From:	Thompson, Steve
To:	Lewis, Jeffrey - OSHA
Cc:	Cole, Howard - OSHA
Subject:	Community meeting in LaPlace, LA to discuss chloroprene risks from Denka (formerly Dupont)
Date:	Wednesday, June 29, 2016 4:05:00 PM

Jeff,
I also left you a voicemail message about this but I thought I would also send an email. EPA and LDEQ are planning a community meeting for July 7th in LaPlace, LA to discuss the NATA results, provide an update on EPA, LDEQ and Denka's efforts to evaluate the risks from chloroprene emissions and to share the initial results from ambient monitoring conducted in the community surrounding the facility.

In preparing for the meeting, we discussed the likelihood of receiving questions related to worker exposures to chloroprene and what their risks might be. Would you all be the appropriate contacts to field these types of questions? If so, would you have someone that might be able to attend the community meeting?

Please give me a call if you have any questions.
Steve

Steve Thompson
Branch Chief
Air Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. EPA Region 6
Dallas,TX 75202
214-665-2769
thompson.steve@epa.gov

From: Lewis, Jeffrey - OSHA [mailto:Lewis.Jeffrey@dol.gov]
Sent: Wednesday, December 09, 2015 7:46 AM
To: Thompson, Steve <thompson.steve@epa.gov>
Cc: Cole, Howard - OSHA <Cole.Howard@dol.gov>
Subject: RE: Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA

Steve,

Thank you for the information. We have been at the facility in the past year or so. I plan to pass the information to the Baton Rouge office for review.

Jeff

From: Thompson, Steve [mailto:thompson.steve@epa.gov]
Sent: Monday, December 07, 2015 4:05 PM
To: Cole, Howard - OSHA; Lewis, Jeffrey - OSHA
Subject: Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA

Jeff and Howard,

I wanted to pass along the following information as an FYI to you all in case you all get questions regarding worker safety/exposures at the Dupont LaPlace, LA facility.

Please give me a call if you have any questions.

Hope all is well.
Steve

Steve Thompson
Branch Chief
Air Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. EPA Region 6
Dallas,TX 75202
214-665-2769
thompson.steve@epa.gov

EPA has recently completed their 2011 National Air Toxics Assessment (NATA) and are scheduled to release their results on December 15th. As a heads-up to OSHA, they may want to look into on-site worker exposures to chloroprene (CAS # 126-99-8) at the Dupont facility in LaPlace, LA. The NATA study shows offsite cancer risks ranging from 1,800 to 3,000 in a million. EPA's regulatory level of concern ranged between 1 and 100 in a million. Emissions of chloroprene at the facility have not changed since the last NATA study was completed utilizing data from 2009, however in 2010, EPA determined that chloroprene was a likely human carcinogen and a Unit Risk Estimate was developed. Since, about 1/3 of the emissions are coming from fugitive emissions and sources like building exhaust fans, it would appear to be prudent to evaluate worker exposure. Below is a summary from the NATA study.

- The 2011 NATA results, publically available at the census tract level, contain a tract with a cancer risk of 900-in-1 million.
- In this tract, the census block driving the risk has a cancer risk of 1,800-in-1 million.
    - Census block risks have been shared with state partners as part of the NATA

review process; they will not be publically available.

- The cancer risk of the census block/tract is mainly due to chloroprene emissions from a stationary point source, the Dupont facility, with a cancer risk of 1,800 to 3,000-in-1 million.
    - The cancer risk for this source is currently 1,800-in-1 million at a polar grid receptor. There are some large area sources overlapping census block receptors with higher risks, resulting in those census blocks not being chosen as the MIR receptor.
    - We are working with the facility on the modeling parameters and when the area sources are corrected, a census block receptor should be selected as the MIR receptor. This could result in facility risks of 3,000-in-1 million.
- An IRIS URE (0.0003 per $\mu g/m^3$) was developed for chloroprene in 2010. The assessment noted that chloroprene is "likely to be carcinogenic to humans."
    - There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.
    - Previously, EPA classified chloroprene as Group D, not classifiable as to human carcinogenicity, because of the absence of adequate data
- The IRIS URE was used in the 2011 NATA, with a modification to account for chloroprene having a mutagenic mode of action. The actual value used was 0.00048 per $\mu g/m^3$.
- Prior to 2010, chloroprene was not assessed for cancer risks because there was not a URE.
- An IRIS RfC (0.02 mg/m^3) was also developed for chloroprene in 2010. The critical effects, seen in male and female mice and rates, include an increase of incidence in olfactory atrophy, alveolar hyperplasia, and splenic hematopoietic proliferation.