UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

November 16, 2017

VIA CERTIFIED U.S.MAIL # 7003 0500 0003 0866 1508
RETURN RECEIPT REQUESTED

Jean-Marie Cencetti
Arkema
900 First Avenue
King of Prussia, PA 19438

Re: Sharing Arkema's Response to Clean Air Act Section 114(a) Request including Confidential Business Information with EPA Contractor

Dear Ms. Cencetti,

Arkema (you) has recently submitted information to the U.S. Environmental Protection Agency (EPA) regarding the Arkema facility in Crosby, Texas. You have claimed some of the information in the submittal(s) as Confidential Business Information (CBI) and requested protection from public disclosure as provided by 40 C.F.R. Part 2. To assist in its review and analysis of the submitted information, and any further information you provide for this matter, EPA now wishes to share this information with an EPA contractor.

Pursuant to 40 C.F.R. § 2.301 (h), EPA possesses the authority to disclose to any authorized representative of the United States information which might otherwise be entitled to confidential treatment. This letter serves as notice to you, pursuant to 40 C.F.R. § 2.301 (h)(2)(iii), of this contemplated disclosure. The contractor is Eastern Research Group (ERG), the contract number is EP-W-15-006.

EPA is investigating the operations of the Arkema facility in Crosby, Texas for compliance with CAA 112(r), EPCRA and other applicable regulatory requirements. This technical direction requires the contractor to support the investigation by reviewing information provided by Arkema. The review will focus on issues surrounding the chemical accidents Arkema experienced following hurricane Harvey. The support may also encompass onsite investigations and activity.

You may submit any comments to EPA within five (5) working days of receipt of this notice. If you have any questions, please contact James Murdock at (214) 665-7302.

Sincerely,

Steve Thompson
Branch Chief
Air Enforcement Branch

cc. Christopher B. Amandes – Morgan, Lewis & Bockius LLP

Enc: List

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From/To	Date	Document Title	Enclosures	Exempt Pages	Exemption
		1st response			
FROM ARKEMA 900 First Avenue, King of Prussia, PA 19438 Jean-Marie Cencetti TO R6 Mr. Samuel Tates		9/18/17 Letter Subject: Arkema Inc. Crosby, Texas Facility Initial response to EPA information Request Pursuant to the Clean air Act Section 114(a)			none
		On-site inventories of raw and finished material for August 28-29, 2017	ARK_EPA_0000001.pdf	14	b4
		On-site inventories of raw and finished material for August 28-29, 2017	ARK_EPA_0000015.pdf	2	b4
	7/21/2013	Process Hazard Analysis of the Organic Peroxide Storage	ARK_EPA_0000017.pdf	44	b4
	6/11/2014	Risk Management Plan	ARK_EPA_0000061.pdf	27	b4
	3/1/2017	Tier Two Emergency and Hazardous Chemical Inventory 2016	ARK_EPA_0000088.pdf	26	b4
		2nd response			
FROM Morgan, Lewis & Bockius LLP 1000 Louisiana Street Suite 4000 Houston, TX 77002 Christopher B. Amandes TO R6 Mr. Samuel Tates		9/22/17 letter RE: Arkema Inc. Crosby, Texas Facility 2nd Response to EPA Information Request Pursuant to the Clean Air Act Section 114			none
		Storage Building Limits and Safety Guidelines OPRS0552 Rev 8/4/17	ARK_EPA_0000440.pdf	11	b4
		Attachment A	ARK_EPA_0000725.pdf	1	b4
		No Title - Spreadsheet Col. C label Material Desc	ARK_EPA_0000726.pdf	2	b4
		Attachment B Crosby Product Line	ARK_EPA_0000728.pdf	3	b4
		No Title "overview"	ARK_EPA_0000731.pdf	3	b4
		Attachment E Refrigerated Organic Peroxides in Reefers	ARK_EPA_0000734.pdf	1	b4
		Attachment A	ARK_EPA_0000735.pdf	1	b4
		No Title - Spreadsheet Col. C label Material Desc	ARK_EPA_0000736.pdf	2	b4
		Attachment B Crosby Product Line	ARK_EPA_0000738.pdf	3	b4
		No Title "overview"	ARK_EPA_0000741.pdf	3	b4
		Attachment E Refrigerated Organic Peroxides in Reefers	ARK_EPA_0000744.pdf	1	b4
		Crosby Plant Products Storage Directory OPRL0574 rev. 11/18/15	ARK_EPA_0000745.pdf	2	b4
		Nitrogen Transfer Procedure OPRP0597 Rev. 8/30/16	ARK_EPA_0000747.pdf	2	b4
		Storage Building Limits and Safety Guidelines OPRS0552 Rev 8/4/17	ARK_EPA_0000749.pdf	11	b4
		Organic Peroxide Spill Clean up	ARK_EPA_0000760.pdf	1	b4

From: Via email Christopher Amandes To: Jason Holloman TCEQ		**6th response 10/13/17**			
		Att 3-A Storage Building Limits and Safety Guidelines OPRS0552 Rev 8/4/17	ARK_TCEQ_0000043.pdf	11	b4
		Att 3-A Organic Peroxide Spill Clean up	ARK_TCEQ_0000054.pdf	1	b4
		Att 3-B Crosby Plant Products Storage Directory OPRL0574 Rev. 11/18/15	ARK_TCEQ_0000055.pdf	2	b4
		Att 7 No Title Spreadsheet Col C label Material Desc	ARK_TCEQ_0000057.pdf	16	b4
		Att 7 No Title Spreadsheet Col C label Material Desc	ARK_TCEQ_0000073.pdf	2	b4
		Att 9 Process description of wastewater treatment process	ARK_TCEQ_0000075.pdf	2	b4