UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

Office of the Regional Administrator

December 19, 2019

St. John the Baptist Parish President
Natalie H. Robottom
1811 W. Airline Highway
LaPlace, LA 70068

Dear Parish President Robottom,

Last February, I visited with community members in LaPlace to talk about EPA's air monitoring program around the Denka facility and our plans to continue the program to December 2019. I write to update you on our plans to change the air monitoring program in 2020.

Since May 2016, EPA has collected, at regular intervals, 24-hour air canister samples at six monitoring locations near the Denka facility. After data validation, EPA posts monitoring data to our public website. Denka has also conducted its own air monitoring at six monitoring locations and continues this monitoring beyond the six months required by the Administrative Order on Consent (AOC) issued by the Louisiana Department of Environmental Quality (LDEQ) on January 6, 2017. Denka submitted a report to LDEQ on July 1, 2019, stating that Denka had met or exceeded all of the AOC's specifications for the installation and operation of the emission reduction projects associated with the AOC, and that Denka believes it has achieved an emissions reduction of 86%. Both EPA's and Denka's data has shown overall lower chloroprene concentrations in the ambient air near the monitors since Denka installed the regenerative thermal oxidizer in late 2017 and it became fully operational in March 2018. But we also continue to see spikes in chloroprene concentrations at different times.

In the coming year, we intend to implement a new air monitoring program to better understand the frequency and magnitude of chloroprene spikes. We believe that this air monitoring effort may help us identify actions that Denka may be able to take to reduce the occurrence of spikes and thereby further reduce ambient concentrations of chloroprene in the community. For the new program, our existing air monitoring stations will be replaced with new monitors, referred to as SPods, which will be placed at each of EPA's six existing community monitoring sites. Each SPod will contain a meteorological station to continuously measure wind speeds and directions and a photoionization detector (PID) to continuously measure total volatile organic compound (VOC) concentrations in the air. The SPods will include a sampling system that is automatically triggered to collect a 24-hour canister sample whenever the PID registers a spike in VOC. The sample will be sent to the laboratory for chloroprene analysis.

EPA will continue to post chloroprene data on our website, but the data from the new monitoring program will be different from the data posted for the past few years. To date, the EPA data has represented air samples collected at regular three or six-day intervals. Under the new program, the frequency of the sampling will depend on the occurrence of VOC spikes at the SPod

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monitors and the sampling will only occur when there is a likely spike in chloroprene. Data from the new monitoring program should show the highest concentrations of chloroprene in the community and less likely to show low or undetectable levels of chloroprene.

EPA will continue to operate the existing air monitoring program until the new program is fully operational. We expect SPods to be operational by April 2020 and the program is expected to operate for about 6 months. We will keep you updated on our schedule. We also understand that Denka will continue its own monitoring program. Under this program, whenever a spike has been detected, Denka has been doing a "root cause assessment" to determine the cause of such events to help them further reduce chloroprene emissions at its facility.

I appreciate your continued support in our efforts to reduce chloroprene emissions in the community. EPA remains committed to this effort. Please feel free to contact me if I can be of assistance.

Sincerely,

David Gray
Deputy Regional Administrator

cc: Dr. Brown, LDEQ