Message

From: Casso, Ruben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E33DF0ABBBF049959E9100E556C7E634-CASSO, RUBEN]
Sent: 5/3/2021 8:59:43 PM
To: Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]
Subject: FW: LA Risk Assessment Emissions Data
Attachments: Final Toxics Data set 2019 and EPA Toxics Data_20210503.xlsx; Compiled 2019 and EPA Toxics Data_20210503.xlsx

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From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Sent: Monday, May 3, 2021 3:56 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <lourdes.iturralde@la.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Roger Gingles <Roger.Gingles@la.gov>
Subject: RE: LA Risk Assessment Emissions Data

Attached is the most up to date data we have for the facilities. I have attached two spreadsheets; one has the combined datasets and the other is the final dataset to be used for modeling.

The combined data set has a combined data status column that identifies records where the data sets matched, when the last time an emissions path was reported if it was not reported in 2019, and which records are unique to the 2019 dataset. Each record has three columns of emissions data, EPA's value, the 2019 value, and the final value that should be used. It was necessary to retain the EPA data for Balchem/BCP Ingredients AI# 27495 because the facility is no longer a major source of toxics so they are not required to report toxics in their annual emissions inventory.

In the final spreadsheet, where the source, process, release point combinations are unique to the 2019 inventory, the "HEM_SourceID" field is highlighted orange. Those will need new IDs assigned.

Please note that, due to time constraints and other time sensitive responsibilities, I have not sent the final dataset to the facilities for review or explanation of the toxics emissions not included in 2019 that were included in prior years. I have also not attempted to compare the emissions reported in the emissions inventory to the TRI.

Please let me know if you have any questions or need additional information.

Thanks,
Kelly Petersen
Air Planning and Assessment Division
Louisiana Department of Environmental Quality
Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

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From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Thursday, April 8, 2021 12:52 PM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Kelly,

If you could please provide us with the current data that you have, matched to the identifiers we have provided. Additionally, if there are current HAP sources we are missing from these facilities, we would appreciate that data as well.

Thank you,

-Mike

From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Sent: Thursday, April 8, 2021 1:01 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <lourdes.iturralde@la.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

We have point source emissions inventory data as recent as 2019. This information is collected annually and available to you through EIS, as required by the Air Emissions Reporting Rule. I am not sure how this is a review of your data when you acknowledge it is out of date. Do you want me to review it for accuracy with regard to the 2014 and 2017 data you used or provide you with current data? If you want current data, it would be far easier for me to download the 2019 EIS data and match your identifiers to it than to try to identify the changes needed to your file.

I have found that your unique identifiers are not at the source level. It is at the source, process, release point level. See the example below where a single unit with only one process, but two release points has two records and different HEM Source IDs.

EIS_Facility_ID	Agency.Facility.ID	HEM_FacilityID	EIS_Emissions_Unit_ID	Agency.Unit.ID	HEM_SourceID	HEM3 m
7202911	2083	220897202911	89503513	SR0237	CEIN0203	Ethyl acrylate
7202911	2083	220897202911	89503513	SR0237	CEIN0204	Ethyl acrylate

Thanks,
Kelly Petersen
Air Planning and Assessment Division
Louisiana Department of Environmental Quality
Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

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From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Thursday, April 8, 2021 11:00 AM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Kelly,

For our modeling purposes, we do not use or retain the agency identifiers for the process and release points. We create unique HEM IDs at the source level only for each EIS emission unit at a particular facility. However, if this information is necessary for your review, it would be located in the NEI.

It appears there may be some confusion overall regarding this task and I want to clarify what exactly our role is and what we are asking. We are assisting Region 6 with regards to the Office of Inspector General's (OIG) request to further evaluate the potential HAP risk (not just from EtO) from these specific facilities. Our role (OAQPS – ATAG) is to assist the Region by performing the air toxic modeling (using HEM). I have provided you with the current modeling parameters that we have on file (from our work in the Risk and Technology Reviews) for these facilities. We recognize that some of this data may be out of date and that the states would have the most current parameters/emissions for these facilities. This is why we provided the data for your review before we proceed with modeling

As you have mentioned, some of this data is from older or differing NEI years. If the only updates you have are from the most recent, published NEI (2017), that is fine and we can update with that information accordingly.

Hopefully this helps clarify what we are asking and If there is still confusion, please let me know and we can set up a call to discuss further.

Thanks,

-Mike

From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Sent: Thursday, April 8, 2021 10:17 AM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <lourdes.iturralde@la.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

It appears the data is grouped by the facility, source, process, release point, and pollutant combinations, not just the Facility ID, Source ID and Pollutant combination. Could you also provide the agency identifiers for the process and release point?

Also, there are two records for Union Carbide without any agency identifiers.

EIS_Facility_ID	Agency.Facility.ID	HEM_FacilityID	EIS_Emissions_Unit_ID	Agency.Unit.ID	HEM_SourceID	HEM3chem
7202911		220897202911	UNIT09		NEOT0236	Ethylene oxide
7202911		220897202911	UNIT10		NEOT0237	Ethylene oxide

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From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Wednesday, April 7, 2021 1:50 PM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde

<Lourdes.Iturralde@LA.GOV>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

All the data we have (as compiled and sent to you) comes from our risk assessments we perform for various Risk and Technology Reviews (RTRs) as part of the NEHSAP program. Sasol and Union Carbide were modeled as part of the miscellaneous organic chemical (MON) RTR in 2014. The other facilities were part of RTR modeling performed in 2017. The RTR modeling assessments include the best data available at the time, often from the most recent NEI and/or information directly from the facility. If you have updated numbers for these emission sources, whether for emission values and/or source parameters, we will use them to update our inventories.

Thanks,

-Mike

From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Sent: Wednesday, April 7, 2021 12:32 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <lourdes.iturralde@la.gov>
Subject: RE: LA Risk Assessment Emissions Data

Is there a reason for this? Sasol and Union Carbide revised their calendar year 2014 inventories in 2019, after the 2014 EIS data was locked. Those revisions are not reflected in these numbers.

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From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Wednesday, April 7, 2021 11:27 AM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Subject: RE: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Not a problem. Sasol Chemicals and Union Carbide data are from 2014. BCP, Taminco and Evonik data are from 2017.

-Mike

From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Sent: Tuesday, April 6, 2021 5:49 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>; Jason Meyers <Jason.Meyers@LA.GOV>; Lourdes Iturralde <lourdes.iturralde@la.gov>
Subject: RE: LA Risk Assessment Emissions Data

Thanks. The pollutant code is much appreciated. Is this supposed to be 2014 data and not something more recent?

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From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Tuesday, April 6, 2021 2:56 PM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Casso, Ruben <Casso.Ruben@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Kelly,

In an effort to (hopefully) make things easier, I've attached an updated data file that includes the Agency IDs (pulled from EIS) merged together (with the EIS and HEM IDs) as the first columns in the spreadsheet. In addition, I've added an EPA Pollutant Code column after the 'HEMchem' pollutant name.

Please let me know if you have other questions.

Thanks,

-Mike

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Monday, April 5, 2021 4:13 PM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

Mike – See my note below. Anything else you can do? -Ruben

LDEQ uploads their data to EIS and EPA assigns new EIS IDs to all of their sources and facilities. These IDs do not exist anywhere in LDEQ systems. The more data manipulation they have to do the higher the chance of introducing errors. The source data for the spreadsheet EPA provided contains the identifiers LDEQ needs, they just weren't included. Without the state identifiers it will just take longer and requires a lot more QA for LDEQ to be sure they are comparing apples to apples.

From: Moeller, Michael <moeller.michael@epa.gov>
Sent: Monday, April 5, 2021 2:25 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Morris, Mark <Morris.Mark@epa.gov>; Woody, Matthew <Woody.Matthew@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

Hi Ruben,

Regarding LDEQ's question, we don't typically retain Agency specific identifiers for our modeling purposes; we use EIS/NEI identifiers for each facility and emission source. I included the EIS/NEI IDs in the original modeling file so that

states would be able to reference to their Agency specific IDs. The states routinely submit facility data to the Emissions Inventory System (EIS) Gateway which contain all of their necessary Agency ID parameters to help identify emission units.

I went ahead and pulled LDEQ's data from the EIS Gateway for the applicable facilities. Each facility file (attached) includes both the EIS IDs and Agency IDs for the specific emission sources. If the state needs further data (stack or release parameter IDs, etc), this can all be pulled from the EIS Gateway.

Please let me know if you have any other questions.

Thanks,

-Mike

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Monday, April 5, 2021 11:01 AM
To: Moeller, Michael <moeller.michael@epa.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: LA Risk Assessment Emissions Data

Mike – Please LDEQ's request below. -Ruben

From: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Sent: Monday, April 5, 2021 9:58 AM
To: Kelly.Petersen@LA.gov; Verhalen, Frances <verhalen.frances@epa.gov>; Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Jason Meyers <Jason.Meyers@LA.GOV>; yvette olmos <yvette.mcgeheeolmos@la.gov>
Subject: RE: LA Risk Assessment Emissions Data

Fran and Ruben - pls see below. Is this possible? Tks

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Date: 4/5/21 9:44 AM (GMT-06:00)
To: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Cc: Jason Meyers <Jason.Meyers@LA.GOV>, Yvette Olmos <Yvette.McGeheeOlmos@LA.GOV>
Subject: RE: LA Risk Assessment Emissions Data

All of the information in their spreadsheet uses EPA identifiers. This makes it nearly impossible to compare to our state data and completely impossible for the facilities to compare this data to their own. Would it be possible to ask EPA to provide the agency IDs instead of the EIS IDs for the following columns?

FACILITY_REGISTRY_IDENTIFIER EMISSION_UNIT_ID PROCESS_ID EMISSION_RELEASE_POINT_ID

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From: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Sent: Monday, April 5, 2021 9:10 AM
To: Kelly Petersen <Kelly.Petersen@LA.GOV>; Bryan Johnston <Bryan.Johnston@LA.GOV>
Cc: Elliott Vega (DEQ) <Elliott.Vega2@LA.GOV>; Jason Meyers <Jason.Meyers@LA.GOV>; Roger Gingles <Roger.Gingles@la.gov>; Bijan Sharafkhani <Bijan.Sharafkhani@LA.GOV>; Yvette Olmos <Yvette.McGeheeOlmos@LA.GOV>
Subject: RE: LA Risk Assessment Emissions Data

Thanks Kelly

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: Kelly Petersen <Kelly.Petersen@LA.GOV>
Date: 4/5/21 9:07 AM (GMT-06:00)
To: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>, Bryan Johnston <Bryan.Johnston@LA.GOV>
Cc: "Elliott Vega (DEQ)" <Elliott.Vega2@LA.GOV>, Jason Meyers <Jason.Meyers@LA.GOV>, Roger Gingles <Roger.Gingles@la.gov>, Bijan Sharafkhani <Bijan.Sharafkhani@LA.GOV>, Yvette Olmos <Yvette.McGeheeOlmos@LA.GOV>
Subject: RE: LA Risk Assessment Emissions Data

I will send the data out to each facilities EI contact to review once I've had a chance to compare the file to their most recent emissions inventory. Yvette is looking for modeling files we might have in house to compare. Needing more time might depend on how many differences are identified. I will keep you posted.

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Louisiana Department of Environmental Quality
Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Sent: Friday, April 2, 2021 11:01 AM
To: Bryan Johnston <Bryan.Johnston@LA.GOV>; Kelly Petersen <Kelly.Petersen@LA.GOV>
Cc: Elliott Vega (DEQ) <Elliott.Vega2@LA.GOV>; Jason Meyers <Jason.Meyers@LA.GOV>; Roger Gingles <Roger.Gingles@la.gov>; Bijan Sharafkhani <Bijan.Sharafkhani@LA.GOV>
Subject: FW: LA Risk Assessment Emissions Data

Can you provide requested data? Do you need more time? Let me know. Tks

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: "Casso, Ruben" <Casso.Ruben@epa.gov>

Date: 4/2/21 7:41 AM (GMT-06:00)
To: Lourdes Iturralde <Lourdes.Iturralde@LA.GOV>
Cc: "Robinson, Jeffrey" <Robinson.Jeffrey@epa.gov>, "Verhalen, Frances" <verhalen.frances@epa.gov>
Subject: LA Risk Assessment Emissions Data

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please see the attached emissions modeling file and summary for the Louisiana facilities listed below. We request that this file be reviewed and returned with changes (if applicable) by April 23rd.
You are welcome to share the data for each individual facility with those specific facilities, if that will facilitate this review. If you need additional time to respond, please let us know.

Facility Name	Location	HEM Facility ID
BCP Ingredients	St. Gabriel, LA	220477451011
Taminco US (Eastman Corp.)	St. Gabriel, LA	220475504811
Union Carbide Corp., St. Charles Operations	Taft, LA	220897202911
Sasol Chemicals (USA) – Lake Charles Complex	Westlake, LA	220198468011
Air Products Performance Manufacturing Inc. – Reserve Plan (Evonik)	Reserve, LA	220955287111

The first 18 columns of the file (columns A through R) are the emission and source input parameters we currently have to model these facilities with the Human Exposure Model (HEM). The remaining columns (S through AG) are the National Emissions Inventory (NEI) data included to provide more detail on the processes and units associated with each emission point (SourceID). Each row represents a facility, emissions source, and pollutant. The 'SumEmissionTPY' (Column D) value is the emission total, in tons per year, attributed to each Facility ID, Source ID and Pollutant combination. Source types (column H) are either point (P) or area (A), and a small number of horizontal points (H). For area sources, the release parameters are given in columns I through N. For point sources, the release parameters are given in columns O through R.

Also attached is a copy of the HEM-4 Users Guide in case anyone wants further information on the HEM input columns (A through R). Specifically, this information can be found on page 33-38.

If any changes are suggested for the emissions file, please note them either in writing and/or highlighting within the file.

If there are further questions regarding the data in this file or the format, feel free to reach out to Michael Moeller at moeller.michael@epa.gov and please cc: me at casso.ruben@epa.gov.

Thank you.

Ruben Casso
Air Toxics Coordinator
EPA Region 6
214-665-6763