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Communication Plan for Air Monitoring System in LaPlace, LA

Objective:

Inform and educate community members, government officials and other stakeholders of the status of Community Air Monitoring Program and SPods monitoring in LaPlace, Louisiana, near the Denka Performance Elastomer, LLC (Denka) facility.

Issue Description:

EPA released its National Air Toxics Assessment in 2015, which showed that the five census tracts around the Denka facility in LaPlace, Louisiana had the highest estimated potential cancer risk in the country. The Denka facility emits chloroprene, which EPA identified as a likely human carcinogen in 2010. Air monitoring data shows the annual average ambient air concentrations of chloroprene near the Denka facility (after Denka's implementation of chloroprene emission control measures) would be lower but for occasional elevated concentrations that contribute to the average. EPA implemented a new monitoring program around the facility that, together with additional investigation, could help identify the root causes of elevated chloroprene emissions at the facility as well as potential opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.

Target Audience:

- Community members in LaPlace, Louisiana
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- Denka company officials
  - Communication through Robert Holden, Denka outside counsel
- Federal, state and local officials
  - Dr. Chuck Carr Brown, LDEQ Secretary
  - Congressman Cedric Richmond (LA-2)
  - St, John the Baptist Parish President Jaclyn Hotard
- Public interest groups
  - LEAN (Wilma Subra)
  - Concerned Citizens of St. John (Robert Taylor)
  - Green Army (General Honore)

Messengers:

- Region 6 ORAC Director Arturo Blanco (Primary EPA messenger to the community)
- OECA Air Enforcement Division staff
  - Providence Spina – messenger to Denka
  - Dan Hoyt – messenger on technical issues
- Region 6 Air Enforcement staff
  - Justin Lannen – messenger to Denka
  - James Leathers – messenger on technical issues
- OAR/OAQPS/Region 6 – messenger on ambient air monitoring

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Key Messages

- EPA is continuing its investigation of chloroprene levels in LaPlace, Louisiana, by using the SPod Air Monitoring Program.
- The Community Air Monitoring Program, which has been in place around the Denka facility since 2016, shows consistent decline of ambient air concentrations since Denka installed emissions control units in 2018.
- The SPod Air Monitoring Program, together with additional investigation, could help identify the root causes of elevated chloroprene emissions (spikes) at the facility as well as potential opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.
- The SPod Program began the initial phase in March 2020 with four monitors, and the operational phase is scheduled to begin in September 2020. The SPod monitors are relatively close to the existing community air monitoring sites.
- Denka began an extended Spring Turn-Around (TAR) shortly after Covid 19 began impacting the country. During that TAR, the facility shut down operations, potentially affecting the SPod monitoring system's ability to gather meaningful data during that time.
- By mid-September, EPA expects to have SPod data from the Operational Phase that can be compared to results from the Community Monitoring program. EPA will use this data to determine SPod Monitoring program effectiveness.
- EPA will post SPods monitoring data for chloroprene to the Region 6 Denka website beginning in September 2020.
- EPA plans to complete SPod monitoring no later than December 31, 2020.

Social Media and New Media Activities

- EPA Region 6 has a dedicated [HYPERLINK "https://www.epa.gov/la/laplace-st-john-baptist-parish-louisiana"] where EPA has posted Community Air Monitoring Program information and results since 2016. This communications plan endorses the continued use of this site as communities and other stakeholders are familiar with it and already use it. The website has been revised to incorporate information about the SPod Air Monitoring Program, but the website requires further updating and revision.
    - Internal Notes for SPod samples
        - There will be a several week lag for analysis and quality control procedures between collecting the sample and posting it on the website.
        - We will post the ambient air concentrations of chloroprene analyzed in the canister samples.
        - We will not post VOC monitoring results from the PIDs or ambient air concentrations of any non-chloroprene compounds analyzed in the canister samples, but all monitoring and sampling data that we collect would have to be released in response to a FOIA request.
        - Because the SPod-triggered canister sampling and analytical protocols are largely the same as the Community Air Monitoring Program protocols (e.g., 24-hour sample period), the presentation of the SPod-triggered canister sample results will look very similar to how the community results currently appear.

- Region 6 may make use of social media posts as an additional means to share public information on EPA monitoring activities.

Proposed Outreach Activities

- Communicate with Green Army (General Honore) and LEAN (Marylee Orr and Wilma Subra)
  - Ensure communication is being shared with affected communities such as St. John the Baptist Concerned Citizens
  - Inform St. John the Baptist Parish Commissioners, School Board, LDEQ of EPA communications with EJ stakeholders for transparency
- Periodically communicate updates
  - Communicate purpose (for exa monitoring/data developments
  - Provide standard materials in the message- for example, data reports
  - Propose initial, mid-range and final virtual meetings (identify who would be attendees) - periodic emails in-between/complements by phone matching time of significant ongoing (air monitoring/data) developments, and providing next steps
  - Maintain desk statement/talking points updated ongoing throughout communication campaign plan
  - Develop/maintain FAQs
  - Identify standardized EPA regional contact, keeping communication channels open and consistent for questions/responses throughout
  - Provide website access to relevant and available information

Ex. 5 AC/DP

Completed Outreach Activities:

- Notification to Denka company of EPA's new monitoring plan - COMPLETED
- Notification to LDEQ of EPA new monitoring plan - COMPLETED
- Letter to LaPlace community (to former Parish President Robottom and current Parish President Hotard) informing them of EPA's new monitoring plan – COMPLETED
  - EPA briefing of Parish President Hotard in – February 11, 2020
- Letter response to Congressman Richmond regarding the new program – January 15, 2020 – COMPLETED
- Letter response to community attorney Hugh Lambert regarding the new program – January 27, 2020 - COMPLETED
- EPA participation in Concerned Citizens of St. John community group's regularly scheduled meeting in LaPlace – February 11, 2020 - COMPLETED

Internal Notifications

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- OAQPS
- OECA
- OCIR
- ORD

Supporting Documents

- FAQs to be posted on Region 6 website
- Additional, internal FAQs to be used to respond to press and community inquiries
- Text explaining the new monitoring plan for the Region 6 website - COMPLETED
- EPA letter informing LaPlace community of EPA new monitoring plan – COMPLETED
- EPA letters responding to Congressman Richmond – COMPLETED
- EPA letter responding to community's counsel Hugh Lambert - COMPLETED

Ex. 5 AC/DP/AWP / Ex. 7(A)

Ex. 5 AC/DP/AWP / Ex. 7(A)

- Public interest groups include: LEAN, Concerned Citizens of St. John, and Green Army

Timeline for Outreach Activities and Supporting Communications Actions

Date	Action	Lead/Owner	Status
12/6/19	EPA verbal notification to LDEQ	DRA David Gray	Completed
12/9/19	Develop EPA talking points for verbal notification to Denka	OECA/AED (Providence Spina) and R6 (Justin Lannen)	Completed

12/12/19	EPA verbal notification to Denka	OECA/AED (Providence Spina) and R6 (Justin Lannen)	Completed
12/16/19	Develop EPA notification letter to LaPlace community	OECA/AED and R6	Completed
12/19/19	Send EPA notification letter to LaPlace community	R6 (David Gray)	Completed
1/15/20	Send response letter to Cong. Richmond	R6 (Ken McQueen)	Completed
1/27/20	Send response letter to Hugh Lambert	R6 (Ken McQueen)	Completed
2/11/20	EPA presents new monitoring plan at LaPlace community group meeting (regular meeting of Concerned Citizens of St. John)	DRA David Gray	Completed
Week of March 9, 2020	SPod deployment	OECA/AED and R6	Completed
3/12/2020	SPod demonstration to community stakeholders	OECA/AED and R6	Completed
April 2020	Develop additional, internal Q+A for press and community inquiries	OECA/AED	In progress
April 2020	Develop FAQs for EPA website	OECA/AED	In progress
TBD	Larger Community meeting in New Orleans	OECA/AED and R6	Pending

Post-SPod Deployment Communication Considerations

- **Communication with LDEQ**
    - Per LDEQ's suggestion, EPA will host monthly meetings/conference calls to share summary information (using an online platform if necessary) and discuss occurrence of sampling triggers and resulting canister data.
    - EPA will not provide LDEQ with hard copies of the data unless specifically requested by LDEQ.
- **Communication with Denka (additional elements to be determined)**
    - If Denka requests, OECA presents EPA monitoring plan via conference call
    - Offer to share collected data with Denka

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Talking Points for Deployment of Continuous Air Monitors in LaPlace, LA

(To be converted into FAQs)

Overall Themes

- EPA is continuing its investigation of chloroprene levels in LaPlace, Louisiana, by starting a new air monitoring program, the SPod Air Monitoring Program.
- Air monitoring data from the Community Air Monitoring Program, implemented in LaPlace since 2016, shows the annual average ambient air concentrations of chloroprene near the Denka facility in 2019 (after Denka's implementation of chloroprene emission control measures) was 0.5-2.3 $\mu g/m^3$, depending upon the location of the monitor. This annual average would be lower but for occasional elevated concentrations that contribute to the average.
- The SPod Air Monitoring Program, together with additional investigation, may identify the root causes of elevated emissions at the facility and assist in identifying potential opportunities to further reduce short- and long-term ambient air concentrations of chloroprene. To keep the public informed, ambient air concentrations of chloroprene from air samples collected through the SPod Air Monitoring Program will be posted on EPA's website.

Chloroprene

- **How is Chloroprene regulated?**
    - Chloroprene is one of 187 pollutants that Congress classified as "hazardous air pollutants," also called air toxics. The Clean Air Act instructs EPA to regulate air toxics by setting limits on the amount of pollution that industrial sources can emit to the air, rather than by setting ambient standards, which are limits on the amount of a pollutant that is allowed in the outdoor air.
- **What is the status of Denka request for reconsideration on the 2010 Integrated Risk Information Systems (IRIS) Toxicological Review of Chloroprene?**
    - Denka and its contractor have been working to develop a new physiologically based pharmacokinetic (PBPK) model for potential use in improving estimates of how chloroprene is absorbed, distributed, metabolized, and excreted by the human body. EPA's Office of Research and Development has been providing guidance regarding procedures for validating new PBPK models. EPA is reviewing the DPE contractor's model documentation and upon completion EPA will arrange for an independent expert peer review. The peer review is anticipated to be completed by early summer, 2020. In accordance with EPA's Information Quality Guidelines, EPA will then review and assess the results of these reviews and convene an IQG Executive Panel to reconsider EPA's response to DPE's original request for correction. Under EPA's IQG, the Executive Review Panel will make a final decision on the request for reconsideration.

Overview of the Monitoring Program

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- **Why is EPA changing the monitoring program? How is this different from the Community Air Monitoring Program that has been conducted to date?**
    - The purpose of Community Air Monitoring Program conducted since 2016 has been to determine the long-term ambient air concentrations of chloroprene in LaPlace, Louisiana. In addition, the monitoring has served to verify the downward trends in ambient chloroprene concentrations during and after the facility installed emissions controls (e.g., Monomer Vent Project and RTO)
    - The Community Air Monitoring Program data over the past year, and also data from Denka's own monitoring network, has shown a steady decline in the average ambient air concentrations of chloroprene, and also a reduction in the frequency of air samples containing "elevated concentrations" of chloroprene. "Elevated concentrations" are concentrations that may, according to EPA's analysis of their magnitude and frequency, cause the long-term ambient air concentration of chloroprene to be over 0.2 $\mu g/m_3$.
    - The purpose of the SPod Air Monitoring Program is to improve our ability to identify activities linked to elevated chloroprene concentrations, investigate the root causes of the activities linked to those elevated concentrations, and identify opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.
- **What monitors is EPA using and how does the monitoring work?**
    - During the week of March 9, 2020, EPA installed six monitoring instruments, called SPods near four existing community monitoring locations. In July 2020, two collocated SPods where relocated near to the other two community monitoring locations, placing an SPod near each of the existing community monitoring locations. An SPod is a monitoring instrument that contains a meteorological station to continuously measure wind speeds and directions, and a photoionization detector (PID) to continuously measure total ambient air concentrations of volatile organic compounds (VOC). Chloroprene is a VOC. The SPods will also have sampling canisters to collect air samples whenever the PID detects a total concentration of VOCs above a specified "trigger" level.
    - PIDs have been widely used for many years across numerous industries to measure VOC concentrations. EPA's SPods will use PIDs that have the capability of detecting chloroprene (along with other VOCs).
    - PIDs can show how much *total* VOCs are in the air, but they cannot determine how much of that total amount is chloroprene. So, when the PID measures a predetermined concentration of total VOCs in the air ("the trigger level"), EPA will take a 24-hour air sample with a canister.
    - The air sample will then be analyzed for chloroprene at a laboratory using the same EPA-approved standard method that is currently being used for the Community Air Monitoring Program. This is the same sample collection process and laboratory analytical procedures EPA has used since the inception of the EPA Community Air Monitoring Program.
- **What happens if a canister sample shows an elevated chloroprene concentration?**
    - If a canister sample shows an elevated concentration of chloroprene, EPA will coordinate with Denka to investigate possible causes of the elevated chloroprene results. The elevated concentration could be the result of numerous factors, including

both meteorological factors (e.g., wind speed and direction), and activities at Denka's facility. The investigation may lead to the identification of opportunities for chloroprene emission reductions at the facility.

- **Will all canister samples with chloroprene concentrations above 0.2 μg/m^3 lead to an EPA investigation?**
    - No. 0.2 μg/m^3 is the cancer risk-based comparison level for chloroprene developed through an EPA Integrated Risk Information System (IRIS) assessment. This means that a population with an average lifetime (70 years) inhalation exposure to 0.2 μg/m^3 of chloroprene has an expected 100-in-1 million risk of developing cancer.
    - 0.2 μg/m^3 is not, however, a federally enforceable emissions limit for chloroprene. EPA recognizes the public health concern associated with the long-term exposure to chloroprene above that level. Accordingly, EPA is looking for opportunities to reduce the long-term ambient air concentrations near the Denka facility.
    - Denka has already taken steps under an agreement with LDEQ to control many known sources of high chloroprene emissions. We believe the next step is to identify elevated ambient air concentrations of chloroprene so that the root causes of those concentrations can be investigated. Investigating the root causes of an elevated concentration may lead to identification of potential opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.
    - Therefore, EPA investigations will focus on chloroprene concentrations that may, according to EPA's analysis of their magnitude and frequency, cause the long term ambient air concentration of chloroprene to be over 0.2 μg/m$_3$.
- **At what concentration of VOCs does EPA take a canister sample?**
    - Upon initial deployment of the SPods, EPA established a VOC "trigger level" above which the monitor's canisters will collect an air sample. EPA set a low initial trigger level based on the community monitoring data, which resulted in samples being collected even when chloroprene concentrations are not detected or are not elevated. EPA is gradually adjusting the trigger level to avoid sampling when chloroprene concentrations are not detectable. By starting low, and gradually raising the trigger level, EPA can be confident that it is not setting the trigger at a level that would miss a sample during a spike event. Additionally, EPA may periodically collect 24-hour air canister samples to continue to characterize routine chloroprene levels, and to evaluate whether the trigger level may be set too high.
    - Setting an appropriate VOC concentration "trigger level" is not a simple task because it will be based on an average over minutes, but EPA will be evaluating elevated chloroprene concentrations based on a 24-hour average. Starting with a low threshold for taking air samples will allow EPA to collect data and adjust the threshold level to account for this discrepancy.
- **Isn't the 24-hour sample too long? How does that capture high spikes of chloroprene that only occur for a short period of time?**
    - A 24-hour sample has the dual benefits of providing a data set that is directly comparable to the Community Air Monitoring Program data, and identifies sustained elevated concentrations that merit additional investigation.

  - A 24-hour sample will be taken whenever the PID measures VOC concentrations above the trigger level for a short period of time. Therefore, the SPod will take a sample even if the chloroprene emissions are high for less than 24 hours.
- **The Community Air Monitoring Program frequently shows ambient air concentrations of chloroprene above 0.2 µg/m^3. Why isn't EPA taking samples continuously?**
  - Through the Community Air Monitoring Program, EPA took air samples at regular intervals to obtain information about the long-term ambient air concentrations of chloroprene. EPA has determined that the community air monitoring results obtained since the facility's RTO became operational in March 2018 provide an accurate picture of the long-term risk associated with the facility's chloroprene emissions and that unless there are substantial changes to the facility's operations or equipment, the data collected since March 2018 will continue to be representative of ambient air conditions near the facility.
  - The purpose of the SPod Air Monitoring Program is to improve our ability to identify activities linked to elevated chloroprene concentrations, investigate the root causes of the activities linked to those elevated concentrations, and identify opportunities to further reduce short- and long-term ambient air concentrations of chloroprene.
- **When will monitors be deployed?**
  - The SPod monitors were deployed the week of March 9, 2020. Two of the monitors were moved to different locations the week of June 29, 2020
- **Will EPA analyze the air samples for any other compounds?**
  - For the first two weeks of monitoring, EPA analyzed air canister samples for 59 detectable VOCs. Since that time, EPA has analyzed air canister samples only for chloroprene.
- **Will EPA continue the Community Air Monitoring Program?**
  - EPA will decide on next steps for the Community Air Monitoring Program in October 2020.

Public Information/Website

- **What data will be posted on the website and how frequently?**
  - Following analysis and quality assurance procedures at the laboratory, EPA will post the concentrations of chloroprene from any air canister samples.
  - Data will be posted only after a canister sample is taken and analyzed. Data may not be posted until several weeks after the sample is taken due to the analysis and quality assurance procedures.

Ex. 5 AC/AWP/DP

- **Are the chloroprene data from the Community Air Monitoring Program and the SPod Air Monitoring Program different?**
  - Both the Community Air Monitoring Program and the SPod Air Monitoring Program analyze 24-hour average ambient air concentrations of chloroprene, but the two

monitoring programs will result in different data because they take air canister samples at different times.

- The Community Air Monitoring takes air samples every six days, regardless of the concentration of VOCs or chloroprene in the ambient air. Therefore, the Community Air Monitoring Program data shows both elevated chloroprene concentrations but also concentrations too low to be detected by the monitoring instruments.
- The SPod Air Monitoring Program, however, is only collecting air samples when the SPod PIDs detect VOCs above a trigger level intended to capture air samples from elevated chloroprene concentration events. Therefore, data from the SPod Air Monitoring Program are more likely to show higher concentrations of chloroprene, and less likely to show low or undetectable levels of chloroprene.
- The differences in the monitoring data do not mean that the data generated under either program is incorrect.

Post-Monitoring Actions

- **If the air samples from the SPod Air Monitoring Program show elevated chloroprene concentrations, how will EPA know where the chloroprene is coming from?**
  - Because the Denka facility is the only local facility that uses chloroprene, any chloroprene emissions can be attributed to the Denka facility.
- **If the SPod Air Monitoring Program shows elevated levels of chloroprene, or the investigation into the elevated levels of chloroprene reveal violations, will EPA take an enforcement action?**
  - EPA and LDEQ will coordinate to address any issues discovered as a result of the SPod Air Monitoring Program.
- **Is EPA taking enforcement action against Denka and DuPont?**
  - EPA identified potential violations of applicable Clean Air Act regulations and permit conditions and other areas of concern in a 2016 inspection of the Denka facility.

Public Health

- **What are you doing to get ambient air concentrations of chloroprene below 0.2 μg/m^3? Why is it acceptable for this community to continue being exposed at levels above this threshold?**
  - 0.2 μg/m^3 is not a federally enforceable emissions limit for chloroprene. But EPA recognizes the public health concern associated with the long-term exposure to chloroprene above that level. Accordingly, EPA is looking for opportunities to reduce the long-term ambient air concentrations near the Denka facility.
- **What will the SPod Air Monitoring Program data tell us about health risks to the community?**
  - The Community Air Monitoring Program is designed to provide information about the long-term ambient air concentrations of chloroprene. EPA has determined that the Community Air Monitoring Program results obtained since the facility's RTO became operational in March 2018 provide an accurate picture of the long-term risk associated with the facility's chloroprene emissions and that extending the Community Air Monitoring Program will not provide new or additional information on long-term risk.

Ex. 5 AC/AWP/DP