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January 7, 2015

VIA E-MAIL

Mr. Dave Hensley (6EN-AS)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Suite 1200
Dallas, TX 75202-2733

Re: U.S. Environmental Protection Agency, DuPont La Porte, Risk Management Plan Inspection – December 15, 2014 through December 18, 2014, Requests for Documents

Dear Mr. Hensley:

In connection with the above-referenced request by the U.S. Environmental Protection Agency ("EPA"), E.I. du Pont de Nemours and Company ("DuPont" or "Company") is providing you with documents responsive to your December 18, 2014 request.

Please note that the information that the Company is providing constitutes confidential trade secrets and commercial or financial information ("Confidential Business Information" or "CBI") exempted from public disclosure under 5 U.S.C. § 552(b)(4) and subject to a claim of confidentiality under 40 C.F.R. § 2.208. Confidential business information gathered under the authority of Section 114 of the Clean Air Act is subject to 40 CFR § 2.301 and appropriate steps should be taken to properly safeguard the information. 40 C.F.R. § 2.211. We have marked specific documents as CBI where appropriate. Please treat these documents and the information they contain as confidential, as provided by the Freedom of Information Act or equivalent state law.

The Company's responses to the following EPA document and information requests are below.

Request 1: La Porte – 1st Party Environmental Compliance Audit, Kevin Roberts, 1/27/2014

RESPONSE:

In response to this request, DuPont is providing the 2014 "LaPorte – 1st Party Environmental Compliance Audit – RMP Program," Bates-labeled DUP-LAP-EPA-0003392 through DUP-LAP-EPA-0003508.

Request 2: La Porte – 1st Party Environmental Compliance Audit, Doris Ann Terrell, 3/7/2011

RESPONSE:

In response to this request, DuPont is providing the 2011 "1st Party Environmental Compliance Audit – RMP Program," Bates-labeled DUP-LAP-EPA-0003509 through DUP-LAP-EPA-0003577.

Request 3: Final PSM Audit DuPont La Porte Plant, William L. Bobinger Jr., 3/19/2012

RESPONSE:

In response to this request, DuPont is providing the 2012 PSM Audit, Bates-labeled DUP-LAP-EPA-0003578 through DUP-LAP-EPA-0003635.

Request 4: Final PSM Audit DuPont La Porte Plant, Jim Klein, 1/30/2009

RESPONSE:

In response to this request, DuPont is providing the 2009 PSM Audit, Bates-labeled DUP-LAP-EPA-0003636 through DUP-LAP-EPA-0003700.

Request 5: DuPont La Porte, Texas Emergency Plan (DuPont only)

RESPONSE:

In response to this request, DuPont is providing the La Porte Facility Emergency Response Plan, Bates-labeled DUP-LAP-EPA-0000759 through DUP-LAP-EPA-0001427.

Request 6: Incident Investigation Report of 11/15/2014 (when Final)

RESPONSE:

The investigation of the November 15, 2014 incident is ongoing. The incident investigation report will be provided when it has been finalized, as requested.

Request 7: Incident Investigation Report of 3/23/2011 #11-0082-RCI, 1/23/2012 #12-0051-RCI, 8/8/2013 #13-0158-RCI, 9/22/2014 #14-0161-RCI

RESPONSE:

In response to this request, DuPont is providing the following Incident Investigation Reports:

- Incident Number 11-0082-RCI, dated March 23, 2011, "HPI 2011-10 – Chemical Exposure at 7013 Reactor in Lannate," Bates-labeled DUP-LAP-EPA-0003193 through DUP-LAP-EPA-0003231;

- Incident Number 12-0051-RCI, dated January 23, 2012, "HPI 2012-05 – Mechanic Exposed to HF While Dismantling Valve," Bates-labeled DUP-LAP-EPA-0003155 through DUP-LAP-EPA-0003192;

- Incident Number 13-0158-RCI, dated August 8, 2013, "HPI 2013-18 – Chlorine Release from Piping (D) – Lannate Permit No. 1834," Bates-labeled DUP-LAP-EPA-0002992 through DUP-LAP-EPA-0003154; and

- Incident Number 14-0161-RCI, dated September 22, 2014, "HPI 2014-20 – SO2 Permit Exceedance from the Sulfuric Acid Unit Stack (D) – PSA Permit No. 21130," Bates-labeled DUP-LAP-EPA-0002932 through DUP-LAP-EPA-0002991.

Request 8: PHA IBU-2013-02, HTM Storage & Unloading, 12/31/2013

RESPONSE:

In response to this request, DuPont is providing PHA 2013-IBU-02, "Process Hazard Analysis of "HTM Storage and Unloading," dated December 31, 2013, Bates-labeled DUP-LAP-EPA-0002761 through DUP-LAP-EPA-0002931.

Request 9: PHA IBU-2008-01, Highly Toxic Materials Handling, 2/20/2008

RESPONSE:

In response to this request, DuPont is providing PHA 08-IBU-01, "Process Hazard Analysis of Highly Toxic Materials Handling," dated December 20, 2008, Bates-labeled DUP-LAP-EPA-0002203 through DUP-LAP-EPA-0002547.

Request 10: Certification of Operating Procedures of all RMP Units for 2013

RESPONSE:

In response to this request, DuPont is providing 2013 Certifications of Operating Procedures, Bates-labeled DUP-LAP-EPA-0003371 through DUP-LAP-EPA-0003381.

Request 11: Certification of Operating Procedures of all RMP Units for 2014

RESPONSE:

In response to this request, DuPont is providing 2014 Certifications of Operating Procedures, Bates-labeled DUP-LAP-EPA-0003353 through DUP-LAP-EPA-0003370.

Request 12: Mechanical Integrity Inspection Documentation for Methyl Mercaptan storage tank 2000-2014

RESPONSE:

In response to this request, DuPont is providing inspection documentation for the Methyl Mercaptan Storage Tank, including Vessel Inspection Reports, Equipment Inspection Plans, and Change Request Forms, dated January 4, 2001 through February 18, 2013, Bates-labeled DUP-LAP-EPA-0003251 through DUP-LAP-EPA-0003352.

Request 13: Ultra Pipe thickness report for Methyl Mercaptan storage tank, 12/18/2014

RESPONSE:

In response to this request, DuPont is providing the UltraPipe Thickness Report for Methyl Mercaptan Storage Tank, equipment ID 406-7010-08.00, Bates-labeled DUP-LAP-EPA-0003235 through DUP-LAP-EPA-0003250.

Request 14: Blank Ultra PIRE Corrosion Monitoring New Survey Report, 12/18/2014

RESPONSE:

DuPont will supplement its response with the requested document.

Request 15: Lannate Methamyl Insecticide Technical Standard La Porte Plant

RESPONSE:

In response to this request, DuPont is providing the Lannate Methomyl Insecticide Technical Standard for the La Porte Plant, Bates-labeled DUP-LAP-EPA-0000062 through DUP-LAP-EPA-0000758.

Request 16: Employee Training Files for: Robert Tisnado, Crystle Wise, Danny Francis, Clarence Baker, & Manuel Tisnado

RESPONSE:

In response to this request, DuPont is providing the training files for:

- Robert Tisnado, Bates-labeled DUP-LAP-EPA-0003701 through DUP-LAP-EPA-0003868;
- Crystle Wise, Bates-labeled DUP-LAP-EPA-0003869 through DUP-LAP-EPA-0003943;
- Danny Francis, Bates-labeled DUP-LAP-EPA-0003944 through DUP-LAP-EPA-0004061;
- Clarence Wade Baker, Bates-labeled DUP-LAP-EPA-0004062 through DUP-LAP-EPA-0004158; and
- Gilbert Manual Tisnado, Bates-labeled DUP-LAP-EPA-0004159 through DUP-LAP-EPA-0004298.

Request 17: Certification of Operating Procedures in Lannate area for 2012

RESPONSE:

In response to this request, DuPont is providing 2012 Certifications of Operating Procedures, Bates-labeled DUP-LAP-EPA-0003382 through DUP-LAP-EPA-0003391.

Request 18: PHA 2013-IBU-03 – A2213 Synthesis Nitrosation, Chlorination, Filtration, & Thiolation, 12/31/2013

RESPONSE:

In response to this request, DuPont is providing PHA 2013-IBU-03, "Process Hazard Analysis of A2213 Nitrosation, Chlorination, Filtration, & Thiolation," dated December 31, 2013, Bates-labeled DUP-LAP-EPA-0001950 through DUP-LAP-EPA-0002202.

Request 19: PHA 2008-APT/2008-IBU-03 A2213 Nitrosation, Filtration, Chlorination and Thiolation

RESPONSE:

In response to this request, DuPont is providing PHA 2008-API-01 / 2008-IBU-03, "Process Hazard Analysis of A2213 Nitrosation, Chlorination, Filtration, & Thiolation," dated December 31, 2008, Bates-labeled DUP-LAP-EPA-0002548 through DUP-LAP-EPA-0002760.

Request 20: PHA 2011-IBU-01 MHTA Synthesis, 12/15/2011

RESPONSE:

In response to this request, DuPont is providing PHA 2011-IBU-01, "Process Hazard Analysis of MHTA Synthesis," dated December 15, 2011, Bates-labeled DUP-LAP-EPA-0001673 through DUP-LAP-EPA-0001949.

Request 21: PHA 2006-LAN-02 MHTA Synthesis, 1/20/2007

RESPONSE:

In response to this request, DuPont is providing PHA 06-LAN-02, "Process Hazard Analysis of MHTA Synthesis," dated January 20, 2007, Bates-labeled DUP-LAP-EPA-0001428 through DUP-LAP-EPA-0001672.

Request 22: Mechanical Integrity Inspection or Testing History of:

a) **Wet End Fan (404-7003-01)**
b) **Dry End Fan (404-7004-01)**
c) **7015 Bay Fan (404-7015-75)**
d) **Melt Bay Fan (FAA not available)**

e) Methyl Mercaptan Detectors (406-0659-XD 0-9)

RESPONSE:

In response to this request, DuPont is providing the work order history for the equipment specified, Bates-labeled DUP-LAP-EPA-0003232 through DUP-LAP-EPA-0003234.

# # #

The Company reserves its rights related to the inadvertent disclosure of attorney-client information or work-product information included in this production. Under Federal Rule of Evidence 502, the disclosure of such information does not operate as a waiver in a federal or state proceeding if: (1) the disclosure is inadvertent, (2) the company took reasonable steps to prevent the disclosure, and (3) the company took reasonable steps to rectify the error. FED. R. EVID. 502(b). "The rule applies to inadvertent disclosures made to a federal office or agency, including but not limited to an office or agency that is acting in the course of its regulatory, investigative, or enforcement authority." Explanatory Notes, Rule 502, Judicial Conference Advisory Committee on Evidence Rules, revised Nov. 28, 2007. Please immediately notify me if you discover information in this production that suggests the document is subject to the attorney-client privilege or protected by the work-product doctrine.

If you have any questions, please do not hesitate to contact me at 512-691-4003.

Sincerely,

Whit Swift