Message

From: Mitchell, David [dmitchell@theadvocate.com]
Sent: 3/10/2021 5:00:24 PM
To: Hubbard, Joseph [Hubbard.Joseph@epa.gov]
CC: Durant, Jennah [Durant.Jennah@epa.gov]
Subject: RE: Denka Performance Elastomer News Release & Background Information

Also,
Who were the people who did the external peer review?

THE ADVOCATE

BATON ROUGE · NEW ORLEANS · ACADIANA

David J. Mitchell

River Parishes reporter

dmitchell@theadvocate.com Tel: (225) 336-6961

www.theadvocate.com Cell: (225) 324-1877

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10705 Rieger Road, Baton Rouge, LA 70809

From: Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Sent: Wednesday, March 10, 2021 7:03 AM
To: Mitchell, David <dmitchell@theadvocate.com>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>
Subject: RE: Denka Performance Elastomer News Release & Background Information

Hi David,

One quick update: The scope of work for each grant are partially complete and both grants are in compliance with federal requirements.

Best,

Joe Hubbard
U.S. Environmental Protection Agency

OFFICE: 214-665-8476
Hubbard.joseph@epa.gov

From: Hubbard, Joseph
Sent: Tuesday, March 9, 2021 3:16 PM
To: Mitchell, David <dmitchell@theadvocate.com>
Cc: Jennah Durant (Durant.Jennah@epa.gov) <Durant.Jennah@epa.gov>
Subject: RE: Denka Performance Elastomer News Release & Background Information

Hi David,

Thanks for your flexibility. Here's our response:

Q1 Also, how does this grant relate to the CRISP report recently issued by the La. Tumor Registry and LSU Health Sciences? LSU says this grant didn't go to them. If so, who is doing this work? When did it start? When will it finish? Is this grant related to the CRISP report recently issued by the La. Tumor Registry and LSU Health Sciences?

A1 Yes, this grant relates to the CRISP report. Both the Louisiana Department of Environmental Quality and the Louisiana Department of Health and Hospitals have separate multipurpose grants from EPA, but the work for this project is connected. LSU was working with LDH on the study. The scope of work for each grant are partially complete and both grants are in compliance with federal requirements. The performance period is from October 1, 2019 through September 30, 2021.

Q2 Can any of you shed light on this process? Denka says they previously filed for a request for reconsideration and withdrew it and now have filed a request for correction. They also say that EPA had peer-reviewed this new Denka risk model for chloroprene, "which suggests the agency's previous assessment could overstate cancer risk from chloroprene exposure by as much as 130 times." Help me understand this process, both generally and in reference to chloroprene.

A2 Chloroprene was identified in the 2010 EPA Integrated Risk Information System (IRIS) assessment as a likely human carcinogen. In June 2017, DPE submitted a Request for Correction (RFC) of the IRIS assessment under EPA's Information Quality Guidelines (IQGs) stating that the assessment does not reflect the "best available science." This request was denied primarily because the issues raised by DPE were previously considered during the external peer review of the IRIS assessment. ORD also conducted an updated literature search and concluded no new evidence was published that would alter the 2010 IRIS conclusions. A physiologically based pharmacokinetic (PBPK) model for chloroprene had been published but EPA identified several limitations in the model that would preclude its application in an assessment.

In July 2018, DPE submitted a Request for Reconsideration (RFR) of EPA's denial of the RFC. In their request, DPE proposed to update the PBPK model for chloroprene to address the limitations raised by EPA. DPE subsequently updated the PBPK model and documentation and submitted it to EPA. EPA organized an independent expert peer review of this updated model. In December2020, the external peer reviewers identified uncertainties in the model that would preclude its application by EPA to update the IRIS chloroprene assessment. DPE decided to withdraw the RFR on March 1, 2021.

EPA has not received a new RFC from DPE concerning Chloroprene as of today. Once the document is received, we will assign an RFC number and process it in accordance with our Information Quality Guidelines (IQG). For more information on IQG, please visit: https://www.epa.gov/sites/production/files/2020-02/documents/epa-info-quality-guidelines_pdf_version.pdf.

Best,

Joe Hubbard
U.S. Environmental Protection Agency
OFFICE: 214-665-8476

Hubbard.joseph@epa.gov

From: Mitchell, David <dmitchell@theadvocate.com>
Sent: Tuesday, March 9, 2021 1:18 PM
To: Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Subject: RE: Denka Performance Elastomer News Release & Background Information

You have time. I realize the weeds are deep on this one.

THE ADVOCATE

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David J. Mitchell

River Parishes reporter

dmitchell@theadvocate.com Tel: (225) 336-6961

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From: Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Sent: Tuesday, March 09, 2021 1:04 PM
To: Mitchell, David <dmitchell@theadvocate.com>
Subject: RE: Denka Performance Elastomer News Release & Background Information

Hey David, we are working on this and should have something soon.

Will you be able to update your story?

Best,

Joe Hubbard
U.S. Environmental Protection Agency
OFFICE: 214-665-8476
Hubbard.joseph@epa.gov

From: Hubbard, Joseph
Sent: Monday, March 8, 2021 4:33 PM
To: Mitchell, David <dmitchell@theadvocate.com>
Subject: RE: Denka Performance Elastomer News Release & Background Information

We may need additional time, but will aim to meet your deadline.

Best,

Joe Hubbard
U.S. Environmental Protection Agency
OFFICE: 214-665-8476
Hubbard.joseph@epa.gov

From: Mitchell, David <dmitchell@theadvocate.com>
Sent: Monday, March 8, 2021 4:30 PM
To: Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Subject: Re: Denka Performance Elastomer News Release & Background Information

Tomorrow at noon.

Sent from my iPhone

On Mar 8, 2021, at 4:00 PM, Hubbard, Joseph <Hubbard.Joseph@epa.gov> wrote:

What's your deadline?

On Mar 8, 2021, at 3:26 PM, Mitchell, David <dmitchell@theadvocate.com> wrote:

Resent you that in separate email.

THE ADVOCATE

BATON ROUGE · NEW ORLEANS · ACADIANA

David J. Mitchell

River Parishes reporter

dmitchell@theadvocate.com Tel: (225) 336-6961

www.theadvocate.com Cell: (225) 324-1877

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10705 Rieger Road, Baton Rouge, LA 70809

From: Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Sent: Monday, March 08, 2021 3:13 PM
To: Mitchell, David <dmitchell@theadvocate.com>
Subject: RE: Denka Performance Elastomer News Release & Background Information

Also, Can you resend me your questions regarding the recent La. Tumor Registry report in connection with Denka and chloroprene?

Best,

Joe Hubbard
U.S. Environmental Protection Agency
OFFICE: 214-665-8476
Hubbard.joseph@epa.gov

From: Mitchell, David <dmitchell@theadvocate.com>
Sent: Monday, March 8, 2021 2:55 PM
To: R6Press <R6Press@epa.gov>; Durant, Jennah <Durant.Jennah@epa.gov>; Hubbard, Joseph <Hubbard.Joseph@epa.gov>; Harwood, Jackie <Harwood.Jackie@epa.gov>
Subject: FW: Denka Performance Elastomer News Release & Background Information

Can any of you shed light on this process?

Denka says they previously filed for a request for reconsideration and withdrew it and now have filed a request for correction.
They also say that EPA had peer-reviewed this new Denka risk model for chloroprene, "which suggests the agency's previous assessment could overstate cancer risk from chloroprene exposure by as much as 130 times."

Help me understand this process, both generally and in reference to chloroprene.

Also you still haven't responded to me regarding my questions about the recent La. Tumor Registry report in connection with Denka and chloroprene.

THE ADVOCATE
BATON ROUGE · NEW ORLEANS · ACADIANA

David J. Mitchell

River Parishes reporter

dmitchell@theadvocate.com Tel: (225) 336-6961

www.theadvocate.com Cell: (225) 324-1877

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10705 Rieger Road, Baton Rouge, LA 70809

From: Schleifstein, Mark <mschleifstein@theadvocate.com>
Sent: Monday, March 08, 2021 2:12 PM
To: Mitchell, David <dmitchell@theadvocate.com>
Subject: FW: Denka Performance Elastomer News Release & Background Information

Mark Schleifstein
Environment reporter
mschleifstein@theadvocate.com
The Times-Picayune | The New Orleans Advocate
840 St. Charles Ave.
New Orleans LA 70130
Mobile: 504.717.1157
Home: 504.887.5331

<image001.png>

From: Jim Harris <jharris@hdaissues.com>
Sent: Monday, March 8, 2021 1:29 PM
To: Schleifstein, Mark <mschleifstein@theadvocate.com>
Cc: David Laplante <dlaplante@hdaissues.com>
Subject: Denka Performance Elastomer News Release & Background Information

Mark,

Please find **attached** a news release from Denka Performance Elastomer. You may quote me as spokesperson if you decide to use this information. Below are some basic points on what it's about. I hope you received the background information on DPE that I sent you a week or so go. I hope everything is going well.

Best,
Jim Harris
On behalf of Denka Performance Elastomer

Background

• DPE is submitting a formal Request for Correction to the U.S. EPA that includes a new scientific model of chloroprene metabolism as part of the company's continued work with the agency to improve its understanding of chloroprene. A response or action on the request from EPA could take months.

• The model has been reviewed by the agency, undergone external peer review as part of being published in a prestigious scientific journal last year, a testament to the scientific community's confidence in its methods.

• The new model shows previous suggestions by the EPA's Integrated Risk Information System about chloroprene greatly overestimated potential risks to more than 130 times higher than reality.

• DPE's new request to EPA will take the place of a Request for Reconsideration, which the company withdrew as part of EPA's standard process for reviewing agency actions. EPA has suggested that this is a more appropriate process for incorporating the new model into EPA's risk assessment. A final decision and action by EPA on DPE's request could take several months. DPE will continue to work with EPA throughout this process.

• As you know, while DPE has been working with EPA throughout the scientific review process, the company spent over $35 million on emissions reduction projects, installing new equipment and improvements to reduce its environmental footprint. This investment has resulted in a similar decrease in concentrations of chloroprene measured in the air near the facility.

Jim Harris
Harris, DeVille & Associates, Inc.
521 Laurel Street
Baton Rouge, LA 70801

(225) 405-7330 (cell)
(225) 344-0381 (phone)
(225) 336-0211 (fax)

jharris@hdaissues.com

Visit us on the Web at http://www.hdaissues.com