UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C., 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Jorge Lavastida
Executive Office and Plant Manager
Denka Performance Elastomer, LLC
560 Highway 44
LaPlace, LA 70068

Re: Information Regarding Elevated Ambient Chloroprene Concentrations

Dear Mr. Lavastida,

As you are aware, the U.S. Environmental Protection Agency ("EPA") has deployed a Continuous Air Monitoring Program (the "Monitoring Program") to monitor for elevated ambient concentrations of chloroprene near Denka Performance Elastomer, LLC's ("DPE's") neoprene manufacturing facility. I am writing to request information regarding the activities and events that contributed to the following elevated ambient chloroprene concentrations measured by the Monitoring Program's air canister samples[1]:

Date	Monitor Location	Chloroprene Concentration (µg/m^3)
10/3/2020	Levee	10.7
10/17/2020	Fifth Ward Elementary School	15.182
11/6/2020	Chad Baker	11.919
11/18/2020	Fifth Ward Elementary School	13.938

For each of these events, please provide the following information:

1. Identify cause – provide a detailed description of the activities that caused the increased chloroprene emissions, including emission sources and emission points, the date, time, and duration of the activity or event that caused the increased emissions, and whether the activities were part of planned maintenance, malfunction, startup, etc. If a bypass occurred, specify the source of the bypass emissions.

[1] Chloroprene sampling results from the Monitoring Program are available at: https://www.epa.gov/la/denka-air-monitoring-data-summary.

2. Estimated quantity of emissions – provide an estimate of the quantity of chloroprene emitted for each event from each emission source and emission point and explain how the estimates were calculated.
3. Describe DPE's response – provide any corrective actions considered and/or implemented for each identified cause.
4. Internal investigation or audit – If DPE conducted an investigation or audit of the emission events, provide a copy of the reports, audits, or any other analysis related to the event. Include any on-site air monitoring that DPE conducted.

The EPA may request additional information about specific emission events and reported activities.

Please provide the requested information within thirty (30) days of receipt of this letter. Your cooperation is greatly appreciated.

Sincerely,

Thomas P. Carroll, Acting Director
Air Enforcement Division
Office of Civil Enforcement

cc (via e-mail):

Robert Holden, Jones Walker, LLP
Steve Thompson, EPA Region 6

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