxics. For certain air toxics and for certain indoor situations, total long-term human exposures can be significantly influenced and sometimes dominated by exposures from indoor sources.
- Risk estimates for chemicals that do not have adequate dose-response information (e.g., assessment does not quantify cancer risk from diesel PM).

- Impacts of non-routine increases in facility emissions due to, for example, equipment startups, shutdowns, malfunctions, and upsets.
- Assessment of adverse environmental effects, or other welfare effects.

6: Who is responsible for controlling air toxics?
A: The responsibility is shared among EPA, state, local and tribal air programs. EPA sets national standards for air toxics emissions. The state, local, tribal programs are responsible for implementing these rules. In addition, some state, local, and tribal programs have their own air toxics rules. Some studies conducted by state, local, and tribal programs can be found here.

7: What should I do if I am concerned about toxics in my area?
A: Contact your State, local or Tribal air program. A list of state and local programs is available at:
http://www.4cleanair.org/agencies EXIT Disclaimer

Information on Tribal programs and EPA's Regional Tribal Program coordinators can be found at:
http://www2.epa.gov/tribal

8: How does NATA differ from the other screening tools used by EPA?
A: NATA is a national assessment that estimates cancer and noncancer risks from inhalation of air toxics. NATA is intended as a screening tool to help users prioritize pollutants, types of emission sources, and locations of interest for further study. NATA is also incorporated into other Agency screening tools, including EJSCREEN and C-FERST/T-FERST.

The focus of the EJSCREEN screening tool is to assist stakeholders in making informed decisions about potential environmental justice issues by identifying the locations of potentially overburdened and vulnerable populations. EJSCREEN output includes environmental justice indexes that combine demographic variables with a single environmental indicator. The index provides a comparison between areas.

The focus of C-FERST is to provide information and community mapping through an assessment tool that is designed to help assess screening-level exposures and risks. To provide guidance and information that helps inform in decision making with communities, C-FERST provides access to resources that can be used to help communities learn more about their environmental issues and to develop solutions.

9: How do I know which screening tool to use?
A: The screening tool you select depends on your main area of interest. Those primarily interested in inhalation risks and pollutant-specific assessment may find NATA to be the best tool. Those interested in how the environmental quality differs by demographics will want to start with EJSCREEN. For communities interested in their specific area with an interest in exploring community strategies to address a specific issues (e.g., brownfield development), CFERST is a good place to start. Users could also use the tools in sequence by identifying communities of interest with EJSCREEN and then using CFERST to take a closer look at that community and using CFERST guides for community assessments and potential solutions.

Emissions, Modeling, Methods Questions

1: Which air toxics are included in NATA?
A: The 2011 NATA is a national-level risk assessment based on the emissions of air toxics that produces census-tract level estimates of ambient and exposure concentrations for 180 air toxics, plus diesel PM, which EPA assessed for noncancer effects only. Using the concentration estimates for the 180 air toxics plus diesel PM, NATA estimates cancer risk and noncancer hazard for 138 of these. For 43 air toxics, concentration estimates but no health effects information are available. A list of all air toxics assessed and an indication of what types of results were generated for each can be found in Appendix B of the 2011 NATA Technical Support Document.

The following individual listed air toxics were not included in this assessment because either no emission information was reported for them in 2011 or emission estimates useful for modeling could not be determined reliably from their reported emissions (e.g., radionuclides).

- 2,3,7,8-tetrachlorodibenzo-p-dioxin,
- Other dioxins/furans
- asbestos,
- fine mineral fibers,
- radionuclides,

- DDE
- Diazomethane, and
- Hexamethylphosphoramide.

2: What are the steps in the National-scale Air Toxics Assessment?
A: NATA includes the following four major steps for assessing air toxics across the United States (and also for Puerto Rico and the U.S. Virgin Islands):

1. **Compile a 2011 national emissions inventory of air toxics from outdoor sources.**
   EPA compiled measured or estimated emissions data reported by sources, States, and others. EPA also estimated mobile source and other emissions using models, measurements, and a quality-control process. This compilation of information is called the National Emissions Inventory (NEI). The types of emission sources in the inventory include major stationary sources (e.g., large waste incinerators and factories), area and other sources (e.g., dry cleaners, small manufacturers), and both onroad and nonroad mobile sources (e.g., cars, trucks, and boats). Emissions from fires and biogenic sources are also included. For 2011, EPA used the NEI as the starting point and developed the 2011 NATA inventory which was used as the source of input information for modeling.
2. **Estimate ambient air concentrations based on the 2011 emissions.**
   The 2011 NATA emissions information for all air toxics were used as inputs to the air dispersion model AERMOD (as run in the Human Exposure Model (HEM), and the Community Multi-scale Air Quality (CMAQ) to estimate ambient concentrations. Forty HAP were modeled in CMAQ and all HAP were modeled in AERMOD. The results were then combined using the hybrid approach to take advantage of the strengths of both models. (The Technical Support Document contains lists of the CMAQ HAP and the AERMOD HAP, as well as a description of the hybrid approach.) As part of this modeling exercise, EPA compared estimated ambient concentrations to available ambient air toxics monitoring data to evaluate model performance.
3. **Estimate population exposures.** The estimated ambient concentrations are used as inputs to an exposure model, the Hazardous Air Pollution Exposure Model (HAPEM). Estimating exposure is a key step in determining potential health risk. People move from one location to another, for example from outside to inside. Thus, exposure isn't the same as it would be if people stayed in one location. People also breathe at different rates depending on their activity levels, so the amounts of air they take in vary in time. For these reasons, the average concentration of a pollutant that people breathe, or their exposure concentration, might be higher or lower than the concentration at a fixed location (i.e., ambient concentration).
4. **Characterize potential public health risks due to inhalation of air toxics.**
   Cancer and noncancer health effects were characterized using available information on air toxics health effects, current Agency risk assessment and risk characterization guidelines, and estimated population exposures. This characterization quantifies, as appropriate, potential cumulative risks to public health due to inhalation of air toxics from outdoor emission sources assuming a lifelong exposure to 2011 levels of emissions. It also discusses the uncertainties and limitations of the NATA assessments. More detailed information about these steps can be found in the Technical Support Document.

3: What is CMAQ and how was it used in the 2011 NATA?
A: CMAQ, EPA's Community Multiscale Air Quality Model, is used to conduct urban- to regional-scale simulations of multiple air quality issues. The model provides complete coverage over space and time of the lower 48 United States. CMAQ accounts for key physical and chemical properties that affect how pollutants are transported and react with other pollutants and gases in the atmosphere. A primary use of CMAQ is to predict how emissions of multiple air pollutants, emitted by numerous sources at the same time, affect the concentration of these pollutants across the U.S.

Several features of CMAQ that contribute to its strengths for the 2011 NATA include: conservation of mass (i.e., if some quantity of a pollutant is transported from an area, it is accounted for in the new area); consideration of long-range transport of pollutants; and estimated concentrations of secondarily-formed pollutants (e.g., formaldehyde). In the 2011 NATA, EPA used CMAQ for about 40 pollutants including emissions from point, nonpoint, mobile, and fires.

In addition to the CMAQ model, the dispersion model AERMOD was run for all of the NATA pollutants at all U.S. census tracts, for point, nonpoint, and mobile sources. Dispersion modeling uses mathematical formulations to characterize the atmospheric processes that disperse a pollutant emitted by a source. The resulting ambient concentrations estimated by both CMAQ and AERMOD were then used together, in a hybrid approach, to take advantage of the features of each model. Detailed information on the approach used with CMAQ and AERMOD can be found in the Technical Support Document (section 3).

4. Why were Alaska, Hawaii, Puerto Rico, the Virgin Islands, and other territories not included in the CMAQ modeling?
A: The CMAQ modeling performed for the 2011 NATA used a single domain that covers the entire continental U.S. and large portions of Canada and Mexico. However, this domain does not include Alaska, Hawaii, Puerto Rico, or the Virgin Islands (which is consistent with previous regulatory modeling exercises conducted by EPA). Air quality modeling done for areas outside of the lower 48 states is typically performed by incorporating data that is tailored to the unique weather and terrain that influence these areas. Incorporating this additional data for the NATA air quality modeling would have required significantly more computing resources. However, users can find additional information about air toxics emissions in these areas by using the NATA mapping tool.

5: Why are all the estimates for the year 2011 and not more recent?
A: We used 2011 data because emission inventories from that year were the most complete and up-to-date available. Working with industries and States, we update our air toxics emission inventories every 3 years and are now gathering and compiling 2014 data. The risk estimates assume a lifelong exposure to 2011 levels because calculating projected exposures based on projections to more recent years would be substantially more complex and uncertain.

6: Why is EPA using computer modeling techniques instead of actual measurements to estimate concentrations and exposure?
A: The ability to directly measure ambient air toxics concentrations evenly across the country is currently limited. Such measurements are available for only a subset of air toxics in relatively few locations and for small study populations. Therefore, computer models that can estimate ambient air toxics concentrations and population exposures nationwide are needed to conduct large-scale, comprehensive assessments such as NATA.

Measurement data are used and will continue to be used to evaluate the models to better understand some of the uncertainties in such assessments and to improve modeling tools. For example, in the Section 3.3 of the Technical Support Document, Model Evaluation, there is an explanation of the results of the model-to-monitor comparisons done for the 2011 NATA. In addition, annual statistics for air toxics monitoring data are provided in the NATA Map Application. Air toxics monitoring data can be obtained from the Air Monitoring Archive in Microsoft ACCESS format for historical data years up to 2013 or, from EPA's AQS data mart for the most up-to-date data.

7: What improvements have been made in the 2011 NATA?
A: The following changes were incorporated in the 2011 NATA. Many of the changes adopted in the 2005 NATA were carried over to the 2011 NATA: they are not repeated here.

- Emissions
  - Used 2011 NEI v2 based on updated information.
  - Included wild fires.
  - Biogenic emissions were split out as separate primary emissions category (were included within secondary category in 2005 NATA).
  - More complete inventory for oil and gas emissions resulting from new EPA nonpoint oil and gas estimation tool and state data submittals.
  - Improved spatial allocation of county-level oil and gas emissions
  - Better characterization of airports
  - Over 750 rail yards were included as point sources.
  - The updated model MOVES2014 was used to develop mobile on-road emissions.
  - Commercial marine vessel emissions were better spatially allocated

    - Prescribed burning and agricultural burning emissions were generated using updated models
    - Updated emission factors collected from rule development were used where available.
- Modeling
    - AERMOD was used to model all NATA pollutants emitted from point, nonpoint, and mobile sources for all U.S. Census tracts.
    - CMAQ was used to model about 40 NATA pollutants for the lower 48 states at 12 km grid resolution to capture chemistry and long-range transport. Ran for point, nonpoint, mobile sources, and fires.
    - Ambient concentrations from both models were combined using a hybrid approach.
    - Updated background concentrations based on remote background concentration estimates and used for pollutants not modeled in CMAQ.
- Risk Characterization
    - HAPEM7 was used to estimate exposure concentrations.
    - Dose-response values were updated with latest science (IRIS, CalEPA, ATSDR).
    - Several benchmarks have been updated since the 2005 NATA.
    - New web-based map to display results.

Although EPA is continually refining and updating the assessment methods, it is important to remember that NATA is a screening-level assessment. The intent is to identify hazardous air pollutants resulting in high exposures or census tracts where population exposures may be of concern. These areas could then utilize more refined assessments (e.g., monitoring or site-specific risk assessments), to develop a more thorough understanding of these "hot-spot" exposures.

8: What kind of changes were made in the 2011 NATA as a result of the review by the States?
A: EPA appreciates the time taken by State, local, and tribal air agencies to preview and comment on the preliminary results of this assessment. It is thorough reviews such as these that enable us to continually improve our assessments, thereby increasing the benefit to all users of the results. The 2011 NEI v1 review led to changes by more than 25 agencies which were incorporated in the 2011 NEI v2. We received over 200 sets of comments from nearly 50 State, local, and tribal agencies during review of the risk results based on the 2011 NEI v2. These comments along with review by EPA resulted in over 45,000 revisions to NATA inventories. These comments covered the areas of:

- Facility changes:
    - Removal of facilities (duplicates or closed prior to 2011)
    - Geographic coordinate changes
    - Facility changes
    - Facility NAICS and SCC changes Revisions to stack parameters

- Emission changes:
    - Additions, deletions, and recalculations
    - Changes to chromium speciation, hexavalent chromium percentage
    - Revision of TRI emissions which were based on midpoint of range (for facilities reporting a range estimate to TRI)
    - Removal of estimates based on older, outdated methodology (ethylene oxide sterilizers)

Most of the comments were addressed by making the appropriate changes to the 2011 NEI and NATA inventories, and the final 2011 NATA now reflects these changes. Additional comments focused on methodological and toxicological questions, many of which are addressed or answered in various sections of the NATA webpage.

9. How did EPA characterize risk from the modeled 2011 exposure estimates?
A: To evaluate a chemical's potential to cause cancer and other adverse health effects, EPA examines the adverse effects a particular substance causes (in a "hazard identification"), determines the exposure to the

population (in an "exposure assessment"), and evaluates the specific exposures at which these effects might occur (in a "dose-response assessment"). The evaluation is based on studies of humans, animals, and microorganisms, and is usually published in peer-reviewed scientific journals. In this national-scale assessment, EPA combined information from dose-response assessments with modeled exposure estimates in a "risk characterization" to describe the potential that real-world exposure to air toxics compounds might cause harm. The EPA also examined the uncertainties surrounding the characterization of risk.

10. How does EPA estimate cancer risk?
A: At present, EPA typically assumes a linear relationship between the level of exposure and the lifetime probability of cancer from an air toxics compound. It expresses this dose-response relationship for cancer in terms of a unit risk estimate. The unit risk estimate (URE) is an upper bound estimate of an individual's probability of contracting cancer over a lifetime of exposure to a concentration of one microgram of the pollutant per cubic meter of air. Risks from exposures to concentrations other than one microgram per cubic meter are usually calculated by multiplying the actual concentration to which someone is exposed by the URE. For example, the EPA may determine the URE of a particular air toxics compound to be one in ten thousand per microgram per cubic meter. This means that a person who inhales air containing an average of one microgram per cubic meter for 70 years would have (as an upper bound) one chance in ten thousand (or 0.01 percent) of contracting cancer as a result. The EPA has developed UREs for many substances, and continues to re-examine and update them as knowledge improves. More information on UREs can be found in the EPA's Integrated Risk Information System. The UREs used in this assessment, are included Appendix H of the Technical Support Document.

11: Why are primary biogenic emissions not included from Alaska, Hawaii, Puerto Rico, and the Virgin Islands?
A: Primary biogenic emissions were only modeled using the CMAQ air quality model. Alaska, Hawaii, Puerto Rico, the Virgin Islands, and other territories are not currently included in CMAQ. See the answer to question 4 for more information.

12: A portion of the estimated risk is due to "background". What is background?
A: In NATA, background risk represent the contributions to outdoor air toxics concentrations resulting from natural sources, persistence in the environment of past years' emissions, and long-range transport from distant sources. Background concentrations could be levels of pollutants that would be found in a particular year, even if there had been no recent manmade emissions. The vast majority of risk from the NATA background concentrations is from carbon tetrachloride, a ubiquitous pollutant that has few sources of emissions but is persistent due to its long half-life. Background was estimated as remote concentration estimates from monitoring and emissions.

13. A portion of the estimated risk is due to secondary formation, and it varies across the country. What is secondary formation?
A: Like ozone, some hazardous air pollutants, such as formaldehyde and acetaldehyde are formed through chemical reactions that occur in the atmosphere due to emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx). Secondary formation was estimated in 2011 NATA using the CMAQ model.

Risk Background Questions

1: What does "1-in-1 million" risk mean?
A: A risk level of 1-in-1 million implies a likelihood that one person, out of one million people that are exposed to the same concentration of the same pollutant, would contract cancer if exposed continuously (24 hours per day) to that specific concentration over 70 years (an assumed lifetime). This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics.

2: What does EPA believe constitutes an acceptable level of risk?
A: Unlike other pollutants that EPA regulates, air toxics have no universally-applicable, pre-defined risk levels that clearly represent acceptable or unacceptable thresholds. However, EPA has made case-specific determinations and described certain general presumptions that apply to particular regulatory programs. The 1989 Benzene National Emission Standard for Hazardous Air Pollutants (NESHAP) rule set up a two-step, risk-based decision framework for the NESHAP program. This rule and framework are described in more detail in EPA's 1999 Residual Risk Report to Congress. First, the rule sets an upper limit of risk acceptability of about 1-in-10,000 (or 100-in-1 million) lifetime cancer risk for the most exposed individual. In the rule, we explained, "The EPA will generally presume that if the risk to that individual [the Maximum Individual Risk] is no higher than approximately 1 in 10 thousand, that risk level is considered acceptable and EPA then considers the other health and risk factors to complete an overall judgment on acceptability." Second, the rule set a target of protecting the greatest number of persons possible to an individual lifetime risk level no

higher than approximately 1-in-1 million. These determinations called for considering other health and risk factors, including the uncertainty in the risk assessment, in making an overall judgment on risk acceptability.

Unlike cancer risk, there currently is no framework for determining the acceptability of noncancer risks. Aggregate exposures equal to or below a hazard index (HI) of 1.0 derived using target organ specific hazard quotients likely will not result in adverse noncancer health effects over a lifetime of exposure and would ordinarily be considered acceptable. However, an HI greater than 1.0 does not necessarily suggest a likelihood of adverse effects nor does it imply an unacceptable level of effect. Instead, the acceptability of exceedances is evaluated on a case-by-case basis, considering such factors as the confidence level of the underlying health data, the uncertainties , the slope of the dose-response curve (if known), the magnitude of the exceedances, and the numbers or types of people exposed at various levels above the RfC.

3: How were the cancer risk estimates affected by EPA's Guidelines for Carcinogen Risk Assessment (EPA/630/P-03/001F) and Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens (EPA/630/R-03/003F)?
A: NATA is consistent with the 2005 revised cancer guidelines and the Supplemental Guidance that makes recommendations with regard to estimating cancer risks to children. The recommendations concerning children's risk have been implemented for the following HAPs: acrylamide, benzidine, chloroprene, coke oven emissions, ethyl carbamate, methylene chloride, nitrosodimethylamine, and PAHs by applying a risk factor of 1.6 to account for the increase in lifetime cancer risk due to childhood exposures. This was done because these HAPs have been shown to have a mutagenic mode of action and because there is no chemical-specific data to show that there are differences between children and adults in the way they respond to exposure to these agents.

In contrast, vinyl chloride does have chemical-specific data available regarding children's exposure and risk. These data were used in the derivation of the unit risk estimate (URE) (see the IRIS website for a more thorough explanation). Therefore, the URE for vinyl chloride that is used in the 2011 NATA and is presented in Appendix H of the Technical Support Document, already reflects the risk due to childhood exposures, and no further adjustment is necessary.

For trichloroethylene, a carcinogen with a mutagenic mode of action, the age dependent adjustment factor for the URE only applies to the portion of the slope factor reflecting risk of kidney cancer. For full lifetime exposure to a constant level of trichloroethylene, the URE was adjusted by a factor of 1.12.

A brief explanation of the adjustments to risk follows: The Supplemental Guidance recommends that risks to children be adjusted for carcinogenic chemicals acting through a mutagenic and linear mode of action (i.e., chemicals that cause cancer by damaging genes). Where available data for the chemical are adequate, they should be used to develop age-specific potency values (e.g., vinyl chloride). Where available data do not support a chemical-specific evaluation of differences between adults and children, the Supplemental Guidance recommends the use of the following default adjustment factors for early-life exposures: increase the carcinogenic potency by 10-fold for children up to 2 years old, and 3-fold for children from 2 to 15 years old. These adjustments have the aggregate effect of increasing by about 60 percent (i.e., a factor of 1.6), the estimated risk for a 70-year (lifetime) constant inhalation exposure.

It is important to keep in mind that EPA recommends that the default adjustments be made only for carcinogens (1) acting through a mutagenic mode of action, (2) for which a linear dose response has been assigned, and (3) for which data to evaluate adult and juvenile differences are not available. **The default adjustments are not recommended for carcinogens whose mode of action is unknown.** EPA will determine as part of the IRIS assessment process which substances meet these criteria, and future national-scale assessments will reflect adjustments for those substances.

4: Why did EPA use the higher potency or unit risk estimate (URE) for formaldehyde reported in the Agency's Integrated Risk Information System (IRIS)?
A: For this 2011 NATA assessment, consistent with the 2005 NATA, we used the existing IRIS URE for formaldehyde. That URE is 1.3 x 10-5 per $\mu g/m^3$. The EPA's Office of Research and Development (ORD) believes there is sufficient published, peer-reviewed research to support the use of the existing IRIS URE. EPA is currently updating the IRIS file for formaldehyde to consider new science published in the peer-reviewed and epidemiologic literature. This updated IRIS assessment is not expected to be completed in the release of the 2011 NATA. Therefore, for this assessment and in the near-term, EPA is using the existing IRIS URE for formaldehyde. In previous NATA analyses (1999 and 2002), EPA utilized a cancer potency for inhalation exposure to formaldehyde derived from modeling sponsored by what was then the Chemical Industry Institute for Toxicology (CIIT), now called the Hamner Institutes for Health Sciences.

5: **Why aren't results for dioxin included?**
A: We did not evaluate exposure and risk related to dioxins in the 2011 NATA because we did not evaluate the completeness or accuracy of the State, Local, and Tribal (S/L/T) agency data for dioxins. The most significant exposure route for dioxin is ingestion, not inhalation, so dioxin's relative contribution to NATA's inhalation risk estimates likely would not be large.

Results Questions

1: **Does the assessment show that the risk is high?**
A: Based on the results of the 2011 NATA and other studies, millions of people live in areas where air toxics may pose potential health concerns. While air quality continues to improve, more needs to be done to meet the Clean Air Act's requirements to reduce the potential exposure and risk from these chemicals.

EPA will continue to develop air toxic regulations as well as cost-effective pollution prevention and other control options to address indoor and urban pollutant sources that significantly contribute to risk.

The 2011 NATA estimates most individuals' risks to be between 1-in-1 million and 100-in-1 million, although the estimates for a small number of localized areas are higher than 100-in-1 million. Individuals and communities may be concerned about this. It is important to remember, however, that NATA was not designed as a definitive means to pinpoint specific risk values at local levels. The results are best used as a tool to prioritize pollutants, emissions sources and locations of interest for further investigation. It should be noted that the risks estimated by NATA do not consider ingestion exposure or indoor sources of air toxics. Also, 138 of the 180 air toxics, plus diesel PM, were assessed for risk in the 2011 NATA. (Diesel PM risk was only assessed for noncancer effects.) Therefore, these risk estimates may represent only a subset of the total potential risks associated with air toxics.

2: **What do these estimates mean to me?**
A: The results of NATA assessments provide estimates of the total amount of air toxics in an area as well as a general estimate of the geographic patterns of potential risk within each State and county in the U.S. in 2011. The results should not be used as an absolute measure of whether an individual's risk is high, but can be used to guide a more specific assessment in that area.

NATA was not designed to be a definitive tool for assessing risks because it has many limitations in data and methods. In addition, this assessment estimates risks associated with a modest range of individual behaviors using ambient levels averaged across a given census tract and averaged across multiple emissions points at a given facility. Such exposures are different from the exposures experienced by the most exposed individuals in a tract. The national-scale assessment contains uncertainties in emissions levels, exposure concentrations, and dose-response information, and lacks the level of refinement that might enable us to adequately assess the highest exposures found in localized "hot spots" (i.e., exposures to individuals who live close to emitting sources. Consequently, the results should not be used as an absolute measure of risk. Rather, they should be used to focus or target more refined measurement and assessment activities.

3: **How accurate is NATA?**
A: NATA is a state-of-the-science screening tool that does not incorporate refined information about emission sources, but rather, uses general information about sources to develop estimates of risks using analytical methods. NATA assessments provide screening-level estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types, and locations that are of greatest potential concern in terms of contribution to population risk.

Uncertainties are inherent in analyses like this (uncertainty in the emissions, actual population exposures, and dose-response or health effects information). For example, results are more uncertain at finer spatial scales. Thus, the results are appropriate to answer questions such as what pollutants or source sectors might be associated with higher risks than others, but not for determining exactly how many people are exposed to certain levels of absolute risk, or to determine what's safe and what's not.

4: **How does the cancer risk identified in this assessment compare to lifetime cancer risk from all causes?**
A: The 2011 NATA estimates that, on average, approximately 1 out of every 25,000 Americans (40-in-1 million) could contract cancer from breathing air toxics if exposed to 2011 emission levels for 70 years. These risks are unevenly distributed. Note that the NATA risk estimates are subject to limitations in the data, modeling, and default assumptions used routinely in any risk assessment. For example, NATA does not consider ingestion exposures or indoor sources of pollutants. Also, NATA only estimates chronic cancer risks for those air toxics that EPA is currently able to quantify with available dose-response data. Therefore,

these risk estimates may represent only a subset of the total potential cancer risk associated with air toxics. NATA risk estimates should be compared with caution to other estimates of risk available.

5: NATA presents risk data down to the census tract level. Are the results accurate enough to draw conclusions at this scale?
A: EPA recommends that the census tract data be used to determine geographic patterns of risks within counties rather than to pinpoint specific risk values for each census tract. We developed NATA as a tool to inform both national and more localized efforts to collect air toxics information and characterize emissions (e.g., to prioritize pollutants and geographic areas of interest for more refined data collection such as monitoring). We feel reasonably confident that the patterns (i.e., relatively higher and lower levels of risk within a county), represent actual fluctuations in overall average population risks within the county. We are less confident that the assessment pinpoints the exact locations where higher risk exists, or that the assessment captures the highest risks in a county.

6: Based on NATA, can EPA determine which areas and/or populations are at greatest risk from air toxics?
A: This assessment has characterized geographic patterns and ranges of risks across the country. However, in general, we see that larger urban areas tend to carry larger risk burdens than smaller urban and rural areas because the emissions of air toxics tend to be higher in areas with more people. This trend is not universal and can vary from pollutant to pollutant, according to its sources, and may also be affected by exposures and risk from non-inhalation and indoor sources of exposure.

7: How does this assessment of 2011 air toxics data compare to previous national-scale assessments?
A: Due to the extent of improvements in our methodology (e.g., inventory improvements, modeling changes, background calculation revisions, and changes in health benchmarks), it is not meaningful to directly compare the 2011 assessment with previous assessments. Before changes in risk levels may be attributable to specific reduction efforts, these assessment changes must be considered. Improvements made to the methods since the 2005 NATA include, but are not limited to:

- The 2010 Census;
- Improved meteorological data from an increased number of stations;
- Improved emissions inventory or location information for oil and gas wells;
- Updated model for onroad emissions with specific emission categories for cold start emissions and extended idle exhaust;
- More complete port and underway inventories;
- Use of both CMAQ and AERMOD results to take advantage of the strengths of each model; and
- Use of a newer exposure model, HAPEM7.

8: Has air quality improved?
A: Since 1990, EPA has made significant progress in reducing emissions of air toxics from stationary, mobile, and indoor sources, finalizing National Emissions Standards for Hazardous Air Pollutants, or MACT standards, to reduce toxic emissions from over 174 categories of industrial sources. These rules result in 1.7 million fewer tons of air toxic emissions every year.

The EPA has also completed all of the required emissions standards for smaller sources known as area sources. Individual area source facilities typically have much lower emissions, but these sources can be numerous and widespread, including in locations that are heavily populated. In some urban areas, the sum of area source emissions for a category can be much greater than emissions from major sources. Examples of area sources are gas stations and dry cleaners. Measured from the 1990 baseline inventory, we have subjected between 90 and 100 percent of the area sources of urban air toxic pollutants to standards and have subjected 90 percent of the sources of seven potentially bio-accumulative toxic pollutants to standards. We project that all of the regulated area sources will be in compliance no later than 2014.

Many motor vehicle, nonroad equipment, and fuel emission control programs of the past have reduced air toxics and will continue to provide significant emission reductions in the future. Mobile source emissions have been reduced by approximately 50 percent, about 1.5 million tons of HAPs, since 1990. With additional fleet turnover, we expect these reductions to increase to 80 percent by the year 2030. In addition, mobile source diesel onroad and nonroad particulate matter decreased by about 27 percent from 1990 to 2005. Significant additional reductions (roughly 90 percent) are projected from 2005 to 2030 as many of the recent mobile source rules targeting diesel engines go into effect. Also, onroad and nonroad benzene emissions continue to decrease and monitoring data reflect this downward trend.

The public health improvement associated with these reductions in emissions will depend on a number of factors including which chemicals were reduced and where the reductions occurred relative to where people live and work.

9: Can the NATA assessment results be used to evaluate exposures at specific points of interest, e.g., near schools, day care centers, or hospitals?
A: NATA is not designed to predict actual risks at a specific location. NATA can be used to identify and prioritize air toxics, emission source types and locations which are of greatest potential concern in terms of contributing to population risk. It is a screening assessment which uses general information about sources along with other information about a facility (how tall the emissions stacks are, for example), to develop estimates of risks which are averaged over a census tract. It does not incorporate finely detailed information about emission sources, or other information that would be necessary to estimate risks at a specific location.

If a particular area is projected to experience low risks, and we are reasonably confident that the information on the significant emission sources is accurate, then we are fairly confident that risks actually are low, and there is no need to develop a more detailed assessment for that area. Conversely, if NATA estimated risks in a particular area are high, we know that refined assessments may be needed to accurately characterize risks these risks in that area.

This screening approach helps EPA and other air pollution control agencies to focus resources on areas where the potential for health risks are highest.

10: I am able to locate a specific facility location from the map and get a risk at that location. How accurate is that risk value?
A: Included in the results section of the 2011 NATA is a link to EPA's 2011 NATA Web App, a GIS Tool that can be used to develop maps that show the risk levels estimated for each census tract. Using these maps, it is then possible to identify the locations of specific buildings (e.g., schools, day care centers, hospitals, etc.), by entering their specific location information (address or latitude/longitude data) into the location query box. These buildings will then be located within a specific census tract and the NATA results for that tract are readily seen. It should be noted that the concentrations and risk estimated are averaged across the tract and do not necessarily reflect the possible impacts that could occur in the immediate vicinity of these buildings. More focused assessments (e.g., air toxics monitoring or local-scale risk assessments), would be needed to more accurately determine those concentrations and risks.

11. Why is there risk from biogenic emissions?
A: Biogenic emissions are emissions from natural sources, such as plants and trees. These sources emit hazardous air pollutants (HAP), such as formaldehyde, acetaldehyde, and methanol. Formaldehyde and acetaldehyde are key risk drivers in 2011 NATA. These sources also emit large quantities of other volatile organic compounds that are not classified as HAP but can react in the atmosphere with manmade emissions to form HAP.

In NATA, the biogenic emissions source group only includes the primary emissions, or those directly emitted into the atmosphere. (Any secondary formation of pollutants is included in the secondary source group.) Biogenic emissions are computed by a model that uses information about the vegetation and land use across an area, as well as environmental conditions in that area such as the temperature and the amount of solar radiation received by an area. More information about how biogenic emissions were computed and modeled in the 2011 NATA can be found in Section 2 of the TSD.

<u>Fire Questions</u>

1. Were fires included in the 2011 NATA?
A: Yes. Prescribed fires, wildfires, and agricultural burning were included in the 2011 NATA. EPA worked with the United States Forest Service (USFS) to develop the emissions estimates for wildfires and prescribed fires for the 2011 National Emissions Inventory (NEI). Some wildfire and prescribed fire data was based on remote sensing, state-submitted data as well as federal agency burn report data. The emissions estimates for agricultural burning fires came from state-submitted data or EPA estimates based on satellite data.

In the 2011 NATA, fires were modeled using CMAQ. CMAQ allows EPA to take into account details that are specific to the fires included. For example, in the NEI, EPA had day-specific emissions information for wildfires and fires from prescribed burning, compared to some other emissions sources that have annual average emissions. Also, using data about the high temperatures of the fires, EPA was able to account for the extra buoyancy of the emission plume and its vertical distribution in the atmosphere in the air quality modeling.

2. What does NATA show regarding impacts of wildfires, prescribed fires and agricultural burning?
A: Prescribed fires, wildfires, and agricultural burning were modeled together in NATA and their impacts cannot be separated. Emissions from each fire type are estimated separately in the NEI, but ambient concentrations, exposure concentrations, and risks are grouped together.

3. What are the uncertainties in risks from emissions from fires?
A: The magnitude and location of fires vary from year to year, so the long-term (or chronic) risk could be different from the risks presented in the 2011 NATA for more persistent and consistent sources. The CMAQ model includes only the 48 continental United States, so risks from fires are not estimated in Alaska, Hawaii, Puerto Rico, or the Virgin Islands.

4. What is being done to reduce air pollution from wildfires and prescribed fires?
A: The threat from wildfires can be mitigated through management of wildland vegetation. Prescribed fires are one tool that land managers can use to reduce fuel load, unnatural understory and tree density, thus helping to reduce the risk of catastrophic wildfires which are frequently of long duration and wide impact as well as causing hazardous levels of air pollutants. Allowing some wildfires to continue and the thoughtful use of prescribed fire can influence the occurrence of catastrophic wildfires, which may reduce the probability of fire-induced smoke impacts and subsequent health effects. The EPA is committed to working with federal land managers, other federal agencies, tribes and states to effectively manage prescribed fire use to reduce the impact of wildfire-related emissions. Prescribed fires are typically managed to minimize impacts through the use of Basic Smoke Management Practices and smoke management programs. USDA and DOI both support efforts to conduct more research into smoke management through the Joint Fire Sciences Program and support broad interagency efforts to address smoke from both wildfires and prescribed fires through the National Wildland Fire Coordinating Group and their Smoke Committee.

Mobile Source Questions

1: How accurate are risk estimates for mobile sources in my census tract?
A: NATA is a state-of-the-science screening tool that does not incorporate refined information about emission sources, but rather, uses general information about sources to develop estimates of risks using analytical methods. NATA assessments provide screening-level estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types, and locations that are of greatest potential concern in terms of contribution to population risk.

Accurately capturing the level of emissions for sources that move from place to place is challenging, particularly at fine spatial scales. For cars, trucks, buses and motorcycles, running emissions are allocated to census tracts using roadways, but activity on those roads is estimated using population, which is not always a good surrogate for traffic volume. Also, a substantial portion of highway vehicle emissions do not actually occur on roads, but are associated with vehicles starting or extended idling. Different surrogates are used for these emissions, which may not always accurately reflect the actual location of emissions.

There is even more uncertainty associated with nonroad sources, such as construction equipment, lawn and garden equipment, and recreational vehicles. Equipment population, age and activity values are not tracked systematically and must be estimated. In addition, emissions for these sources are often spatially allocated based on how land is used, and land use surrogates may not track well with actual activity. Furthermore, emissions are first allocated from the national to the county level in the NONROAD emissions model using one set of surrogates, then allocated to the census tract using a second set of surrogates. Thus, results for mobile sources are very uncertain at the census tract level and must be interpreted with caution. Results are more certain at larger geographic scales, such as regions and states.

It should be noted that EPA has recently integrated nonroad equipment emissions into the MOVES mobile source emissions model, and is planning to update activity estimates in the model. EPA is thus actively looking for data related to nonroad populations and activity, including geographic allocation data. EPA recognizes that these data can influence NATA results and therefore welcomes suggestions.

2: Onroad and nonroad mobile sources are large contributors to overall risk in the 2011 assessment. What is the Agency doing to reduce emissions of mobile source air toxics?
A: Mobile source hazardous air pollutant emissions have been reduced by approximately 50 percent, about 1.5 million tons since 1990. With additional fleet turnover, EPA expects these reductions to grow to 80 percent by the year 2030. In addition, mobile source diesel onroad and nonroad particulate matter emissions decreased by about 27 percent from 1990 to 2005. EPA projects significant additional reductions (roughly 90 percent) from 2005 to 2030 as many of the recent mobile source rules targeting diesel engines go into effect.

The EPA's most recent regulatory programs that significantly reduces mobile source air toxics are Tier 3 vehicle and fuel standards. These requirements, issued in 2014, will reduce emissions of air toxics from motor vehicles between 10 and 30 percent by 2030, depending on the pollutant.

Another recent regulatory program which reduced mobile source air toxics was the 2007 mobile source air toxics rule, which controlled the benzene content of gasoline, as well as vehicle emissions at cold temperatures and emissions from portable fuel containers. A recent assessment in Anchorage, Alaska found a reduction in ambient benzene of more than 50 percent, and the fuel benzene standard was a major contributing factor.

Other programs which are reducing mobile source air toxics are low-sulfur gasoline and diesel requirements, heavy-duty engine and vehicle standards, controls for small spark-ignition engines and recreational marine engines, the locomotive and commercial marine rule, standards for nonroad diesel engines, and the North American and Caribbean Emission Control Areas (ECAs) established to reduce emissions from ships.

Moreover, non-regulatory initiatives are also reducing mobile source air toxics. Examples include the National Clean Diesel Campaign, SmartWay, and EPA's Ports Initiative. In addition, EPA's Diesel Emissions Reduction Program (known as "DERA") was created to deploy pollution-controlling technologies in diesel fleets. Clean diesel projects yield an immediate public health and air quality benefit. The EPA estimates that for every dollar invested in reducing diesel exhaust, a community may achieve up to 13 dollars in public health benefits. From 2008 to 2013, the EPA awarded $569 million to retrofit or replace nearly 73,000 engines in vehicles, vessels, locomotives or other pieces of equipment. The EPA estimates that these projects will reduce emissions by 14,700 tons of fine particle pollution over the lifetime of the affected engines. For more information, visit http://www2.epa.gov/cleandiesel.

Learn more about EPA's programs to reduce air toxics from mobile sources.

3: Why are only noncancer risks calculated for diesel PM? Isn't there a cancer unit risk available?
A: In this assessment, the potential risk from diesel PM is not addressed in the same fashion that other pollutants are. This is because EPA currently does not have a cancer unit risk estimate (URE) for diesel exhaust. In the 2002 Health Assessment Document for Diesel Engine Exhaust, EPA concluded that diesel exhaust is likely to be carcinogenic to humans at environmental levels of exposure, but found that data from the health studies available at the time were not suitable for estimating cancer potency. However, EPA has concluded that diesel exhaust is among the substances that the national-scale assessment suggests pose the greatest risk. The 2002 Health Assessment Document evaluated several human epidemiology studies linking increased lung cancer with diesel PM. Exposures in several of these epidemiology studies are in the same range as ambient exposures throughout the United States.

Recently, several large epidemiology studies have been published that strengthen the weight of evidence that diesel exhaust is carcinogenic to humans. Two of these studies included quantitative estimates of exposure. Partly on the basis of these studies, the International Agency for Research on Cancer elevated its classification of diesel exhaust to "carcinogenic to humans" (Class 1) in 2012.

In 2012, EPA requested that the Health Effects Institute (HEI) evaluate the suitability of the new epidemiology studies for developing a cancer potency. In November 2015, HEI published its report on these new studies, and concluded that they are sufficiently robust to estimate quantitative cancer risks and estimate uncertainties. EPA is currently reviewing this report.

These new studies underscore the importance of continuing to move forward in reducing emissions and exposures. Because diesel exhaust exposure is associated with serious negative health effects (both cancer and noncancer), EPA has and continues to take aggressive action to reduce diesel emissions through stringent standards for heavy trucks and engines. As a result of these aggressive actions, onroad diesel engines manufactured in 2007 and later have much more advanced emission control systems, resulting in much lower emissions with different composition than the diesel engines which formed the basis of the currently available epidemiology studies. Thus a cancer potency based on available epidemiology studies may not be relevant to newer technology diesels.

In addition to the potential for lung cancer risk, there is a significant potential for noncancer health effects based on the contribution of diesel PM to ambient levels of fine particles. Exposure to fine particles has been linked to significant public health impacts, including respiratory and cardiovascular effects, as well as premature mortality. These effects are not specifically presented in the national-scale assessment analysis but are considered in setting and implementing EPA's National Ambient Air Quality Standards for $PM_{2.5}$.

Also, EPA has designated a chronic Reference Concentration (RfC) for diesel PM of 5 $\mu g/m^3$ based on specific noncancer effects found in several animal studies which showed adverse changes in lungs such as inflammation and lesions. The 2011 NATA uses this value in estimating the diesel PM hazard quotient. More information on health effects associated with diesel PM can be found in the Health Assessment Document for Diesel Engine Exhaust.

4: There has been increased concern about the health effects associated with pollution near roads. What can the 2011 NATA tell us about communities potentially at greater health risk from exposure to near-road pollution?

A: There is a large body of research that consistently shows that populations spending a significant amount of time near heavily-traveled roads experience increased risks for a number of adverse health effects. Air quality measurement studies also indicate that elevated levels of pollution can be found near roads. Scientists are researching the relationship between the composition of the complex mixture of air toxics and other pollutants people are exposed to near these roads, and the observed adverse health effects.

Research findings indicate that roadways generally influence air quality within a few hundred meters - about 500-600 feet downwind from the vicinity of heavily traveled roadways or along corridors with significant trucking traffic or rail activities. For any given location, NATA's exposure estimates of populations near major roads may not be accurate as a result of limitations in the underlying data. NATA's air quality modeling does not have the resolution to model elevated concentrations along individual roadways. However, HAPEM7 exposure modeling accounts for the impact of populations living near roads on average census tract exposures. As such, NATA can be used as a screening tool to help identify populations with higher exposures to air toxics due to a greater density of traffic in the area where they work and live. More refined modeling should be used to characterize air quality in areas with populations experiencing potentially elevated exposures of near-roadway pollutants.

EPA has a web site focused on near-roadway air pollution and health, which can be found at the following link: http://www3.epa.gov/otaq/nearroadway.htm. There is also an EPA web site about ongoing near-source air pollution research, found here: http://www2.epa.gov/air-research/near-source-air-pollution-research.

5: NATA results show significant risks associated with a port in my community. How accurate are the risk estimates associated with ports, and what can be done to reduce these risks?

A: As with other sources, NATA results for ports should be used to identify locations where additional analysis is warranted. There are a number of uncertainties and limitations in NATA's analysis of ports. First, although emissions from various sources contribute to overall pollutant concentrations in ports, only emissions from commercial marine vessels are included within ports in NATA. Also, port emissions for commercial marine vessels come from state and local agency submittals or, in most cases, EPA's estimates. EPA's estimates are based on a 2002 inventory, projected to 2011 using regional adjustment factors to account for growth. Thus, differences in growth among ports in a given region of the country were not accounted for in the EPA estimates. In addition, the boundaries of ports are handled in a more simplified way than they would be in a local assessment, because it is not feasible to do more refined modeling in a national-scale assessment (See Section 2 of the Technical Support Document). Finally, emission estimates for toxics from commercial marine vessels are based on extremely limited data.

Despite limitations in assessment of air toxics at ports in this assessment, NATA indicates that people who live and work near ports may experience elevated risks. EPA has taken a number of actions which have reduced risks since 2011. These actions include Tier 2 and Tier 3 standards on oceangoing marine vessels, sulfur control on marine fuel oil, and designation of an emission control area (ECA) off our coasts (http://www3.epa.gov/otaq/oceanvessels.htm#fr). Finally, EPA has established a ports initiative to develop and implement sustainable ports strategies (http://www2.epa.gov/ports-initiative).

6: What does this NATA say about risk from airports?

A: NATA is a state-of-the-science screening tool that does not incorporate refined information about emission sources, but rather, uses general information about sources to develop estimates of risks using analytical methods. NATA assessments provide screening-level estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types, and locations that are of greatest potential concern in terms of contribution to population risk.

While airports are small contributors to the estimate of national air toxics risks, localized impacts can be significant, especially for people living and working in close proximity to an airport. When interpreting

NATA data on airport air toxics impacts it is important to be aware of limitations in the data used. For example, emission inventory estimates at general aviation airports are based on nationwide estimates of the mix of aircraft types using those airports. However, the mix at individual airports can be differ significantly, which could significantly impact results. Also, impacts can be significantly affected by local meteorological and operating conditions, which are not fully addressed in a national-scale analysis. In addition, NATA's air quality modeling does not have the resolution to model concentrations at specific distances from individual airports.

A potential public health concern that should be noted is exposure to emissions from piston-engine aircraft, which still use leaded gasoline. EPA is evaluating the impact of these lead emissions using measurements and much more refined modeling than used in NATA, in order to make a determination about whether these lead emissions cause or contribute to air pollution which may reasonably be anticipated to endanger public health and welfare. Information on EPA's evaluation of lead emissions from piston-engine aircraft can be found at: http://www3.epa.gov/otaq/aviation.htm.

To: Noonan, Jenny[Noonan.Jenny@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]; Drinkard, Andrea[Drinkard.Andrea@epa.gov]; Gray, David[gray.david@epa.gov]
From: Millett, John
Sent: Fri 12/11/2015 6:27:38 PM
Subject: update for Janet --

Hi All – from my notes this morning . . . please chime in if I'm missing anything or screwed anything up – thanks! I plan to send to Janet in an hour or so . . .

~~~~~~~~~~~~~~~~

Hi Janet and all – work progresses on the NATA rollout. Later today I'll send the general rollout material for review, and overall, we are on track for a Thursday posting.

A couple of pieces to be aware of as we head into next week:

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process
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Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

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John Millett

Director, OAR Communications

Desk: 202-564-2903

Cell: 202-510-1822
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To: Curry, Ron[Curry.Ron@epa.gov]; Coleman, Sam[Coleman.Sam@epa.gov]; Gray, David[gray.david@epa.gov]; Ruiz, Thomas[Ruiz.Thomas@epa.gov]
Cc: Blanco, Arturo[Blanco.Arturo@epa.gov]
From: Stenger, Wren
Sent: Mon 11/30/2015 7:16:01 PM
Subject: Chloroprene and DuPont, LA facility

Ron, Sam,

David and I talked with Mike Koerber and Erika Sasser today regarding the chloroprene roll-out planned for Dec. **Ex. 5 - Deliberative Process**

Ex. 5 - Deliberative Process

I will work with David on materials we need to manage the message and work with community stakeholders.

Wren Stenger

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

From: Koerber, Mike
Sent: Monday, November 30, 2015 9:38 AM
To: Stenger, Wren
Cc: Sasser, Erika
Subject: FW: Chloroprene and DuPont, LA facility

Wren – As a followup to my voicemail to you this morning, I am sending you this note in hopes that we can talk today at your convenience. Let me know if you have time. Steve talked with Janet earlier today and I wanted to share her thoughts with you. Thank you.

Mike

Begin forwarded message:

From: "Stenger, Wren" <stenger.wren@epa.gov>
Date: November 25, 2015 at 2:16:12 PM EST
To: "Page, Steve" <Page.Steve@epa.gov>, "Wayland, Richard" <Wayland.Richard@epa.gov>, "Jordan, Deborah" <Jordan.Deborah@epa.gov>
Cc: "Sasser, Erika" <Sasser.Erika@epa.gov>
Subject: Chloroprene and DuPont, LA facility

Ex. 5 - Deliberative Process

Wren Stenger

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

From: Page, Steve
Sent: Wednesday, November 18, 2015 9:55 AM
To: Stenger, Wren
Cc: Sasser, Erika
Subject: left you a voice mail

Ex. 5 - Deliberative Process

MASTER_AI_ID	AI	FACILITY_NAME	AI_NAME	ADDRESS1	CITY
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
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ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE	SOURCE_TYPE	ACT_TRACKING_NO
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

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70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009

PERMIT	PERMIT_NUMBER	PERMIT_ISSUED	PERMIT_END_DATE	EIQ#	SUBJ_ITEM_ID
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202

SUBJ_ITEM_TYPE_DESC	SUBJECT_ITEM_DESC	PARAMETER_DESC
Stack/Vent	Poly Kettles Vent Condenser	Chloroprene
Other	Poly Building Wall Fans	Chloroprene
Stack/Vent	Strippers Condenser Vent	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	Chloroprene
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Chloroprene
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Chloroprene
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Chloroprene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Chloroprene
Scrubber	HCl Feed Tanks' Scrubber	Chloroprene
Condenser	Waste Storage Tanks' Condenser	Chloroprene
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Chloroprene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	Chloroprene
Above ground storage vessel	Aeration Tank (Waste Water Tank)	Chloroprene
Furnace	HCl Recovery Unit	Chloroprene
Equipment leaks	Fugitive Emissions	Chloroprene
Miscellaneous	Waste Loading Vent	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 1	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 2	Chloroprene

Above ground storage vessel	Stripped Emulsion Tank No. 3	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 4	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 5	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 9	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 11	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 12	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 15	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 16	Chloroprene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Chloroprene

TPY_PERMITTED_EMISSIONS	Emissions (tons)	Emissions minus Permit (tons)
34.39	22.8675	-11.5225
15.83	15.8315	0.0015
17.3	9.17	-8.13
5.77	4.686	-1.084
7.17	4.0145	-3.1555
5.82	3.259	-2.561
1.99	2.1695	0.1795
1.6	2.091	0.491
3	1.907	-1.093
2.42	1.357	-1.063
1.09	1.111	0.021
1.14	0.873	-0.267
1.49	0.836	-0.654
1.17	0.706	-0.464
0.02	0.0255	0.0055
0.04	0.0215	-0.0185
0.04	0.012	-0.028
0.01	0.0055	-0.0045
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065

0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.19	0.00011	-0.18989

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38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
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38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace

38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace

38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
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38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
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38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace

ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE	SOURCE_TYPE	ACT_TRACKING_NO
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Loading apparatus	PER20080009
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009

70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
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70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Scrubber	PER20100004

70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009

70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20100004

PERMIT	PERMIT_NUMBER	PERMIT_ISSUED	PERMIT_END_DATE	EIQ#	SUBJ_ITEM_ID
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-85	EQT00000000214
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-80	RLP00000000017
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
206-V2	206-V2	3/14/2011	3/2/2015	1180-21	EQT00000000082
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204

2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-81	RLP00000000018
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-81	RLP00000000018
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-75	EQT00000000194
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-76	EQT00000000195
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-79	EQT00000000198
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-77	EQT00000000196
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-84A	EQT00000000212
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-84B	EQT00000000213
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-57	EQT00000000166
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-60	EQT00000000168
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-61	EQT00000000169
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-62	EQT00000000170
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087

2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162

206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136

206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086

SUBJ_ITEM_TYPE_DESC	SUBJECT_ITEM_DESC	PARAMETER_DESC
Equipment leaks	Fugitive Emissions	VOC, Total
Equipment leaks	Fugitive Emissions	Toluene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	VOC, Total
Above ground storage vessel	Surge Tank (Waste Water Tank)	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Tetrachloroethylene
Loading apparatus	Liquid Dispersion Loading (Truck, Tote, Rail Car)	VOC, Total
Equipment leaks	Fugitive Emissions	Hydrochloric acid
Stack/Vent	ACR Storage Common Vent Header (1700-80.1 & 80.2)	VOC, Total
Scrubber	HCl Feed Tanks' Scrubber	Chloroprene
Scrubber	HCl Product Tanks' Scrubber	Hydrochloric acid
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Dichloromethane
Above ground storage vessel	Aeration Tank (Waste Water Tank)	VOC, Total

Above ground storage vessel	Aeration Tank (Waste Water Tank)	Chloroprene
Condenser	Waste Storage Tanks' Condenser	Hydrochloric acid
Other	Poly Building Wall Fans	Toluene
Other	Poly Building Wall Fans	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	Toluene
Stack/Vent	ACR Refining Vent	Hydrochloric acid
Stack/Vent	ACR Refining Vent	VOC, Total
Above ground storage vessel	ACR / Solvent Blend Tank	Xylene (mixed isomers)
Stack/Vent	ACR Drumming Vent	Xylene (mixed isomers)
Stack/Vent	ACR Drumming Vent	Dichloromethane
Miscellaneous	Waste Loading Vent	VOC, Total
Other	Resin 90 Railcar	VOC, Total
Miscellaneous	Waste Loading Vent	Chloroprene
Other	Poly Building Wall Fans	VOC, Total

Above ground storage vessel	Stripped Emulsion Tank No. 1	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 2	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 3	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 4	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 5	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 9	VOC, Total
Other	Rosin S Railcar	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 1	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 2	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 3	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 4	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 5	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 9	Chloroprene
Above ground storage vessel	ACR / Solvent Blend Tank	Tetrachloroethylene

Above ground storage vessel	ACR / Solvent Blend Tank	Dichloromethane
Other	Emergency Stabilizer Drumming	VOC, Total
Miscellaneous	Waste Loading Vent	Toluene
Above ground storage vessel	Octopol Storage Tank	VOC, Total
Above ground storage vessel	Advance Fibres System (AFS) - Emulsion Shipping (Emulsion Blend Tank)	VOC, Total
Loading apparatus	Advance Fibres System (AFS) - Emulsion Shipping (Tote Loading)	VOC, Total
Stack/Vent	ACR Drumming Vent	Tetrachloroethylene
Above ground storage vessel	Stripped Emulsion Tank No. 11	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 11	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 12	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 12	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 15	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 15	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 16	Chloroprene

Above ground storage vessel	Stripped Emulsion Tank No. 16	VOC, Total
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Toluene
Above ground storage vessel	Aeration Tank (Waste Water Tank)	Toluene
Furnace	HCl Recovery Unit	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Xylene (mixed isomers)
Stack/Vent	Strippers Condenser Vent	Toluene
Above ground storage vessel	Diisobutylene (DIB) Storage Tank	VOC, Total
Above ground storage vessel	ACR / Solvent Blend Tank	VOC, Total
Equipment leaks	Fugitive Emissions	Chloroprene
Stack/Vent	ACR Drumming Vent	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 3	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 4	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 5	VOC, Total
Scrubber	HCl Feed Tanks' Scrubber	Toluene

Non equipment leaks	Fugitive Emissions - Neoprene Unit	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Toluene
Condenser	Waste Storage Tanks' Condenser	Toluene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Toluene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Toluene
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Toluene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Chloroprene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	VOC, Total
Condenser	Waste Storage Tanks' Condenser	Chloroprene
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Toluene
Stack/Vent	Poly Kettles Vent Condenser	Toluene
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Toluene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	Chloroprene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	VOC, Total

Scrubber	HCl Feed Tanks' Scrubber	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Chloroprene
Furnace	HCl Recovery Unit	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	VOC, Total
Condenser	Waste Storage Tanks' Condenser	VOC, Total
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	VOC, Total
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Chloroprene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	VOC, Total
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	VOC, Total
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Chloroprene
Furnace	HCl Recovery Unit	Chlorine
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Chloroprene

Furnace	HCl Recovery Unit	Carbon monoxide
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	VOC, Total
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	VOC, Total
Furnace	HCl Recovery Unit	Particulate matter (10 microns or less)
Stack/Vent	Strippers Condenser Vent	Ammonia
Stack/Vent	Strippers Condenser Vent	Chloroprene
Stack/Vent	Strippers Condenser Vent	VOC, Total
Stack/Vent	Poly Kettles Vent Condenser	Chloroprene
Stack/Vent	Poly Kettles Vent Condenser	VOC, Total
Furnace	HCl Recovery Unit	Sulfur dioxide
Furnace	HCl Recovery Unit	Hydrochloric acid
Furnace	HCl Recovery Unit	Nitrogen oxides

TPY_PERMITTED_EMISSIONS	Emissions (tons)	Emissions minus Permit (tons)
0.13	1.16	1.03
0.04	0.979	0.939
1.6	2.091	0.491
2.11	2.293	0.183
1.99	2.1695	0.1795
0.02	0.102	0.082
0.01	0.08	0.07
0.04	0.087	0.047
0.07	0.101	0.031
1.09	1.111	0.021
0.03	0.044	0.014
0.02	0.031	0.011
0.02	0.027	0.007

0.02	0.0255	0.0055
1.09	1.095	0.005
5.19	5.1925	0.0025
15.83	15.8315	0.0015
0.06	0.0615	0.0015
0.7	0.7	0
2.2	2.2	0
0.001	0.00001	-0.00099
0.001	0.0000005	-0.00100
0.01	0.0085	-0.0015
0.01	0.006	-0.004
0.01	0.006	-0.004
0.01	0.0055	-0.0045
27.94	27.935	-0.005

0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.003	-0.007

0.02	0.013	-0.007
0.01	0.002	-0.008
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095

0.01	0.0005	-0.0095
0.01	0.000005	-0.01000
0.01	0.000005	-0.01000
0.04	0.0215	-0.0185
0.02	0.0005	-0.0195
0.03	0.0085	-0.0215
0.11	0.084	-0.026
0.037	0.01	-0.027
0.04	0.012	-0.028
0.034	0.006	-0.028
0.06	0.02	-0.04
0.06	0.02	-0.04
0.06	0.02	-0.04
0.26	0.219	-0.041

2.23	2.156	-0.074
0.23	0.131	-0.099
0.2	0.0715	-0.1285
0.22	0.0645	-0.1555
0.38	0.212	-0.168
0.47	0.298	-0.172
0.19	0.00011	-0.18989
0.21	0.001	-0.209
1.14	0.873	-0.267
0.79	0.4435	-0.3465
0.53	0.1595	-0.3705
0.98	0.546	-0.434
1.17	0.706	-0.464
1.17	0.706	-0.464

1.96	1.39	-0.57
1.49	0.836	-0.654
0.94	0.025	-0.915
2.19	1.227	-0.963
1.94	0.95	-0.99
2.42	1.357	-1.063
5.77	4.686	-1.084
5.77	4.686	-1.084
3	1.907	-1.093
3.56	1.991	-1.569
4.41	2.798	-1.612
5.82	3.259	-2.561
3.9	1.26	-2.64
7.17	4.0145	-3.1555

8.3	5.09	-3.21
8.15	4.562	-3.588
10.04	5.62	-4.42
15.3	9.38	-5.92
10.51	3.8255	-6.6845
17.3	9.17	-8.13
17.36	9.182	-8.178
34.39	22.8675	-11.5225
34.92	23.137	-11.783
37.1	0.965	-36.135
45.9	4.906	-40.994
183.5	87.67	-95.83

year	AI	AI_NAME	OWNER_NAME	ADDRESS1	ADDRESS2	ADDRESS3
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
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2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)

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2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)

CITY	STATE_CODE	ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE
Laplace	LA	70068	325212	2869
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PARISH_OR_COUNTY_DESC	SOURCE_ID	NEDS_ID	SOURCE_DESCRIPTION
St. John the Baptist	NEOR15		Poly Kettles Vent Condenser
St. John the Baptist	NEO185	91	Poly Building Wall Fans
St. John the Baptist	NEO144	26	East Hot Dryer Exhaust
St. John the Baptist	NEO145	27	West Hot Dryer Exhaust
St. John the Baptist	NEOR14		Strippers Condenser Vent
St. John the Baptist	NEO139	17	CD Refining Column Jet
St. John the Baptist	NEO140	18	CD Refining Column Jet (Spare)
St. John the Baptist	MON026	45	CD Vent Condenser
St. John the Baptist	NEO141	20	2MM Pound CD Storage Tank
St. John the Baptist	NEO136	76	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent
St. John the Baptist	NEO135	11	Poly Kettles Manholes / Strainers (1 & 2) Common Vent
St. John the Baptist	NEOG08	09	Unstripped Emulsion Storage Tanks Common Vent
St. John the Baptist	NEO142	24	East Wash Belt Dryer
St. John the Baptist	NEO143	25	West Wash Belt Dryer
St. John the Baptist	NEO203	37	Surge Tank (Waste Water Tank)
St. John the Baptist	NEOFUG	35	Fugitive Emissions - Neoprene Unit
St. John the Baptist	NEOG10	88	Vent Header System
St. John the Baptist	NEOR16	81	No. 6, 7, 8, 10, 15, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)
St. John the Baptist	MONC17		CHLOROPRENE UNIT CONDITION XVII

St. John the Baptist	NEOC17		NEOPRENE UNIT CONDITION XVII
St. John the Baptist	NEO134	01	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower
St. John the Baptist	HCL087	63	HCl Feed Tanks' Scrubber
St. John the Baptist	MON059	52	Aqueous Storage Vent Condenser
St. John the Baptist	HCL090	61	Waste Storage Tanks' Condenser
St. John the Baptist	NEO167	10	No. 6 Emulsion Storage Tank Manhole
St. John the Baptist	NEO230		No. 10 Emulsion Storage Tank Manway
St. John the Baptist	MONFUG	58	Chloroprene Unit - Fugitive Emissions
St. John the Baptist	NEO162	34	Inhibitor Mix Tank (Surge Control Vessel)
St. John the Baptist	MON017	44	Isom Reactor Vent System
St. John the Baptist	NEO231		No. 13 Emulsion Storage Tank Manway
St. John the Baptist	NEO232		No. 14 Emulsion Storage Tank Manway
St. John the Baptist	MON006	41	Refining Jets Vent System
St. John the Baptist	NEOR13		Stabilizer & Catalyst Tanks Manholes Vent
St. John the Baptist	MON027	46	Catalyst Sludge Receiver
St. John the Baptist	HCLC17		HCL UNIT CONDITION XVII
St. John the Baptist	NEO183	89	Water Solution Exhaust Fan
St. John the Baptist	NEO204	38	Aeration Tank (Waste Water Tank)
St. John the Baptist	HCL086	62	HCl Recovery Unit
St. John the Baptist	HCLFUG	93	Fugitive Emissions

St. John the Baptist	MON067	56	Monomer Flare
St. John the Baptist	HCL097	75	Waste Loading Vent
St. John the Baptist	NEO163	78	Stripped Emulsion Tank No. 1
St. John the Baptist	NEO164	79	Stripped Emulsion Tank No. 2
St. John the Baptist	NEO165	80	Stripped Emulsion Tank No. 3
St. John the Baptist	NEO186		Stripped Emulsion Tank No. 4
St. John the Baptist	NEO187		Stripped Emulsion Tank No. 5
St. John the Baptist	NEO188		Stripped Emulsion Tank No. 9
St. John the Baptist	MON046	71	1117-1 DCB Storage Tanks Vent
St. John the Baptist	MON064	53	Emergency Aqueous Tank
St. John the Baptist	MON014		DCB Storage Tank No. 1
St. John the Baptist	MON015		DCB Storage Tank No. 2
St. John the Baptist	MON060		Diversion Tank
St. John the Baptist	MON061		Aqueous Clarifier Tank
St. John the Baptist	MON062		No.1 CD Brine Tank
St. John the Baptist	MON063		No.2 CD Brine Tank
St. John the Baptist	NEO150		Unstripped Emulsion Storage Tank No. 6 (Surge Control Vessel)
St. John the Baptist	NEO151		Unstripped Emulsion Storage Tank No. 7 (Surge Control Vessel)
St. John the Baptist	NEO152		Unstripped Emulsion Storage Tank No. 8 (Surge Control Vessel)
St. John the Baptist	NEO153		Unstripped Emulsion Storage Tank No. 10 (Surge Control Vessel)

St. John the Baptist	NEO154		Unstripped Emulsion Storage Tank No. 13 (Surge Control Vessel)
St. John the Baptist	NEO155		Unstripped Emulsion Storage Tank No. 14 (Surge Control Vessel)
St. John the Baptist	NEO171	12	No. 1 CD Solution Tank (Surge Control Vessel)
St. John the Baptist	NEO172	77	Inhibitor Final Make-Up Tank (Surge Control Vessel)
St. John the Baptist	NEO173		Inhibitor Hold-Up Tank (Surge Control Vessel)
St. John the Baptist	NEO175	13	No. 2 CD Solution Tank (Surge Control Vessel)
St. John the Baptist	NEO176	15	Recovered CD Storage Tank No. 1 (Surge Control Vessel)
St. John the Baptist	NEO177		Recovered CD Storage Tank No. 2 (Surge Control Vessel)
St. John the Baptist	NEO178	16	CD Heels Tank (Bottom Receiver)
St. John the Baptist	NEO181		Crude CD Storage Tank No. 3
St. John the Baptist	NEO182	32	Refined CD Storage Tank
St. John the Baptist	NEO189		Stripped Emulsion Tank No. 11
St. John the Baptist	NEO190		Stripped Emulsion Tank No. 12
St. John the Baptist	NEO191		Stripped Emulsion Tank No. 15
St. John the Baptist	NEO192		Stripped Emulsion Tank No. 16
St. John the Baptist	MON013	42	DCB Storage Tanks Condenser
St. John the Baptist	MON018		Isom JVC Effluent Tank
St. John the Baptist	MON019		TEA Storage Tank
St. John the Baptist	MON020		TEA Burette
St. John the Baptist	MON022		Catalyst Feed Tank

St. John the Baptist	MON023		Isom Purge Tank
St. John the Baptist	MON024		Isom Distillation Column
St. John the Baptist	MON021		Catalyst Mix Tank
St. John the Baptist	NEO146	28	No. 1 East Dryer Cooling Compartment
St. John the Baptist	NEO147	29	No. 1 West Dryer Cooling Compartment
St. John the Baptist	NEO148	30	No. 2 East Dryer Cooling Compartment
St. John the Baptist	NEO149	31	No. 2 West Dryer Cooling Compartment
St. John the Baptist	MON025		Isom Reactors
St. John the Baptist	NEO222		Large Poly Kettle Vent No. 1
St. John the Baptist	NEO223		Large Poly Kettle Vent No. 2
St. John the Baptist	NEO224		Large Poly Kettle Vent No. 3
St. John the Baptist	NEO225		Large Poly Kettle Vent No. 4
St. John the Baptist	NEO226		Large Poly Kettle Vent No. 5
St. John the Baptist	NEO202	36	Diversion Tank (Waste Water Tank)
St. John the Baptist	HCL088		No. 1 HCl Unit Feed Tank
St. John the Baptist	HCL089		No. 2 HCl Unit Feed Tank
St. John the Baptist	HCL091		No. 1 Waste Organic Tank
St. John the Baptist	HCL092		No. 2 Waste Organic Tank
St. John the Baptist	HCL093		No. 3 Waste Organic Tank
St. John the Baptist	HCL094		No. 4 Waste Organic Tank

St. John the Baptist	HCL095	No. 5 Waste Organic Tank
St. John the Baptist	HCL096	Decant Tank
St. John the Baptist	MON007	JVC Effluent Tank
St. John the Baptist	MON008	Pentane Column
St. John the Baptist	MON009	Heads Column
St. John the Baptist	MON010	Topper Column
St. John the Baptist	MON011	Refiner Column
St. John the Baptist	MON012	Recovery Column
St. John the Baptist	NEO219	Stripper No. 1
St. John the Baptist	NEO220	Stripper No. 2
St. John the Baptist	NEO221	Stripper No. 3

SUBJECT_ITEM_ID	SOURCE_TYPE	PERMIT	EIQ	SOURCE_STATUS	SCC
RLP00000000015	Other	2249-V7	1700-3	Active	30102699
EQT00000000185	Other	2249-V7	1700-66	Active	30102699
EQT00000000144	Other	2249-V7	1700-27	Active	30102699
EQT00000000145	Other	2249-V7	1700-28	Active	30102699
RLP00000000014	Other	2249-V7	1700-2	Active	30102699
EQT00000000139	Other	2249-V7	1700-20	Active	30102699
EQT00000000140	Other	2249-V7	1700-20A	Active	30102699
EQT00000000026	Condenser	3000-V5	1110-4	Active	30102625
EQT00000000141	Above ground storage vessel	2249-V7	1700-21A	Active	30102699
EQT00000000136	Other	2249-V7	1700-13A	Active	30102699
EQT00000000135	Other	2249-V7	1700-13	Active	30102699
Not Listed	Above ground storage vessel	2249-V7	1700-5	Active	30102699
EQT00000000142	Other	2249-V7	1700-25	Active	30102699
EQT00000000143	Other	2249-V7	1700-26	Active	30102699
EQT00000000203	Wastewater Treatment System	2249-V7	4-95	Active	30102699
FUG00000000004	Fugitive Emissions	2249-V7	1-93	Active	30102699
Not Listed	Other	2249-V7	1700-63	Active	30102699
RLP00000000016	Other	2249-V7	1700-56	Active	30102699
EMS00000000003	GC XVII Emissions	3000-V5		Active	30102625

EMS00000000005	GC XVII Emissions	2249-V7		Active	30102699
EQT00000000134	Above ground storage vessel	2249-V7	1700-1	Active	30102699
EQT00000000087	Scrubber	206-V2	7000-17	Active	30102699
EQT00000000059	Condenser	3000-V5	1140-20	Active	30102625
EQT00000000090	Condenser	206-V2	2-74	Active	30102699
EQT00000000167	Other	2249-V7	1700-5A	Active	30102699
EQT00000000230	Other	2249-V7	1700-87	Active	30102699
FUG00000000001	Fugitive Emissions	3000-V5	3-91	Active	30102625
EQT00000000162	Above ground storage vessel	2249-V7	1700-51	Active	30102699
EQT00000000017	Reactor vessel	3000-V5	1110-3	Active	30102625
EQT00000000231	Other	2249-V7	1700-88	Active	30102699
EQT00000000232	Other	2249-V7	1700-89	Active	30102699
EQT00000000006	Scrubber	3000-V5	1110-2	Active	30102625
RLP00000000013	Other	2249-V7	1700-14B.3	Active	30102699
EQT00000000027	Container	3000-V5	1110-4B	Active	30102625
EMS00000000001	GC XVII Emissions	206-V2		Active	30102699
EQT00000000183	Above ground storage vessel	2249-V7	1700-64	Active	30102699
EQT00000000204	Wastewater Treatment System	2249-V7	5-95	Active	30102699
EQT00000000086	Other	206-V2	7000-15	Active	30102699
FUG00000000003	Fugitive Emissions	206-V2	3-96	Active	30102699

EQT00000000067	Flare	3000-V5	7000-10A	Active	30102625
EQT00000000097	Other	206-V2	1-96	Active	30102699
EQT00000000163	Above ground storage vessel	2249-V7	1700-53	Active	30102699
EQT00000000164	Above ground storage vessel	2249-V7	1700-54	Active	30102699
EQT00000000165	Above ground storage vessel	2249-V7	1700-55	Active	30102699
EQT00000000186	Above ground storage vessel	2249-V7	1700-67	Active	30102699
EQT00000000187	Above ground storage vessel	2249-V7	1700-68	Active	30102699
EQT00000000188	Above ground storage vessel	2249-V7	1700-69	Active	30102699
EQT00000000046	Above ground storage vessel	3000-V5	1117-1	Active	30102625
EQT00000000064	Above ground storage vessel	3000-V5	1150-25	Active	30102625
EQT00000000014	Above ground storage vessel	3000-V5	1110-2A.1	Active	30102625
EQT00000000015	Above ground storage vessel	3000-V5	1110-2A.2	Active	30102625
EQT00000000060	Above ground storage vessel	3000-V5	1140-20A	Active	30102625
EQT00000000061	Above ground storage vessel	3000-V5	1140-20B	Active	30102625
EQT00000000062	Above ground storage vessel	3000-V5	1140-20C	Active	30102625
EQT00000000063	Above ground storage vessel	3000-V5	1140-20D	Active	30102625
EQT00000000150	Above ground storage vessel	2249-V7	1700-5.3	Active	30102699
EQT00000000151	Above ground storage vessel	2249-V7	1700-5.4	Active	30102699
EQT00000000152	Above ground storage vessel	2249-V7	1700-5.5	Active	30102699
EQT00000000153	Above ground storage vessel	2249-V7	1700-5.6	Active	30102699

EQT00000000154	Above ground storage vessel	2249-V7	1700-5.7	Active	30102699
EQT00000000155	Above ground storage vessel	2249-V7	1700-5.8	Active	30102699
EQT00000000171	Above ground storage vessel	2249-V7	1700-63.1	Active	30102699
EQT00000000172	Above ground storage vessel	2249-V7	1700-63.10	Active	30102699
EQT00000000173	Above ground storage vessel	2249-V7	1700-63.11	Active	30102699
EQT00000000175	Above ground storage vessel	2249-V7	1700-63.2	Active	30102699
EQT00000000176	Above ground storage vessel	2249-V7	1700-63.3	Active	30102699
EQT00000000177	Above ground storage vessel	2249-V7	1700-63.4	Active	30102699
EQT00000000178	Above ground storage vessel	2249-V7	1700-63.5	Active	30102699
EQT00000000181	Above ground storage vessel	2249-V7	1700-63.8	Active	30102699
EQT00000000182	Above ground storage vessel	2249-V7	1700-63.9	Active	30102699
EQT00000000189	Above ground storage vessel	2249-V7	1700-70	Active	30102699
EQT00000000190	Above ground storage vessel	2249-V7	1700-71	Active	30102699
EQT00000000191	Above ground storage vessel	2249-V7	1700-72	Active	30102699
EQT00000000192	Above ground storage vessel	2249-V7	1700-73	Active	30102699
EQT00000000013	Condenser	3000-V5	1110-2A	Active	30102625
EQT00000000018	Container	3000-V5	1110-3A	Active	30102625
EQT00000000019	Container	3000-V5	1110-3B	Active	30102625
EQT00000000020	Container	3000-V5	1110-3C	Active	30102625
EQT00000000022	Container	3000-V5	1110-3E	Active	30102625

EQT00000000023	Container	3000-V5	1110-3F	Active	30102625
EQT00000000024	Distillation unit	3000-V5	1110-3H	Active	30102625
EQT00000000021	Mixer	3000-V5	1110-3D	Active	30102625
EQT00000000146	Other	2249-V7	1700-45	Active	30102699
EQT00000000147	Other	2249-V7	1700-46	Active	30102699
EQT00000000148	Other	2249-V7	1700-47	Active	30102699
EQT00000000149	Other	2249-V7	1700-48	Active	30102699
EQT00000000025	Reactor vessel	3000-V5	1110-3I	Active	30102625
EQT00000000222	Reactor vessel	2249-V7	1700-3A	Active	30102699
EQT00000000223	Reactor vessel	2249-V7	1700-3B	Active	30102699
EQT00000000224	Reactor vessel	2249-V7	1700-3C	Active	30102699
EQT00000000225	Reactor vessel	2249-V7	1700-3D	Active	30102699
EQT00000000226	Reactor vessel	2249-V7	1700-3E	Active	30102699
EQT00000000202	Wastewater Treatment System	2249-V7	3-95	Active	30102699
EQT00000000088	Above ground storage vessel	206-V2	7000-17.1	Active	30102699
EQT00000000089	Above ground storage vessel	206-V2	7000-17.2	Active	30102699
EQT00000000091	Above ground storage vessel	206-V2	2-74.1	Active	30102699
EQT00000000092	Above ground storage vessel	206-V2	2-74.2	Active	30102699
EQT00000000093	Above ground storage vessel	206-V2	2-74.3	Active	30102699
EQT00000000094	Above ground storage vessel	206-V2	2-74.4	Active	30102699

EQT00000000095	Above ground storage vessel	206-V2	2-74.5	Active	30102699
EQT00000000096	Container	206-V2	2-74.6	Active	30102699
EQT00000000007	Container	3000-V5	1110-2.1	Active	30102625
EQT00000000008	Distillation unit	3000-V5	1110-2.2	Active	30102625
EQT00000000009	Distillation unit	3000-V5	1110-2.3	Active	30102625
EQT00000000010	Distillation unit	3000-V5	1110-2.4	Active	30102625
EQT00000000011	Distillation unit	3000-V5	1110-2.5	Active	30102625
EQT00000000012	Distillation unit	3000-V5	1110-2.6	Active	30102625
EQT00000000219	Steam stripper	2249-V7	1700-2A	Active	30102699
EQT00000000220	Steam stripper	2249-V7	1700-2B	Active	30102699
EQT00000000221	Steam stripper	2249-V7	1700-2C	Active	30102699

RELEASE_POINT_ID	RELEASE_POINT_DESCRIPTION	RELEASE_POINT_TYPE	HEIGHT_FT
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RP0185	1700-66 BUILDING EXHAUST FAN	Area	3
RP0144	1700-27 EAST HOT DRYER	Stack	65.5
RP0145	1700-28 WEST HOT DRYER	Stack	65.5
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RP0139	1700-20 CD REFINING COLUMN JETS	Stack	63.5
RP0140	1700-20A CD REFINING COLUMN JET SPARE	Stack	63.4
RP0026	1110-4 CD VENT CONDENSER	Stack	72
RP0141	1700-21A 2MMLB CD STORAGE TANK	Vent	48.2
RP0136	1700-13A LPK MH/STRAINERS (3,4 & 5)	Vent	59
RP0135	1700-13 POLYKETTLE MANHOLE	Vent	58.2
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RP0142	1700-25 EAST WASH BELT DRYER	Stack	31
RP0143	1700-26 WEST WASH BELT DRYER	Stack	31
RP0203	4-95 NO. 1 AERATION TANK	Area	3
RPF004	1-93 FUGITIVE EMISSIONS NEOPRENE UNIT	Fugitive	3
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPN016	1700-56 UNSTRIPPED TANKS DEPRESS. VENT	Stack	55
RPMC17	CHLOROPRENE UNIT GC XVII	Area	3

RPNC17	NEOPRENE UNIT GC XVII	Area	3
RP0134	1700-1 NO. 7 & 8 EMULSION MANHOLES	Vent	53.8
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0167	1700-5A NO. 6 EMUL STORAGE TANK MANHOLE	Vent	53.8
RPN230	No. 10 Emulsion Storage Tank Manway	Vent	55
RPF001	3-91 FUGITIVE EMISSIONS CHLOROPRENE UNIT	Fugitive	3
RP0162	1700-51 INHIBITOR MIX TANK	Vent	59
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RPN231	No. 13 Emulsion Storage Tank Manway	Vent	55
RPN232	No. 14 Emulsion Storage Tank Manway	Vent	55
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RPG006	1700-14B SOLUITON MAKE UP	Stack	57
RP0027	1110-4B CATALYST SLUDGE RECEIVER	Stack	80
RPHC17	HCL UNI GC XVII	Area	3
RP0183	1700-64 WATER SOLUTION MH FAN	Vent	53.6
RP0204	5-95 NO. 2 AERATION TANK	Area	3
RP0086	7000-15 HCL RECOVERY UNIT	Stack	120
RPF003	3-96 HCL UNIT FUGITIVE EMISSIONS	Fugitive	3

RP0067	7000-10A FLARE STACK	Stack	129
RP0097	1-96 WASTE LOADING VENT	Stack	43.5
RP0163	1700-53 STRIPPED EMULSION TANK #1	Vent	38
RP0164	1700-54 STRIPPED EMULSION TANK #2	Vent	38
RP0165	1700-55 STRIPPED EMULSION TANK #3	Vent	38
RP0186	1700-67 STRIPPED EMULSION TANK # 4	Vent	38
RP0187	1700-68 STRIPPED EMULSION TANK # 5	Vent	38
RP0188	1700-69 STRIPPED EMULSION TANK # 9	Vent	38
RP0046	1117-1 DCB STORAGE TANKS VENT	Vent	50
RP0064	1150-25 EMERGENCY AQUEOUS TANK	Vent	30.1
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55

RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RP0189	1700-70 STRIPPED EMULSION TANK # 11	Vent	38
RP0190	1700-71 STRIPPED EMULSION TANK # 12	Vent	38
RP0191	1700-72 STRIPPED EMULSION TANK # 15	Vent	38
RP0192	1700-73 STRIPPED EMULSION TANK # 16	Vent	38
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4

RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0146	1700-45 #1 EAST COOLING COMPARTMENT	Stack	49.6
RP0147	1700-46 #1 WEST COOLING COMPARTMENT	Stack	49.6
RP0148	1700-47 #2 EAST COOLING COMPARTMENT	Stack	49.6
RP0149	1700-48 #2 WEST COOLING COMPARTMENT	Stack	49.6
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RP0202	3-95 DIVERSION TANK	Area	3
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5

RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4

DIAMETER_FT	WIDTH_FT	LENGTH_FT	ORIENTATION_DEC_DEGREES	EXIT_GAS_FLOW_RATE_CFS
0.3			0	0.3
	500	500	0	7939.4
3			0	476.7
3			0	476.7
0.3			0	0.1
0.2			0	0.1099
0.2			0	0.1099
0.1			0	0.1185
0.3			0	0.1625
2			0	141.7
1.3			0	115
0.2			0	0.2419
14.1			0	2841.8
14.1			0	2841.8
	60	60	0	0
	5000	5000	0	0
0.1			0	0.0534
0.2			0	18.8
	1000	1000	0	

	1000	1000	0	
1.2			0	38.5
0.2			0	0.1445
0.3			0	0.1625
0.2			0	0.2
1.3			0	123.3
0.17			0	1.4
	5000	5000	0	0
0.3			0	0.1625
0.2			0	0.1288
0.17			0	1.4
0.17			0	1.4
0.3			0	0.3463
1.5			0	185
0.3			0	0.1625
	1000	1000	0	
1.3			0	39.6
	60	60	0	0
1.5			0	79.5
	5000	5000	0	0

6.5	0	2010.9
0.2	0	0.2
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.2	0	0.2419
0.2	0	0.2419
0.2	0	0.2419
0.2	0	0.2419

0.2	0	0.2419
0.2	0	0.2419
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.2	0	0.1288
0.2	0	0.1288
0.2	0	0.1288
0.2	0	0.1288

0.2			0	0.1288
0.2			0	0.1288
0.2			0	0.1288
2.7			0	344.2
2.7			0	344.2
2.7			0	344.2
2.7			0	344.2
0.2			0	0.1288
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
	60	60	0	0
0.2			0	0.1445
0.2			0	0.1445
0.2			0	0.2
0.2			0	0.2
0.2			0	0.2
0.2			0	0.2

0.2	0	0.2
0.2	0	0.2
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.1
0.3	0	0.1
0.3	0	0.1

EXIT_GAS_VELOCITY_FT_PER_SEC	EXIT_GAS_TEMPERATURE_DEG_F	MOISTURE_CONTENT_PERCENT
4.2	34	
	77	
67.4	250	
67.4	250	
1.4	30	
3.5	65	
3.5	65	
15.1	60	
2.3	30	
45.1	77	
82.4	77	
7.7	77	
18.2	104	
18.2	104	
	77	
	80	
6.8	41	
600	77	

34	77
4.6	86
2.3	41
6.1	43
88.3	77
60	77
	80
2.3	37
4.1	86
60	77
60	77
4.9	75
104.7	77
2.3	86
29.8	77
	77
45	110
	80

60.6	1832
6.1	86
2.3	77
2.3	77
2.3	77
2.3	77
2.3	77
2.3	77
2.3	83
2.3	86
2.3	86
2.3	86
2.3	41
2.3	41
2.3	41
2.3	41
7.7	77
7.7	77
7.7	77
7.7	77

7.7	77
7.7	77
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
2.3	77
2.3	77
2.3	77
2.3	77
2.3	86
4.1	86
4.1	86
4.1	86
4.1	86

4.1	86
4.1	86
4.1	86
61.6	122
61.6	122
61.6	122
61.6	122
4.1	86
4.2	34
4.2	34
4.2	34
4.2	34
4.2	34
	77
4.6	86
4.6	86
6.1	43
6.1	43
6.1	43
6.1	43

6.1	43
6.1	43
4.9	75
4.9	75
4.9	75
4.9	75
4.9	75
4.9	75
1.4	30
1.4	30
1.4	30

LONGITUDE_DEC_DEGREES	LATITUDE_DEC_DEGREES	UTM_EASTING_M	UTM_NORTHLING_M	UTM_ZONE
-90.52449	30.05899	738653.1	3327905.4	15
-90.52407	30.05902	738693.6	3327909.6	15
-90.52459	30.05943	738642.4	3327953.9	15
-90.52464	30.05942	738637.6	3327952.7	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52437	30.05821	738666.6	3327819.1	15
-90.52432	30.05821	738671.4	3327819.2	15
-90.52275	30.05533	738829.7	3327503.2	15
-90.52323	30.05748	738778.3	3327740.6	15
-90.52453	30.05903	738649.2	3327909.7	15
-90.52452	30.05898	738650.3	3327904.2	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52458	30.05944	738643.4	3327955.1	15
-90.52467	30.05941	738634.8	3327951.5	15
-90.52578	30.06027	738525.7	3328044.6	15
-90.52424	30.05876	738677.8	3327880.4	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52429	30.05901	738672.4	3327908	15
-90.52326	30.05517	738780.9	3327484.4	15

-90.52422	30.05877	738679.7	3327881.5	15
-90.52428	30.05902	738673.3	3327909.1	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52434	30.05897	738667.7	3327903.5	15
-90.52427	30.05902	738674.3	3327909.1	15
-90.5229	30.05534	738815.2	3327504	15
-90.52403	30.05862	738698.4	3327865.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52428	30.05901	738673.3	3327908	15
-90.52426	30.05902	738675.2	3327909.2	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52443	30.05886	738659.2	3327891.1	15
-90.5227	30.05519	738834.9	3327487.8	15
-90.52573	30.0567	738539.1	3327648.9	15
-90.52421	30.05856	738681.2	3327858.3	15
-90.52549	30.05976	738554.9	3327988.6	15
-90.52579	30.05681	738533	3327661	15
-90.52565	30.0568	738546.5	3327660.2	15

-90.52531	30.05714	738578.5	3327698.6	15
-90.52613	30.05587	738502.5	3327556.1	15
-90.52441	30.05897	738660.9	3327903.3	15
-90.52443	30.05896	738659	3327902.2	15
-90.52439	30.05899	738662.8	3327905.6	15
-90.52439	30.05897	738662.8	3327903.4	15
-90.52435	30.05901	738666.6	3327907.9	15
-90.52421	30.05904	738680	3327911.5	15
-90.52235	30.05568	738867.5	3327542.9	15
-90.52314	30.05727	738787.5	3327717.5	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15

-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52415	30.05906	738685.8	3327913.8	15
-90.52412	30.05904	738688.7	3327911.7	15
-90.52409	30.059	738691.7	3327907.3	15
-90.52408	30.05897	738692.7	3327904	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15

-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52465	30.05964	738636.1	3327977.1	15
-90.52469	30.05963	738632.3	3327975.9	15
-90.52481	30.05959	738620.8	3327971.2	15
-90.52476	30.05961	738625.6	3327973.5	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52562	30.06033	738541	3328051.6	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15

-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52451	30.05903	738651.1	3327909.8	15

HORIZONTAL_ACCURACY_MEASURE_M	HORIZONTAL_COLLECTION_METHOD	EMISSION_TYPE	POLLUTANT
	5006	Routine	Chloroprene
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CAS_	EMISSIONS	UNIT	Emissions (tons)
00126-99-8	45735	lb	22.8675
00126-99-8	31663	lb	15.8315
00126-99-8	24480	lb	12.24
00126-99-8	24480	lb	12.24
00126-99-8	18340	lb	9.17
00126-99-8	10985	lb	5.4925
00126-99-8	10985	lb	5.4925
00126-99-8	9392	lb	4.696
00126-99-8	9372	lb	4.686
00126-99-8	8029	lb	4.0145
00126-99-8	6518	lb	3.259
00126-99-8	4950	lb	2.475
00126-99-8	4785	lb	2.3925
00126-99-8	4785	lb	2.3925
00126-99-8	4339	lb	2.1695
00126-99-8	4182	lb	2.091
00126-99-8	3878	lb	1.939
00126-99-8	3814	lb	1.907
00126-99-8	3100	lb	1.55

00126-99-8	2797 lb	1.3985
00126-99-8	2714 lb	1.357
00126-99-8	2222 lb	1.111
00126-99-8	2111 lb	1.0555
00126-99-8	1746 lb	0.873
00126-99-8	1672 lb	0.836
00126-99-8	1666 lb	0.833
00126-99-8	1481 lb	0.7405
00126-99-8	1412 lb	0.706
00126-99-8	1085 lb	0.5425
00126-99-8	1041 lb	0.5205
00126-99-8	1041 lb	0.5205
00126-99-8	987 lb	0.4935
00126-99-8	740 lb	0.37
00126-99-8	355 lb	0.1775
00126-99-8	305 lb	0.1525
00126-99-8	166 lb	0.083
00126-99-8	51 lb	0.0255
00126-99-8	43 lb	0.0215
00126-99-8	24 lb	0.012

00126-99-8	20 lb	0.01
00126-99-8	11 lb	0.0055
00126-99-8	7 lb	0.0035
00126-99-8	7 lb	0.0035
00126-99-8	7 lb	0.0035
00126-99-8	7 lb	0.0035
00126-99-8	7 lb	0.0035
00126-99-8	7 lb	0.0035
00126-99-8	4 lb	0.002
00126-99-8	3 lb	0.0015
00126-99-8	1 lb	0.0005
00126-99-8	1 lb	0.0005
00126-99-8	1 lb	0.0005
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00126-99-8	0.22 lb	0.00011
00126-99-8	0.01 lb	0.000005
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00126-99-8	0.01 lb	0.000005
00126-99-8	0.01 lb	0.000005

Chloroprene releases and waste management, 2010 - 2014 (in lbs.)

DuPont Performance Elastomers LLC Pontchartrain Site
TRI ID# = 70068DPNTD560HW
Primary NAICS Code = 325212 - Synthetic rubber manufacturing
Regularly reported chloroprene, 2011 was final year to report to TRI.

DuPont Ponchartrain Works
TRI ID# = 70069DPNTPHIGHW
Primary NAICS Code = 325110 - Petroche
Started reporting chloroprene in 2012.

	Elastomers	Elastomers	Works	Works
Form R element	**2010**	**2011**	**2012**	**2013**
5.1 Fugitive or non-point air	5,465	5,568	21,278	12,000
5.2 Stack or point air	263,815	254,700	228,452	240,000
5.3 Discharges to streams/water bodies	240	87	85	84
5.4.1 Underground injection onsite	5,800	7,555	11,402	6,100
6.1 POTW				
6.2 Transfers to offsite locations	5,150 (M50); 6,216 (M50); 29,804 (M50)	8,100 (M50); 6,392 (M50)	2,465 (M50); 458 (M64); 43 (M50)	1 (M64/P91); 290 (M50); 1,839 (M50)
7.A On-site waste treatment methods	Incineration, condenser, flare, scrubber	Incineration, condenser, flare, scrubber	Incineration, condenser, flare, scrubber	Condenser, flare, scrubber
7.B On-site energy recovery processes	NA	NA	NA	Industrial furnace
Source Reduction & Recycling Activities				
8.1.a Onsite disp - UI wells, RCRA landfills, etc.	5,800	7,555	11,402	6,100
8.1.b Onsite disp/releases	269,520	260,355	249,815	252,084
8.1.c Offsite disp - UI wells, RCRA landfills, etc.	NA	NA	458	1
8.1.d Other offsite disp				
8.2 Energy recovery onsite	NA	NA	NA	540,103
8.5 Recycled offsite				
8.6 Quantity treated onsite	3,025,770	2,315,793	2,134,886	1,782,902
8.7 Quantity treated offsite	41,170	14,492	2,508	2,129
8.9 Production ratio	1.79	0.96	0.89	0.99

Chloroprene is manufactured and processed.

Maximum amount of chloroprene on-site during the calendar year is 1,000,000 to 9,999,999 lbs.

mical manufacturing

Works	
2014	
12,000	
250,000	
88	
3,400	
	M64 - other landfills
4 (M64/P91); 3,055 (M50); 111 (M50)	M50 - incineration/thermal treatment
Condenser, flare, scrubber	
Industrial furnace	
3,400	
262,088	
4	
510,000	
1,800,000	
3,166	
1	

LIST OF SCHOOLS There are five schools west of the facility. Two schools are about 1500 feet away.		
Our Lady of Grace School	A private middle school with 123 students 780 Louisiana 44, LaPlace, LA 70068	(718) 375-2081
Fifth Ward Elementary	A public middle school with 514 students 158 Panther Drive, Reserve, LA 70084	(985) 536-4221
LIST OF COMMUNITY ORGANIZATIONS		
Ann Rolfes, Founder	Louisiana Bucket Brigade (LABB) is an environmental health and justice organization working with communities that neighbor the state's oil refineries and chemical plants. Their mission is to support communities' use of grassroots action to create informed, sustainable neighborhoods free from industrial pollution. http://www.labucketbrigade.org/	504-484-3433 anne@labucketbrigade.org
Mary Lee Orr, President	Louisiana Environmental Action Network (LEAN) purpose is to foster cooperation and communication between individual citizens, corporate and government organizations in an effort to assess and fix environmental problems in Louisiana. http://leanweb.org/	225-928-1315 marylee@leanweb.org
Dr. Beverly Wright, President	Deep South Center for Environmental Justice (DSCEJ) was founded in 1992 in collaboration with community environmental groups and universities within the region to address issues of EJ. DSCEJ has a Community/University Partnership, under the auspices of Dillard University. http://dscej.org/	504-816-4005 (ofc) Ex. 6 Personal Privacy (PP) (cell) Ex. 6 Personal Privacy (PP)@aol.com
Gen. Russel Honore, Leader	GreenARMY, is an alliance of civic, community, and environmental groups and concerned citizens throughout Louisiana, who are fighting for clean air, clean water, and healthy communities in Louisiana. http://gogreenarmy.com/	Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP)@gmail.com
Darryl Malek-Wiley EJ Associate Representative	Sierra Club – New Orleans/Gulf of Mexico Regional Office	504-861-4835 Darryl.malek-wiley@sierraclub.org
FAITH BASED ORGANIZATIONS		
Rev. Roderick Coates	Our Lady of Grace Church - 780 Hwy 44, Reserve, LA 70084	(985) 536-2613
	Bethlehem Baptist Church - Reserve, LA 70084	

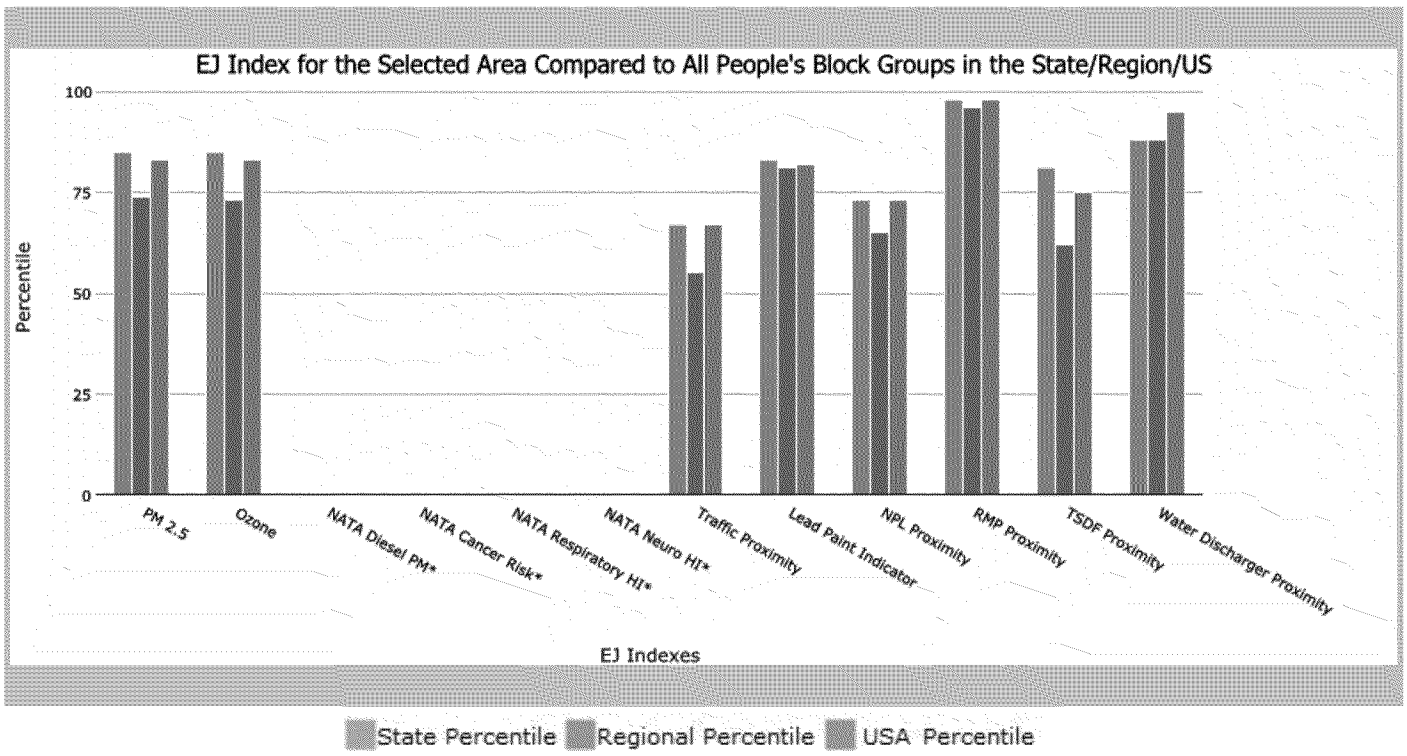
EJSCREEN Report

for 1 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 1620

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	85	74	83
EJ Index for Ozone	85	73	83
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	67	55	67
EJ Index for Lead Paint Indicator	83	81	82
EJ Index for Proximity to NPL sites	73	65	73
EJ Index for Proximity to RMP sites	98	96	98
EJ Index for Proximity to TSDFs	81	62	75
EJ Index for Proximity to Major Direct Dischargers	88	88	95



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

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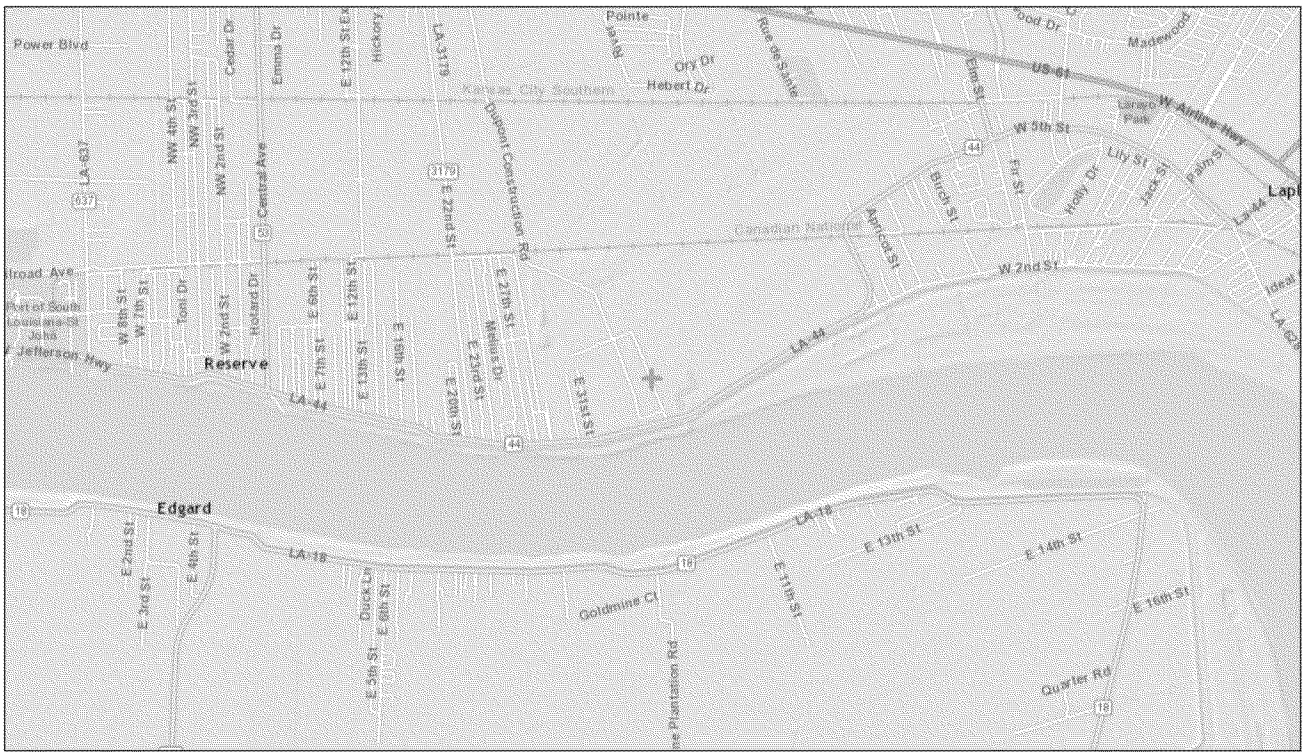
EJSCREEN Report

for 1 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 1620

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068



December 1, 2015

Digitized Point

1:36,112

0 0.3 0.6 1.2 mi

0 0.5 1 2 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

EJSCREEN Report

for 1 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 1620

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	9.53	9.54	53	9.77	36	9.78	39
Ozone (ppb)	44.6	44.7	65	48.6	27	46.1	40
NATA Diesel PM (µg/m^3)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	7.2	58	24	81	16	110	17
Lead Paint Indicator (% Pre-1960 Housing)	0.21	0.23	62	0.19	68	0.3	49
NPL Proximity (site count/km distance)	0.018	0.065	31	0.063	31	0.096	20
RMP Proximity (facility count/km distance)	2.7	0.45	98	0.42	98	0.31	99
TSDF Proximity (facility count/km distance)	0.012	0.025	48	0.062	26	0.054	33
Water Discharger Proximity (facility count/km distance)	0.66	0.53	73	0.35	85	0.25	92
Demographic Indicators							
Demographic Index	71%	39%	86	44%	82	35%	90
Minority Population	84%	40%	85	49%	80	36%	87
Low Income Population	59%	39%	81	39%	78	34%	85
Linguistically Isolated Population	0%	2%	61	6%	36	5%	45
Population With Less Than High School Education	33%	18%	88	18%	82	14%	89
Population Under 5 years of age	7%	7%	51	7%	45	7%	55
Population over 64 years of age	13%	12%	62	11%	67	13%	59

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: http://www.epa.gov/ttn/atw/natamain/index.html.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

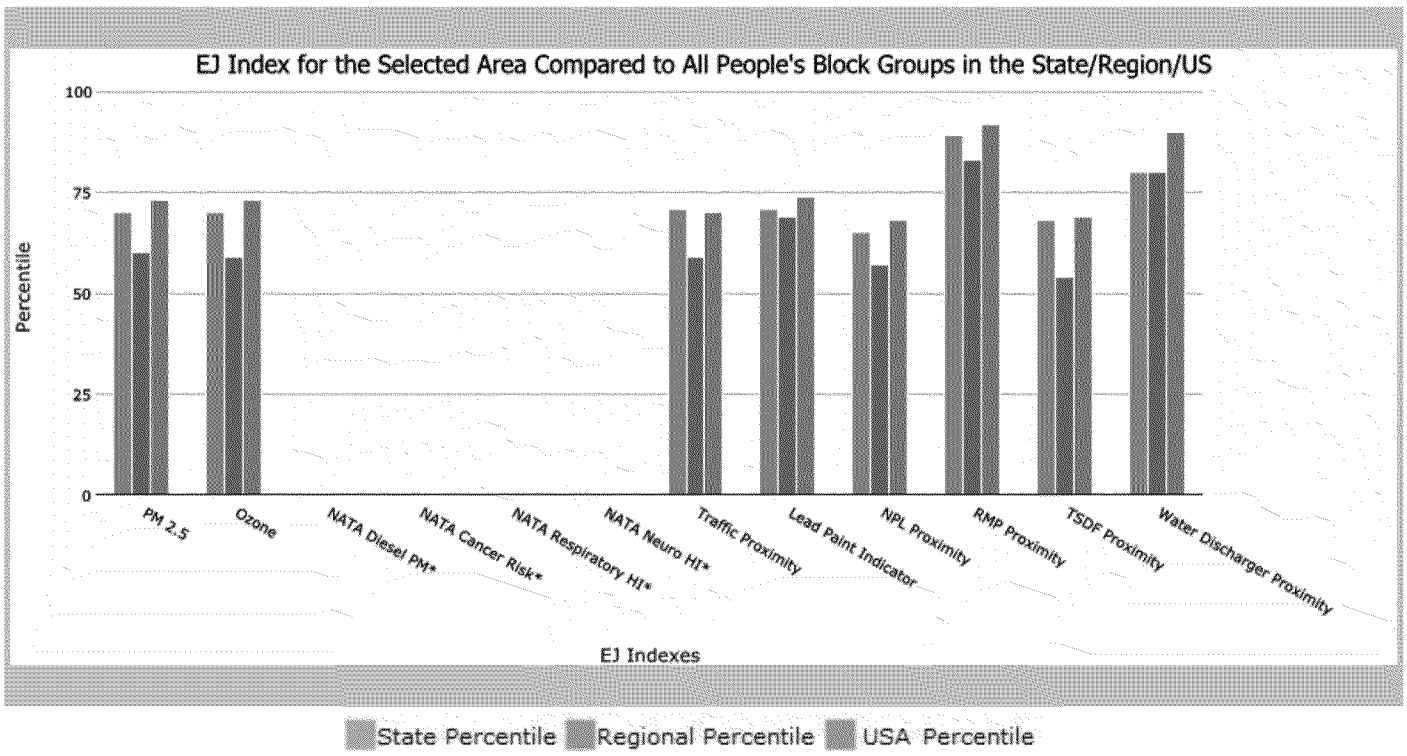
EJSCREEN Report

for 3 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 24868

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	70	60	73
EJ Index for Ozone	70	59	73
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	71	59	70
EJ Index for Lead Paint Indicator	71	69	74
EJ Index for Proximity to NPL sites	65	57	68
EJ Index for Proximity to RMP sites	89	83	92
EJ Index for Proximity to TSDFs	68	54	69
EJ Index for Proximity to Major Direct Dischargers	80	80	90



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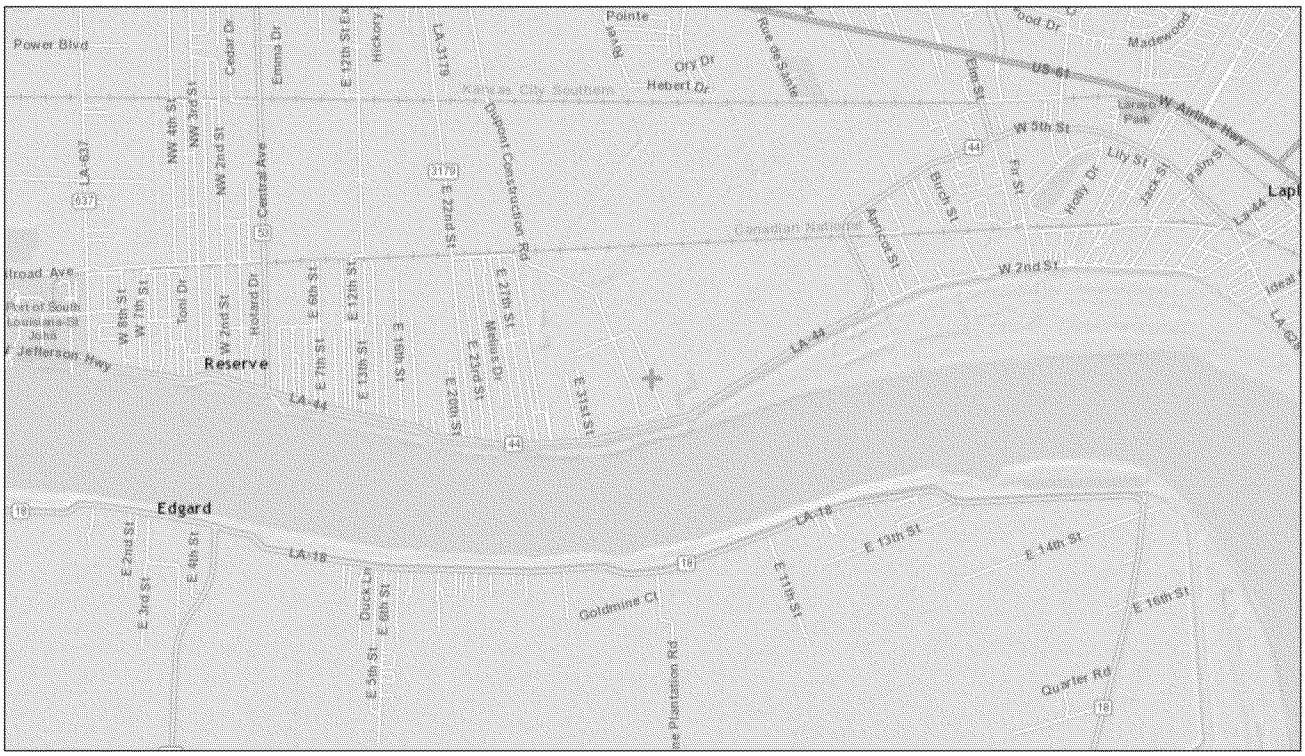
ED_000702_PST_000001953-00001

EJSCREEN Report

for 3 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 24868

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068



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Approximate Population: 24868

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	9.46	9.54	49	9.77	34	9.78	38
Ozone (ppb)	44.9	44.7	70	48.6	28	46.1	41
NATA Diesel PM (µg/m^3)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	26	58	52	81	43	110	42
Lead Paint Indicator (% Pre-1960 Housing)	0.16	0.23	54	0.19	62	0.3	44
NPL Proximity (site count/km distance)	0.019	0.065	32	0.063	32	0.096	21
RMP Proximity (facility count/km distance)	1.3	0.45	90	0.42	93	0.31	96
TSDF Proximity (facility count/km distance)	0.012	0.025	47	0.062	25	0.054	32
Water Discharger Proximity (facility count/km distance)	0.59	0.53	71	0.35	84	0.25	90
Demographic Indicators							
Demographic Index	49%	39%	68	44%	60	35%	73
Minority Population	59%	40%	72	49%	62	36%	74
Low Income Population	39%	39%	52	39%	52	34%	63
Linguistically Isolated Population	1%	2%	63	6%	38	5%	47
Population With Less Than High School Education	19%	18%	56	18%	59	14%	71
Population Under 5 years of age	7%	7%	60	7%	54	7%	63
Population over 64 years of age	12%	12%	51	11%	58	13%	50

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: http://www.epa.gov/ttn/atw/natamain/index.html.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

ED_000702_PST_000001953-00003

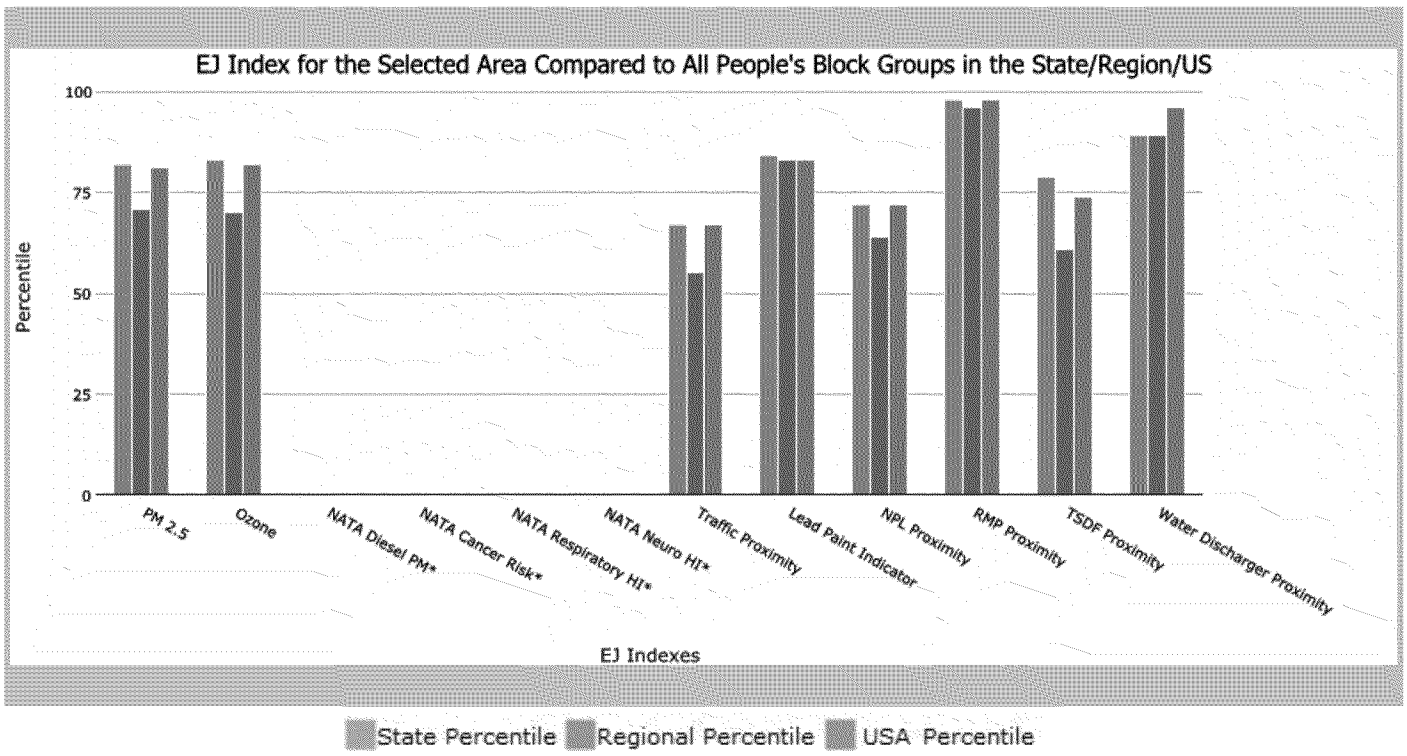
EJSCREEN Report

for .5 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 315

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	82	71	81
EJ Index for Ozone	83	70	82
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	67	55	67
EJ Index for Lead Paint Indicator	84	83	83
EJ Index for Proximity to NPL sites	72	64	72
EJ Index for Proximity to RMP sites	98	96	98
EJ Index for Proximity to TSDFs	79	61	74
EJ Index for Proximity to Major Direct Dischargers	89	89	96



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

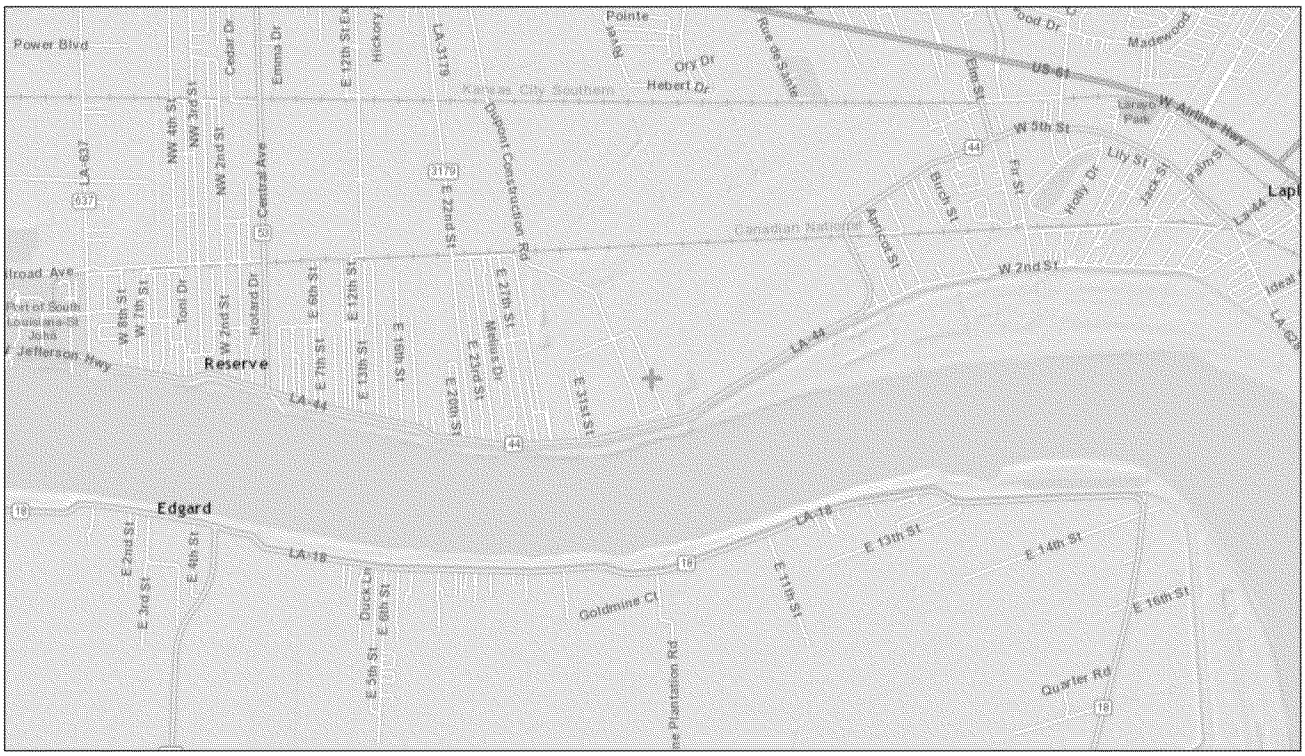
ED_000702_PST_000001954-00001

EJSCREEN Report

for .5 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 315

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068



EJSCREEN Report

for .5 mile Ring Centered at 30.054293,-90.524894, LOUISIANA, EPA Region 6

Approximate Population: 315

Dupont Pontchartrain Works 586 LOUISIANA 44, LAPLACE, LA 70068

Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	9.53	9.54	53	9.77	36	9.78	39
Ozone (ppb)	44.6	44.7	65	48.6	27	46.1	40
NATA Diesel PM (µg/m^3)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	7.8	58	25	81	17	110	18
Lead Paint Indicator (% Pre-1960 Housing)	0.25	0.23	68	0.19	72	0.3	54
NPL Proximity (site count/km distance)	0.018	0.065	31	0.063	31	0.096	21
RMP Proximity (facility count/km distance)	2.7	0.45	98	0.42	98	0.31	99
TSDF Proximity (facility count/km distance)	0.012	0.025	48	0.062	26	0.054	33
Water Discharger Proximity (facility count/km distance)	0.78	0.53	77	0.35	88	0.25	93
Demographic Indicators							
Demographic Index	73%	39%	87	44%	84	35%	91
Minority Population	83%	40%	85	49%	79	36%	86
Low Income Population	63%	39%	85	39%	82	34%	88
Linguistically Isolated Population	0%	2%	61	6%	36	5%	45
Population With Less Than High School Education	35%	18%	91	18%	84	14%	91
Population Under 5 years of age	7%	7%	53	7%	47	7%	57
Population over 64 years of age	16%	12%	75	11%	77	13%	71

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: http://www.epa.gov/ttn/atw/natamain/index.html.

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To: Thompson, Steve[thompson.steve@epa.gov]
From: Yurk, Jeffrey
Sent: Wed 12/9/2015 3:21:12 PM
Subject: FW: DuPont LaPlace - TRI

From: Riley, David
Sent: Wednesday, December 09, 2015 9:06 AM
To: Yurk, Jeffrey
Subject: RE: DuPont LaPlace - TRI

Digging into this further, the "works" facility has only been reporting chloroprene since 2012. The other facility, which regularly reported chloroprene, stopped reporting in 2011. I would guess that they are both now reporting to the TRI as one facility.

David Riley

EPCRA 313 Enforcement Officer

US EPA Region 6 (PD-T)

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

Phone: (214) 665-7298

Fax: (214) 665-6655

e-mail: riley.david@epa.gov

year	AI	AI_NAME	OWNER_NAME	ADDRESS1
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44
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ADDRESS2	ADDRESS3	CITY	STATE_CODE	ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE
(portion of)		Laplace	LA	70068	325212	2869
(portion of)		Laplace	LA	70068	325212	2869
(portion of)		Laplace	LA	70068	325212	2869
(portion of)		Laplace	LA	70068	325212	2869
(portion of)		Laplace	LA	70068	325212	2869
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PARISH_OR_COUNTY_DESC	SOURCE_ID	NEDS_ID
St. John the Baptist	NEOR15	
St. John the Baptist	NEO185	91
St. John the Baptist	NEO144	26
St. John the Baptist	NEO145	27
St. John the Baptist	NEOR14	
St. John the Baptist	NEO139	17
St. John the Baptist	NEO140	18
St. John the Baptist	MON026	45
St. John the Baptist	NEO141	20
St. John the Baptist	NEO136	76
St. John the Baptist	NEO135	11
St. John the Baptist	NEOG08	9
St. John the Baptist	NEO142	24
St. John the Baptist	NEO143	25
St. John the Baptist	NEO203	37
St. John the Baptist	NEOFUG	35
St. John the Baptist	NEOG10	88
St. John the Baptist	NEOR16	81
St. John the Baptist	MONC17	

St. John the Baptist	NEOC17	
St. John the Baptist	NEO134	1
St. John the Baptist	HCL087	63
St. John the Baptist	MON059	52
St. John the Baptist	HCL090	61
St. John the Baptist	NEO167	10
St. John the Baptist	NEO230	
St. John the Baptist	MONFUG	58
St. John the Baptist	NEO162	34
St. John the Baptist	MON017	44
St. John the Baptist	NEO231	
St. John the Baptist	NEO232	
St. John the Baptist	MON006	41
St. John the Baptist	NEOR13	
St. John the Baptist	MON027	46
St. John the Baptist	HCLC17	
St. John the Baptist	NEO183	89
St. John the Baptist	NEO204	38
St. John the Baptist	HCL086	62
St. John the Baptist	NEOUAD	
St. John the Baptist	HCLFUG	93

St. John the Baptist	MON067	56
St. John the Baptist	HCL097	75
St. John the Baptist	NEO163	78
St. John the Baptist	NEO164	79
St. John the Baptist	NEO165	80
St. John the Baptist	NEO186	
St. John the Baptist	NEO187	
St. John the Baptist	NEO188	
St. John the Baptist	MONUAD	
St. John the Baptist	MON046	71
St. John the Baptist	MON064	53
St. John the Baptist	MON014	
St. John the Baptist	MON015	
St. John the Baptist	MON060	
St. John the Baptist	MON061	
St. John the Baptist	MON062	
St. John the Baptist	MON063	
St. John the Baptist	NEO150	
St. John the Baptist	NEO151	
St. John the Baptist	NEO152	
St. John the Baptist	NEO153	
St. John the Baptist	NEO154	

St. John the Baptist	NEO155	
St. John the Baptist	NEO171	12
St. John the Baptist	NEO172	77
St. John the Baptist	NEO173	
St. John the Baptist	NEO175	13
St. John the Baptist	NEO176	15
St. John the Baptist	NEO177	
St. John the Baptist	NEO178	16
St. John the Baptist	NEO181	
St. John the Baptist	NEO182	32
St. John the Baptist	NEO189	
St. John the Baptist	NEO190	
St. John the Baptist	NEO191	
St. John the Baptist	NEO192	
St. John the Baptist	MON013	42
St. John the Baptist	MON018	
St. John the Baptist	MON019	
St. John the Baptist	MON020	
St. John the Baptist	MON022	
St. John the Baptist	MON023	
St. John the Baptist	MON024	
St. John the Baptist	MON021	

St. John the Baptist	NEO146	28
St. John the Baptist	NEO147	29
St. John the Baptist	NEO148	30
St. John the Baptist	NEO149	31
St. John the Baptist	MON025	
St. John the Baptist	NEO222	
St. John the Baptist	NEO223	
St. John the Baptist	NEO224	
St. John the Baptist	NEO225	
St. John the Baptist	NEO226	
St. John the Baptist	NEO202	36
St. John the Baptist	HCL088	
St. John the Baptist	HCL089	
St. John the Baptist	HCL091	
St. John the Baptist	HCL092	
St. John the Baptist	HCL093	
St. John the Baptist	HCL094	
St. John the Baptist	HCL095	
St. John the Baptist	HCL096	
St. John the Baptist	MON007	
St. John the Baptist	MON008	
St. John the Baptist	MON009	

St. John the Baptist	MON010
St. John the Baptist	MON011
St. John the Baptist	MON012
St. John the Baptist	NEO219
St. John the Baptist	NEO220
St. John the Baptist	NEO221

SOURCE_DESCRIPTION
Poly Kettles Vent Condenser
Poly Building Wall Fans
East Hot Dryer Exhaust
West Hot Dryer Exhaust
Strippers Condenser Vent
CD Refining Column Jet
CD Refining Column Jet (Spare)
CD Vent Condenser
2MM Pound CD Storage Tank
Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent
Poly Kettles Manholes / Strainers (1 & 2) Common Vent
Unstripped Emulsion Storage Tanks Common Vent
East Wash Belt Dryer
West Wash Belt Dryer
Surge Tank (Waste Water Tank)
Fugitive Emissions - Neoprene Unit
Vent Header System
No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessel
CHLOROPRENE UNIT CONDITION XVII

NEOPRENE UNIT CONDITION XVII

No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower

HCl Feed Tanks' Scrubber

Aqueous Storage Vent Condenser

Waste Storage Tanks' Condenser

No. 6 Emulsion Storage Tank Manhole

No. 10 Emulsion Storage Tank Manway

Chloroprene Unit - Fugitive Emissions

Inhibitor Mix Tank (Surge Control Vessel)

Isom Reactor Vent System

No. 13 Emulsion Storage Tank Manway

No. 14 Emulsion Storage Tank Manway

Refining Jets Vent System

Stabilizer & Catalyst Tanks Manholes Vent

Catalyst Sludge Receiver

HCL UNIT CONDITION XVII

Water Solution Exhaust Fan

Aeration Tank (Waste Water Tank)

HCl Recovery Unit

Unauthorized Discharges - Neoprene Unit

Fugitive Emissions

Monomer Flare

Waste Loading Vent

Stripped Emulsion Tank No. 1

Stripped Emulsion Tank No. 2

Stripped Emulsion Tank No. 3

Stripped Emulsion Tank No. 4

Stripped Emulsion Tank No. 5

Stripped Emulsion Tank No. 9

Unauthorized Discharges - Chloroprene Unit

1117-1 DCB Storage Tanks Vent

Emergency Aqueous Tank

DCB Storage Tank No. 1

DCB Storage Tank No. 2

Diversion Tank

Aqueous Clarifier Tank

No.1 CD Brine Tank

No.2 CD Brine Tank

Unstripped Emulsion Storage Tank No. 6 (Surge Control Vessel)

Unstripped Emulsion Storage Tank No. 7 (Surge Control Vessel)

Unstripped Emulsion Storage Tank No. 8 (Surge Control Vessel)

Unstripped Emulsion Storage Tank No. 10 (Surge Control Vessel)

Unstripped Emulsion Storage Tank No. 13 (Surge Control Vessel)

Unstripped Emulsion Storage Tank No. 14 (Surge Control Vessel)

No. 1 CD Solution Tank (Surge Control Vessel)

Inhibitor Final Make-Up Tank (Surge Control Vessel)

Inhibitor Hold-Up Tank (Surge Control Vessel)

No. 2 CD Solution Tank (Surge Control Vessel)

Recovered CD Storage Tank No. 1 (Surge Control Vessel)

Recovered CD Storage Tank No. 2 (Surge Control Vessel)

CD Heels Tank (Bottom Receiver)

Crude CD Storage Tank No. 3

Refined CD Storage Tank

Stripped Emulsion Tank No. 11

Stripped Emulsion Tank No. 12

Stripped Emulsion Tank No. 15

Stripped Emulsion Tank No. 16

DCB Storage Tanks Condenser

Isom JVC Effluent Tank

TEA Storage Tank

TEA Burette

Catalyst Feed Tank

Isom Purge Tank

Isom Distillation Column

Catalyst Mix Tank

No. 1 East Dryer Cooling Compartment

No. 1 West Dryer Cooling Compartment

No. 2 East Dryer Cooling Compartment

No. 2 West Dryer Cooling Compartment

Isom Reactors

Large Poly Kettle Vent No. 1

Large Poly Kettle Vent No. 2

Large Poly Kettle Vent No. 3

Large Poly Kettle Vent No. 4

Large Poly Kettle Vent No. 5

Diversion Tank (Waste Water Tank)

No. 1 HCl Unit Feed Tank

No. 2 HCl Unit Feed Tank

No. 1 Waste Organic Tank

No. 2 Waste Organic Tank

No. 3 Waste Organic Tank

No. 4 Waste Organic Tank

No. 5 Waste Organic Tank

Decant Tank

JVC Effluent Tank

Pentane Column

Heads Column

Topper Column

Refiner Column

Recovery Column

Stripper No. 1

Stripper No. 2

Stripper No. 3

SOURCE_TYPE	PERMIT	EIQ	SOURCE_STATUS	SCC	RELEASE_POINT_ID
Other	2249-V7	1700-3	Active	30102699	RPN015
Other	2249-V7	1700-66	Active	30102699	RP0185
Other	2249-V7	1700-27	Active	30102699	RP0144
Other	2249-V7	1700-28	Active	30102699	RP0145
Other	2249-V7	1700-2	Active	30102699	RPN014
Other	2249-V7	1700-20	Active	30102699	RP0139
Other	2249-V7	1700-20A	Active	30102699	RP0140
Condenser	3000-V5	1110-4	Active	30102625	RP0026
Above ground storage vessel	2249-V7	1700-21A	Active	30102699	RP0141
Other	2249-V7	1700-13A	Active	30102699	RP0136
Other	2249-V7	1700-13	Active	30102699	RP0135
Above ground storage vessel	2249-V7	1700-5	Active	30102699	RPG008
Other	2249-V7	1700-25	Active	30102699	RP0142
Other	2249-V7	1700-26	Active	30102699	RP0143
Wastewater Treatment System	2249-V7	Apr-95	Active	30102699	RP0203
Fugitive Emissions	2249-V7	Jan-93	Active	30102699	RPF004
Other	2249-V7	1700-63	Active	30102699	RPG010
Other	2249-V7	1700-56	Active	30102699	RPN016
GC XVII Emissions	3000-V5		Active	30102625	RPMC17

GC XVII Emissions	2249-V7		Active	30102699	RPNC17
Above ground storage vessel	2249-V7	1700-1	Active	30102699	RP0134
Scrubber	206-V2	7000-17	Active	30102699	RP0087
Condenser	3000-V5	1140-20	Active	30102625	RP0059
Condenser	206-V2	Feb-74	Active	30102699	RP0090
Other	2249-V7	1700-5A	Active	30102699	RP0167
Other	2249-V7	1700-87	Active	30102699	RPN230
Fugitive Emissions	3000-V5	Mar-91	Active	30102625	RPF001
Above ground storage vessel	2249-V7	1700-51	Active	30102699	RP0162
Reactor vessel	3000-V5	1110-3	Active	30102625	RP0017
Other	2249-V7	1700-88	Active	30102699	RPN231
Other	2249-V7	1700-89	Active	30102699	RPN232
Scrubber	3000-V5	1110-2	Active	30102625	RP0006
Other	2249-V7	1700-14B.	Active	30102699	RPG006
Container	3000-V5	1110-4B	Active	30102625	RP0027
GC XVII Emissions	206-V2		Active	30102699	RPHC17
Above ground storage vessel	2249-V7	1700-64	Active	30102699	RP0183
Wastewater Treatment System	2249-V7	May-95	Active	30102699	RP0204
Other	206-V2	7000-15	Active	30102699	RP0086
Other	2249-V7		Active	30102699	RPNUAD
Fugitive Emissions	206-V2	Mar-96	Active	30102699	RPF003

Flare	3000-V5	7000-10A	Active	30102625	RP0067
Other	206-V2	Jan-96	Active	30102699	RP0097
Above ground storage vessel	2249-V7	1700-53	Active	30102699	RP0163
Above ground storage vessel	2249-V7	1700-54	Active	30102699	RP0164
Above ground storage vessel	2249-V7	1700-55	Active	30102699	RP0165
Above ground storage vessel	2249-V7	1700-67	Active	30102699	RP0186
Above ground storage vessel	2249-V7	1700-68	Active	30102699	RP0187
Above ground storage vessel	2249-V7	1700-69	Active	30102699	RP0188
Other	3000-V5		Active	30102625	RPMUAD
Above ground storage vessel	3000-V5	1117-1	Active	30102625	RP0046
Above ground storage vessel	3000-V5	1150-25	Active	30102625	RP0064
Above ground storage vessel	3000-V5	1110-2A.1	Active	30102625	RP0013
Above ground storage vessel	3000-V5	1110-2A.2	Active	30102625	RP0013
Above ground storage vessel	3000-V5	1140-20A	Active	30102625	RP0059
Above ground storage vessel	3000-V5	1140-20B	Active	30102625	RP0059
Above ground storage vessel	3000-V5	1140-20C	Active	30102625	RP0059
Above ground storage vessel	3000-V5	1140-20D	Active	30102625	RP0059
Above ground storage vessel	2249-V7	1700-5.3	Active	30102699	RPG008
Above ground storage vessel	2249-V7	1700-5.4	Active	30102699	RPG008
Above ground storage vessel	2249-V7	1700-5.5	Active	30102699	RPG008
Above ground storage vessel	2249-V7	1700-5.6	Active	30102699	RPG008
Above ground storage vessel	2249-V7	1700-5.7	Active	30102699	RPG008

Above ground storage vessel	2249-V7	1700-5.8	Active	30102699	RPG008
Above ground storage vessel	2249-V7	1700-63.1	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.1	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.1	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.2	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.3	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.4	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.5	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.8	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-63.9	Active	30102699	RPG010
Above ground storage vessel	2249-V7	1700-70	Active	30102699	RP0189
Above ground storage vessel	2249-V7	1700-71	Active	30102699	RP0190
Above ground storage vessel	2249-V7	1700-72	Active	30102699	RP0191
Above ground storage vessel	2249-V7	1700-73	Active	30102699	RP0192
Condenser	3000-V5	1110-2A	Active	30102625	RP0013
Container	3000-V5	1110-3A	Active	30102625	RP0017
Container	3000-V5	1110-3B	Active	30102625	RP0017
Container	3000-V5	1110-3C	Active	30102625	RP0017
Container	3000-V5	1110-3E	Active	30102625	RP0017
Container	3000-V5	1110-3F	Active	30102625	RP0017
Distillation unit	3000-V5	1110-3H	Active	30102625	RP0017
Mixer	3000-V5	1110-3D	Active	30102625	RP0017

Other	2249-V7	1700-45	Active	30102699	RP0146
Other	2249-V7	1700-46	Active	30102699	RP0147
Other	2249-V7	1700-47	Active	30102699	RP0148
Other	2249-V7	1700-48	Active	30102699	RP0149
Reactor vessel	3000-V5	1110-3I	Active	30102625	RP0017
Reactor vessel	2249-V7	1700-3A	Active	30102699	RPN015
Reactor vessel	2249-V7	1700-3B	Active	30102699	RPN015
Reactor vessel	2249-V7	1700-3C	Active	30102699	RPN015
Reactor vessel	2249-V7	1700-3D	Active	30102699	RPN015
Reactor vessel	2249-V7	1700-3E	Active	30102699	RPN015
Wastewater Treatment System	2249-V7	Mar-95	Active	30102699	RP0202
Above ground storage vessel	206-V2	7000-17.1	Active	30102699	RP0087
Above ground storage vessel	206-V2	7000-17.2	Active	30102699	RP0087
Above ground storage vessel	206-V2	2-74.1	Active	30102699	RP0090
Above ground storage vessel	206-V2	2-74.2	Active	30102699	RP0090
Above ground storage vessel	206-V2	2-74.3	Active	30102699	RP0090
Above ground storage vessel	206-V2	2-74.4	Active	30102699	RP0090
Above ground storage vessel	206-V2	2-74.5	Active	30102699	RP0090
Container	206-V2	2-74.6	Active	30102699	RP0090
Container	3000-V5	1110-2.1	Active	30102625	RP0006
Distillation unit	3000-V5	1110-2.2	Active	30102625	RP0006
Distillation unit	3000-V5	1110-2.3	Active	30102625	RP0006

Distillation unit	3000-V5 1110-2.4	Active	30102625	RP0006
Distillation unit	3000-V5 1110-2.5	Active	30102625	RP0006
Distillation unit	3000-V5 1110-2.6	Active	30102625	RP0006
Steam stripper	2249-V7 1700-2A	Active	30102699	RPN014
Steam stripper	2249-V7 1700-2B	Active	30102699	RPN014
Steam stripper	2249-V7 1700-2C	Active	30102699	RPN014

RELEASE_POINT_DESCRIPTION	RELEASE_POINT_TYPE	HEIGHT_FT	DIAMETER_FT	WIDTH_FT
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
1700-66 BUILDING EXHAUST FAN	Area	3		500
1700-27 EAST HOT DRYER	Stack	65.5	3	
1700-28 WEST HOT DRYER	Stack	65.5	3	
1700-2 STRIPPERS COMMON VENT	Stack	62.4	0.3	
1700-20 CD REFINING COLUMN JETS	Stack	63.5	0.2	
1700-20A CD REFINING COLUMN JET SPARE	Stack	63.4	0.2	
1110-4 CD VENT CONDENSER	Stack	72	0.1	
1700-21A 2MMLB CD STORAGE TANK	Vent	48.2	0.3	
1700-13A LPK MH/STRAINERS (3,4 & 5)	Vent	59	2	
1700-13 POLYKETTLE MANHOLE	Vent	58.2	1.3	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	
1700-25 EAST WASH BELT DRYER	Stack	31	14.1	
1700-26 WEST WASH BELT DRYER	Stack	31	14.1	
4-95 NO. 1 AERATION TANK	Area	3		60
1-93 FUGITIVE EMISSIONS NEOPRENE UNIT	Fugitive	3		5000
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1	
1700-56 UNSTRIPPED TANKS DEPRESS. VENT	Stack	55	0.2	
CHLOROPRENE UNIT GC XVII	Area	3		1000

NEOPRENE UNIT GC XVII	Area	3		1000
1700-1 NO. 7 & 8 EMULSION MANHOLES	Vent	53.8	1.2	
7000-17 HCL FEED TANKS	Vent	10	0.2	
1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1	0.3	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
1700-5A NO. 6 EMUL STORAGE TANK MANHOLE	Vent	53.8	1.3	
No. 10 Emulsion Storage Tank Manway	Vent	55	0.17	
3-91 FUGITIVE EMISSIONS CHLOROPRENE UNIT	Fugitive	3		5000
1700-51 INHIBITOR MIX TANK	Vent	59	0.3	
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2	
No. 13 Emulsion Storage Tank Manway	Vent	55	0.17	
No. 14 Emulsion Storage Tank Manway	Vent	55	0.17	
1110-2 JET VENT SCRUBBER	Stack	98	0.3	
1700-14B SOLUITON MAKE UP	Stack	57	1.5	
1110-4B CATALYST SLUDGE RECEIVER	Stack	80	0.3	
HCL UNI GC XVII	Area	3		1000
1700-64 WATER SOLUTION MH FAN	Vent	53.6	1.3	
5-95 NO. 2 AERATION TANK	Area	3		60
7000-15 HCL RECOVERY UNIT	Stack	120	1.5	
UNAUTHORIZED DISCHARGE - NEOPRENE UNIT	Fugitive	3		100
3-96 HCL UNIT FUGITIVE EMISSIONS	Fugitive	3		5000

7000-10A FLARE STACK	Stack	129	6.5	
1-96 WASTE LOADING VENT	Stack	43.5	0.2	
1700-53 STRIPPED EMULSION TANK #1	Vent	38	0.3	
1700-54 STRIPPED EMULSION TANK #2	Vent	38	0.3	
1700-55 STRIPPED EMULSION TANK #3	Vent	38	0.3	
1700-67 STRIPPED EMULSION TANK # 4	Vent	38	0.3	
1700-68 STRIPPED EMULSION TANK # 5	Vent	38	0.3	
1700-69 STRIPPED EMULSION TANK # 9	Vent	38	0.3	
UNAUTHORIZED DISCHARGE - CHLOROPRENE U	Fugitive	3		100
1117-1 DCB STORAGE TANKS VENT	Vent	50	0.3	
1150-25 EMERGENCY AQUEOUS TANK	Vent	30.1	0.3	
1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5	0.3	
1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5	0.3	
1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1	0.3	
1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1	0.3	
1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1	0.3	
1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1	0.3	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	
1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2	

1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55	0.2
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-63 1712 COMMON VENT HEADER	Stack	33	0.1
1700-70 STRIPPED EMULSION TANK # 11	Vent	38	0.3
1700-71 STRIPPED EMULSION TANK # 12	Vent	38	0.3
1700-72 STRIPPED EMULSION TANK # 15	Vent	38	0.3
1700-73 STRIPPED EMULSION TANK # 16	Vent	38	0.3
1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5	0.3
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2

1700-45 #1 EAST COOLING COMPARTMENT	Stack	49.6	2.7	
1700-46 #1 WEST COOLING COMPARTMENT	Stack	49.6	2.7	
1700-47 #2 EAST COOLING COMPARTMENT	Stack	49.6	2.7	
1700-48 #2 WEST COOLING COMPARTMENT	Stack	49.6	2.7	
1110-3 ISOM REACTOR VENT	Stack	58.4	0.2	
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
1700-3 POLY KETTLES COMMON VENT	Stack	62.4	0.3	
3-95 DIVERSION TANK	Area	3		60
7000-17 HCL FEED TANKS	Vent	10	0.2	
7000-17 HCL FEED TANKS	Vent	10	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
2-74 WASTE STORAGE TANKS	Vent	43.5	0.2	
1110-2 JET VENT SCRUBBER	Stack	98	0.3	
1110-2 JET VENT SCRUBBER	Stack	98	0.3	
1110-2 JET VENT SCRUBBER	Stack	98	0.3	

1110-2 JET VENT SCRUBBER	Stack	98	0.3
1110-2 JET VENT SCRUBBER	Stack	98	0.3
1110-2 JET VENT SCRUBBER	Stack	98	0.3
1700-2 STRIPPERS COMMON VENT	Stack	62.4	0.3
1700-2 STRIPPERS COMMON VENT	Stack	62.4	0.3
1700-2 STRIPPERS COMMON VENT	Stack	62.4	0.3

LENGTH_FT	ORIENTATION_DEC_DEGREES	EXIT_GAS_FLOW_RATE_CFS	EXIT_GAS_VELOCITY_FT_PER_SEC
	0	0.3	4.2
500	0	7939.4	
	0	476.7	67.4
	0	476.7	67.4
	0	0.1	1.4
	0	0.1099	3.5
	0	0.1099	3.5
	0	0.1185	15.1
	0	0.1625	2.3
	0	141.7	45.1
	0	115	82.4
	0	0.2419	7.7
	0	2841.8	18.2
	0	2841.8	18.2
60	0	0	
5000	0	0	
	0	0.0534	6.8
	0	18.8	600
1000	0		

1000	0		
	0	38.5	34
	0	0.1445	4.6
	0	0.1625	2.3
	0	0.2	6.1
	0	123.3	88.3
	0	1.4	60
5000	0	0	
	0	0.1625	2.3
	0	0.1288	4.1
	0	1.4	60
	0	1.4	60
	0	0.3463	4.9
	0	185	104.7
	0	0.1625	2.3
1000	0		
	0	39.6	29.8
60	0	0	
	0	79.5	45
100	0		
5000	0	0	

	0	2010.9	60.6
	0	0.2	6.1
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
100	0		
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.1625	2.3
	0	0.2419	7.7
	0	0.2419	7.7
	0	0.2419	7.7
	0	0.2419	7.7
	0	0.2419	7.7

0	0.2419	7.7
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.0534	6.8
0	0.1625	2.3
0	0.1625	2.3
0	0.1625	2.3
0	0.1625	2.3
0	0.1625	2.3
0	0.1288	4.1
0	0.1288	4.1
0	0.1288	4.1
0	0.1288	4.1
0	0.1288	4.1
0	0.1288	4.1
0	0.1288	4.1

	0	344.2	61.6
	0	344.2	61.6
	0	344.2	61.6
	0	344.2	61.6
	0	0.1288	4.1
	0	0.3	4.2
	0	0.3	4.2
	0	0.3	4.2
	0	0.3	4.2
	0	0.3	4.2
60	0	0	
	0	0.1445	4.6
	0	0.1445	4.6
	0	0.2	6.1
	0	0.2	6.1
	0	0.2	6.1
	0	0.2	6.1
	0	0.2	6.1
	0	0.2	6.1
	0	0.3463	4.9
	0	0.3463	4.9
	0	0.3463	4.9

0	0.3463	4.9
0	0.3463	4.9
0	0.3463	4.9
0	0.1	1.4
0	0.1	1.4
0	0.1	1.4

EXIT_GAS_TEMPERATURE_DEG_F	MOISTURE_CONTENT_PERCENT	LONGITUDE_DEC_DEGREES
34		-90.52449
77		-90.52407
250		-90.52459
250		-90.52464
30		-90.52451
65		-90.52437
65		-90.52432
60		-90.52275
30		-90.52323
77		-90.52453
77		-90.52452
77		-90.52435
104		-90.52458
104		-90.52467
77		-90.52578
80		-90.52424
41		-90.52446
77		-90.52429
		-90.52326

	-90.52422
77	-90.52428
86	-90.52553
41	-90.52131
43	-90.52601
77	-90.52434
77	-90.52427
80	-90.5229
37	-90.52403
86	-90.52342
77	-90.52428
77	-90.52426
75	-90.52283
77	-90.52443
86	-90.5227
	-90.52573
77	-90.52421
77	-90.52549
110	-90.52579
80	-90.52422
80	-90.52565

1832	-90.52531
86	-90.52613
77	-90.52441
77	-90.52443
77	-90.52439
77	-90.52439
77	-90.52435
77	-90.52421
80	-90.52301
83	-90.52235
86	-90.52314
86	-90.52097
86	-90.52097
41	-90.52131
41	-90.52131
41	-90.52131
41	-90.52131
77	-90.52435
77	-90.52435
77	-90.52435
77	-90.52435
77	-90.52435

77	-90.52435
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
41	-90.52446
77	-90.52415
77	-90.52412
77	-90.52409
77	-90.52408
86	-90.52097
86	-90.52342
86	-90.52342
86	-90.52342
86	-90.52342
86	-90.52342
86	-90.52342

122	-90.52465
122	-90.52469
122	-90.52481
122	-90.52476
86	-90.52342
34	-90.52449
34	-90.52449
34	-90.52449
34	-90.52449
34	-90.52449
77	-90.52562
86	-90.52553
86	-90.52553
43	-90.52601
43	-90.52601
43	-90.52601
43	-90.52601
43	-90.52601
43	-90.52601
75	-90.52283
75	-90.52283
75	-90.52283

75	-90.52283
75	-90.52283
75	-90.52283
30	-90.52451
30	-90.52451
30	-90.52451

LATITUDE_DEC_DEGREES	UTM_EASTING_M	UTM_NORTHLING_M	UTM_ZONE
30.05899	738653.1	3327905.4	15
30.05902	738693.6	3327909.6	15
30.05943	738642.4	3327953.9	15
30.05942	738637.6	3327952.7	15
30.05903	738651.1	3327909.8	15
30.05821	738666.6	3327819.1	15
30.05821	738671.4	3327819.2	15
30.05533	738829.7	3327503.2	15
30.05748	738778.3	3327740.6	15
30.05903	738649.2	3327909.7	15
30.05898	738650.3	3327904.2	15
30.05898	738666.7	3327904.5	15
30.05944	738643.4	3327955.1	15
30.05941	738634.8	3327951.5	15
30.06027	738525.7	3328044.6	15
30.05876	738677.8	3327880.4	15
30.0581	738658.2	3327806.8	15
30.05901	738672.4	3327908	15
30.05517	738780.9	3327484.4	15

30.05877	738679.7	3327881.5	15
30.05902	738673.3	3327909.1	15
30.05669	738558.4	3327648.2	15
30.05613	738966.7	3327594.9	15
30.05576	738514.3	3327544.1	15
30.05897	738667.7	3327903.5	15
30.05902	738674.3	3327909.1	15
30.05534	738815.2	3327504	15
30.05862	738698.4	3327865.3	15
30.05556	738764.6	3327527.3	15
30.05901	738673.3	3327908	15
30.05902	738675.2	3327909.2	15
30.05538	738821.9	3327508.6	15
30.05886	738659.2	3327891.1	15
30.05519	738834.9	3327487.8	15
30.0567	738539.1	3327648.9	15
30.05856	738681.2	3327858.3	15
30.05976	738554.9	3327988.6	15
30.05681	738533	3327661	15
30.05891	738679.4	3327897.1	15
30.0568	738546.5	3327660.2	15

30.05714	738578.5	3327698.6	15
30.05587	738502.5	3327556.1	15
30.05897	738660.9	3327903.3	15
30.05896	738659	3327902.2	15
30.05899	738662.8	3327905.6	15
30.05897	738662.8	3327903.4	15
30.05901	738666.6	3327907.9	15
30.05904	738680	3327911.5	15
30.05531	738804.7	3327500.5	15
30.05568	738867.5	3327542.9	15
30.05727	738787.5	3327717.5	15
30.05516	739001.8	3327488.1	15
30.05516	739001.8	3327488.1	15
30.05613	738966.7	3327594.9	15
30.05613	738966.7	3327594.9	15
30.05613	738966.7	3327594.9	15
30.05613	738966.7	3327594.9	15
30.05898	738666.7	3327904.5	15
30.05898	738666.7	3327904.5	15
30.05898	738666.7	3327904.5	15
30.05898	738666.7	3327904.5	15
30.05898	738666.7	3327904.5	15

30.05898	738666.7	3327904.5	15
30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
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30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
30.0581	738658.2	3327806.8	15
30.05906	738685.8	3327913.8	15
30.05904	738688.7	3327911.7	15
30.059	738691.7	3327907.3	15
30.05897	738692.7	3327904	15
30.05516	739001.8	3327488.1	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15
30.05556	738764.6	3327527.3	15

30.05964	738636.1	3327977.1	15
30.05963	738632.3	3327975.9	15
30.05959	738620.8	3327971.2	15
30.05961	738625.6	3327973.5	15
30.05556	738764.6	3327527.3	15
30.05899	738653.1	3327905.4	15
30.05899	738653.1	3327905.4	15
30.05899	738653.1	3327905.4	15
30.05899	738653.1	3327905.4	15
30.05899	738653.1	3327905.4	15
30.06033	738541	3328051.6	15
30.05669	738558.4	3327648.2	15
30.05669	738558.4	3327648.2	15
30.05576	738514.3	3327544.1	15
30.05576	738514.3	3327544.1	15
30.05576	738514.3	3327544.1	15
30.05576	738514.3	3327544.1	15
30.05576	738514.3	3327544.1	15
30.05576	738514.3	3327544.1	15
30.05538	738821.9	3327508.6	15
30.05538	738821.9	3327508.6	15
30.05538	738821.9	3327508.6	15

30.05538	738821.9	3327508.6	15
30.05538	738821.9	3327508.6	15
30.05538	738821.9	3327508.6	15
30.05903	738651.1	3327909.8	15
30.05903	738651.1	3327909.8	15
30.05903	738651.1	3327909.8	15

HORIZONTAL_ACCURACY_MEASURE_M	HORIZONTAL_COLLECTION_METHOD	EMISSION_TYPE	POLLUTANT
50	6	Routine	Chloroprene
50	6	Routine	Chloroprene
50	6	Routine	Chloroprene
50	6	Routine	Chloroprene
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50	6	Unauthorized Dis	Chloroprene
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50	6 Routine	Chloroprene
50	6 Routine	Chloroprene
50	6 Routine	Chloroprene

CAS_	EMISSIONS	UNIT	Emissions (tons)	Point Name
00126-99-8	45735	lb	22.8675	L00001A
00126-99-8	31663	lb	15.8315	L00002A
00126-99-8	24480	lb	12.24	L00003A
00126-99-8	24480	lb	12.24	L00004A
00126-99-8	18340	lb	9.17	L00005A
00126-99-8	10985	lb	5.4925	L00006A
00126-99-8	10985	lb	5.4925	L00007A
00126-99-8	9392	lb	4.696	L00008A
00126-99-8	9372	lb	4.686	L00009A
00126-99-8	8029	lb	4.0145	L00010A
00126-99-8	6518	lb	3.259	L00011A
00126-99-8	4950	lb	2.475	L00012A
00126-99-8	4785	lb	2.3925	L00013A
00126-99-8	4785	lb	2.3925	L00014A
00126-99-8	4339	lb	2.1695	L00015A
00126-99-8	4182	lb	2.091	L00016A
00126-99-8	3878	lb	1.939	L00017A
00126-99-8	3814	lb	1.907	L00018A
00126-99-8	3100	lb	1.55	L00019A

00126-99-8	2797 lb	1.3985	L00020A
00126-99-8	2714 lb	1.357	L00021A
00126-99-8	2222 lb	1.111	L00022A
00126-99-8	2111 lb	1.0555	L00023A
00126-99-8	1746 lb	0.873	L00024A
00126-99-8	1672 lb	0.836	L00025A
00126-99-8	1666 lb	0.833	L00026A
00126-99-8	1481 lb	0.7405	L00027A
00126-99-8	1412 lb	0.706	L00028A
00126-99-8	1085 lb	0.5425	L00029A
00126-99-8	1041 lb	0.5205	L00030A
00126-99-8	1041 lb	0.5205	L00031A
00126-99-8	987 lb	0.4935	L00032A
00126-99-8	740 lb	0.37	L00033A
00126-99-8	355 lb	0.1775	L00034A
00126-99-8	305 lb	0.1525	L00035A
00126-99-8	166 lb	0.083	L00036A
00126-99-8	51 lb	0.0255	L00037A
00126-99-8	43 lb	0.0215	L00038A
00126-99-8	26 lb	0.013	L00039A
00126-99-8	24 lb	0.012	L00040A

00126-99-8	20 lb	0.01	L00041A
00126-99-8	11 lb	0.0055	L00042A
00126-99-8	7 lb	0.0035	L00043A
00126-99-8	7 lb	0.0035	L00044A
00126-99-8	7 lb	0.0035	L00045A
00126-99-8	7 lb	0.0035	L00046A
00126-99-8	7 lb	0.0035	L00047A
00126-99-8	7 lb	0.0035	L00048A
00126-99-8	5 lb	0.0025	L00049A
00126-99-8	4 lb	0.002	L00050A
00126-99-8	3 lb	0.0015	L00051A
00126-99-8	1 lb	0.0005	L00052A
00126-99-8	1 lb	0.0005	L00053A
00126-99-8	1 lb	0.0005	L00054A
00126-99-8	1 lb	0.0005	L00055A
00126-99-8	1 lb	0.0005	L00056A
00126-99-8	1 lb	0.0005	L00057A
00126-99-8	1 lb	0.0005	L00058A
00126-99-8	1 lb	0.0005	L00059A
00126-99-8	1 lb	0.0005	L00060A
00126-99-8	1 lb	0.0005	L00061A
00126-99-8	1 lb	0.0005	L00062A

00126-99-8	1 lb	0.0005	L00063A
00126-99-8	1 lb	0.0005	L00064A
00126-99-8	1 lb	0.0005	L00065A
00126-99-8	1 lb	0.0005	L00066A
00126-99-8	1 lb	0.0005	L00067A
00126-99-8	1 lb	0.0005	L00068A
00126-99-8	1 lb	0.0005	L00069A
00126-99-8	1 lb	0.0005	L00070A
00126-99-8	1 lb	0.0005	L00071A
00126-99-8	1 lb	0.0005	L00072A
00126-99-8	1 lb	0.0005	L00073A
00126-99-8	1 lb	0.0005	L00074A
00126-99-8	1 lb	0.0005	L00075A
00126-99-8	1 lb	0.0005	L00076A
00126-99-8	1 lb	0.0005	L00077A
00126-99-8	1 lb	0.0005	L00078A
00126-99-8	1 lb	0.0005	L00079A
00126-99-8	1 lb	0.0005	L00080A
00126-99-8	1 lb	0.0005	L00081A
00126-99-8	1 lb	0.0005	L00082A
00126-99-8	1 lb	0.0005	L00083A
00126-99-8	1 lb	0.0005	L00084A

00126-99-8	1 lb	0.0005	L00085A
00126-99-8	1 lb	0.0005	L00086A
00126-99-8	1 lb	0.0005	L00087A
00126-99-8	1 lb	0.0005	L00088A
00126-99-8	1 lb	0.0005	L00089A
00126-99-8	1 lb	0.0005	L00090A
00126-99-8	1 lb	0.0005	L00091A
00126-99-8	1 lb	0.0005	L00092A
00126-99-8	1 lb	0.0005	L00093A
00126-99-8	1 lb	0.0005	L00094A
00126-99-8	0.22 lb	0.00011	L00095A
00126-99-8	0.01 lb	0.000005	L00096A
00126-99-8	0.01 lb	0.000005	L00097A
00126-99-8	0.01 lb	0.000005	L00098A
00126-99-8	0.01 lb	0.000005	L00099A
00126-99-8	0.01 lb	0.000005	L00100A
00126-99-8	0.01 lb	0.000005	L00101A
00126-99-8	0.01 lb	0.000005	L00102A
00126-99-8	0.01 lb	0.000005	L00103A
00126-99-8	0.01 lb	0.000005	L00104A
00126-99-8	0.01 lb	0.000005	L00105A
00126-99-8	0.01 lb	0.000005	L00106A

00126-99-8	0.01 lb	0.000005	L00107A
00126-99-8	0.01 lb	0.000005	L00108A
00126-99-8	0.01 lb	0.000005	L00109A
00126-99-8	0.01 lb	0.000005	L00110A
00126-99-8	0.01 lb	0.000005	L00111A
00126-99-8	0.01 lb	0.000005	L00112A

BEFORE THE ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:	)	
OPERATING PERMIT CHLOROPRENE UNIT DUPONT DOW ELASTOMERS, L.L.C. LA PLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA	)	PETITION NO. 6-03-02
Part 70 Operating Permit 3000-VO	)	

ORDER DENYING PETITION FOR OBJECTION TO PERMIT

I. INTRODUCTION

On May 7, 2002, the Louisiana Department of Environmental Quality ("LDEQ") issued DuPont Dow Elastomers, L.L.C., ("DuPont Dow") a state operating permit for its Chloroprene Manufacturing Unit at its facility in La Place, St. John the Baptist Parish, Louisiana, pursuant to title V of the Clean Air Act, 42 U.S.C. §§ 7661-7661f, and its implementing regulations. *See* Permit 3000-VO ("title V Permit" or "permit"). The permit also constitutes a state preconstruction permit which authorized the replacement of a reactor system pursuant to the State's minor new source review program. The Louisiana Environmental Action Network ("Petitioner" or "LEAN") has requested that EPA object to the issuance of the title V permit pursuant to Section 505(b) of the Act and 40 C.F.R. § 70.8(d). Petition to Object (Nov. 13, 2001). Petitioner alleges that the permit is deficient on the ground that the emission limitations applicable to halogenated vent streams under 40 C.F.R. part 63, subpart G are not correctly determined in the permit.

II. STATUTORY AND REGULATORY FRAMEWORK

Section 502(d)(1) of the Act calls upon each state to develop and submit to EPA an operating permit program intended to meet the requirements of CAA title V. The State of Louisiana has a fully approved operating permit program which can be found at 40 C.F.R. part 70 Appendix A. Under these rules, major stationary sources of air pollution and other sources covered by title V are required to obtain an operating permit that includes emission limitations and such other conditions as are necessary to assure compliance with applicable requirements of the Act, including the applicable implementation plan. *See* CAA §§ 502(a) and 504(a).

The title V operating permit program does not generally impose new substantive air quality control requirements (referred to as "applicable requirements") on sources. The program does require permits to contain monitoring, recordkeeping, reporting, and other conditions necessary to assure compliance by sources with existing applicable requirements. *See* 57 Fed. Reg. 32250, 32251 (July 21, 1992). One purpose of the title V program is to "enable the source, States, EPA, and the public to better understand the requirements to which the source is subject, and whether the source is meeting those requirements." *Id.* Thus, the title V operating permit program is a vehicle for ensuring that existing air quality control requirements are appropriately applied to a facility's emission units in a single document, therefore enhancing compliance with the requirements of the Act.

Pursuant to Clean Air Act § 505(b)(2) and 40 C.F.R. § 70.8(d), if the EPA does not object to a facility's draft title V operating permit on its own initiative, members of the public may petition the Administrator, within 60 days of the expiration of EPA's 45-day review period, to object to the proposed permit. These sections also provide that a petition must be based only on

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objections to the permit that were raised with reasonable specificity during the public comment period (unless the petitioner demonstrates that it was impracticable to raise such objections within that period or the grounds for such objections arose after that period).

Section 505(b)(2) of the Act requires the Administrator to issue a permit objection if a petitioner demonstrates that a permit is not in compliance with the requirements of the Act, including the requirements of 40 C.F.R. part 70 and the applicable implementation plan. In this case, the applicable requirements include 40 C.F.R. part 63, subpart G, one of the hazardous air pollutant ("HAP") emission standards promulgated pursuant to Section 112(d) of the Act. If, in responding to a petition, EPA objects to a permit that has already been issued, EPA or the permitting authority will modify, terminate, or revoke and reissue the permit consistent with the procedures in 40 C.F.R. § 70.7(g)(4) or (5)(i) and (ii) for reopening a permit for cause. A petition for review does not stay the effectiveness of the permit or its requirements if the permit was issued after the expiration of EPA's 45-day review period. *See* CAA § 505 (b)(2)-(b)(3); 40 C.F.R § 70.8(d).

III. BACKGROUND

On October 11, 1996, DuPont Dow submitted an application requesting a Part 70 operating permit for its Chloroprene Unit at the LaPlace, Louisiana facility. On November 14, 2000, DuPont Dow submitted a revision to the application to request authorization to replace the reactor system at the Chloroprene Unit with a new system that would have a higher conversion

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rate and generate less waste.[1] The total amount of chloroprene produced per year would not increase due to the process modification. Title V Permit at 2.

The Chloroprene Unit has been in operation since before 1969. At the time of the application, it was covered by a state permit, Permit No. 3000, and several modifications thereto. The Chloroprene Unit is a Synthetic Organic Chemical Manufacturing Industry ("SOCMI") facility and is a major source of regulated toxic air pollutants covered by, *inter alia*, 40 C.F.R. part 63, subpart G and L.A.C. 33:III.Chapter 51.

LDEQ published the proposed permit for public comment on August 25, 2001. LEAN submitted comments requesting, among other things, that additional information be made available to the public and that the comment period be extended. LDEQ published a second public notice announcing extension of the public comment period through December 5, 2001, and the scheduling of a public hearing on the same date.[2] LEAN submitted additional comments during the extended comment period. On May 7, 2002, LDEQ issued the final title V and preconstruction permit.

The emissions unit at issue in LEAN's petition is the CD Vent Condenser (Emission Point No. 1110-4), which has a permitted emission rate for chloroprene of 18.3 tpy. *See* Petition at 1, 4; *see also* Title V Permit, Emission Inventory Questionnaire for No. 1110-4. LDEQ determined that the chloroprene emissions constituted a halogenated vent stream subject to 40 C.F.R. part 63, subpart G and classified it as a "Group 2" process vent based on the equation and requirements in

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[1] DuPont Dow is awaiting issuance of a patent for the new reactor system before replacing the existing reactors. Title V Permit at 2.

[2] The hearing was adjourned when no public attendees were present.

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40 C.F.R. § 63.115(d)(3) and the applicable coefficients listed in Table 1 to Subpart G. A Group 2 process vent is subject to the monitoring and reporting requirements set forth in 40 C.F.R. § 63.113(d) and (e), rather than the more stringent "Group 1" control requirements in § 63.113(a).

LEAN objects to the permit on the ground that LDEQ has misinterpreted 40 C.F.R. § 63.115(d)(3) and Table 1, and thus set the requirements for halogenated vent streams based on an incorrect Group 2 classification. Although LEAN styles its petition as raising five objections, all of the objections raise essentially this same issue. LEAN raised this issue in letters to EPA's Region 6 office and the Office of Enforcement and Compliance Assurance ("OECA") in 1996,[3] and received responses from both offices explaining the Agency's interpretation of 40 C.F.R. § 63.115(d)(3).[4] LEAN's five objections are: (1) LDEQ's interpretation of § 63.115 is inconsistent with the Clean Air Act's goal of protecting public health; (2) LDEQ's interpretation would result in increased discharges of halogenated organic HAPs, posing risks to human health;[5] (3) LDEQ's interpretation results in greater controls of nonhalogenated vent streams relative to halogenated vent streams; (4) a rational interpretation of § 63.115 must result in a Group 1 classification and the accompanying control requirements; and (5) LDEQ has misinterpreted §

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[3] *See* Letter from M. Orr, LEAN, to S. Herman, EPA OECA (Aug. 29, 1996); Letter from M. Orr, to J. Saginaw, EPA Region 6 (Aug. 19, 1996).

[4] *See* Letter from E. Stanley, EPA Office of Compliance, to M. Orr, LEAN (May 5, 1997) ("OECA Response Letter"); Letter from J. Luehrs, EPA Region 6, to M. Orr (Oct. 18, 1996) ("Region 6 Response Letter").

[5] Chloroprene is classified under State law as a Class II toxic air pollutant, and thus a "Suspected Human Carcinogen and Known or Suspected Human Reproductive Toxin." L.A.C. 33.III.5112 Table 51.1.

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63.115. EPA has performed an independent review of Petitioner's claims. Based on a review of all of the information before me, I hereby deny the Petition for the reasons set forth in this Order.

IV. EPA AGREES WITH LDEQ'S INTERPRETATION OF 40 C.F.R. § 63.115 AND FINDS IT CONSISTENT WITH SECTION 112 OF THE CLEAN AIR ACT.

Petitioner asserts that it is arbitrary and capricious for LDEQ to interpret 40 C.F.R. § 63.115 in a manner that allows halogenated organic HAPs such as chloroprene to avoid "Group 1" control requirements, and emphasizes the risk that this HAP poses to public health. However, the express terms of § 63.115(d)(3) govern and, in this case, result in a Group 2 classification. Petitioner's objection reflects a lack of understanding of the method by which air toxic standards are set under Section 112(d) of the Act.

Until 1990, the Clean Air Act required EPA to set risk-based air pollutant standards under Section 112 that would provide an "ample margin of safety to protect public health." *See Cement Kiln Recycling Coalition v. EPA*, 255 F.3d 855, 857 (D.C. Cir. 2001). To address problems with the implementation of risk-based regulation, Congress amended the Act in 1990 to require EPA to set technology-based standards, referred to as "maximum achievable control technology," or MACT standards. *Id.* at 858-59. EPA has implemented this requirement through a two-step process: the Agency first sets emission "floors" for HAP emissions from each source category, and then determines whether stricter standards are achievable in light of the factors listed in Section 112(d)(2), such as the cost-effectiveness of additional emissions reductions. *Id.* Congress recognized that risk to human health and the environment may remain under the technology-based approach, and reserved the development of standards where residual risk exists

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for a second stage of regulation under Section 112(f), which is to occur "within 8 years" after Section 112(d) standards are promulgated.[6]

Subpart G, including 40 C.F.R. § 63.115, is a technology-based MACT standard promulgated under Section 112(d). Halogenated streams from process vents have certain treatment requirements according to whether they are determined to be a Group 1 or Group 2 stream under 40 C.F.R. § 63.111 and 40 C.F.R. § 63.115. The Group 1 or Group 2 classification depends, in part, on the Total Resource Effectiveness ("TRE") index value, which is determined by the formula in § 63.115.[7] The TRE index value serves as a measure of the supplemental total resource requirement per unit reduction of organic HAP emissions associated with the vent stream. *See* 40 C.F.R. § 63.111. In other words, "[t]he TRE is a decision tool that is used to determine if control of a process vent is required. The TRE is a standardized calculation that compares the annual cost of controlling a given vent stream with the emission reduction achieved." *See* OECA Response Letter at 2. A process vent is classified as Group 1 if the TRE value is less than or equal to 1.0, and is classified as Group 2 if the TRE value is greater than 1.0

Section 63.115(d)(3) sets forth the formula for calculating the TRE. It further provides that the applicable coefficients from Table 1 of Subpart G shall be used in the formula as follows:

> The owner or operator of a halogenated vent stream shall calculate the TRE index value based on the use of a *thermal incinerator with 0 percent heat recovery, and a scrubber*. The owner or operator shall use *the applicable coefficients in table 1 of this subpart for halogenated vent streams* located within existing sources. . . . .

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[6] EPA is in the process of conducting the Section 112(f) review for the Synthetic Organic Chemical Manufacturing Industry standards.

[7] The classification also depends on the vent stream flow rate and the total organic HAP concentration by volume. *See* 40 C.F.R. § 63.111. Those factors are not at issue in this petition.

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Id. (emphasis added). Table 1 separates the appropriate coefficients for nonhalogenated vent streams from halogenated vent streams. The table, as it appears in the rule, is reprinted below, with the exception of the coefficients not at issue in this petition:

Type of Stream	Control Device Basis	Value of Coefficients			
		a	b	c	d
Nonhalogenated . .	Flare	1.935			
	Thermal Incinerator 0 Percent Heat Recovery	1.492			
	Thermal Incinerator 70 Percent Heat Recovery	2.519			
Halogenated	Thermal Incinerator and Scrubber	3.995			

The correct coefficient to use when determining the TRE for a halogenated stream is the coefficient listed under the heading "halogenated" for "Thermal Incinerator and Scrubber." *See* OECA Response Letter at 2; Region 6 Response Letter at 1. This result is required by § 63.115(d)(3) which directs the source to use the "applicable coefficients in table 1 . . . for halogenated vent streams" and to use the coefficient based on the use of a "thermal incinerator with 0 percent heat recovery, and a scrubber." There is only one entry for halogenated streams, and the control device basis listed for that stream, "Thermal Incinerator and Scrubber" plainly encompasses "a thermal incinerator with 0 percent heat recovery, and a scrubber."[8]

This reading is consistent with the other provisions in 40 C.F.R. § 63.115(d). Section 63.115(d)(3)(ii) addresses the calculation of TRE index values for nonhalogenated streams. This

[8] The Agency has previously explained that: "This equation for thermal incinerators with acid gas scrubbers was based on the 0 percent heat recovery scenario. This equation is based on the cost of controlling process vents using both a thermal incinerator and an acid gas scrubber used to remove acid gases created by combustion of the halogenated organic compound." OECA Response Letter at 3.

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provision shows that the three coefficients listed in Table 1 for nonhalogenated streams are to be used in determining the TRE for nonhalogenated streams, contrary to LEAN's suggestion that nonhalogenated stream coefficients also apply to halogenated streams. Specifically, § 63.115(d)(3)(ii) provides: "The owner or operator of a nonhalogenated vent stream shall calculate the TRE index value based on the use of a flare, a thermal incinerator with 0 percent heat recovery, and a thermal incinerator with 70 percent heat recovery and shall select the lowest TRE index value." Under the entry for nonhalogenated streams, Table 1 contains coefficients for each of these three control device bases - a flare, a thermal incinerator with 0 percent heat recovery, and a thermal incinerator with 70 percent heat recovery.

LEAN, however, argues that the correct coefficient to use for halogenated vent streams is the one listed under "Nonhalogenated" for "thermal incinerator with 0 percent heat recovery." Petition at 6. LEAN contends that the table is ambiguous and that "the two descriptions in the middle of the table ("Thermal Incinerator 0% Heat Recovery" and "Thermal Incinerator 70% Heat Recovery") are not limited by 'Type of Stream'" and thus must be used for halogenated streams. To address the inconsistency this interpretation would create with the requirement to base the TRE index value on use of a "thermal incinerator. . . <u>and</u> a scrubber" (§ 63.115(d)(3)), LEAN contends that a source must then calculate the TRE a <u>second</u> time -- a "second post-treatment calculation of the TRE" -- using the "thermal incinerator and scrubber" coefficient listed for halogenated streams. Petition at 6.

EPA disagrees with LEAN's interpretation. The table is not ambiguous. Under "Type of Stream" - "Nonhalogenated", there are three controls listed under "Control Device Basis." Under any rational reading of the table, the TRE coefficients apply only to the entry they follow --

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nonhalogenated streams. Moreover, the regulation does not provide for a second "post-treatment" calculation of a TRE, and doing a post-treatment calculation makes no sense. The TRE index value is a measure of the cost-effectiveness of the potentially applicable control device – for halogenated streams, a thermal incinerator and scrubber – and is used to determine whether the stream must be controlled.[9] OECA Response Letter at 3; Region 6 Response Letter at 1. The Agency's response to comments in the Subpart G rulemaking reiterates this point. BID, Volume I, at 2-11 ("The TRE index value is a measure of cost-effectiveness of control and the TRE calculation for halogenated streams is based on application of a combustor followed by a scrubber.") Thus, as the Agency has previously explained:

> it is not correct to suggest that the halogenated category "thermal incinerator and scrubber" is for determining the TRE of a vent stream coming *out* of an incinerator . . . The purpose of the acid gas scrubbers is to remove any acid gases created in the combustion of the process vent stream and is not intended to achieve greater control of emissions from the process vents.

OECA Response Letter at 4.

LEAN complains that the coefficient for halogenated streams is unreasonably high, making a Group 2 classification more likely and thus allowing halogenated organic HAPs to avoid the more stringent Group 1 control requirements. Petition at 7. However, it would be expected that the coefficient for halogenated streams is higher because halogenated streams would be subject to both a thermal incinerator and scrubber, in contrast to nonhalogenated streams, which would be

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[9] The Agency's response to comments for the Subpart G rule reflect the function of the TRE index value in more detail: "The economic feasibility of controlling a vent stream is determined by the TRE calculation. The EPA has attempted to identify streams with high or 'unreasonable' cost-effectiveness through the establishment of a Group 1/Group 2 classification based either on TRE or on low flow and low concentration levels." Docket No. A-90-19, Background Information Document ("BID"), Volume I at 2-22 (Mar. 9, 1994) (available at: http://www.epa.gov/ttn/caaa/t3/reports/honbid1.pdf).

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subject to only a single control device (flare or incinerator). Two control devices predictably affect the cost-effectiveness rating, resulting in a higher TRE.

To summarize, 40 C.F.R. § 63.115(d)(3)(iii) clearly requires the TRE index value for halogenated vent streams to be determined based on the use of a thermal incinerator with 0 percent heat recovery and a scrubber. The correct coefficient is that listed in Table 1 under "Type of Stream - Halogenated," across from "thermal incinerator and scrubber" – that is, 3.995. This results in a TRE value greater than 1.0 for the CD Vent Condenser.[10] Therefore, it is a "Group 2 process vent" under § 63.111. As LEAN acknowledges, Group 2 process vents are subject to monitoring and reporting requirements under § 63.113(d), but not the control requirements of § 63.115(a). Additionally, the title V permit imposes conditions on the operation of the CD Vent Condenser as a recovery device to limit the chloroprene emissions and maintain a TRE index value above 1.0. Title V Permit, Specific Condition No. 2 & EIQ Sheet No. 1110-4.

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[10] LEAN concedes that use of the 3.995 coefficient yields a TRE index value greater than 1.0. *See* Petition at 7; Public Comments Response Summary for the Title V Permit, at 6 (TRE is 2.110). EPA has reviewed the TRE calculations and reached substantially the same TRE number. Using the equation in § 63.115(d), the TRE index value for the CD vent condenser is calculated as follows:

$TRE = (1/E_{hap})\ [a + b(Q_s) + c(H_t) + d(E_{toc})$
$TRE = 0.5249\ [3.9950 + 0.0039 - 0.0089 + 0.0018]$
$TRE = 2.095$

Coefficients from Table 1 to 40 C.F.R. part 63, subpart G: a = 3.995; b = 0.052; c = -0.001769; d = 0.00097

Q_s	H_t	E_{toc}	E_{hap}
0.0748 Dry scm/min	5.0276 Mega Joules/scm	1.9056 Kilograms/hr	1.9053 Kilograms/hr

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LEAN's real disagreement is with the merits of the standards set for process vents under 40 C.F.R. part 63, subpart G, and the exclusion of risk-based factors from Section 112(d). These are not valid grounds for objecting to a title V permit.

V. CONCLUSIONS

For the reasons set forth above and pursuant to Section 505(b) of the Act and 40 C.F.R. § 70.8(d), I deny the petition submitted by the Louisiana Environmental Action Network.

/s/
Michael O. Leavitt
Administrator

Date: 11/20/03

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MASTER_AI_ID	AI	FACILITY_NAME	AI_NAME	ADDRESS1	CITY
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
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ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE	SOURCE_TYPE	ACT_TRACKING_NO
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

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70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009

PERMIT	PERMIT_NUMBER	PERMIT_ISSUED	PERMIT_END_DATE	EIQ#	SUBJ_ITEM_ID
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202

SUBJ_ITEM_TYPE_DESC	SUBJECT_ITEM_DESC	PARAMETER_DESC
Stack/Vent	Poly Kettles Vent Condenser	Chloroprene
Other	Poly Building Wall Fans	Chloroprene
Stack/Vent	Strippers Condenser Vent	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	Chloroprene
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Chloroprene
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Chloroprene
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Chloroprene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Chloroprene
Scrubber	HCl Feed Tanks' Scrubber	Chloroprene
Condenser	Waste Storage Tanks' Condenser	Chloroprene
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Chloroprene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	Chloroprene
Above ground storage vessel	Aeration Tank (Waste Water Tank)	Chloroprene
Furnace	HCl Recovery Unit	Chloroprene
Equipment leaks	Fugitive Emissions	Chloroprene
Miscellaneous	Waste Loading Vent	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 1	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 2	Chloroprene

Above ground storage vessel	Stripped Emulsion Tank No. 3	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 4	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 5	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 9	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 11	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 12	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 15	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 16	Chloroprene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Chloroprene

TPY_PERMITTED_EMISSIONS	Emissions (tons)	Emissions minus Permit (tons)
34.39	22.8675	-11.5225
15.83	15.8315	0.0015
17.3	9.17	-8.13
5.77	4.686	-1.084
7.17	4.0145	-3.1555
5.82	3.259	-2.561
1.99	2.1695	0.1795
1.6	2.091	0.491
3	1.907	-1.093
2.42	1.357	-1.063
1.09	1.111	0.021
1.14	0.873	-0.267
1.49	0.836	-0.654
1.17	0.706	-0.464
0.02	0.0255	0.0055
0.04	0.0215	-0.0185
0.04	0.012	-0.028
0.01	0.0055	-0.0045
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065

0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.19	0.00011	-0.18989

MASTER_AI_ID	AI	FACILITY_NAME	AI_NAME	ADDRESS1	CITY
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44	Laplace
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38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace

38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace
38806	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co - Pontchartrain Site	586 Hwy 44 Laplace

ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE	SOURCE_TYPE	ACT_TRACKING_NO
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Loading apparatus	PER20080009
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009

70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
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70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Fugitive Emissions	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Container	PER20080009
70068	325212	2869	Scrubber	PER20100004

70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Fugitive Emissions	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Wastewater Treatment System	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009

70068	325212	2869	Scrubber	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009
70068	325212	2869	Condenser	PER20100004
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Above ground storage vessel	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20080009
70068	325212	2869	Other	PER20100004
70068	325212	2869	Other	PER20080009

70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20080009
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20100004
70068	325212	2869 Other	PER20100004

PERMIT	PERMIT_NUMBER	PERMIT_ISSUED	PERMIT_END_DATE	EIQ#	SUBJ_ITEM_ID
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-85	EQT00000000214
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-80	RLP00000000017
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
206-V2	206-V2	3/14/2011	3/2/2015	1180-21	EQT00000000082
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204

2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185
2249-V7	2249-V6	6/16/2009	6/16/2014	Apr-95	EQT00000000203
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-81	RLP00000000018
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-81	RLP00000000018
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-75	EQT00000000194
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-66	EQT00000000185

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-76	EQT00000000195
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-53	EQT00000000163
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-54	EQT00000000164
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-55	EQT00000000165
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-67	EQT00000000186
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-68	EQT00000000187
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-69	EQT00000000188
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-79	EQT00000000198
206-V2	206-V2	3/14/2011	3/2/2015	Jan-96	EQT00000000097
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-77	EQT00000000196
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-84A	EQT00000000212
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-84B	EQT00000000213
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-70	EQT00000000189
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-71	EQT00000000190
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-72	EQT00000000191
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192

2249-V7	2249-V6	6/16/2009	6/16/2014	1700-73	EQT00000000192
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
2249-V7	2249-V6	6/16/2009	6/16/2014	May-95	EQT00000000204
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-57	EQT00000000166
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-82	EQT00000000201
206-V2	206-V2	3/14/2011	3/2/2015	Mar-96	FUG00000000003
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-83	RLP00000000019
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-60	EQT00000000168
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-61	EQT00000000169
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-62	EQT00000000170
206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087

2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	Jan-93	FUG00000000004
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
2249-V7	2249-V6	6/16/2009	6/16/2014	Mar-95	EQT00000000202
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-51	EQT00000000162

206-V2	206-V2	3/14/2011	3/2/2015	7000-17	EQT00000000087
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-5A	EQT00000000167
206-V2	206-V2	3/14/2011	3/2/2015	Feb-74	EQT00000000090
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-21A	EQT00000000141
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-1	EQT00000000134
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-56	RLP00000000016
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136

206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13	EQT00000000135
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-13A	EQT00000000136
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-2	RLP00000000014
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
2249-V7	2249-V6	6/16/2009	6/16/2014	1700-3	RLP00000000015
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086
206-V2	206-V2	3/14/2011	3/2/2015	7000-15	EQT00000000086

SUBJ_ITEM_TYPE_DESC	SUBJECT_ITEM_DESC	PARAMETER_DESC
Equipment leaks	Fugitive Emissions	VOC, Total
Equipment leaks	Fugitive Emissions	Toluene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	VOC, Total
Above ground storage vessel	Surge Tank (Waste Water Tank)	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Tetrachloroethylene
Loading apparatus	Liquid Dispersion Loading (Truck, Tote, Rail Car)	VOC, Total
Equipment leaks	Fugitive Emissions	Hydrochloric acid
Stack/Vent	ACR Storage Common Vent Header (1700-80.1 & 80.2)	VOC, Total
Scrubber	HCl Feed Tanks' Scrubber	Chloroprene
Scrubber	HCl Product Tanks' Scrubber	Hydrochloric acid
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Dichloromethane
Above ground storage vessel	Aeration Tank (Waste Water Tank)	VOC, Total

Above ground storage vessel	Aeration Tank (Waste Water Tank)	Chloroprene
Condenser	Waste Storage Tanks' Condenser	Hydrochloric acid
Other	Poly Building Wall Fans	Toluene
Other	Poly Building Wall Fans	Chloroprene
Above ground storage vessel	Surge Tank (Waste Water Tank)	Toluene
Stack/Vent	ACR Refining Vent	Hydrochloric acid
Stack/Vent	ACR Refining Vent	VOC, Total
Above ground storage vessel	ACR / Solvent Blend Tank	Xylene (mixed isomers)
Stack/Vent	ACR Drumming Vent	Xylene (mixed isomers)
Stack/Vent	ACR Drumming Vent	Dichloromethane
Miscellaneous	Waste Loading Vent	VOC, Total
Other	Resin 90 Railcar	VOC, Total
Miscellaneous	Waste Loading Vent	Chloroprene
Other	Poly Building Wall Fans	VOC, Total

Above ground storage vessel	Stripped Emulsion Tank No. 1	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 2	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 3	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 4	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 5	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 9	VOC, Total
Other	Rosin S Railcar	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 1	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 2	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 3	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 4	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 5	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 9	Chloroprene
Above ground storage vessel	ACR / Solvent Blend Tank	Tetrachloroethylene

Above ground storage vessel	ACR / Solvent Blend Tank	Dichloromethane
Other	Emergency Stabilizer Drumming	VOC, Total
Miscellaneous	Waste Loading Vent	Toluene
Above ground storage vessel	Octopol Storage Tank	VOC, Total
Above ground storage vessel	Advance Fibres System (AFS) - Emulsion Shipping (Emulsion Blend Tank)	VOC, Total
Loading apparatus	Advance Fibres System (AFS) - Emulsion Shipping (Tote Loading)	VOC, Total
Stack/Vent	ACR Drumming Vent	Tetrachloroethylene
Above ground storage vessel	Stripped Emulsion Tank No. 11	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 11	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 12	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 12	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 15	Chloroprene
Above ground storage vessel	Stripped Emulsion Tank No. 15	VOC, Total
Above ground storage vessel	Stripped Emulsion Tank No. 16	Chloroprene

Above ground storage vessel	Stripped Emulsion Tank No. 16	VOC, Total
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Toluene
Above ground storage vessel	Aeration Tank (Waste Water Tank)	Toluene
Furnace	HCl Recovery Unit	Chloroprene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Xylene (mixed isomers)
Stack/Vent	Strippers Condenser Vent	Toluene
Above ground storage vessel	Diisobutylene (DIB) Storage Tank	VOC, Total
Above ground storage vessel	ACR / Solvent Blend Tank	VOC, Total
Equipment leaks	Fugitive Emissions	Chloroprene
Stack/Vent	ACR Drumming Vent	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 3	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 4	VOC, Total
Above ground storage vessel	Diisobutylene Nitrosate (DIBN) Storage Tank No. 5	VOC, Total
Scrubber	HCl Feed Tanks' Scrubber	Toluene

Non equipment leaks	Fugitive Emissions - Neoprene Unit	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Toluene
Condenser	Waste Storage Tanks' Condenser	Toluene
Non equipment leaks	Fugitive Emissions - Neoprene Unit	Toluene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Toluene
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Toluene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	Chloroprene
Above ground storage vessel	Diversion Tank (Waste Water Tank)	VOC, Total
Condenser	Waste Storage Tanks' Condenser	Chloroprene
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Toluene
Stack/Vent	Poly Kettles Vent Condenser	Toluene
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Toluene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	Chloroprene
Above ground storage vessel	Inhibitor Mix Tank (Surge Control Vessel)	VOC, Total

Scrubber	HCl Feed Tanks' Scrubber	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	Chloroprene
Furnace	HCl Recovery Unit	VOC, Total
Above ground storage vessel	No. 6 Emulsion Storage Tank Manhole	VOC, Total
Condenser	Waste Storage Tanks' Condenser	VOC, Total
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	Chloroprene
Above ground storage vessel	2MM Pound CD Storage Tank	VOC, Total
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	Chloroprene
Above ground storage vessel	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower	VOC, Total
Stack/Vent	No. 6, 7, 8, 10, 13, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)	VOC, Total
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	Chloroprene
Furnace	HCl Recovery Unit	Chlorine
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	Chloroprene

Furnace	HCl Recovery Unit	Carbon monoxide
Other	Poly Kettles Manholes / Strainers (1 & 2) Common Vent	VOC, Total
Other	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent	VOC, Total
Furnace	HCl Recovery Unit	Particulate matter (10 microns or less)
Stack/Vent	Strippers Condenser Vent	Ammonia
Stack/Vent	Strippers Condenser Vent	Chloroprene
Stack/Vent	Strippers Condenser Vent	VOC, Total
Stack/Vent	Poly Kettles Vent Condenser	Chloroprene
Stack/Vent	Poly Kettles Vent Condenser	VOC, Total
Furnace	HCl Recovery Unit	Sulfur dioxide
Furnace	HCl Recovery Unit	Hydrochloric acid
Furnace	HCl Recovery Unit	Nitrogen oxides

TPY_PERMITTED_EMISSIONS	Emissions (tons)	Emissions minus Permit (tons)
0.13	1.16	1.03
0.04	0.979	0.939
1.6	2.091	0.491
2.11	2.293	0.183
1.99	2.1695	0.1795
0.02	0.102	0.082
0.01	0.08	0.07
0.04	0.087	0.047
0.07	0.101	0.031
1.09	1.111	0.021
0.03	0.044	0.014
0.02	0.031	0.011
0.02	0.027	0.007

0.02	0.0255	0.0055
1.09	1.095	0.005
5.19	5.1925	0.0025
15.83	15.8315	0.0015
0.06	0.0615	0.0015
0.7	0.7	0
2.2	2.2	0
0.001	0.00001	-0.00099
0.001	0.0000005	-0.00100
0.01	0.0085	-0.0015
0.01	0.006	-0.004
0.01	0.006	-0.004
0.01	0.0055	-0.0045
27.94	27.935	-0.005

0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.004	-0.006
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.0035	-0.0065
0.01	0.003	-0.007

0.02	0.013	-0.007
0.01	0.002	-0.008
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.001	-0.009
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095
0.01	0.0005	-0.0095

0.01	0.0005	-0.0095
0.01	0.000005	-0.01000
0.01	0.000005	-0.01000
0.04	0.0215	-0.0185
0.02	0.0005	-0.0195
0.03	0.0085	-0.0215
0.11	0.084	-0.026
0.037	0.01	-0.027
0.04	0.012	-0.028
0.034	0.006	-0.028
0.06	0.02	-0.04
0.06	0.02	-0.04
0.06	0.02	-0.04
0.26	0.219	-0.041

2.23	2.156	-0.074
0.23	0.131	-0.099
0.2	0.0715	-0.1285
0.22	0.0645	-0.1555
0.38	0.212	-0.168
0.47	0.298	-0.172
0.19	0.00011	-0.18989
0.21	0.001	-0.209
1.14	0.873	-0.267
0.79	0.4435	-0.3465
0.53	0.1595	-0.3705
0.98	0.546	-0.434
1.17	0.706	-0.464
1.17	0.706	-0.464

1.96	1.39	-0.57
1.49	0.836	-0.654
0.94	0.025	-0.915
2.19	1.227	-0.963
1.94	0.95	-0.99
2.42	1.357	-1.063
5.77	4.686	-1.084
5.77	4.686	-1.084
3	1.907	-1.093
3.56	1.991	-1.569
4.41	2.798	-1.612
5.82	3.259	-2.561
3.9	1.26	-2.64
7.17	4.0145	-3.1555

8.3	5.09	-3.21
8.15	4.562	-3.588
10.04	5.62	-4.42
15.3	9.38	-5.92
10.51	3.8255	-6.6845
17.3	9.17	-8.13
17.36	9.182	-8.178
34.39	22.8675	-11.5225
34.92	23.137	-11.783
37.1	0.965	-36.135
45.9	4.906	-40.994
183.5	87.67	-95.83

year	AI	AI_NAME	OWNER_NAME	ADDRESS1	ADDRESS2	ADDRESS3
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
2014	38806	E I DuPont de Nemours & Co - Pontchartrain Site	E I DuPont de Nemours & Co Inc	586 Hwy 44	(portion of)	
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CITY	STATE_CODE	ZIPCODE	PRIMARY_NAICS_CODE	PRIMARY_SIC_CODE
Laplace	LA	70068	325212	2869
Laplace	LA	70068	325212	2869
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PARISH_OR_COUNTY_DESC	SOURCE_ID	NEDS_ID	SOURCE_DESCRIPTION
St. John the Baptist	NEOR15		Poly Kettles Vent Condenser
St. John the Baptist	NEO185	91	Poly Building Wall Fans
St. John the Baptist	NEO144	26	East Hot Dryer Exhaust
St. John the Baptist	NEO145	27	West Hot Dryer Exhaust
St. John the Baptist	NEOR14		Strippers Condenser Vent
St. John the Baptist	NEO139	17	CD Refining Column Jet
St. John the Baptist	NEO140	18	CD Refining Column Jet (Spare)
St. John the Baptist	MON026	45	CD Vent Condenser
St. John the Baptist	NEO141	20	2MM Pound CD Storage Tank
St. John the Baptist	NEO136	76	Poly Kettles Manholes / Strainers (3, 4, & 5) Common Vent
St. John the Baptist	NEO135	11	Poly Kettles Manholes / Strainers (1 & 2) Common Vent
St. John the Baptist	NEOG08	09	Unstripped Emulsion Storage Tanks Common Vent
St. John the Baptist	NEO142	24	East Wash Belt Dryer
St. John the Baptist	NEO143	25	West Wash Belt Dryer
St. John the Baptist	NEO203	37	Surge Tank (Waste Water Tank)
St. John the Baptist	NEOFUG	35	Fugitive Emissions - Neoprene Unit
St. John the Baptist	NEOG10	88	Vent Header System
St. John the Baptist	NEOR16	81	No. 6, 7, 8, 10, 15, & 14 Unstripped Storage Tanks Depressure Vent (Surge Control Vessels)
St. John the Baptist	MONC17		CHLOROPRENE UNIT CONDITION XVII

St. John the Baptist	NEOC17		NEOPRENE UNIT CONDITION XVII
St. John the Baptist	NEO134	01	No. 7, 8, 10, 13, 14 Emulsion Storage Tks Manhole & Exhaust Blower
St. John the Baptist	HCL087	63	HCl Feed Tanks' Scrubber
St. John the Baptist	MON059	52	Aqueous Storage Vent Condenser
St. John the Baptist	HCL090	61	Waste Storage Tanks' Condenser
St. John the Baptist	NEO167	10	No. 6 Emulsion Storage Tank Manhole
St. John the Baptist	NEO230		No. 10 Emulsion Storage Tank Manway
St. John the Baptist	MONFUG	58	Chloroprene Unit - Fugitive Emissions
St. John the Baptist	NEO162	34	Inhibitor Mix Tank (Surge Control Vessel)
St. John the Baptist	MON017	44	Isom Reactor Vent System
St. John the Baptist	NEO231		No. 13 Emulsion Storage Tank Manway
St. John the Baptist	NEO232		No. 14 Emulsion Storage Tank Manway
St. John the Baptist	MON006	41	Refining Jets Vent System
St. John the Baptist	NEOR13		Stabilizer & Catalyst Tanks Manholes Vent
St. John the Baptist	MON027	46	Catalyst Sludge Receiver
St. John the Baptist	HCLC17		HCL UNIT CONDITION XVII
St. John the Baptist	NEO183	89	Water Solution Exhaust Fan
St. John the Baptist	NEO204	38	Aeration Tank (Waste Water Tank)
St. John the Baptist	HCL086	62	HCl Recovery Unit
St. John the Baptist	HCLFUG	93	Fugitive Emissions

St. John the Baptist	MON067	56	Monomer Flare
St. John the Baptist	HCL097	75	Waste Loading Vent
St. John the Baptist	NEO163	78	Stripped Emulsion Tank No. 1
St. John the Baptist	NEO164	79	Stripped Emulsion Tank No. 2
St. John the Baptist	NEO165	80	Stripped Emulsion Tank No. 3
St. John the Baptist	NEO186		Stripped Emulsion Tank No. 4
St. John the Baptist	NEO187		Stripped Emulsion Tank No. 5
St. John the Baptist	NEO188		Stripped Emulsion Tank No. 9
St. John the Baptist	MON046	71	1117-1 DCB Storage Tanks Vent
St. John the Baptist	MON064	53	Emergency Aqueous Tank
St. John the Baptist	MON014		DCB Storage Tank No. 1
St. John the Baptist	MON015		DCB Storage Tank No. 2
St. John the Baptist	MON060		Diversion Tank
St. John the Baptist	MON061		Aqueous Clarifier Tank
St. John the Baptist	MON062		No.1 CD Brine Tank
St. John the Baptist	MON063		No.2 CD Brine Tank
St. John the Baptist	NEO150		Unstripped Emulsion Storage Tank No. 6 (Surge Control Vessel)
St. John the Baptist	NEO151		Unstripped Emulsion Storage Tank No. 7 (Surge Control Vessel)
St. John the Baptist	NEO152		Unstripped Emulsion Storage Tank No. 8 (Surge Control Vessel)
St. John the Baptist	NEO153		Unstripped Emulsion Storage Tank No. 10 (Surge Control Vessel)

St. John the Baptist	NEO154		Unstripped Emulsion Storage Tank No. 13 (Surge Control Vessel)
St. John the Baptist	NEO155		Unstripped Emulsion Storage Tank No. 14 (Surge Control Vessel)
St. John the Baptist	NEO171	12	No. 1 CD Solution Tank (Surge Control Vessel)
St. John the Baptist	NEO172	77	Inhibitor Final Make-Up Tank (Surge Control Vessel)
St. John the Baptist	NEO173		Inhibitor Hold-Up Tank (Surge Control Vessel)
St. John the Baptist	NEO175	13	No. 2 CD Solution Tank (Surge Control Vessel)
St. John the Baptist	NEO176	15	Recovered CD Storage Tank No. 1 (Surge Control Vessel)
St. John the Baptist	NEO177		Recovered CD Storage Tank No. 2 (Surge Control Vessel)
St. John the Baptist	NEO178	16	CD Heels Tank (Bottom Receiver)
St. John the Baptist	NEO181		Crude CD Storage Tank No. 3
St. John the Baptist	NEO182	32	Refined CD Storage Tank
St. John the Baptist	NEO189		Stripped Emulsion Tank No. 11
St. John the Baptist	NEO190		Stripped Emulsion Tank No. 12
St. John the Baptist	NEO191		Stripped Emulsion Tank No. 15
St. John the Baptist	NEO192		Stripped Emulsion Tank No. 16
St. John the Baptist	MON013	42	DCB Storage Tanks Condenser
St. John the Baptist	MON018		Isom JVC Effluent Tank
St. John the Baptist	MON019		TEA Storage Tank
St. John the Baptist	MON020		TEA Burette
St. John the Baptist	MON022		Catalyst Feed Tank

St. John the Baptist	MON023		Isom Purge Tank
St. John the Baptist	MON024		Isom Distillation Column
St. John the Baptist	MON021		Catalyst Mix Tank
St. John the Baptist	NEO146	28	No. 1 East Dryer Cooling Compartment
St. John the Baptist	NEO147	29	No. 1 West Dryer Cooling Compartment
St. John the Baptist	NEO148	30	No. 2 East Dryer Cooling Compartment
St. John the Baptist	NEO149	31	No. 2 West Dryer Cooling Compartment
St. John the Baptist	MON025		Isom Reactors
St. John the Baptist	NEO222		Large Poly Kettle Vent No. 1
St. John the Baptist	NEO223		Large Poly Kettle Vent No. 2
St. John the Baptist	NEO224		Large Poly Kettle Vent No. 3
St. John the Baptist	NEO225		Large Poly Kettle Vent No. 4
St. John the Baptist	NEO226		Large Poly Kettle Vent No. 5
St. John the Baptist	NEO202	36	Diversion Tank (Waste Water Tank)
St. John the Baptist	HCL088		No. 1 HCl Unit Feed Tank
St. John the Baptist	HCL089		No. 2 HCl Unit Feed Tank
St. John the Baptist	HCL091		No. 1 Waste Organic Tank
St. John the Baptist	HCL092		No. 2 Waste Organic Tank
St. John the Baptist	HCL093		No. 3 Waste Organic Tank
St. John the Baptist	HCL094		No. 4 Waste Organic Tank

St. John the Baptist	HCL095	No. 5 Waste Organic Tank
St. John the Baptist	HCL096	Decant Tank
St. John the Baptist	MON007	JVC Effluent Tank
St. John the Baptist	MON008	Pentane Column
St. John the Baptist	MON009	Heads Column
St. John the Baptist	MON010	Topper Column
St. John the Baptist	MON011	Refiner Column
St. John the Baptist	MON012	Recovery Column
St. John the Baptist	NEO219	Stripper No. 1
St. John the Baptist	NEO220	Stripper No. 2
St. John the Baptist	NEO221	Stripper No. 3

SUBJECT_ITEM_ID	SOURCE_TYPE	PERMIT	EIQ	SOURCE_STATUS	SCC
RLP00000000015	Other	2249-V7	1700-3	Active	30102699
EQT00000000185	Other	2249-V7	1700-66	Active	30102699
EQT00000000144	Other	2249-V7	1700-27	Active	30102699
EQT00000000145	Other	2249-V7	1700-28	Active	30102699
RLP00000000014	Other	2249-V7	1700-2	Active	30102699
EQT00000000139	Other	2249-V7	1700-20	Active	30102699
EQT00000000140	Other	2249-V7	1700-20A	Active	30102699
EQT00000000026	Condenser	3000-V5	1110-4	Active	30102625
EQT00000000141	Above ground storage vessel	2249-V7	1700-21A	Active	30102699
EQT00000000136	Other	2249-V7	1700-13A	Active	30102699
EQT00000000135	Other	2249-V7	1700-13	Active	30102699
Not Listed	Above ground storage vessel	2249-V7	1700-5	Active	30102699
EQT00000000142	Other	2249-V7	1700-25	Active	30102699
EQT00000000143	Other	2249-V7	1700-26	Active	30102699
EQT00000000203	Wastewater Treatment System	2249-V7	4-95	Active	30102699
FUG00000000004	Fugitive Emissions	2249-V7	1-93	Active	30102699
Not Listed	Other	2249-V7	1700-63	Active	30102699
RLP00000000016	Other	2249-V7	1700-56	Active	30102699
EMS00000000003	GC XVII Emissions	3000-V5		Active	30102625

EMS00000000005	GC XVII Emissions	2249-V7		Active	30102699
EQT00000000134	Above ground storage vessel	2249-V7	1700-1	Active	30102699
EQT00000000087	Scrubber	206-V2	7000-17	Active	30102699
EQT00000000059	Condenser	3000-V5	1140-20	Active	30102625
EQT00000000090	Condenser	206-V2	2-74	Active	30102699
EQT00000000167	Other	2249-V7	1700-5A	Active	30102699
EQT00000000230	Other	2249-V7	1700-87	Active	30102699
FUG00000000001	Fugitive Emissions	3000-V5	3-91	Active	30102625
EQT00000000162	Above ground storage vessel	2249-V7	1700-51	Active	30102699
EQT00000000017	Reactor vessel	3000-V5	1110-3	Active	30102625
EQT00000000231	Other	2249-V7	1700-88	Active	30102699
EQT00000000232	Other	2249-V7	1700-89	Active	30102699
EQT00000000006	Scrubber	3000-V5	1110-2	Active	30102625
RLP00000000013	Other	2249-V7	1700-14B.3	Active	30102699
EQT00000000027	Container	3000-V5	1110-4B	Active	30102625
EMS00000000001	GC XVII Emissions	206-V2		Active	30102699
EQT00000000183	Above ground storage vessel	2249-V7	1700-64	Active	30102699
EQT00000000204	Wastewater Treatment System	2249-V7	5-95	Active	30102699
EQT00000000086	Other	206-V2	7000-15	Active	30102699
FUG00000000003	Fugitive Emissions	206-V2	3-96	Active	30102699

EQT00000000067	Flare	3000-V5	7000-10A	Active	30102625
EQT00000000097	Other	206-V2	1-96	Active	30102699
EQT00000000163	Above ground storage vessel	2249-V7	1700-53	Active	30102699
EQT00000000164	Above ground storage vessel	2249-V7	1700-54	Active	30102699
EQT00000000165	Above ground storage vessel	2249-V7	1700-55	Active	30102699
EQT00000000186	Above ground storage vessel	2249-V7	1700-67	Active	30102699
EQT00000000187	Above ground storage vessel	2249-V7	1700-68	Active	30102699
EQT00000000188	Above ground storage vessel	2249-V7	1700-69	Active	30102699
EQT00000000046	Above ground storage vessel	3000-V5	1117-1	Active	30102625
EQT00000000064	Above ground storage vessel	3000-V5	1150-25	Active	30102625
EQT00000000014	Above ground storage vessel	3000-V5	1110-2A.1	Active	30102625
EQT00000000015	Above ground storage vessel	3000-V5	1110-2A.2	Active	30102625
EQT00000000060	Above ground storage vessel	3000-V5	1140-20A	Active	30102625
EQT00000000061	Above ground storage vessel	3000-V5	1140-20B	Active	30102625
EQT00000000062	Above ground storage vessel	3000-V5	1140-20C	Active	30102625
EQT00000000063	Above ground storage vessel	3000-V5	1140-20D	Active	30102625
EQT00000000150	Above ground storage vessel	2249-V7	1700-5.3	Active	30102699
EQT00000000151	Above ground storage vessel	2249-V7	1700-5.4	Active	30102699
EQT00000000152	Above ground storage vessel	2249-V7	1700-5.5	Active	30102699
EQT00000000153	Above ground storage vessel	2249-V7	1700-5.6	Active	30102699

EQT00000000154	Above ground storage vessel	2249-V7	1700-5.7	Active	30102699
EQT00000000155	Above ground storage vessel	2249-V7	1700-5.8	Active	30102699
EQT00000000171	Above ground storage vessel	2249-V7	1700-63.1	Active	30102699
EQT00000000172	Above ground storage vessel	2249-V7	1700-63.10	Active	30102699
EQT00000000173	Above ground storage vessel	2249-V7	1700-63.11	Active	30102699
EQT00000000175	Above ground storage vessel	2249-V7	1700-63.2	Active	30102699
EQT00000000176	Above ground storage vessel	2249-V7	1700-63.3	Active	30102699
EQT00000000177	Above ground storage vessel	2249-V7	1700-63.4	Active	30102699
EQT00000000178	Above ground storage vessel	2249-V7	1700-63.5	Active	30102699
EQT00000000181	Above ground storage vessel	2249-V7	1700-63.8	Active	30102699
EQT00000000182	Above ground storage vessel	2249-V7	1700-63.9	Active	30102699
EQT00000000189	Above ground storage vessel	2249-V7	1700-70	Active	30102699
EQT00000000190	Above ground storage vessel	2249-V7	1700-71	Active	30102699
EQT00000000191	Above ground storage vessel	2249-V7	1700-72	Active	30102699
EQT00000000192	Above ground storage vessel	2249-V7	1700-73	Active	30102699
EQT00000000013	Condenser	3000-V5	1110-2A	Active	30102625
EQT00000000018	Container	3000-V5	1110-3A	Active	30102625
EQT00000000019	Container	3000-V5	1110-3B	Active	30102625
EQT00000000020	Container	3000-V5	1110-3C	Active	30102625
EQT00000000022	Container	3000-V5	1110-3E	Active	30102625

EQT00000000023	Container	3000-V5	1110-3F	Active	30102625
EQT00000000024	Distillation unit	3000-V5	1110-3H	Active	30102625
EQT00000000021	Mixer	3000-V5	1110-3D	Active	30102625
EQT00000000146	Other	2249-V7	1700-45	Active	30102699
EQT00000000147	Other	2249-V7	1700-46	Active	30102699
EQT00000000148	Other	2249-V7	1700-47	Active	30102699
EQT00000000149	Other	2249-V7	1700-48	Active	30102699
EQT00000000025	Reactor vessel	3000-V5	1110-3I	Active	30102625
EQT00000000222	Reactor vessel	2249-V7	1700-3A	Active	30102699
EQT00000000223	Reactor vessel	2249-V7	1700-3B	Active	30102699
EQT00000000224	Reactor vessel	2249-V7	1700-3C	Active	30102699
EQT00000000225	Reactor vessel	2249-V7	1700-3D	Active	30102699
EQT00000000226	Reactor vessel	2249-V7	1700-3E	Active	30102699
EQT00000000202	Wastewater Treatment System	2249-V7	3-95	Active	30102699
EQT00000000088	Above ground storage vessel	206-V2	7000-17.1	Active	30102699
EQT00000000089	Above ground storage vessel	206-V2	7000-17.2	Active	30102699
EQT00000000091	Above ground storage vessel	206-V2	2-74.1	Active	30102699
EQT00000000092	Above ground storage vessel	206-V2	2-74.2	Active	30102699
EQT00000000093	Above ground storage vessel	206-V2	2-74.3	Active	30102699
EQT00000000094	Above ground storage vessel	206-V2	2-74.4	Active	30102699

EQT00000000095	Above ground storage vessel	206-V2	2-74.5	Active	30102699
EQT00000000096	Container	206-V2	2-74.6	Active	30102699
EQT00000000007	Container	3000-V5	1110-2.1	Active	30102625
EQT00000000008	Distillation unit	3000-V5	1110-2.2	Active	30102625
EQT00000000009	Distillation unit	3000-V5	1110-2.3	Active	30102625
EQT00000000010	Distillation unit	3000-V5	1110-2.4	Active	30102625
EQT00000000011	Distillation unit	3000-V5	1110-2.5	Active	30102625
EQT00000000012	Distillation unit	3000-V5	1110-2.6	Active	30102625
EQT00000000219	Steam stripper	2249-V7	1700-2A	Active	30102699
EQT00000000220	Steam stripper	2249-V7	1700-2B	Active	30102699
EQT00000000221	Steam stripper	2249-V7	1700-2C	Active	30102699

RELEASE_POINT_ID	RELEASE_POINT_DESCRIPTION	RELEASE_POINT_TYPE	HEIGHT_FT
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RP0185	1700-66 BUILDING EXHAUST FAN	Area	3
RP0144	1700-27 EAST HOT DRYER	Stack	65.5
RP0145	1700-28 WEST HOT DRYER	Stack	65.5
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RP0139	1700-20 CD REFINING COLUMN JETS	Stack	63.5
RP0140	1700-20A CD REFINING COLUMN JET SPARE	Stack	63.4
RP0026	1110-4 CD VENT CONDENSER	Stack	72
RP0141	1700-21A 2MMLB CD STORAGE TANK	Vent	48.2
RP0136	1700-13A LPK MH/STRAINERS (3,4 & 5)	Vent	59
RP0135	1700-13 POLYKETTLE MANHOLE	Vent	58.2
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RP0142	1700-25 EAST WASH BELT DRYER	Stack	31
RP0143	1700-26 WEST WASH BELT DRYER	Stack	31
RP0203	4-95 NO. 1 AERATION TANK	Area	3
RPF004	1-93 FUGITIVE EMISSIONS NEOPRENE UNIT	Fugitive	3
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPN016	1700-56 UNSTRIPPED TANKS DEPRESS. VENT	Stack	55
RPMC17	CHLOROPRENE UNIT GC XVII	Area	3

RPNC17	NEOPRENE UNIT GC XVII	Area	3
RP0134	1700-1 NO. 7 & 8 EMULSION MANHOLES	Vent	53.8
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0167	1700-5A NO. 6 EMUL STORAGE TANK MANHOLE	Vent	53.8
RPN230	No. 10 Emulsion Storage Tank Manway	Vent	55
RPF001	3-91 FUGITIVE EMISSIONS CHLOROPRENE UNIT	Fugitive	3
RP0162	1700-51 INHIBITOR MIX TANK	Vent	59
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RPN231	No. 13 Emulsion Storage Tank Manway	Vent	55
RPN232	No. 14 Emulsion Storage Tank Manway	Vent	55
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RPG006	1700-14B SOLUITON MAKE UP	Stack	57
RP0027	1110-4B CATALYST SLUDGE RECEIVER	Stack	80
RPHC17	HCL UNI GC XVII	Area	3
RP0183	1700-64 WATER SOLUTION MH FAN	Vent	53.6
RP0204	5-95 NO. 2 AERATION TANK	Area	3
RP0086	7000-15 HCL RECOVERY UNIT	Stack	120
RPF003	3-96 HCL UNIT FUGITIVE EMISSIONS	Fugitive	3

RP0067	7000-10A FLARE STACK	Stack	129
RP0097	1-96 WASTE LOADING VENT	Stack	43.5
RP0163	1700-53 STRIPPED EMULSION TANK #1	Vent	38
RP0164	1700-54 STRIPPED EMULSION TANK #2	Vent	38
RP0165	1700-55 STRIPPED EMULSION TANK #3	Vent	38
RP0186	1700-67 STRIPPED EMULSION TANK # 4	Vent	38
RP0187	1700-68 STRIPPED EMULSION TANK # 5	Vent	38
RP0188	1700-69 STRIPPED EMULSION TANK # 9	Vent	38
RP0046	1117-1 DCB STORAGE TANKS VENT	Vent	50
RP0064	1150-25 EMERGENCY AQUEOUS TANK	Vent	30.1
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RP0059	1140-20 AQUEOUS STORAGE VENT CONDENSER	Stack	53.1
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55

RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG008	1700-5 EMUL STORAGE TANKS 4,5,6,7, & 8	Vent	55
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RPG010	1700-63 1712 COMMON VENT HEADER	Stack	33
RP0189	1700-70 STRIPPED EMULSION TANK # 11	Vent	38
RP0190	1700-71 STRIPPED EMULSION TANK # 12	Vent	38
RP0191	1700-72 STRIPPED EMULSION TANK # 15	Vent	38
RP0192	1700-73 STRIPPED EMULSION TANK # 16	Vent	38
RP0013	1110-2A DCB STORAGE TANK VENTS (1031)	Vent	23.5
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4

RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RP0146	1700-45 #1 EAST COOLING COMPARTMENT	Stack	49.6
RP0147	1700-46 #1 WEST COOLING COMPARTMENT	Stack	49.6
RP0148	1700-47 #2 EAST COOLING COMPARTMENT	Stack	49.6
RP0149	1700-48 #2 WEST COOLING COMPARTMENT	Stack	49.6
RP0017	1110-3 ISOM REACTOR VENT	Stack	58.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RPN015	1700-3 POLY KETTLES COMMON VENT	Stack	62.4
RP0202	3-95 DIVERSION TANK	Area	3
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0087	7000-17 HCL FEED TANKS	Vent	10
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5

RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0090	2-74 WASTE STORAGE TANKS	Vent	43.5
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RP0006	1110-2 JET VENT SCRUBBER	Stack	98
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4
RPN014	1700-2 STRIPPERS COMMON VENT	Stack	62.4

DIAMETER_FT	WIDTH_FT	LENGTH_FT	ORIENTATION_DEC_DEGREES	EXIT_GAS_FLOW_RATE_CFS
0.3			0	0.3
	500	500	0	7939.4
3			0	476.7
3			0	476.7
0.3			0	0.1
0.2			0	0.1099
0.2			0	0.1099
0.1			0	0.1185
0.3			0	0.1625
2			0	141.7
1.3			0	115
0.2			0	0.2419
14.1			0	2841.8
14.1			0	2841.8
	60	60	0	0
	5000	5000	0	0
0.1			0	0.0534
0.2			0	18.8
	1000	1000	0	

	1000	1000	0	
1.2			0	38.5
0.2			0	0.1445
0.3			0	0.1625
0.2			0	0.2
1.3			0	123.3
0.17			0	1.4
	5000	5000	0	0
0.3			0	0.1625
0.2			0	0.1288
0.17			0	1.4
0.17			0	1.4
0.3			0	0.3463
1.5			0	185
0.3			0	0.1625
	1000	1000	0	
1.3			0	39.6
	60	60	0	0
1.5			0	79.5
	5000	5000	0	0

6.5	0	2010.9
0.2	0	0.2
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.2	0	0.2419
0.2	0	0.2419
0.2	0	0.2419
0.2	0	0.2419

0.2	0	0.2419
0.2	0	0.2419
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.1	0	0.0534
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.3	0	0.1625
0.2	0	0.1288
0.2	0	0.1288
0.2	0	0.1288
0.2	0	0.1288

0.2			0	0.1288
0.2			0	0.1288
0.2			0	0.1288
2.7			0	344.2
2.7			0	344.2
2.7			0	344.2
2.7			0	344.2
0.2			0	0.1288
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
0.3			0	0.3
	60	60	0	0
0.2			0	0.1445
0.2			0	0.1445
0.2			0	0.2
0.2			0	0.2
0.2			0	0.2
0.2			0	0.2

0.2	0	0.2
0.2	0	0.2
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.3463
0.3	0	0.1
0.3	0	0.1
0.3	0	0.1

EXIT_GAS_VELOCITY_FT_PER_SEC	EXIT_GAS_TEMPERATURE_DEG_F	MOISTURE_CONTENT_PERCENT
4.2	34	
	77	
67.4	250	
67.4	250	
1.4	30	
3.5	65	
3.5	65	
15.1	60	
2.3	30	
45.1	77	
82.4	77	
7.7	77	
18.2	104	
18.2	104	
	77	
	80	
6.8	41	
600	77	

34	77
4.6	86
2.3	41
6.1	43
88.3	77
60	77
	80
2.3	37
4.1	86
60	77
60	77
4.9	75
104.7	77
2.3	86
29.8	77
	77
45	110
	80

60.6	1832
6.1	86
2.3	77
2.3	77
2.3	77
2.3	77
2.3	77
2.3	77
2.3	83
2.3	86
2.3	86
2.3	86
2.3	41
2.3	41
2.3	41
2.3	41
7.7	77
7.7	77
7.7	77
7.7	77

7.7	77
7.7	77
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
6.8	41
2.3	77
2.3	77
2.3	77
2.3	77
2.3	86
4.1	86
4.1	86
4.1	86
4.1	86

4.1	86
4.1	86
4.1	86
61.6	122
61.6	122
61.6	122
61.6	122
4.1	86
4.2	34
4.2	34
4.2	34
4.2	34
4.2	34
	77
4.6	86
4.6	86
6.1	43
6.1	43
6.1	43
6.1	43

6.1	43
6.1	43
4.9	75
4.9	75
4.9	75
4.9	75
4.9	75
4.9	75
1.4	30
1.4	30
1.4	30

LONGITUDE_DEC_DEGREES	LATITUDE_DEC_DEGREES	UTM_EASTING_M	UTM_NORTHLING_M	UTM_ZONE
-90.52449	30.05899	738653.1	3327905.4	15
-90.52407	30.05902	738693.6	3327909.6	15
-90.52459	30.05943	738642.4	3327953.9	15
-90.52464	30.05942	738637.6	3327952.7	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52437	30.05821	738666.6	3327819.1	15
-90.52432	30.05821	738671.4	3327819.2	15
-90.52275	30.05533	738829.7	3327503.2	15
-90.52323	30.05748	738778.3	3327740.6	15
-90.52453	30.05903	738649.2	3327909.7	15
-90.52452	30.05898	738650.3	3327904.2	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52458	30.05944	738643.4	3327955.1	15
-90.52467	30.05941	738634.8	3327951.5	15
-90.52578	30.06027	738525.7	3328044.6	15
-90.52424	30.05876	738677.8	3327880.4	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52429	30.05901	738672.4	3327908	15
-90.52326	30.05517	738780.9	3327484.4	15

-90.52422	30.05877	738679.7	3327881.5	15
-90.52428	30.05902	738673.3	3327909.1	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52434	30.05897	738667.7	3327903.5	15
-90.52427	30.05902	738674.3	3327909.1	15
-90.5229	30.05534	738815.2	3327504	15
-90.52403	30.05862	738698.4	3327865.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52428	30.05901	738673.3	3327908	15
-90.52426	30.05902	738675.2	3327909.2	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52443	30.05886	738659.2	3327891.1	15
-90.5227	30.05519	738834.9	3327487.8	15
-90.52573	30.0567	738539.1	3327648.9	15
-90.52421	30.05856	738681.2	3327858.3	15
-90.52549	30.05976	738554.9	3327988.6	15
-90.52579	30.05681	738533	3327661	15
-90.52565	30.0568	738546.5	3327660.2	15

-90.52531	30.05714	738578.5	3327698.6	15
-90.52613	30.05587	738502.5	3327556.1	15
-90.52441	30.05897	738660.9	3327903.3	15
-90.52443	30.05896	738659	3327902.2	15
-90.52439	30.05899	738662.8	3327905.6	15
-90.52439	30.05897	738662.8	3327903.4	15
-90.52435	30.05901	738666.6	3327907.9	15
-90.52421	30.05904	738680	3327911.5	15
-90.52235	30.05568	738867.5	3327542.9	15
-90.52314	30.05727	738787.5	3327717.5	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52131	30.05613	738966.7	3327594.9	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15

-90.52435	30.05898	738666.7	3327904.5	15
-90.52435	30.05898	738666.7	3327904.5	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52446	30.0581	738658.2	3327806.8	15
-90.52415	30.05906	738685.8	3327913.8	15
-90.52412	30.05904	738688.7	3327911.7	15
-90.52409	30.059	738691.7	3327907.3	15
-90.52408	30.05897	738692.7	3327904	15
-90.52097	30.05516	739001.8	3327488.1	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15

-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52465	30.05964	738636.1	3327977.1	15
-90.52469	30.05963	738632.3	3327975.9	15
-90.52481	30.05959	738620.8	3327971.2	15
-90.52476	30.05961	738625.6	3327973.5	15
-90.52342	30.05556	738764.6	3327527.3	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52449	30.05899	738653.1	3327905.4	15
-90.52562	30.06033	738541	3328051.6	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52553	30.05669	738558.4	3327648.2	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15

-90.52601	30.05576	738514.3	3327544.1	15
-90.52601	30.05576	738514.3	3327544.1	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52283	30.05538	738821.9	3327508.6	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52451	30.05903	738651.1	3327909.8	15
-90.52451	30.05903	738651.1	3327909.8	15

HORIZONTAL_ACCURACY_MEASURE_M	HORIZONTAL_COLLECTION_METHOD	EMISSION_TYPE	POLLUTANT
	5006	Routine	Chloroprene
	5006	Routine	Chloroprene
	5006	Routine	Chloroprene
	5006	Routine	Chloroprene
	5006	Routine	Chloroprene
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5006	Routine	Chloroprene
5006	Routine	Chloroprene
5006	Routine	Chloroprene

CAS_	EMISSIONS	UNIT	Emissions (tons)
00126-99-8	45735	lb	22.8675
00126-99-8	31663	lb	15.8315
00126-99-8	24480	lb	12.24
00126-99-8	24480	lb	12.24
00126-99-8	18340	lb	9.17
00126-99-8	10985	lb	5.4925
00126-99-8	10985	lb	5.4925
00126-99-8	9392	lb	4.696
00126-99-8	9372	lb	4.686
00126-99-8	8029	lb	4.0145
00126-99-8	6518	lb	3.259
00126-99-8	4950	lb	2.475
00126-99-8	4785	lb	2.3925
00126-99-8	4785	lb	2.3925
00126-99-8	4339	lb	2.1695
00126-99-8	4182	lb	2.091
00126-99-8	3878	lb	1.939
00126-99-8	3814	lb	1.907
00126-99-8	3100	lb	1.55

00126-99-8	2797 lb	1.3985
00126-99-8	2714 lb	1.357
00126-99-8	2222 lb	1.111
00126-99-8	2111 lb	1.0555
00126-99-8	1746 lb	0.873
00126-99-8	1672 lb	0.836
00126-99-8	1666 lb	0.833
00126-99-8	1481 lb	0.7405
00126-99-8	1412 lb	0.706
00126-99-8	1085 lb	0.5425
00126-99-8	1041 lb	0.5205
00126-99-8	1041 lb	0.5205
00126-99-8	987 lb	0.4935
00126-99-8	740 lb	0.37
00126-99-8	355 lb	0.1775
00126-99-8	305 lb	0.1525
00126-99-8	166 lb	0.083
00126-99-8	51 lb	0.0255
00126-99-8	43 lb	0.0215
00126-99-8	24 lb	0.012

00126-99-8	20 lb	0.01
00126-99-8	11 lb	0.0055
00126-99-8	7 lb	0.0035
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00126-99-8	4 lb	0.002
00126-99-8	3 lb	0.0015
00126-99-8	1 lb	0.0005
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00126-99-8	1 lb	0.0005
00126-99-8	0.22 lb	0.00011
00126-99-8	0.01 lb	0.000005
00126-99-8	0.01 lb	0.000005
00126-99-8	0.01 lb	0.000005
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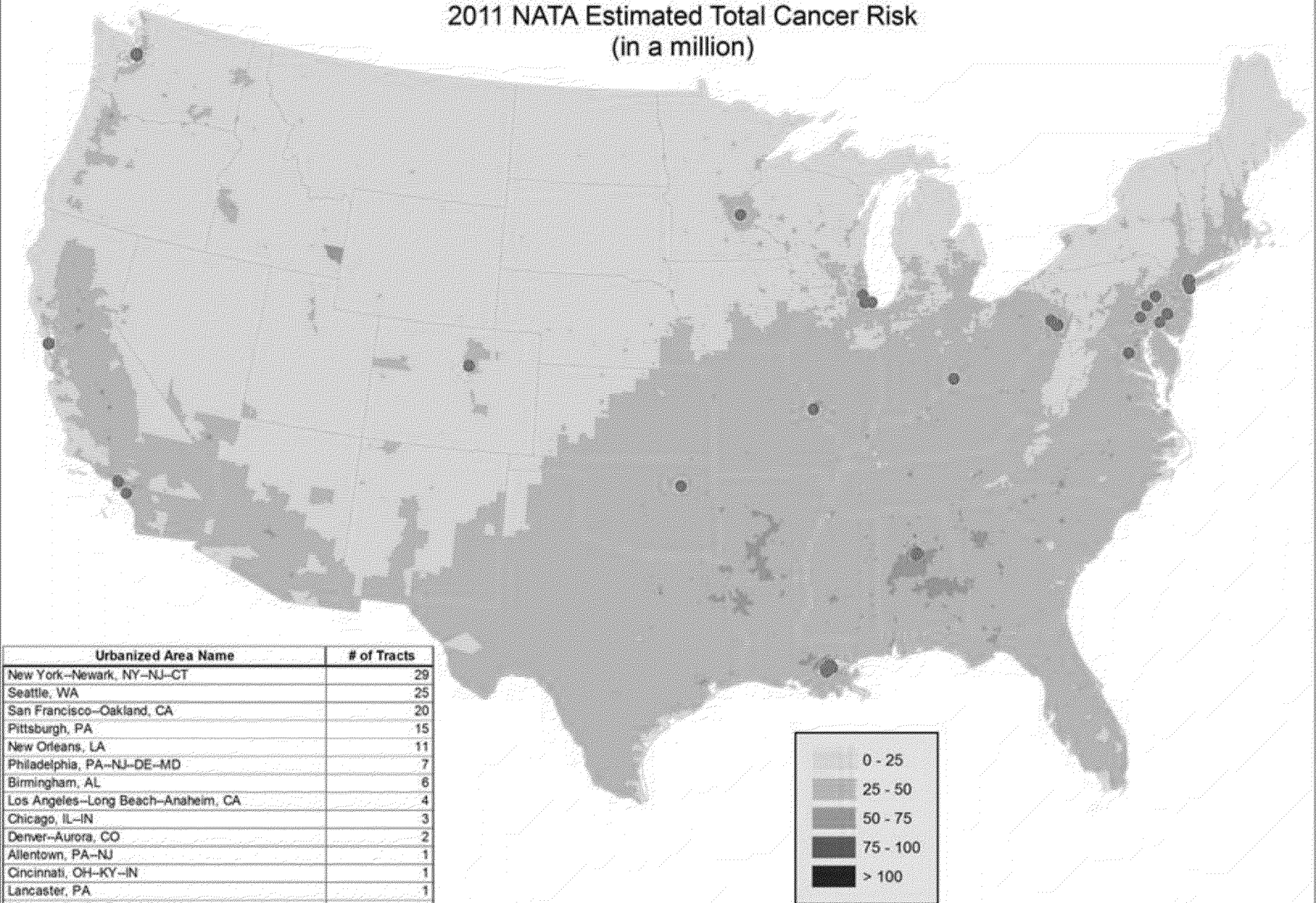
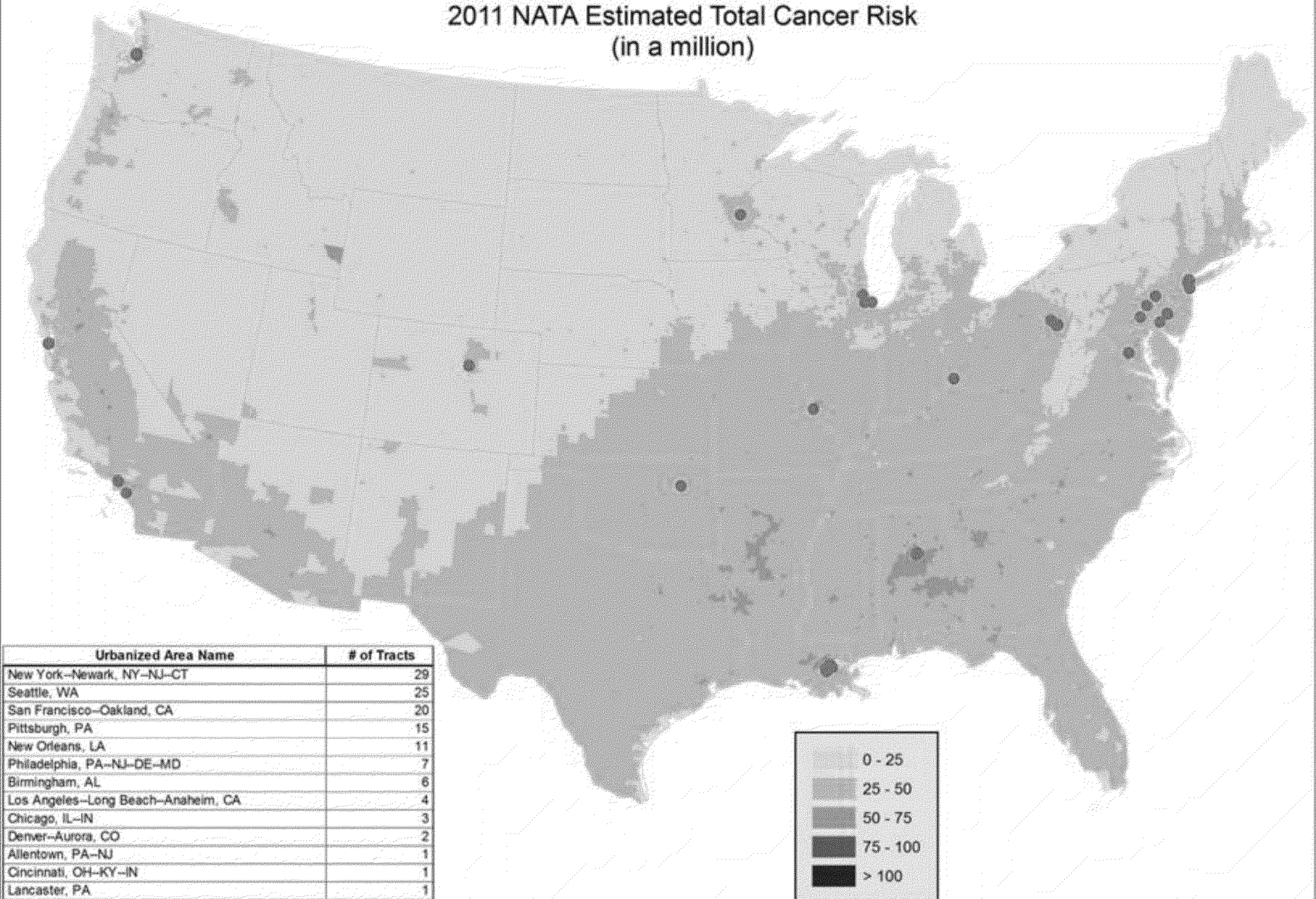
2011 NATA Estimated Total Cancer Risk
(in a million)



Urbanized Area Name	# of Tracts
New York--Newark, NY--NJ--CT	29
Seattle, WA	25
San Francisco--Oakland, CA	20
Pittsburgh, PA	15
New Orleans, LA	11
Philadelphia, PA--NJ--DE--MD	7
Birmingham, AL	6
Los Angeles--Long Beach--Anaheim, CA	4
Chicago, IL--IN	3
Denver--Aurora, CO	2
Allentown, PA--NJ	1
Cincinnati, OH--KY--IN	1
Lancaster, PA	1
Minneapolis--St. Paul, MN--WI	1
Reading, PA	1
St. Louis, MO--IL	1
Tulsa, OK	1
Washington, DC--VA--MD	1

Blue dots indicate tracts with risk > 100 in a million
131 tracts nationwide (17 Urbanized Areas)

2011 NATA Estimated Total Cancer Risk
(in a million)



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Denver--Aurora, CO	2
Allentown, PA--NJ	1
Cincinnati, OH--KY--IN	1
Lancaster, PA	1
Minneapolis--St. Paul, MN--WI	1
Reading, PA	1
St. Louis, MO--IL	1
Tulsa, OK	1
Washington, DC--VA--MD	1

Blue dots indicate tracts with risk > 100 in a million
131 tracts nationwide (17 Urbanized Areas)

To: Tina Forrester[txf5@cdc.gov]
Cc: Pettigrew, George[pettigrew.george@epa.gov]
From: Burgin, Deborah
Sent: Wed 12/16/2015 7:21:49 PM
Subject: Update on chloroprene - LaPlace LA

Hi Tina (and George!)

Just wanted to give you a quick update – I'm developing a ToxFAQ-like document for chloroprene (based on the 1,3-butadiene ToxFAQ). Almost finished, in fact. So, I'd like to send that to you by the end of the day (at the latest) for your review. Is it okay if I send to both of you for simultaneous review?

(Here's the 1,3-butadiene ToxFAQ ink for your info
http://www.atsdr.cdc.gov/toxfaqs/tfacts28.pdf)
Thanks!

Deb

Deborah Burgin, PhD, DABT

Toxicologist
Agency for Toxic Substances and Disease Registry
Liaison Office to EPA HQ
1200 Pennsylvania Ave, N.W. (5202P)
Washington, D.C. 20460

703.603.8813

To: Mickunas, Dave[Mickunas.Dave@epa.gov]
Cc: Humphrey, Marvelyn[humphrey.marvelyn@epa.gov]
From: Ritter, Melvin
Sent: Tue 12/1/2015 6:16:28 PM
Subject: Sampling and analysis for chloroprene

DAVE:

Possible interest in using TAGA for chloroprene air samples.—see e-mail below from Region 6 Air Monitoring Chief

Please contact me re TAGA status.

Thanks

****

Melvin L. Ritter

U.S.EPA Region 6

Houston Laboratory

10625 Fallstone Road

Houston, TX 77099

Off: 281-983-2146

ritter.melvin@epa.gov

****

From: Verhalen, Frances
Sent: Monday, November 30, 2015 1:26 PM
To: Humphrey, Marvelyn
Cc: Casso, Ruben
Subject: Sampling Protocol and Analytical Methodology for Chloroprene

Marvelyn,

Mid December, HQ is going to release the new National Air Toxics Assessment (NATA) number for chloroprene. I need to determine what the sampling protocol and analytical methodology for this chemical are. Samples should be outside ambient air and stack samples (still trying to get the industry to do this). Analytical will most likely be Houston Lab.

Could you check into the availability and capability of the TAGA for this assessment?

I appreciate your assistance on this and hope you can address this by Wednesday? Let me know. Thank you.

Frances Verhalen, P.E., Chief

Air Monitoring and Grants Section

US Environmental Protection Agency

1445 Ross Avenue (MC 6MM-AM)

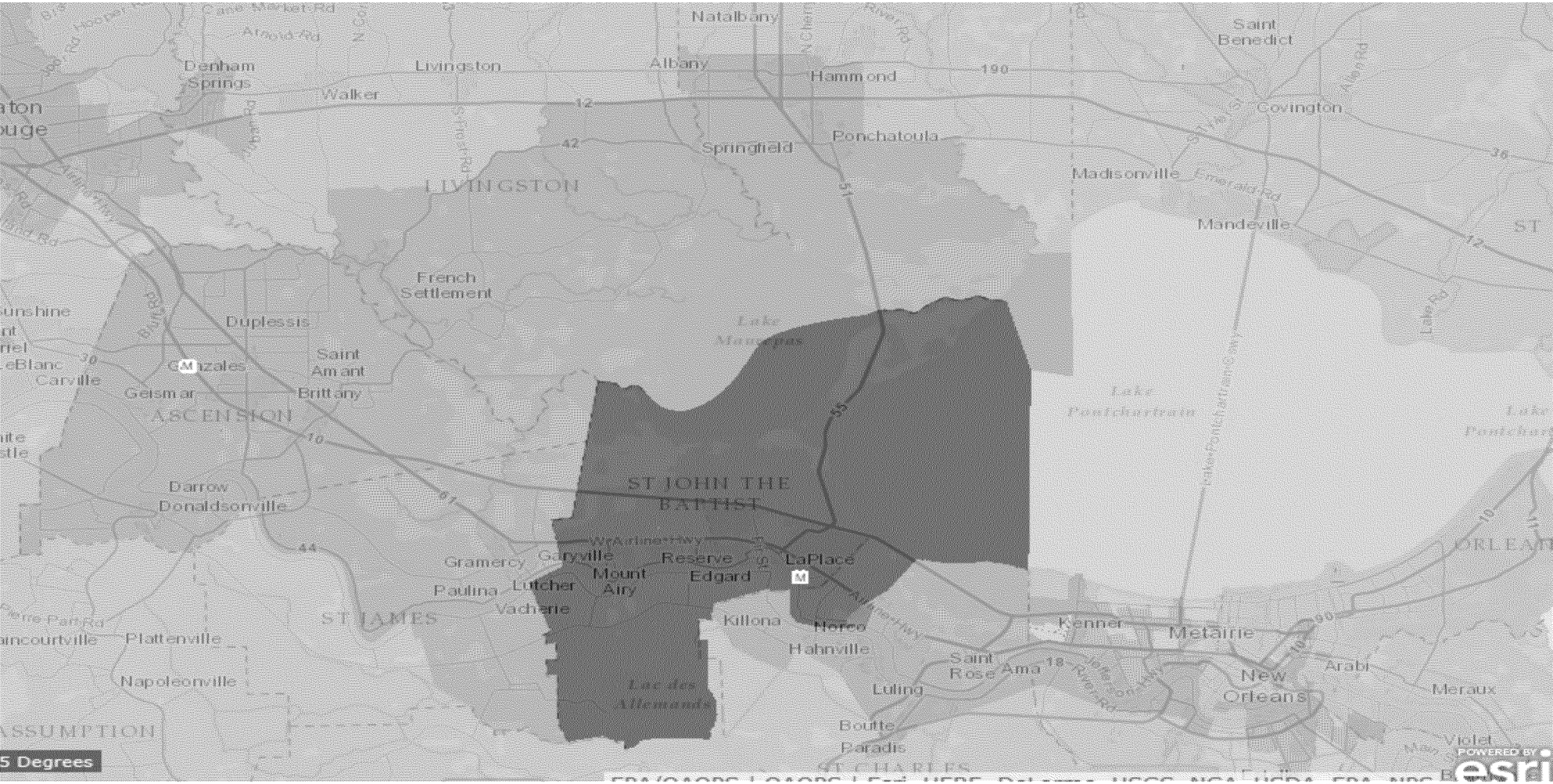
Dallas, TX 75202

214-665-2172

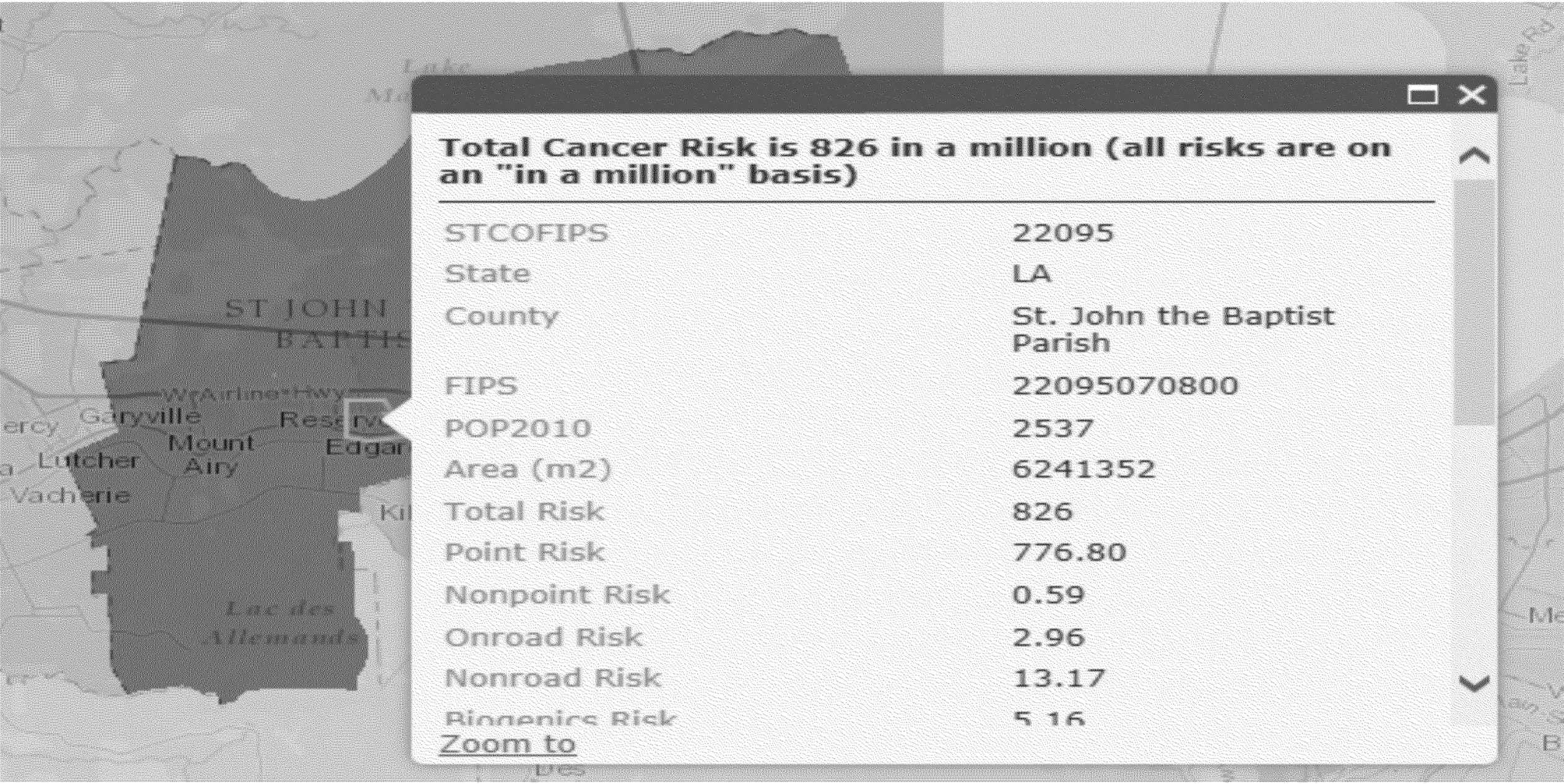
verhalen.frances@epa.gov

2011 NATA map – Region 6 – scale view

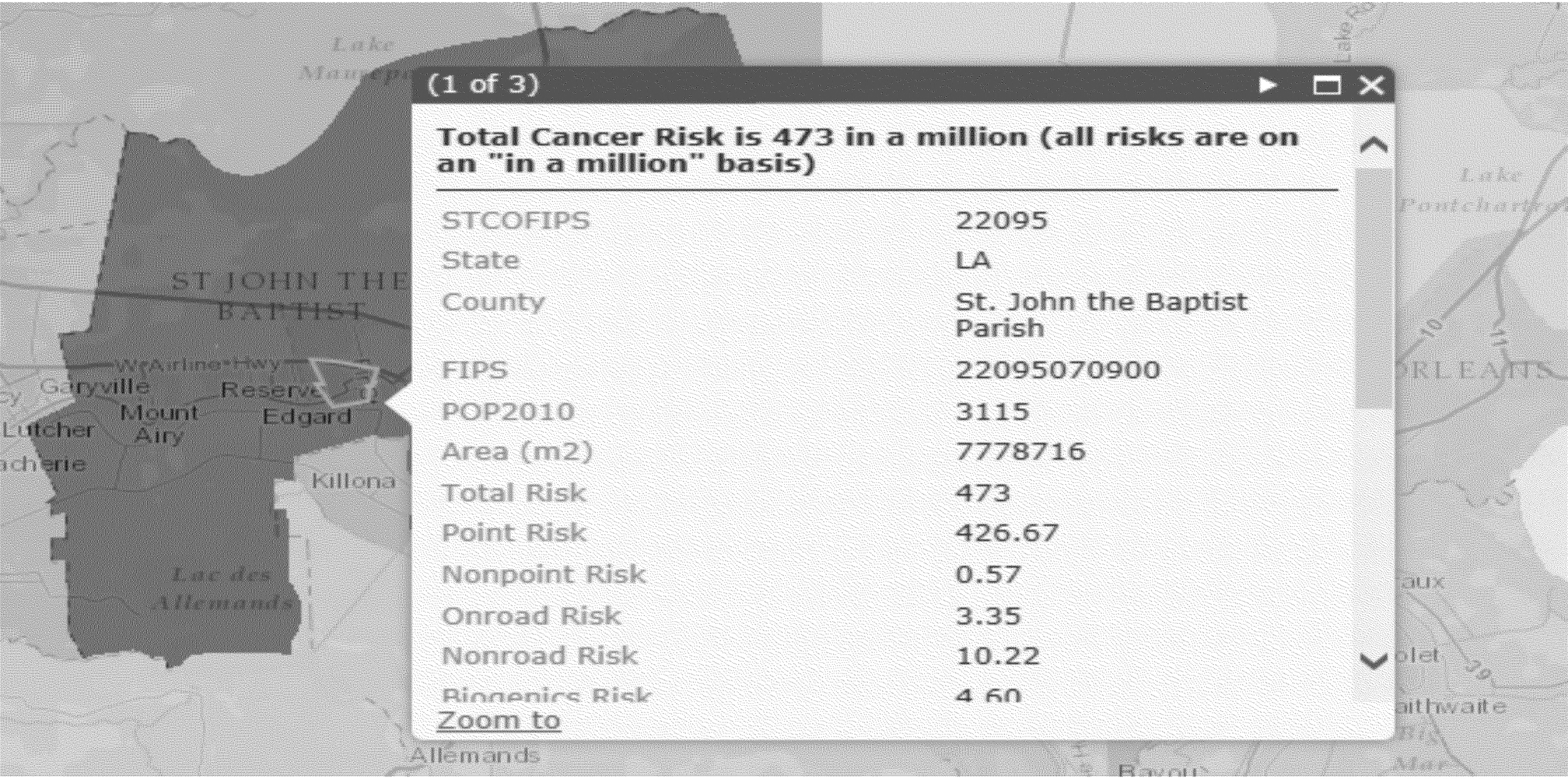
2011 NATA map – St John the Baptist Parish area



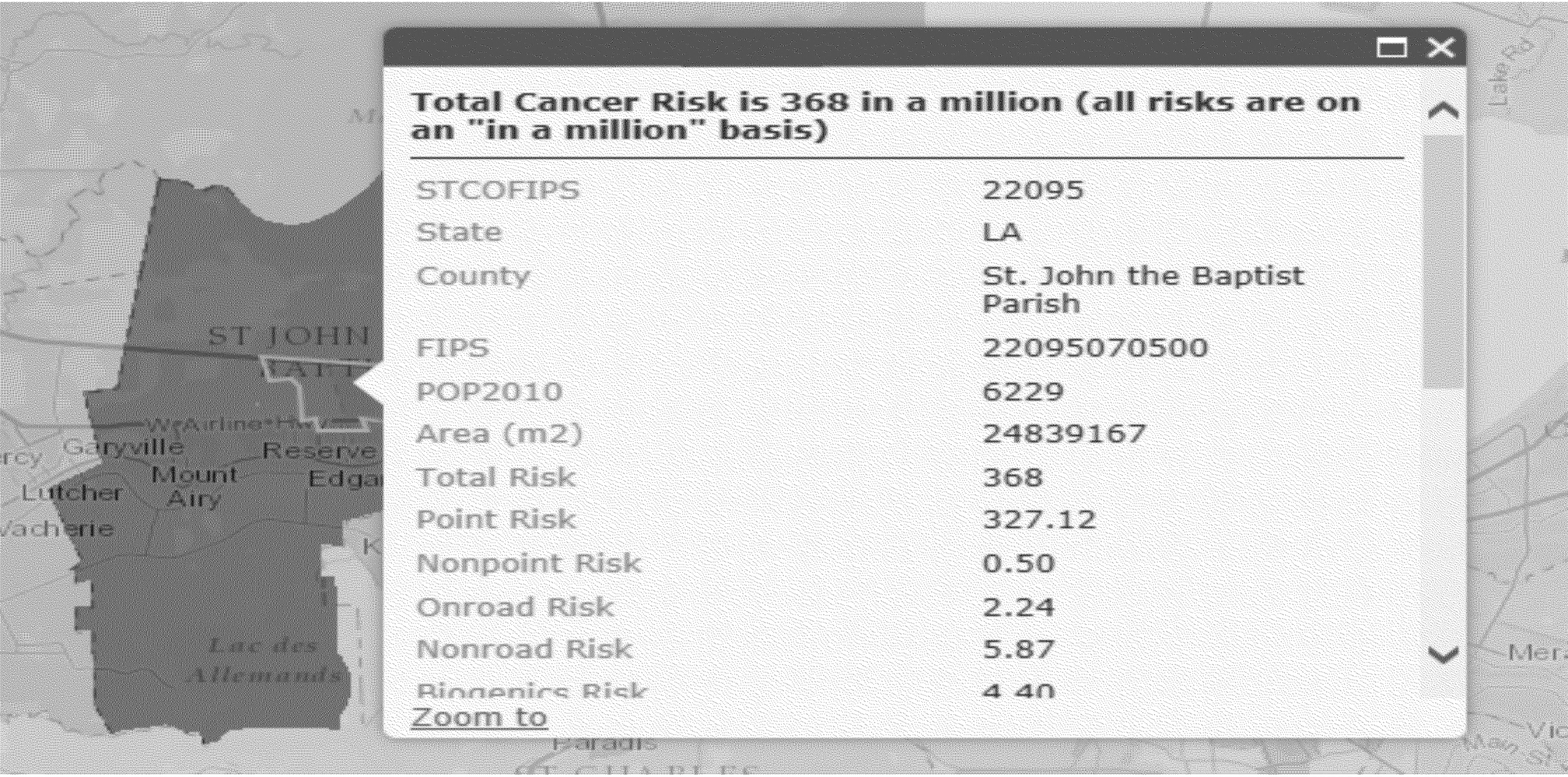
826 in a million *estimated* risk census tract & pop-up data



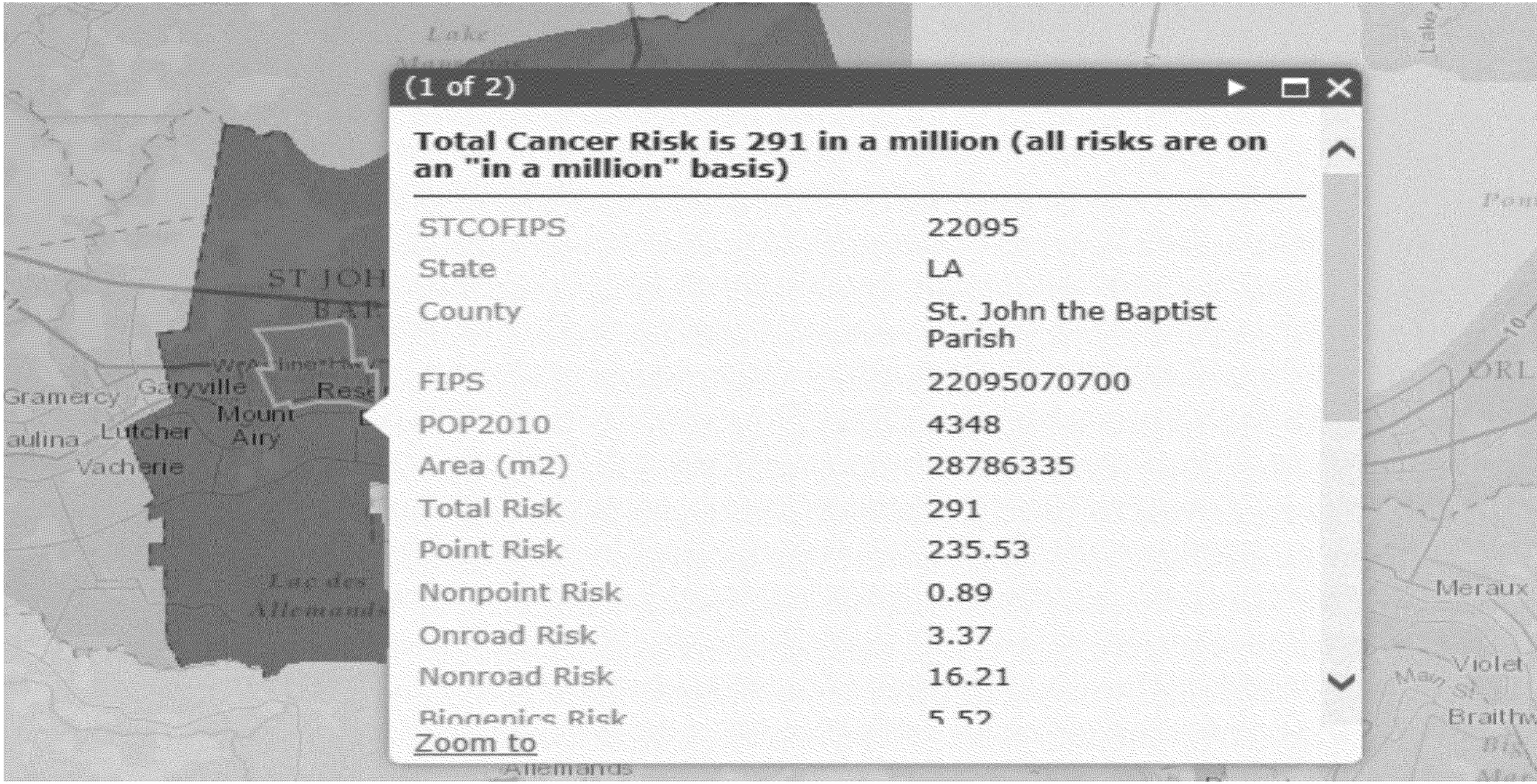
473 in a million *estimated* risk census tract & pop-up data



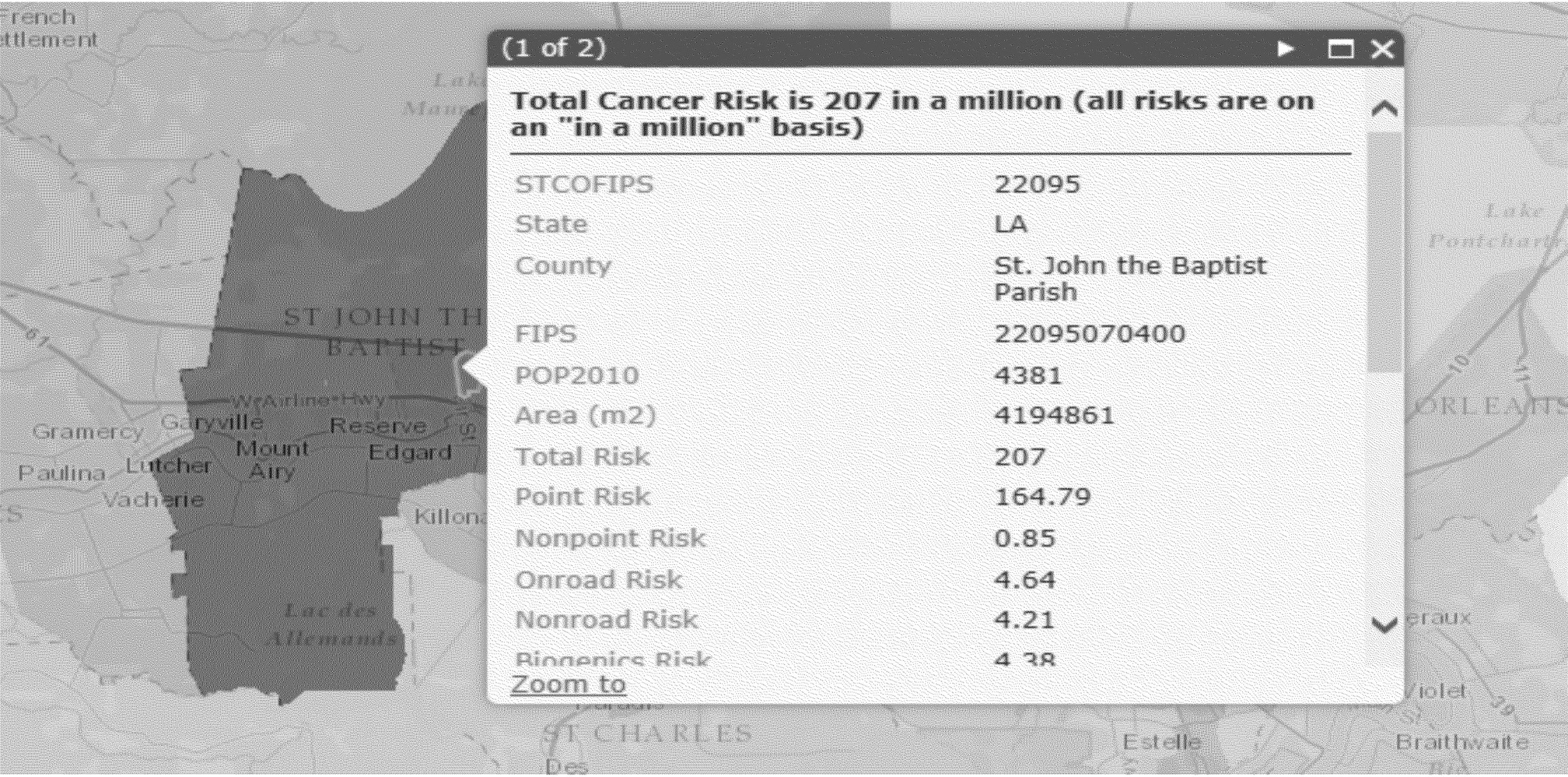
368 in a million *estimated* risk census tract & pop-up data



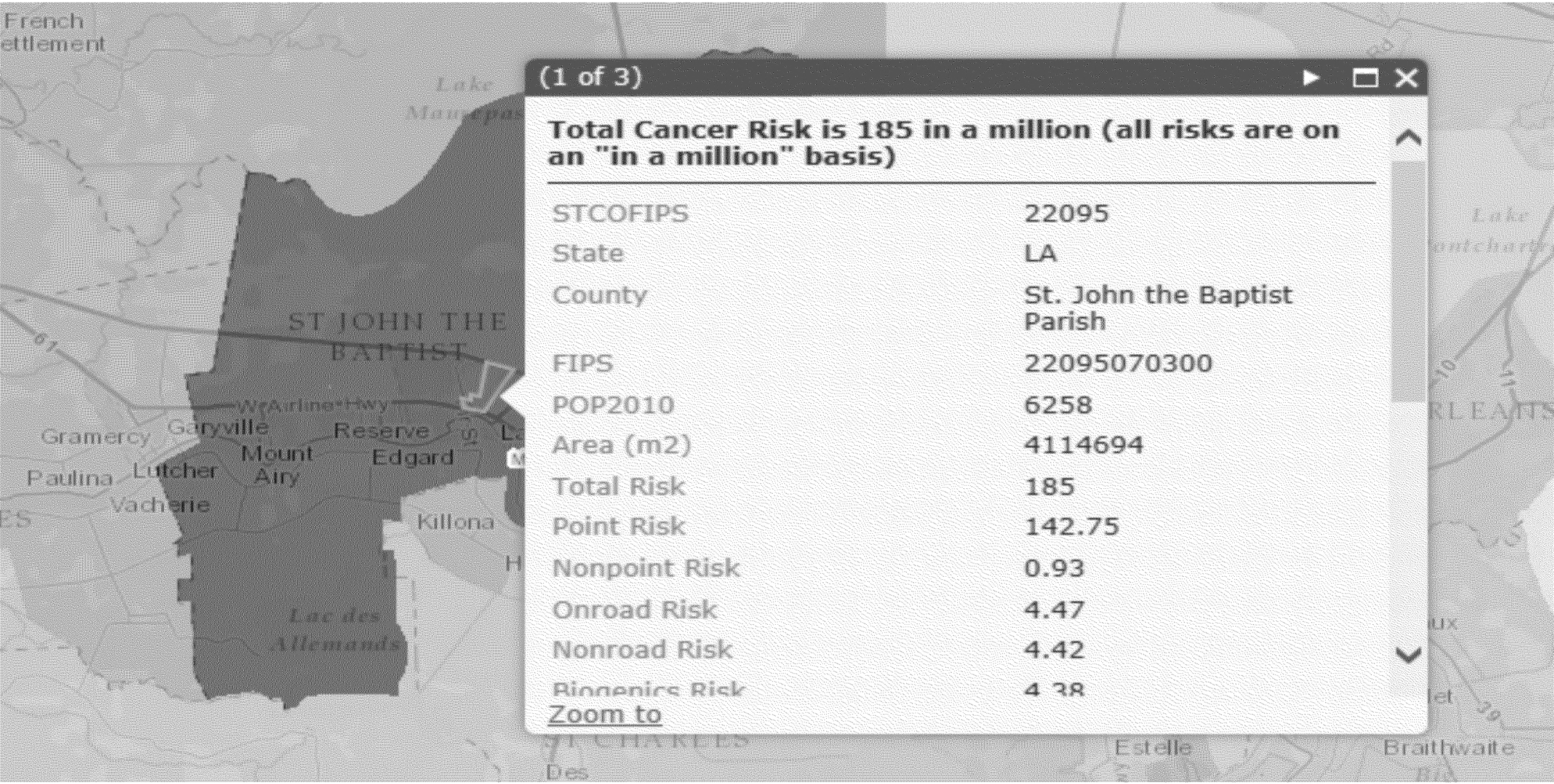
291 in a million *estimated* risk census tract & pop-up data



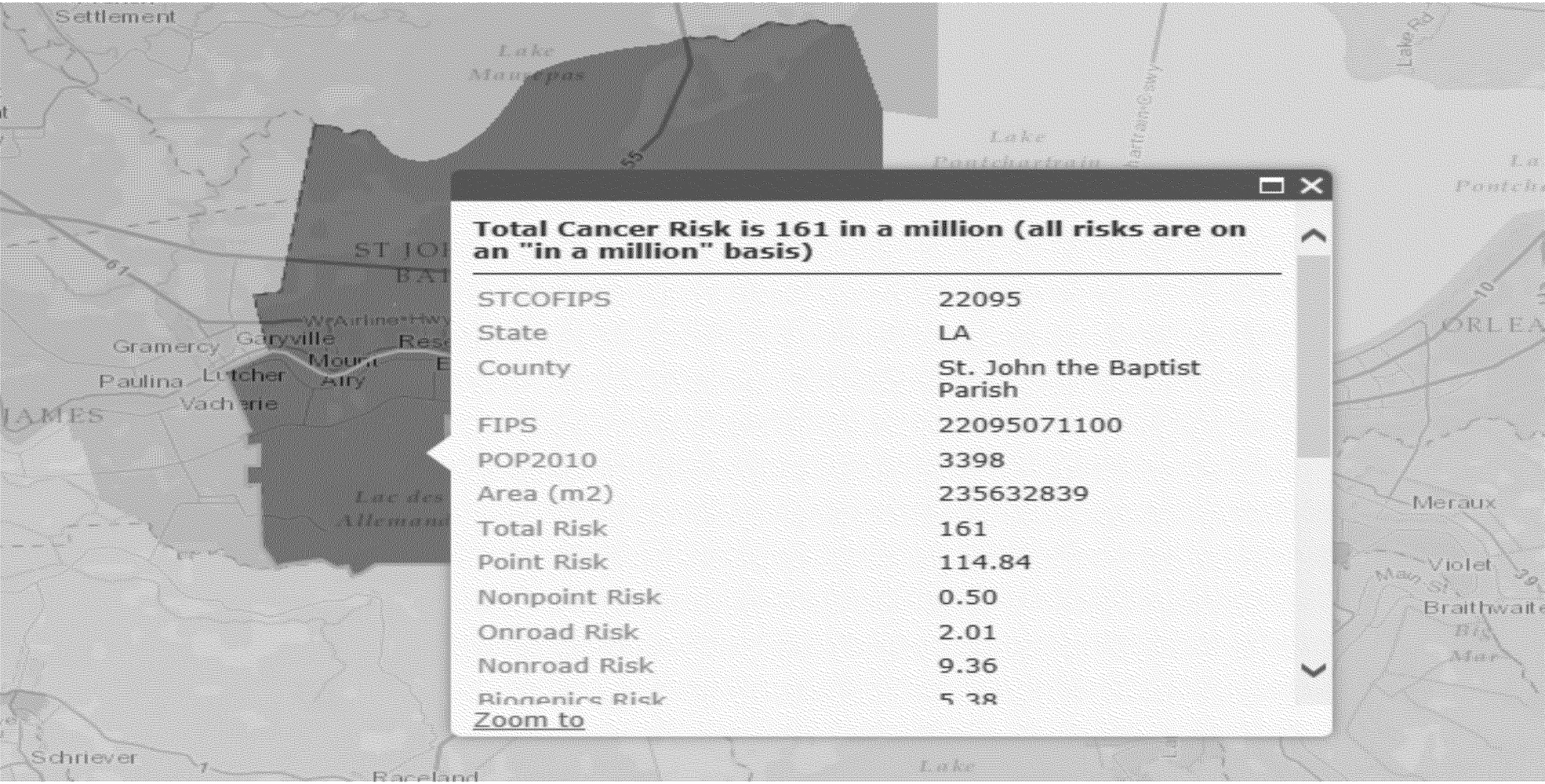
207 in a million *estimated* risk census tract & pop-up data



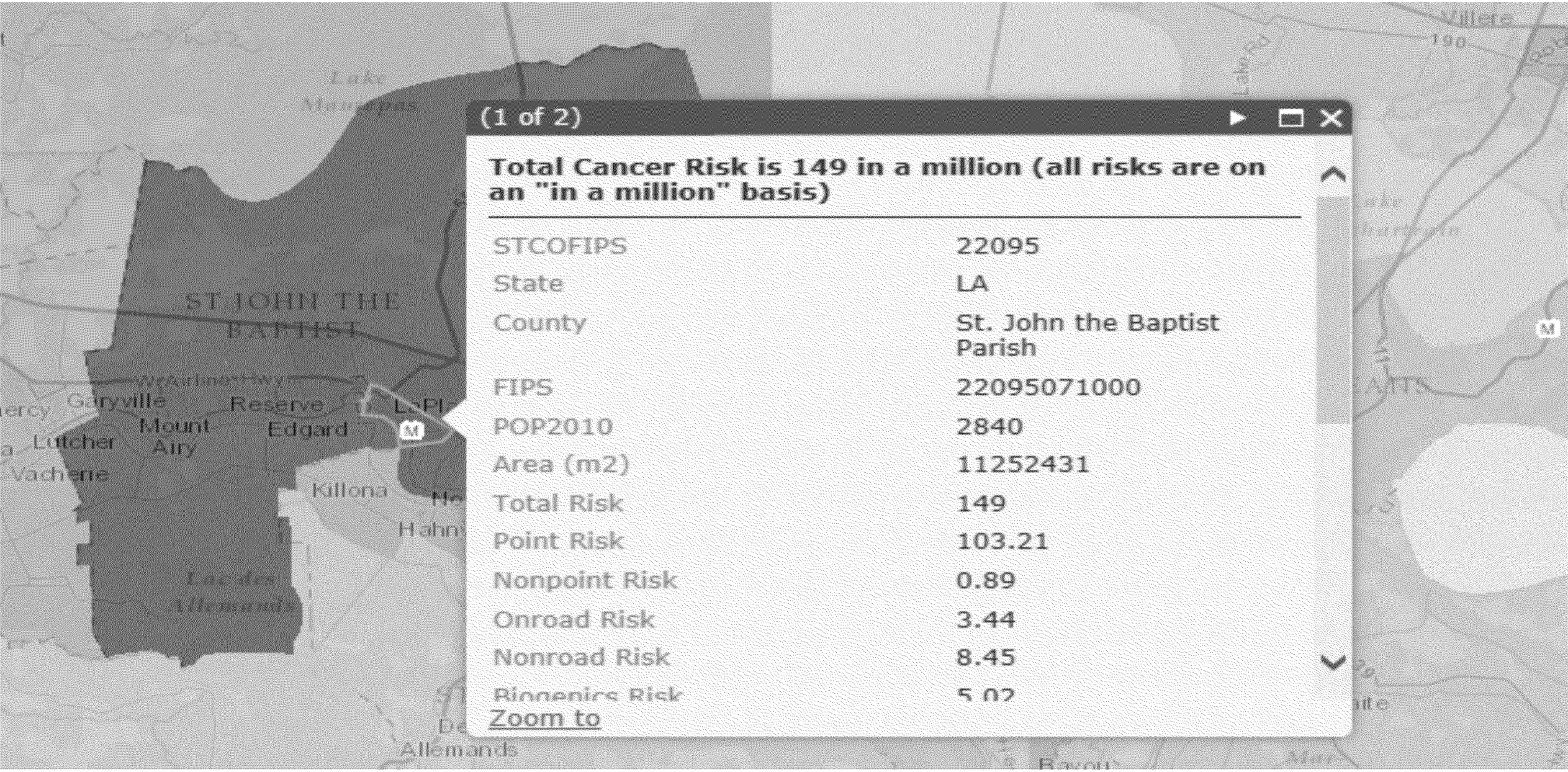
185 in a million *estimated* risk census tract & pop-up data



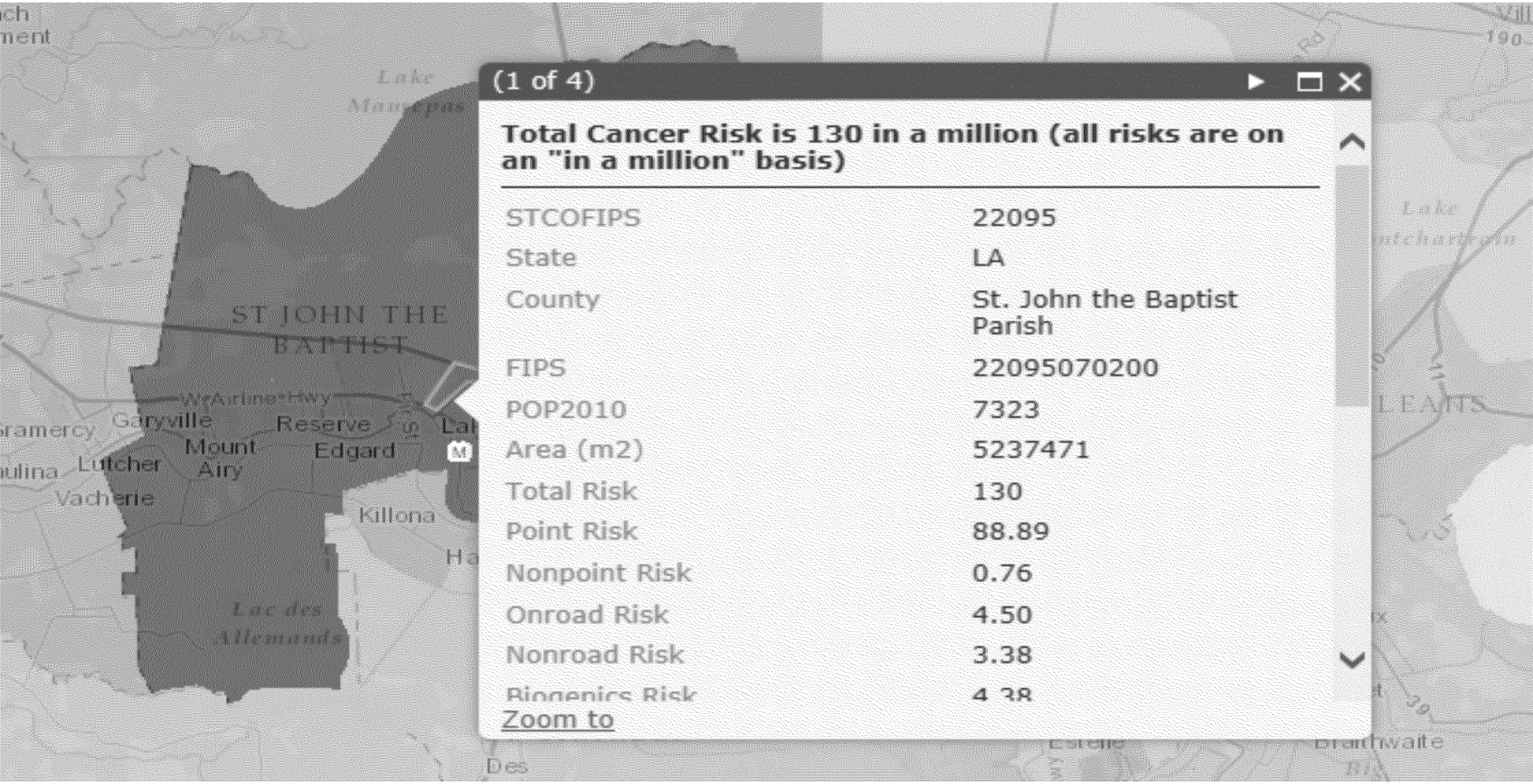
161 in a million *estimated* risk census tract & pop-up data



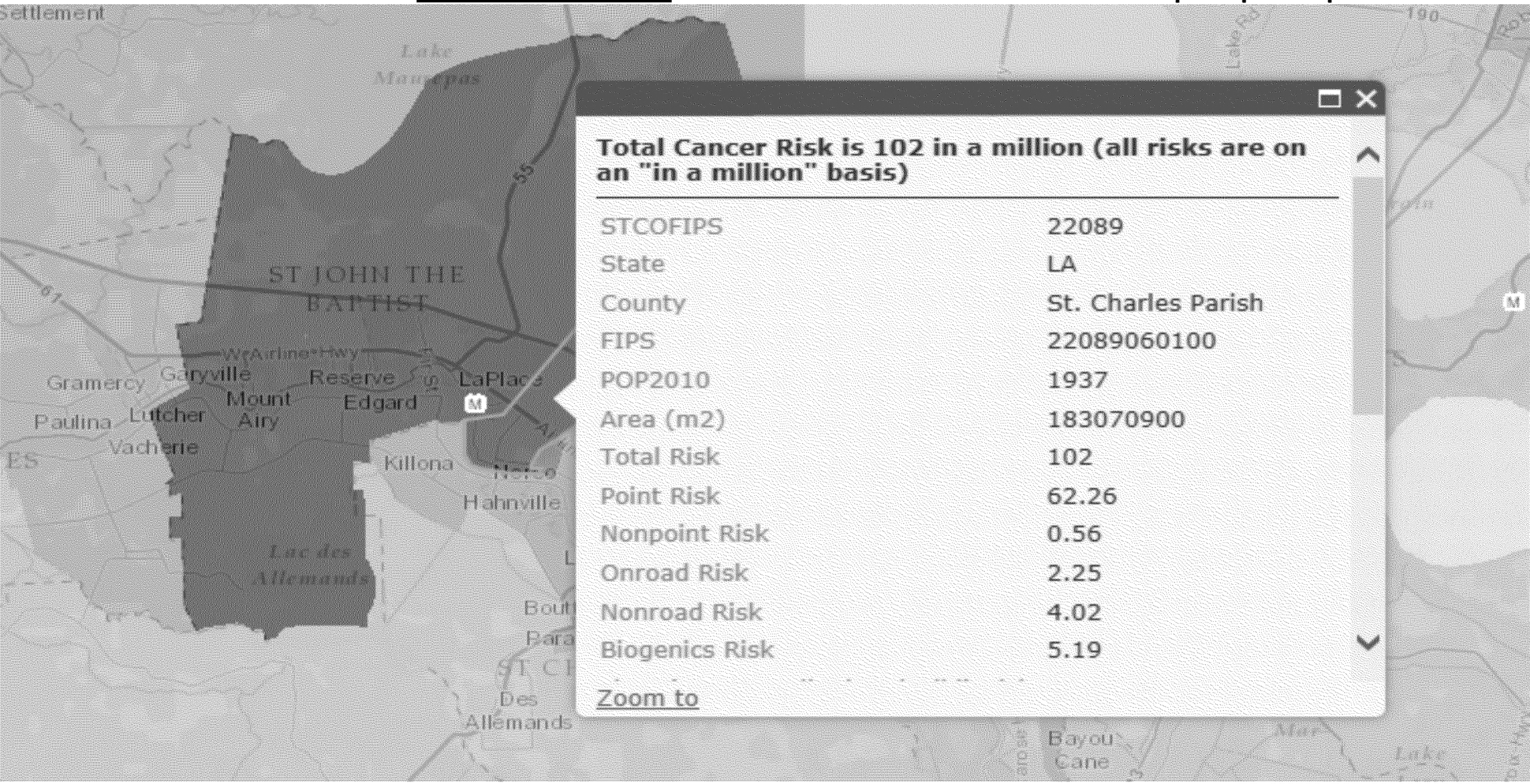
149 in a million *estimated* risk census tract & pop-up data



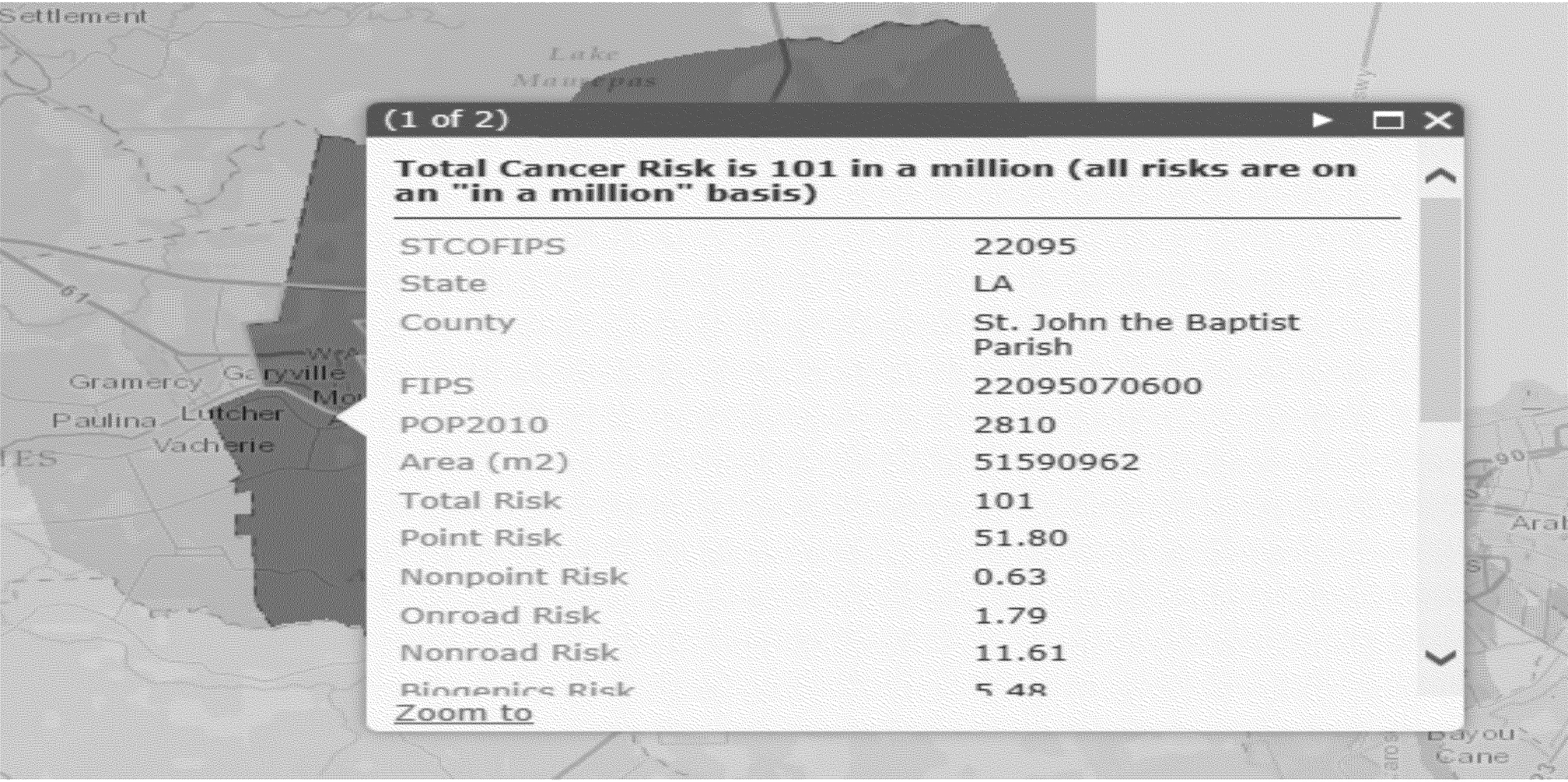
130 in a million *estimated* risk census tract & pop-up data



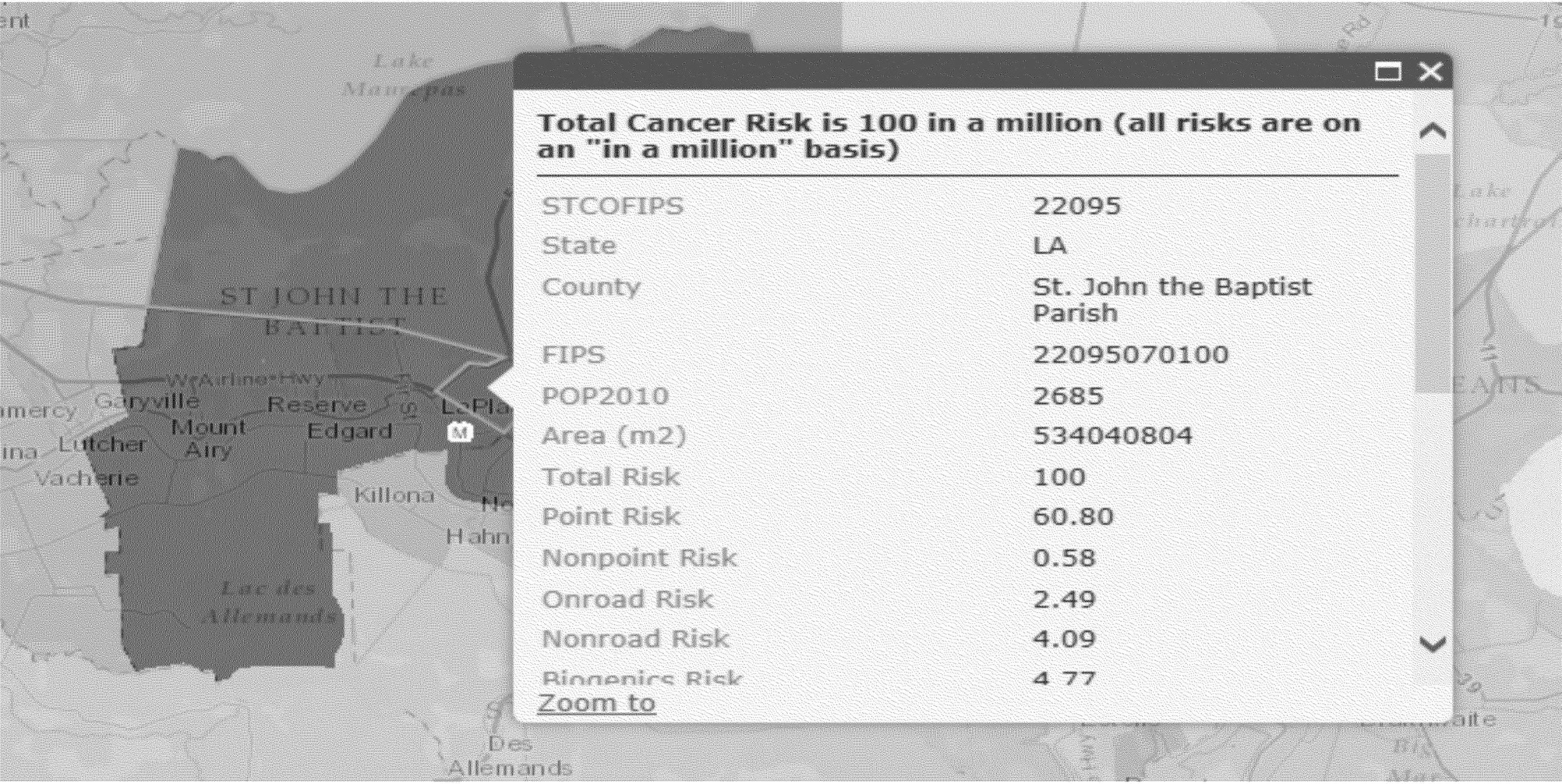
102 in a million *estimated* risk census tract & pop-up data



101 in a million *estimated* risk census tract & pop-up data



100 in a million *estimated* risk census tract & pop-up data



Top 25 NATA census tracts with estimated total risk > 100 in a million + 3 more in LA

1	State	EPA Region	County	FIPS	Tract	Population	Point (includes railyards) Cancer Risk (per million	Total Cancer Risk (per million)	CHLOROPREN
2	LA	EPA Region 6	St. John the Baptis	22095	22095070800	2,537	776.802	826.309	768.460
3	LA	EPA Region 6	St. John the Baptis	22095	22095070900	3,115	426.667	473.139	419.106
4	LA	EPA Region 6	St. John the Baptis	22095	22095070500	6,229	327.119	367.927	320.998
5	LA	EPA Region 6	St. John the Baptis	22095	22095070700	4,348	235.541	290.549	224.896
6	LA	EPA Region 6	St. John the Baptis	22095	00000000000	45,924	209.476	253.829	201.617
7	LA	EPA Region 6	St. John the Baptis	22095	22095070400	4,381	164.790	206.649	158.515
8	PA	EPA Region 3	Allegheny	42003	42003432400	2,584	162.421	200.616	0.000
9	LA	EPA Region 6	St. John the Baptis	22095	22095070300	6,258	142.753	184.736	135.887
10	WA	EPA Region 10	King	53033	53033008200	3,280	0.507	165.898	0.001
11	LA	EPA Region 6	St. John the Baptis	22095	22095071100	3,398	114.841	160.621	107.650
12	WA	EPA Region 10	King	53033	53033008300	2,505	0.462	160.169	0.001
13	PA	EPA Region 3	Allegheny	42003	42003434000	1,781	118.956	156.302	0.000
14	WA	EPA Region 10	King	53033	53033008002	3,013	0.433	154.592	0.001
15	PA	EPA Region 3	Allegheny	42003	42003432300	2,121	117.986	152.964	0.000
16	WA	EPA Region 10	King	53033	53033008400	3,760	0.457	151.270	0.001
17	LA	EPA Region 6	St. John the Baptis	22095	22095071000	2,840	103.207	148.656	92.120
18	PA	EPA Region 3	Philadelphia	42101	42101000402	3,142	2.179	148.007	0.000
19	WA	EPA Region 10	King	53033	53033008100	4,070	0.608	144.848	0.001
20	NY	EPA Region 2	New York	36061	36061026500	7,021	0.660	143.002	0.000
21	WA	EPA Region 10	King	53033	53033008500	4,341	0.632	138.669	0.001
22	CA	EPA Region 9	San Francisco	06075	06075012502	3,821	0.352	132.130	0.000
23	IL	EPA Region 5	Cook	17031	17031803606	8,287	0.948	130.025	0.000
24	LA	EPA Region 6	St. John the Baptis	22095	22095070200	7,323	88.893	129.680	82.074
25	WA	EPA Region 10	King	53033	53033007500	6,282	0.376	129.563	0.001
26	PA	EPA Region 3	Philadelphia	42101	42101000804	3,609	2.596	128.951	0.000
111	LA	EPA Region 6	St. Charles Parish	22089	22089060100	1,937	62.256	101.898	37.537
118	LA	EPA Region 6	St. John the Baptis	22095	22095070600	2,810	51.798	100.668	41.876
121	LA	EPA Region 6	St. John the Baptis	22095	22095070100	2,685	60.796	100.426	50.524

Note: census tract "00000000000" shows parish-wide total population and parish-wide *average* estimated risks

To: Gilrein, Stephen[gilrein.stephen@epa.gov]
From: Yurk, Jeffrey
Sent: Tue 11/24/2015 6:26:19 PM
Subject: DuPont facility in Laplace, LA

Steve: I wanted to make you aware that, there is a potential imminent and substantial endangerment to the communities surrounding the DuPont facility in Laplace, LA from releases of the hazardous air pollutant chloroprene. Ex. 5 - Deliberative

Ex. 5 - Deliberative A cancer slope factor for chloroprene was finalized and released by EPA in March of 2011, prior to that chloroprene was not listed as a carcinogen. RTP just completed risk modeling utilizing the 2011 National Emissions Inventory. The NATA is scheduled to be released on December 15th. The primary uncertainties around the risk assessment are the source-specific emissions reported by the facility calculated utilizing engineering calculations. The DuPont facility does appear to be operating below their permit limit. They are permitted to release 191 tons and are releasing about 125 tons. No other sources of chloroprene within the Region report emitting even one ton.

Jeff

Ex. 5 - Deliberative Process

To: Diem, Art[Diem.Art@epa.gov]
From: Shine, Brenda
Sent: Fri 10/30/2015 8:26:55 PM
Subject: RE: categorized emissions from dupont's neoprene plant

Ex. 5 - Deliberative Process

From: Diem, Art
Sent: Friday, October 30, 2015 3:01 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: categorized emissions from dupont's neoprene plant

Ex. 5 - Deliberative Process

- -

Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division, Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185

To: Diem, Art[Diem.Art@epa.gov]
From: Lesley Stobert
Sent: Thur 10/1/2015 1:13:30 PM
Subject: FW: Denka in Omi, Japan

Hi Art,

This link from Denka also has their emissions of PRTR substances, which is like our HAP list. http://www.denka.co.jp/eng/csr/environment/program/ The PRTR substances list does not include chloroprene, so they wouldn't list chloroprene or get credit for reducing it. http://www.env.go.jp/en/chemi/prtr/substances/list.html **Ex. 5 - Deliberative Process**

Ex. 5 - Deliberative Process

Lesley Stobert

EC/R Incorporated

(919) 433-8339

stobert.lesley@ecrweb.com

From: Lesley Stobert [mailto:stobert.lesley@ecrweb.com]
Sent: Thursday, October 01, 2015 9:07 AM
To: 'Diem, Art' <Diem.Art@epa.gov>
Subject: Denka in Omi, Japan

Ex. 5 - Deliberative Process

Lesley Stobert

EC/R Incorporated

(919) 433-8339

stobert.lesley@ecrweb.com

To: Wren Stenger[Stenger.Wren@epa.gov]
From: Hansen, Mark
Sent: Fri 12/4/2015 2:46:59 PM
Subject: FW: DuPont Chloroprene

Sorry, missed this one on the 114 letter. This type of 114 would usually go out straight from OAQPS without Regional involvement. We are happy to help them if needed and have let Kelly Rimer know so.

From: Verhalen, Frances
Sent: Friday, December 04, 2015 7:25 AM
To: Stenger, Wren; Hansen, Mark; Casso, Ruben; Young, Carl
Subject: RE: DuPont Chloroprene

Wren, Here's what we have on the 114.

Ex. 5 - Deliberative Process

Frances Verhalen, P.E., Chief

Air Monitoring and Grants Section

US Environmental Protection Agency

1445 Ross Avenue (MC 6MM-AM)

Dallas, TX 75202

214-665-2172

verhalen.frances@epa.gov

From: Stenger, Wren

Sent: Thursday, December 03, 2015 5:57 PM
To: Hansen, Mark; Verhalen, Frances; Casso, Ruben; Young, Carl
Subject: DuPont Chloroprene

On the 114 letter for OAQPS, we need a schedule from them to send a 114 to DuPont. Would we draft it for them? What is the plan?

Wren Stenger

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

To: Koerber, Mike[Koerber.Mike@epa.gov]
Cc: Smith, Darcie[Smith.Darcie@epa.gov]; Keating, Martha[keating.martha@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]
From: Sasser, Erika
Sent: Mon 11/30/2015 10:04:48 PM
Subject: Chloroprene Materials

Here are some background materials on the NATA results for the LaPlace LA facility. It is important to note that the Q&A document is very preliminary and for internal use only (to answer questions after NATA rollout). Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Thanks,

Erika