Message

From: Diem, Art [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=968850B28AF04C6A828006016A28CF22-ADIEM]
Sent: 12/11/2015 7:14:23 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]
Subject: RE: Draft 114 for Denka/Dupont
Attachments: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 10 2015 AD.docx

Hi Penny,

Ex. 5 Deliberative Process (DP)

Thanks,
Art

From: Lassiter, Penny
Sent: Friday, December 11, 2015 1:56 PM
To: Diem, Art
Subject: FW: Draft 114 for Denka/Dupont

More we need to look at.

From: Stenger, Wren
Sent: Friday, December 11, 2015 1:55 PM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Rimer, Kelly <Rimer.Kelly@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Blevins, John <Blevins.John@epa.gov>; Gray, David <gray.david@epa.gov>; Stenger, Wren <stenger.wren@epa.gov>; Hansen, Mark <Hansen.Mark@epa.gov>
Subject: RE: Draft 114 for Denka/Dupont

All, I know there are conversations swilling and information being passed. Please keep in mind in addition to the Dec 8 call with Dupont/Denka there are many things in motion and any of the following could and probably will change. FYI

Attached is the R6 draft Action Plan for La Place, Louisiana, DuPont/Chloroprene. This document is intended to be shared and inform the community

David Gray has calls in to the Parish President and to the Governor Elect's Transition Team.

On Dec 10, David Gray discussed the upcoming NATA release and La Place/Dupont/chloroprene issue with Mary Lee Orr and Wilma Subra, Lean

On Dec 14, R6 will hold a webinar with LDEQ and LDHH, briefing them on the NATA and chloroprene
On Dec 15, R6 will brief Enviros to include Green Army (General Honore), Lean (Mary Lee Orr, Wilma Subra)
On Dec 16, David Gray will notify La Bucket Brigade (Anne Rolfes) of the planned Dec 17 NATA release
During the week of January 4, R6 in coordination with OAQPS and Lean will host a community meeting in La Place, La.

WREN STENGER
Director
Multimedia Planning and Permitting Division
EPA Region 6 Dallas, Texas
214.665.6583

From: Lassiter, Penny
Sent: Friday, December 11, 2015 8:57 AM
To: Blevins, John; Stenger, Wren
Cc: Rimer, Kelly; Bremer, Kristen
Subject: RE: Draft 114 for Denka/Dupont

John,

Thanks. I got it. We will look at it today and try to get you any comments back no later than Monday.

John & Wren - Regarding a meeting with Denka/DuPont reps this coming Tuesday, December 8, I have heard back from the company that they would be available to meet with us any time after 10:00 am Central Time. Please let me know your availability.

From: Blevins, John
Sent: Friday, December 11, 2015 9:49 AM
To: Stenger, Wren <stenger.wren@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Shinkman, Susan <Shinkman.Susan@epa.gov>
Cc: Seager, Cheryl <Seager.Cheryl@epa.gov>; Harrison, Ben <Harrison.Ben@epa.gov>; Coleman, Sam <Coleman.Sam@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>
Subject: FW: Draft 114 for Denka/Dupont
Importance: High

Attached is the draft 114 letter...we are still fine tuning....please send you comments to Steve Thompson...we will work to have this ready for signature on the 17th...2 letters will go out- 1 to Dupont and 1 to Denka...again our goal is to gather existing data...I will look at cover letter today in detail...thanks for your help on this...

John

From: Thompson, Steve
Sent: Friday, December 11, 2015 8:40 AM
To: Blevins, John
Subject: Draft 114 for Denka/Dupont

Please send me any comments and we will work quickly to consolidate. I have attached the full 114 and also inserted the questions into the email below.

Questions:

Denka Performance Elastomers LLC shall submit the following information about its elastomers facility located in Laplace, Louisiana, within 30 days:

The Facility contains emission units that emit or have the potential to emit pollutants that are subject to requirements of the Clean Air Act (CAA). Accordingly, Denka must provide the following information for the Facility:

1. A scaled site plot plan drawing of the Facility and the area immediately surrounding the Facility. The plot plan should include the Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2 and containing the following:
    a. Property lines on all sides, true north arrow orientation, and showing immediately adjacent streets or property names;
    b. Buildings, structures, significant features and equipment areas on the plant property, with labels or a legend identifying each building, structure, feature or area; and
    c. Labels or a legend identifying the locations and names of all air emission sources that emit **chloroprene** at the Facility, consistent with permit ID No. designations and names found in the Facility's above-referenced Title V air permits.

2. Provide up-to-date detailed process flow diagrams for all production processes and affected auxiliary support operations at the Facility (e.g., wastewater treatment, loading/unloading etc.), where chloroprene is an emitted pollutant. On the diagrams, using a key for clarity purposes, identify each of the units identified in response to question #1. The diagram must include all emissions units, continuous emissions monitoring systems ("CEMS"), continuous opacity monitoring systems ("COMS"), and all Air Pollution Control Equipment ("APCE"), labeled in a manner consistent with the Facility's LDEQ Air Permits.

3. Provide complete copies of air dispersion modeling studies or reports completed during calendar years 2011 through 2015, for air permitting or other emissions authorization, risk management plans, disaster prevention and release response planning, or episodic release reporting. Include as electronic attachments any emission source modeling spreadsheets developed and employed, plus input and output files in their native format from the modeling software or program used. In addition, please include the meteorological site location and the meteorological data utilized for the air dispersion modeling.

4. Provide all emission calculations of chloroprene that were prepared for LDEQ air permit applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.

5. For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2 % of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are the so similar (e.g., is the previous years reported emissions used to estimate the future emission, does the methodology used to estimate emissions leave no room for inaccuracy, etc.).

6. Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.

7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent TRE index value for any applicable MACT standard. Include any data, assumptions and procedures used for the engineering assessments.

8. Provide the most recent performance testing records required by the above referenced Title V air permits (Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2).

9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards.

Steve Thompson
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