Appointment

From: Deppe, Fred [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e1a489eab37451f8584f690b2b31032-Deppe, Fred]
Sent: 4/20/2022 12:03:03 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]

Subject: Accepted: Denka RCRA Inspection
Location: Microsoft Teams Meeting

Start: 4/20/2022 2:30:00 PM
End: 4/20/2022 3:00:00 PM
Show Time As: Busy

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/20/2022 3:59:56 PM
To: Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]
Subject: FW: Denka IRL Q's and A's
Attachments: Denka RCRA IRL Q's and A's.docx

Deppe, Fred has shared a OneDrive for Business file with you. To view it, click the link below.

Denka RCRA IRL Q's and A's.docx

From: Stephanos, Ann <Stephanos.Ann@epa.gov>
Sent: Wednesday, April 20, 2022 7:43 AM
To: Mostaghim, Negin <Mostaghim.Negin@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: Denka IRL Q's and A's

I am assisting in the communications effort at Denka and EPA will be releasing the first round of fenceline monitoring data collected earlier this year next week. In the messaging on this data, we are including current enforcement efforts (to the extent that we can talk about them) including the issuance of the RCRA IRL and the current RCRA inspection.

I am putting together some q's and a's on the RCRA IRL and was hoping that you could help me fill in the blanks. Remember, these are not public q's and a's – we put them together for the press people so in case they get questions, they can hopefully answer them (so we are guessing with what will be asked). So if you could provide an answers or if you have additional q's and a's that you think we might get on the IRLs, feel free to include them as well. I need something quick (sorry – things don't move for awhile then they need everything yesterday) so if you could look at this today, I would greatly appreciate it. And yes, I'm working with Jennah Durant in R6's public affairs office so we are coordinating our efforts with R6. Thanks!

Ann Stephanos (she/her)
Attorney Advisor
Waste Enforcement Branch
202-564-4006

Q: What is the purpose of the information request letter that EPA sent to Denka?

A: To obtain information from Denka regarding

Q: Where can I get a copy of the information request letters that EPA sent to Denka?

A: The letter is available from

Q: When will the Agency get the requested information from Denka? When and how will EPA make data collected from the information request letter publicly available?

A:

Q: What data does EPA currently have on chloroprene emissions from Denka?

A: [I will prepare an answer on what we have as far as Air monitoring data but if we have anything outside of Air, please let me know]

Q: If the data provided in response to the information request letter shows additional sources of chloroprene emissions, what will EPA do to address these sources?

A:

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/29/2022 4:07:41 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: Denka

Marcia,

I am not sure what time Margaret gets back but I am available so I can tell you what happened this morning about Denka, I am being told to send another 3007 and they want it in e-routing today for sampling which is occuring on Tuesday.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 11:05 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: Denka

Yes we can. I just sent an invitation to include Russell, Elizabeth, and Fred. Marcia

---

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 29, 2022 11:03 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Re: Denka

No problem. I'm sorry to double book but we had an urgent matter to discuss. Elizabeth and Russell can fill you in. I'm on leave and will be back at 2:00. We can talk then.

Thanks,
Margaret

Sent from my iPhone

> On Apr 29, 2022, at 11:01 AM, Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov> wrote:
>
> Good morning, Margaret,
>
> I did not have an opportunity to join the Denka call you scheduled this morning, double booked. We were scheduled to brief Dr. Nance for 30 mins, and the call went for an hour. It was necessary, but through off some portion of my schedule and so I did not see your invitation in time.
>
> Did you need anything from me?
>
> Marcia

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/29/2022 6:08:52 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: Denka sampliing
Attachments: questions.docx

1. Please provide confirmation that the Dredging of the brine pit for removal of neoprene popcorn will be during the week of May 2, 2022. Also confirm what time or times of day this activity will take place.

2. Should dredging of the Outside Brine Pit not be required during the week of May 2, 2022 please provide the day and time the activity will be taking place next.

3. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn during the week of May 2, 2022. Also confirm the time or times of day this activity will take place.

4. Should cleaning of the Poly Kettle Screens not be taking place during the week of May 2, 2022 please provide the day and time the Poly Kettle Screens will be cleaned next.

5. Background sampling data will be taken one hour prior to sampling of the Outside Brine Pit and Poly Kettle Screens. Please confirm that this will be possible in relation to the times these units will be cleaned or dredged.

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	8	VOC	TO-15	28	--	6L Summa Canister	1	None
Liquid	4	VOC	8260B	14	--	40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14	--	EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Include additional containers as needed for QA/QC samples required by Denka's lab

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/29/2022 8:18:26 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: Denka Questions
Attachments: Questions for Denka.docx

EPA Questions to Denka Performance Polymers for Sampling the week of May 2, 2022

1. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

2. If the cleaning of the Poly Kettle Screens is not required to take place during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

3. Please provide confirmation that the Dredging of the brine pit for removal of neoprene popcorn will be conducted during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

4. If the dredging of the Outside Brine Pit is not required during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

5) Background samples for the Outside Brine Pit and Poly Kettle Screens will need to be collected 1 hour prior to the beginning of any cleanout activities, so please confirm access will be will be possible in relation to the times these units will be cleaned or dredged.

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From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/29/2022 8:57:29 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
CC: Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]
Subject: RE: Denka Questions
Attachments: Questions for Denka.docx

Marcia,

Here is the final approved version of the questions.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 3:49 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka Questions

Fred and John,

Please confirm this is the correct version as I write the cover email. Thanks, MM

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 29, 2022 3:18 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka Questions

EPA Questions to Denka Performance Elastomers for Sampling the week of May 2, 2022

1. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn in accordance with the SOP presented during the April RCRA inspection during the week of May 2, 2022. In addition, please provide the best estimate of the date these operations will cease.

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*Currently planning 8 and tentatively adding 4 canisters as plan moves through its draft phase.

Include additional containers as needed for QA/QC samples required by Denka's lab

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From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 4/29/2022 9:14:36 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: Denka Questions
Attachments: Questions for Denka1.pdf

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 3:59 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Questions

FYI, the last question has two "will be" and I deleted one. Otherwise, I am getting ready to make a Pdf version to send in a few mins. Thanks, MM

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Sent: Friday, April 29, 2022 3:57 PM
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Subject: RE: Denka Questions

Marcia,

Here is the final approved version of the questions.

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From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 3:49 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: George, Elizabeth A <George.Elizabeth.A@epa.gov>
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Fred and John,

Please confirm this is the correct version as I write the cover email. Thanks, MM

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To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
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EPA Questions to Denka Performance Elastomers for Sampling the week of May 2, 2022

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Sent: 4/29/2022 9:19:47 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: Denka Questions
Attachments: Requests for Denka.pdf

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 3:59 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
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Subject: RE: Denka Questions

Marcia,

Here is the final approved version of the questions.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 3:49 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>
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Subject: RE: Denka Questions

Fred and John,

Please confirm this is the correct version as I write the cover email. Thanks, MM

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Sent: Friday, April 29, 2022 3:18 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka Questions

EPA's Request to Denka Performance Elastomers for Sampling the week of May 2, 2022

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*Currently planning 8 and tentatively adding 4 canisters as plan moves through its draft phase.

Include additional containers as needed for QA/QC samples required by Denka's lab

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 1/31/2022 7:06:45 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: Denka 3007/onsite inspection/7003
Attachments: Denka Draft 3007 Ltr.docx

Marcia,

This is the most current version that I have of the 3007 letter.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 12:18 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Good afternoon, Fred,

I see that Margaret attached a RCRA 3007 Information Request to the email below but it is not the last version we work on. I will send you an invitation for this afternoon so we can be sure of the version that will go into e-routing is the most compete and current. Of the scheduled below, I can commit to placing the RCRA 3007 in e-routing tomorrow (2/1) since we need no comments from DOJ.

Thanks,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 9:52 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka 3007/onsite inspection/7003
Importance: High

Hi all:

There is renewed interest in using RCRA authorities at the Denka facility as the CAA settlement negotiations are not proceeding apace. HQ would like us to proceed with our plans to issue a 7003 to the facility. We had previously discussed the need for a 3007 to obtain the information we need for the 7003. HQ would also like us to conduct an onsite inspection prior to 7003 issuance. Therefore, I am proposing the following schedule:

2/2/2022	Put 3007 in eRouting
2/8/2022	Send approved 3007 to OECA for final review
2/14/2022	Issue 3007
2/28/2022	Receive 3007 response
3/21/2022	Conduct onsite inspection

4/?/2022 Issue 7003

Attached is the latest version of the 3007 information request that we drafted back in the Fall. Could you please review it and let me know if you have any comments or questions you think should be added? And could you put it in the final form of a formal 3007 and then place it into eRouting? John, I'm including you since we'd like you to conduct the inspection and you may have some additional questions you think should be included in the 3007.

Thanks so much!
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, January 5, 2022 9:44 AM
To: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Oif, Leslie <Oif.Leslie@epa.gov>
Subject: Denka 3007

Hi Russell and Margaret – happy New Year!

Leslie Oif and I worked on the questions for Denka (please see the attached). It was based on the draft questions provided earlier by Marcia.

If you're ok with these questions, I can input this into formal correspondence (with the certification, definitions, etc). Also, if you have R6 letterhead, I can use that and put a final document together for you.

We are happy to collaborate further on Denka with you!

Best,
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer (Denka) La Place Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to receipt of damaged packages and wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's process and hazardous waste generation, storage and or disposal is releasing solid waste into the ambient air. Further, EPA has evidence that supports a likelihood that the solid waste in question is a known listed hazardous waste and carcinogen of likely risk. EPA has community monitoring data which reports the solid waste being released is chloroprene. While these three facts taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within thirty (30) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address.

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures

cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (DENKA or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for each facility identified in question 4 below, within thirty (30) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the specified 30 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which DENKA must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of DENKA. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject DENKA to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term "Facility" or "Facilities" shall mean DENKA locations owned and/or operated by DENKA in La Place Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

   d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by

which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneously at the time of waste generation and before any dilution, mixing, or other alteration of the waste occurred.
3. Please identify all **actual and potential generation points** where Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulates Waste Coagulate, Waste Polymer.
4. For question number three above, please provide copies of hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneously at the time of waste generation and before any dilution, mixing, or other alteration of the waste occurred.

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request. Further, please ensure all hazardous wastes reported on the facility RCRA Permit, waste analysis plan, and 8700-12 RCRA notification are linked to individual points of waste generation and these points of waste generation can be easily identified in PNID diagrams or some other form of engineered process flow diagram.

5. For the **Poly-Building**, please respond to the following questions:
   i. Please provide a process flow diagram of all processes that take place in the Poly-Building? Please note, inputs, outputs, and points of waste generation should be clearly identified.
   ii. How often does Denka perform a clean-out of the five or more Kettles in the Poly-Building?
   iii. Please describe the need for and the operation of the wall fans located in the Poly-Building.
   iv. What is the amount of solid waste generated by weight (in kilogram/pounds) of each clean-out event?
   v. Please list any cleaning agents used in the clean-out of the Kettles, i.e., solvents.
   vi. Where is the waste taken to be stored, managed, treated, and/or ultimately disposed?
   vii. If stored, managed, treated, and/or disposed on site, please state the storage time, treatment method, and/or ultimate disposal site. If on-site, please provide a description of the on-site location. If off-site, please state the name and provide the location of the disposal site.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. Please list the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit?
   ii. What is the kilogram/pound of waste by weight on a monthly basis and/or by event that is cleaned from the Open Brine Pit?
   iii. Where is the waste taken to be stored, managed, treated, and/or ultimately disposed?
   viii. If stored, managed, treated, and/or disposed on site, please state the storage time and treatment method, and the ultimate disposal site. If on-site, please provide the description of the on-site location. If off-site, please state the name and provide the location of the disposal site.
   iv. Does Denka, consider the Open Brine Pit a Tank or a Surface Impoundment? Please provide construction drawing and details to support Denka's position, for example a PNID or other engineered diagrams.
7. For your **Underground Injection Wells**, please answer the following questions:
   i. Please provide in one spreadsheet with dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each it took to repair?
   ii. What is the origination, generation, and/or sources of the waste streams that are placed in your UIC Wells?
   iii. Please provide us with copies of waste determination for each separate waste stream that is placed in Denka's UIC Wells, whether by testing or by knowledge of process, which were made contemporaneously at the time of waste generation and before any dilution, mixing, or other alteration of the waste occurred.
8. Please provide information regarding all Emergency and non-emergency response events and releases at the Denka facility over the last three years.

i. Please provide all waste determinations made in response to clean up of all releases.
ii. Please provide a brief narrative of each event and identify the related unit(s) and/or process(es).

9. How many **Roll-off Boxes** does Denka manages at its facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es):
   i. Please provide photographs of each Roll-off Box.
   ii. What waste is stored and/or managed in the Roll-off Box(es)? Also, state the origination and final disposition of the waste.
   iii. How does Denka control emission releases from its Roll-off Box(es)?
   ix. What is the ultimate disposal site of the waste? If on-site, what is the description of the on-site location? If off-site, please state the name and provide the location of the disposal site.
10. For all management, storage, and/or treatment units (to include, containers, tanks (treatment and storage), that are not listed in questions five through eight above, please list and answer the following questions:
    i. What emission control devices are on each units?
    ii. What type of emission could potentially leak and/or escape for each units?
    iii. What is Denka's inspection maintenance protocol for each unit?
    iv. Please share a copy of Denka's Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the unites listed in questions five through eight) at its facility.
11. For Denka's **Regenerative Thermal Oxidizer ("RTO")**, please answer the following questions:
    i. Since the April 2018 performance test, was there a subsequent test(s) of the RTO to supports its required destruction or removal efficiency?
    ii. Please provide a copy of all subsequent test(s) and their respective results.
    iii. Has the RTO malfunctioned since its installation and/or after the 2018 performance test?
12. Does Denka have any runoff of any kind into the Mississippi? If yes, please describe and state how often?
13. What knowledge does Denka have of operational drinking water wells at or near its facility?
14. Please provide us with copies of reported exceedances from all your monitoring wells, to include dates and amounts.
15. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of emissions, discharges, and/or disposals? Please describe events, dates, and amounts.
16. Provide a log showing inspection compliance for all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards for the last three years. RCRA subparts AA, BB, and CC have recordkeeping requirements, please submit these records for all Hazardous Waste Management units and associated piping works. For this response, please submit detailed drawings and identify all inspection points.

17. For each unit at the facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart for each's final disposal site, whether on-site or off-site, each generation unit, and constituency. And please provide the required LDR notice that was prepared contemporaneously and with the respective dates.
19. What connection(s) if any is there that exit from the Denka facility and any municipal drinking water supply, well water, recreational water, or waters that have fishes or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls, and to what body of water do they discharge?
21. How much water annually does Denka draw from the Mississippi River? In what process(es), is this water used?
22. What system does Denka have in place for the washing and cleaning of equipments and vessels and the ultimate collection and disposal of these wash waters?
    i. Please provide PNID or engineered process flow diagrams which show points of generation and travel between units to terminal storage and disposal.
23. Are there stormwater run-offs from the facility that is contaminated with Chloroprene? If no, how do you know?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of DENKA and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2020.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 1/31/2022 7:46:49 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: Denka 3007/onsite inspection/7003
Attachments: Denka Draft 3007 Ltr.docx

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 1:13 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003
Importance: High

Thanks Fred.

I will share the most current version with you as I worked on our last version (since I saw Margaret's email) to address comments I received from HQs last year.

This is still in draft, as I have not done my first read through after addressing all the comments and so there may still be issues with spaces, etc.

Please review for our meet and let and use as a guide during the meeting.

Thanks,
Marcia

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Monday, January 31, 2022 1:07 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Marcia,

This is the most current version that I have of the 3007 letter.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 12:18 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Good afternoon, Fred,

I see that Margaret attached a RCRA 3007 Information Request to the email below but it is not the last version we work on. I will send you an invitation for this afternoon so we can be sure of the version that will go into e-

routing is the most compete and current. Of the scheduled below, I can commit to placing the RCRA 3007 in e-routing tomorrow (2/1) since we need no comments from DOJ.

Thanks,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 9:52 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka 3007/onsite inspection/7003
Importance: High

Hi all:

There is renewed interest in using RCRA authorities at the Denka facility as the CAA settlement negotiations are not proceeding apace. HQ would like us to proceed with our plans to issue a 7003 to the facility. We had previously discussed the need for a 3007 to obtain the information we need for the 7003. HQ would also like us to conduct an onsite inspection prior to 7003 issuance. Therefore, I am proposing the following schedule:

2/2/2022	Put 3007 in eRouting
2/8/2022	Send approved 3007 to OECA for final review
2/14/2022	Issue 3007
2/28/2022	Receive 3007 response
3/21/2022	Conduct onsite inspection
4/?/2022	Issue 7003

Attached is the latest version of the 3007 information request that we drafted back in the Fall. Could you please review it and let me know if you have any comments or questions you think should be added? And could you put it in the final form of a formal 3007 and then place it into eRouting? John, I'm including you since we'd like you to conduct the inspection and you may have some additional questions you think should be included in the 3007.

Thanks so much!
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, January 5, 2022 9:44 AM
To: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Oif, Leslie <Oif.Leslie@epa.gov>
Subject: Denka 3007

Hi Russell and Margaret – happy New Year!

Leslie Oif and I worked on the questions for Denka (please see the attached). It was based on the draft questions provided earlier by Marcia.

If you're ok with these questions, I can input this into formal correspondence (with the certification, definitions, etc). Also, if you have R6 letterhead, I can use that and put a final document together for you.

We are happy to collaborate further on Denka with you!

Best,
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer (Denka) La Place Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to receipt of damaged packages and wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's process and hazardous waste generation, storage and or disposal is releasing solid waste into the ambient air. Further, EPA has evidence that supports a likelihood that the solid waste in question is a known listed hazardous waste and carcinogen of likely risk. EPA has community monitoring data which reports the solid waste being released is chloroprene. While these three facts taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within thirty (30) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address.

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures

cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (DENKA or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for each facility identified in question 4 below, within thirty (30) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the specified 30 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which DENKA must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of DENKA. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject DENKA to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term "Facility" or "Facilities" shall mean DENKA locations owned and/or operated by DENKA in La Place Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

   d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by

which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.
4. For question number three above, please provide copies of hazardous waste determinations, whether by testing or by knowledge of process, which were made

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building? Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) of each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where is the waste taken to be stored, managed, treated, and ultimately disposed?
   viii. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility?
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event.
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements. Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.
7. For your **Underground Injection Wells**, please answer the following questions:

i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair?

ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in your UIC Wells?

iii. Provide copies of waste determination for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

8. Please provide information regarding all emergency and non-emergency response events associated with releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other Containers:
   i. Provide photographs of each Roll-off Box and other Containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other Containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from its Roll-off Box(es) and other Containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other Containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the unites listed in questions five through nine) at its Facility.
11. Have there been any runoffs of any kind into the Mississippi or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of emissions, discharges, and/or disposals? Please describe events (if any), dates, types of emissions, and amounts.

15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. , Please submit these records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to subpart is applicable to the respect unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls, and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? , How does Denka determine whether there are stormwater run-offs ? How does Denka mange and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of DENKA and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2020.

_____
(Signature)

_____
(Name)

_____
(Title)

Appointment

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
on behalf of Young, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=351f8d3d77ff49a98d3d33cb2a1c8153-Justin Young]
Sent: 6/29/2022 6:34:47 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

Subject: FW: Denka Inspection report call
Location: Microsoft Teams Meeting

Start: 6/30/2022 4:30:00 PM
End: 6/30/2022 5:30:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Wednesday, June 29, 2022 12:04 PM
To: Young, Justin; Deppe, Fred; Penland, John; Osbourne, Margaret; Davies, Lynne; Mostaghim, Negin; Yurk, Jeffrey
Subject: Denka Inspection report call
When: Thursday, June 30, 2022 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Continue with Denka inspection report review

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 112 727 082 2
Alternate VTC instructions

Or call in (audio only)
+1 202-991-0477,,72572472# United States, Washington DC
Phone Conference ID: 725 724 72#
Find a local number | Reset PIN

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

Learn More | Meeting options

Appointment

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
on behalf of Young, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=351f8d3d77ff49a98d3d33cb2a1c8153-Justin Young]
Sent: 6/29/2022 6:35:01 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

Subject: FW: Continue Denka inspection call
Location: Microsoft Teams Meeting

Start: 6/30/2022 7:30:00 PM
End: 6/30/2022 8:30:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Wednesday, June 29, 2022 12:06 PM
To: Young, Justin; Deppe, Fred; Penland, John; Davies, Lynne; Mostaghim, Negin; Osbourne, Margaret
Subject: Continue Denka inspection call
When: Thursday, June 30, 2022 3:30 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Continue with Denka inspection report review.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 112 207 174 8
Alternate VTC instructions

Or call in (audio only)
+1 202-991-0477,,796237429# United States, Washington DC
Phone Conference ID: 796 237 429#
Find a local number | Reset PIN

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

Learn More | Meeting options

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 7/28/2022 3:54:28 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Sure thing.

Fred

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 10:44 AM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Hi Fred:

You'll be getting the FTP link shortly. Can you please upload the unredacted version of the sampling report to it?

We'll also probably have to do the same with the HQ report.

Thanks,
Margaret

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Thursday, July 28, 2022 10:41 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Yes. Fred has been added and should be receiving access instructions shortly.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 11:38 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Thanks. Can you add Fred Deppe to it since John's on inspection?

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Thursday, July 28, 2022 10:32 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida,

Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret,

You and John have been added as users to a dedicated folder on the Bracewell ShareFile site. You both should be receiving an email with access instructions from the ShareFile service shortly. Please let me know if you encounter any issues.

Thanks,
Kevin

KEVIN M. VOELKEL
Associate
kevin.voelkel@bracewell.com | download v-card
T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

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From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 11:12 AM
To: Hutt, Jason <jason.hutt@bracewell.com>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Hi Jason:

Can you please provide a link to your FTP site so we can upload the non-redacted inspection report?

Thanks,
Margaret

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, July 27, 2022 5:09 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – by way of update, our attempts to forward the email (with attachment) to Chris did not work either. The electronic signatures may be causing the issue. Regardless, we posted the document to a secure site and Chris now has access to it. I wanted to make you aware for future communications. Thanks.

JASON B. HUTT
Partner
jason.hutt@bracewell.com | download v-card
T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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CONFIDENTIALITY STATEMENT
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From: Hutt, Jason
Sent: Wednesday, July 27, 2022 3:26 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Mr. Kevin M. Voelkel <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Jorge Lavastida <jorge-lavastida@denka-pe.com>; Akihiko Kusaka <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – thank you for forwarding the transmittal from John Penland to Chris Meyers, which attached the Final Inspection Report. Three quick items:

1. I have confirmed with Chris that he did not receive the transmittal. The email address is correct, so we don't yet have a good explanation for the confusion. It is possible that the file size (11 MB) caused the issue. DPE requests a short extension of time to respond before the report is posted to EPA's website. Our strong preference would be an extension until 10 days after receipt of the second RCRA inspection report (anticipated to be transmitted to us on Friday, July 29, 2022). This will allow concurrent responses to the two reports, if any.

2. Please provide an unredacted copy of the report.

3. When you or John transmits the upcoming RCRA inspection report, please copy Bob Holden, Kevin Voelkel and me. We will be requesting an unredacted copy of that report as well.

Thanks in advance, - Jason

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 1:00 PM
To: Hutt, Jason <jason.hutt@bracewell.com>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

---

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
Subject: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Mr. Meyers,

On May 5, 2022, the United States Environmental Protection Agency conducted a sampling inspection at your facility under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA) and your Denka's RCRA Permit. A copy of the final inspection report is attached to this email. Please review the report, note the areas of concern, and take any actions necessary to ensure compliance with RCRA. The attached inspection report will be posted to EPA's public website after July 29, 2022.

Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 7/29/2022 7:35:18 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Denka final inspection report

We should probably have a quick chat.

Fred

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, July 29, 2022 2:32 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: Denka final inspection report

Thanks Fred. The signed report is on the SharePoint site that HQ previously shared. Do you have access to it?

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, July 29, 2022 12:49 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka final inspection report

Margaret,

I told Jeff I would wait until noon but I have not uploaded the inspection report. We tried to access the sharepoint where the report was located and neither of us could get in. I emailed Lynn and Justin but have not heard back. I contacted Bracewell and a secure FTP has been made available for us to put the file into, so all we need in the report .

Fred

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 9:14 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: Denka final inspection report
Importance: High

Hi Fred:

Please upload the inspection report to the Bracewell FTP site. Then please send an email to Jason Hutt letting him know it's there. Tell them that we'll be sending them a CBI redacted report in the near future.

Thanks,
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, July 28, 2022 7:59 PM
To: Young, Justin <Young.Justin@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>

Subject: RE: Denka final inspection report
Importance: High

I also just signed it – thanks, Justin!

So – Justin, make sure Fred has access to the final version of the report. And Fred, I think next steps are for you to transmit to the Bracewell FTP site. Also, Justin – Steve Shermer and Davis Forsythe should get access to the sharepoint folder (I shared their email addresses with you earlier).

All sound good and we're set?

What a huge milestone that was met! Congrats to all!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

From: Young, Justin <Young.Justin@epa.gov>
Sent: Thursday, July 28, 2022 7:13 PM
To: Davies, Lynne <Davies.Lynne@epa.gov>
Subject: Denka final inspection report

Lynne,

I signed the PDF Denka inspection report. Its uploaded to the SharePoint.

Justin

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 9/8/2022 2:55:57 PM
To: Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Deppe, Fred shared the folder "Denka reply to Inspection Report contains CBI" with you.

Deppe, Fred shared a folder with you

Not really sure if everyone had recieved a link to the attachments to the Jones Walker responce to the Inspection. Iv got everything downloaded and here is the link to the file. Notice this file does contain information claimed CBI.

Denka reply to Inspection Report contains CBI

This link only works for the direct recipients of this message.

Open

Microsoft

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Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 8/18/2022 3:43:10 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Let me know if these look right
Attachments: Denka May RCRA Inspection.pdf; ezD8195082_8.15 Update April Report_Redacted.pdf

Message

From: Deppe, Fred [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E1A489EAB37451F8584F690B2B31032-DEPPE, FRED]
Sent: 9/9/2022 2:32:57 PM
To: Davies, Lynne [Davies.Lynne@epa.gov]
Subject: RE: Introducing Kevin to Fred

Sure I will do what I can.

Fred

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Friday, September 09, 2022 9:30 AM
To: Housman, Van <Housman.Van@epa.gov>
Cc: Schanilec, Kevin <Schanilec.Kevin@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: FW: Introducing Kevin to Fred

Hi Fred – I'm also introducing Van Housman, who has also agreed to join in on the fun! Van knows Kevin quite well due to their work on RCRA mineral processing cases. Would you also mind pointing Van in the right direction as to relevant documents for him to review?

Many, many thanks!
Lynne

From: Davies, Lynne
Sent: Thursday, September 8, 2022 6:04 PM
To: Schanilec, Kevin <Schanilec.Kevin@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: Introducing Kevin to Fred

Hi Kevin – Fred from Region 6 is going to help provide you with relevant documents and there is a call tomorrow afternoon that likely will be scheduled with a chemist from NEIC. If you can't participate, no worries – we will catch you up next week.

Denka has claimed that its waste is not hazardous and they have some calculations submitted that we need some help reviewing.

There is also likely a process diagram to get you acquainted with waste generation at the facility – it is prehistoric.

Fred also has access to the inspection report and inspection response documents.

What we need in the near-term is a rebuttal, basically, to Denka's claim that its neoprene waste coag/"popcorn" is not a reactive or ignitable waste.

A huge thanks, Kevin, to you and Fred!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA

1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 3/17/2022 2:38:11 PM
To: Leathers, James [Leathers.James@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: Re: Access to process flow at DPE for RCRA inspection planning

Thank you James.
MM

From: Leathers, James <Leathers.James@epa.gov>
Sent: Thursday, March 17, 2022 8:40 AM
To: Penland, John <Penland.John@epa.gov>
Cc: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: Re: Access to process flow at DPE for RCRA inspection planning

Hi John,

During a RCRA call discussion regarding the 3007 RFI, I mentioned that we have some process flow diagrams from our CAA inspection. The diagrams were before the company's AOC with LDEQ, so they won't reflect process changes since 2016 (RTO and MERP emission reduction projects). Also, the facility didn't have a detailed process flow diagram for the Neoprene unit, so NEIC drafted one with input from the facility engineers. Since both diagrams are claimed CBI, I send you and Fred a secure OneDrive link so you can access both documents.

Let me know if you have issues with access. Thanks

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

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Message

From: Voelkel, Kevin [kevin.voelkel@bracewell.com]
Sent: 3/18/2022 12:24:57 AM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Celena Cage [celena.cage@la.gov]; Craig Easley [craig.easley@la.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Hutt, Jason [jason.hutt@bracewell.com]; Holden, Bob [bholden@joneswalker.com]
Subject: DPE | First Submission in Response to Feb. 2022 Information Request
Attachments: 2022.03.17 . DPE - First Response to 2.24 RCRA Information Request (Q 1 2 8).pdf

Flag: Follow up

Please find attached a letter providing DPE's first submission in response to EPA's February 24, 2022 information request. Information referenced in the letter is being made available via a secure filesharing website to which DPE has been provided access by EPA. As described in the letter, DPE asserts that certain such documents may qualify for confidential treatment and have been marked as "Company Confidential."

Given the electronic form of transmittal, we would request a reply email confirming receipt of this submission.

Please feel free to contact me with any questions.

Regards,
Kevin

KEVIN M. VOELKEL
Associate
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T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

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BRACEWELL

March 17, 2022

VIA EMAIL

Ms. Cheryl T. Seager
Director
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
Seager.Cheryl@epa.gov

Re: Denka Performance Elastomer LLC – First Submission in Response to EPA's February 24, 2022 Information Request

Dear Ms. Seager,

I write on behalf of Denka Performance Elastomer, LLC ("DPE") to provide the Environmental Protection Agency ("EPA") with DPE's first submission in response to EPA's Resource Conservation and Recovery Act ("RCRA"), Section 3007 information request sent by email to Mr. Jorge Lavastida on February 24, 2022 (the "Request Letter"). As discussed with Ms. Marcia Moncrieffe on March 15, 2022, this submission contains DPE's responses to Questions 1, 2, and 8 of the Request Letter. We will remain in dialogue with EPA concerning the timing of DPE's remaining responses.

While DPE acknowledges EPA's view that it has sufficient information to issue the Request Letter, DPE does not concur with all aspects of EPA's evidence. DPE notes that LDEQ (with delegated authority from EPA) conducted a Full Compliance Evaluation Inspection of DPE's facility in the fourth quarter of 2021. No violations were noted as a result of LDEQ's inspection, as reflected in LDEQ's December 2021 RCRA Compliance Evaluation Report.

DPE also notes that it has received four other information requests from EPA in the past year, each requiring large amounts of documents and information, in addition to a demand to put in place a fenceline monitoring system with a difficult deadline for completion. Despite this seemingly unprecedented level of scrutiny, DPE has devoted significant resources responding to EPA's requests.

Please note that DPE asserts that certain documents, in whole or in part, related to this production may qualify for confidential treatment and protection from public disclosure. These documents have been marked as "Company Confidential." As discussed with Ms. Moncrieffe on March 15, 2022, DPE intends to

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provide substantiation for the information contained in these documents within 30 days of DPE's final submission to the Request Letter.

Information referenced in this letter is being made available via a secure filesharing website to which DPE has been provided access by EPA. Although the information provided herein represents DPE's good faith efforts to address the identified questions, DPE reserves the right to supplement its response at any time in the future if it discovers additional, inconsistent, or conflicting information.

The following numbered paragraphs correspond with the questions posed in Section II of the Request Letter. DPE's responses are provided immediately below each restated question, including, where applicable, references to documents made available to EPA via the secure filesharing website. As discussed with Ms. Moncrieffe on March 15, 2022, the responses below relate to the past 3 years of operations at the DPE facility unless otherwise indicated.

1. **Providing a process diagram as support, please identify and list all Denka's points of solid waste generation. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.**

Please refer to documents DPE-RCRA-01-0001 – 0720 which contain waste characterization forms ("WCFs") for waste that has been shipped offsite in the past 3 years (January 1, 2019 – December 31, 2021). The WCFs reflect points of generation for solid waste that has been shipped offsite in the past 3 years. DPE personnel are unaware of any unused and/or outdated ingredients/products that would have been used in DPE's processes during that time period.

In addition, other solid waste generated from the facility's Monomer, Polymer, and Finishing areas is handled pursuant to its permitted facilities, such as underground injection control wells and the Wastewater Treatment system. Non-hazardous plant trash is also generated and disposed offsite.

DPE does not maintain process diagrams relevant to the requested information.

2. **For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.**

The WCFs referenced in Response 1 reflect hazardous waste determinations. In addition, please refer to documents DPE-RCRA-01-0721 – 0852, which contain additional information that supports hazardous waste determinations for certain wastes described in Response 1.

8. **Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.**

i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.

Please refer to documents DPE-RCRA-01-0857 – 0883, which provide data confirming that analytical samples taken in connection with an August 2020 leak event were below the LDEQ Risk Evaluation Corrective Action Program screening standards for soil and groundwater. No other emergency or non-emergency response events associated with RCRA releases have occurred at or from the Denka facility between January 1, 2019 and the date of EPA's Request Letter.

ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).

A description of the August 2020 leak event, including a description of the associated clean up, remediation, and sampling efforts are provided in documents DPE-RCRA-01-0853 – 0854.

***

DPE does not waive and reserves all rights to object to EPA's request. Please feel free to contact me should you have any questions.

Respectfully,

Kevin Voelkel
Counsel to Denka Performance Elastomer LLC

cc: *EPA*
Marcia Moncrieffe

LDEQ
Craig Easley
Phyllis Luke

DPE
Jorge Lavastida
Patrick Walsh

Counsel to DPE
Jason Hutt (Bracewell LLP)
Bob Holden (Jones Walker LLP)

STATEMENT OF CERTIFICATION

Denka Performance Elastomer LLC

I certify that I am authorized to respond to this information request on behalf of Denka Performance Elastomer LLC and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the foregoing is true and correct. Executed on March 17*, 2022.*

(Signature)

Patrick A. Walsh
(Name)

Manager, Safety, Health, and Environmental
(Title)

Message

From: Voelkel, Kevin [kevin.voelkel@bracewell.com]
Sent: 3/31/2022 11:31:52 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Celena Cage [celena.cage@la.gov]; Craig Easley [craig.easley@la.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Hutt, Jason [jason.hutt@bracewell.com]; Holden, Bob [bholden@joneswalker.com]
Subject: DPE | Third Submission in Response to Feb. 2022 Information Request
Attachments: 2022.03.31 . DPE - Third Response to 2.24 RCRA Information Request.pdf

Flag: Follow up

Please find attached a letter providing DPE's third submission in response to EPA's February 24, 2022 information request. Information referenced in the letter is being made available via a secure filesharing website to which DPE has been provided access by EPA. As described in the letter, DPE asserts that certain such documents may qualify for confidential treatment and have been marked as "Company Confidential."

Given the electronic form of transmittal, we would again ask for a reply email confirming receipt of this submission.

Please feel free to contact me with any questions.

Regards,
Kevin

KEVIN M. VOELKEL
Associate
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BRACEWELL

March 31, 2022

VIA EMAIL

Ms. Cheryl T. Seager
Director
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
Seager.Cheryl@epa.gov

Re: Denka Performance Elastomer LLC – Third Submission in Response to EPA's February 24, 2022 Information Request

Dear Ms. Seager,

I write on behalf of Denka Performance Elastomer, LLC ("DPE") to provide the Environmental Protection Agency ("EPA") with DPE's third submission in response to EPA's Resource Conservation and Recovery Act ("RCRA"), Section 3007 information request sent by email to Mr. Jorge Lavastida on February 24, 2022 (the "Request Letter"). This submission supplements DPE's prior responses, which were submitted to EPA on March 17 and March 24, 2022. As discussed with Ms. Marcia Moncrieffe on March 29, 2022, this submission contains DPE's responses to Questions 7, 12, 13, 14, and 15 of the Request Letter. We will remain in dialogue with EPA concerning the timing of DPE's remaining responses.

Please note that DPE asserts that certain documents, in whole or in part, related to this production may qualify for confidential treatment and protection from public disclosure. These documents have been marked as "Company Confidential." As discussed with Ms. Moncrieffe on March 15, 2022, DPE intends to provide substantiation for the information contained in these documents within 30 days of DPE's final submission to the Request Letter.

Information referenced in this letter is being made available via a secure filesharing website to which DPE has been provided access by EPA. Although the information provided herein represents DPE's good faith efforts to address the identified questions, DPE reserves the right to supplement its response at any time in the future if it discovers additional, inconsistent, or conflicting information.

The following numbered paragraphs correspond with the questions posed in Section II of the Request Letter. DPE's responses are provided immediately below each restated question, including, where

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applicable, references to documents made available to EPA via the secure filesharing website. As discussed with Ms. Moncrieffe on March 15, 2022, the responses below relate to the past 3 years of operations at the DPE facility unless otherwise indicated.

**

DPE Responses to Questions 7, 12, 13, 14, and 15 of the Request Letter

7. For your Underground Injection Wells, please answer the following questions:

i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.

Please refer to the table provided in document DPE-RCRA-03-0001.

ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?

Please refer to documents DPE-RCRA-03-0002 – 63, which provide DPE's *2021 Waste Minimization Plan and Alternatives to UIC Disposal for Aqueous Wastewaters Disposed in Onsite Hazardous Waste Underground Injection Wells* ("Waste Minimization Plan"). Sections 4-10 of the Plan provide a summary of the waste streams that are placed in DPE's UIC wells.

iii. Please provide a description of all waste streams generated from the storage, clarification, neutralization and filtration of waste streams sent to the Aqueous Waste Area, prior to underground injection, as well as maintenance activities and how this waste, including filters, is ultimately managed and disposed of.

Please refer to documents DPE-RCRA-03-0002 – 63, which provide DPE's 2021 Waste Minimization Plan. Sections 4-10 of the Plan provide a summary of the waste streams that are sent to the Aqueous Waste Area.

iv. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

Please refer to documents DPE-RCRA-03-0002 – 63, which provide DPE's 2021 Waste Minimization Plan. Sections 4-10 of the Plan provide waste determinations for waste streams placed in the UIC Wells.

12. Provide a description of the sludge removal and handling procedures from the WWTP,whether the sludge is sampled to determine if it is hazardous and where and how it is disposed.

Sludge removal is performed through use of a filter press. Sampling of the filter cake is completed annually for recertification of the waste profile. Please refer to documents DPE-RCRA-03-0064 – 125, which provide results of such sampling for 2019-2021. These reports do not indicate that the samples are hazardous. The filter cake is profiled and shipped offsite to a permitted TSDF (Waste Pro).

13. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.

There are no runoffs into the Mississippi River. DPE's facility is located on land owned by DuPont. Non-process area stormwater runoff is routed to ditches managed by DuPont. The ultimate destination of such runoff is the responsibility of DuPont.

14. What knowledge does Denka have of operational drinking water wells at or near its Facility?

Please refer to documents DPE-RCRA-03-0126 – 1291, which provide Section 5 of DPE's *Class I Waste Injection Well 2021 Permit Renewal Application*. Information available to DPE regarding wells within two miles of the Facility are discussed on documents DPE-RCRA-03-0139 – 40. Additional information can be found on LDNR's SONRIS website.

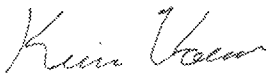
15. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.

DPE does not operate monitoring wells, nor are there any applicable limits or standards related to discharges from the UIC wells at the facility.

**

Please feel free to contact me should you have any questions.

Respectfully,



Kevin M. Voelkel
Counsel to Denka Performance Elastomer LLC

cc: *EPA*
Marcia Moncrieffe

LDEQ
Craig Easley
Phyllis Luke

DPE
Jorge Lavastida
Patrick Walsh

Counsel to DPE
Jason Hutt (Bracewell LLP)
Bob Holden (Jones Walker LLP)

STATEMENT OF CERTIFICATION

Denka Performance Elastomer LLC

I certify that I am authorized to respond to this information request on behalf of Denka Performance Elastomer LLC and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the foregoing is true and correct. Executed on March 31*, 2022.*

(Signature)

Patrick A. Walsh
(Name)

Manager, Safety, Health, and Environmental
(Title)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/8/2022 1:28:46 PM
To: Leathers, James [Leathers.James@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka RCRA 3007 Information Request Questions 16 and 18

Good morning, Fred and James,

Thank you for your responses below.

Please let me know your feedback on the path I have decided going forward when we talk this morning.

For question 16: I will follow-up with a clarification as to volume and mass. As well, I will ask about acute hazardous waste since such a small amount is hazardous. Fred, in terms of characterization and underline hazardous waste constituencies, is there more you would want to know?

For 18: I would follow-up to say we are still considering there position. Further, we should have a call with John before the inspection to discuss the inspector's approach during the inspection since Denka said, "EPA is welcome to come on site and view the documents." I will add John to the call this morning and see if he is available.

Talk with you soon.

Thanks,
Marcia

From: Leathers, James <Leathers.James@epa.gov>
Sent: Friday, April 08, 2022 6:58 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request Questions 16 aand 18

Marcia,

For Air, the documents requested would not be required to be made digitally available, just available upon request. The company has agreed. Since we will have an inspector onsite, I think the inspector can narrow the universe of P&IDs that will be needed for RCRA's compliance evaluation. For the CAA, we have no interest in having all P&IDs, just a subset that are needed to fill gaps to help with our compliance determinations. For example, we have requested P&IDs for the HAPF, but not from every source that routes to the HAPF. So the production ends up being 4 to 5 documents rather than 25 to 50 documents. Also, as Fred indicated, the size of many of the drawing adds to the burden of producing all P&IDs. I provided examples of process flow diagrams that are most valuable for Air compliance evaluations to John.

James Leathers
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Chief, Air Toxics Enforcement Section
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From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, April 07, 2022 3:14 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request Questions 16 aand 18

Thank you Fred.

James,
Please see Fred's contribution to 16 and 18 below.
Please review and include any additional thoughts you may have.

Thanks,
MM

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Thursday, April 07, 2022 2:27 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka RCRA 3007 Information Request Questions 16 aand 18

Marcia,

My thoughts on questions 16 and 18 in relation to Denka responses.

16. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.

KV "We asked whether DPE should consider volume alone in identifying the "largest amount" of emissions, discharges, and disposals."

My Answer: I suppose DPE has a point we did not tell them what "units" to give us an answer in. We could tell them we would like not only volume but mass if it is known.

18. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.

KV "DPE has indicated that there are likely hundreds of potentially responsive hand-markups of P&IDs (showing components at the facility) that are not digitized and not easily scannable. We previewed that preparing the P&IDs in an electronic form would impose a significant burden on DPE and would require a great deal of time and resources (both internal and external). As a reasonable alternative, we suggested that EPA was welcome to review the originals at the DPE Facility."

My answer: Sad and potentially true. I would say it is an outdated industry standard to still use paper but its completely legal. I also believe these may be large and difficult to scan documents known as blueprints which can be unwieldly. Regardless the materials were asked for and they are indeed available. I am unsure if this could be considered burdensome as I believe these materials must be part of any permit the facility holds. I think there will be a cost and unspecified amount of manpower involved with producing the P&ID diagrams but the information they hold is vital for our inspectors and the understanding of the facility. I personally would hate for an inspection team to run off blindly tracing pipes at Denka without first knowing where everything goes and what it carries.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, April 07, 2022 8:44 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

Thanks for your follow-up. I had hoped we would be, especially since they attorneys we have been working with have been cooperative. MM

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 07, 2022 8:15 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

Thanks John. Marcia, it sounds like we're good with Denka's proposed timeline for the remainder of the submittal.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, April 7, 2022 7:44 AM
To: Penland, John <Penland.John@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

Good morning, John,

On the question of the process diagram, speak with James. He may be able to help you.

Marcia

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, April 07, 2022 7:27 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Yurk,

Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

I don't see anything that we need in advance. I do see some questions where their response so far has been incomplete. For example, Question #1 asks for process diagrams where they claim to not have responsive documents, but I would be surprised if they don't have something WE would consider to be process diagrams. I feel like this may be an area where we aren't communicating. These are things I can hopefully clear up onsite.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, April 6, 2022 7:57 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

Thank you for the information, Marcia. I'm looping in John to see if he has what he needs for the inspection or if he wants to push to get the responses to any of the questions 9-11 and 16-19 information sooner. John, please let us know ASAP.

Thanks,
Margaret

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, April 6, 2022 8:11 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka RCRA 3007 Information Request

Margaret and Jeff,

The call with Denka went well yesterday (4/5).

Denka made its submittals as promised through Thursday(3/31) of last week and will make another submittal for tomorrow (4/7) for questions 20 through 25.

The remaining questions, 16-19 and 9 through 11, we will not receive by April 21st because of the Easter Holiday and other competing commitments. I doubt there would be an issue since Denka has been working to provide us with the responses, but defer to you.

For question 18, Denka believes it to be burdensome to export the files. Counsel for Denka assuredly stated, "EPA is more than welcome to come to the plant and look at the PNID drawings." I will have more to share with Fred upon receipt of a follow-up email I am expecting from Denka regarding questions 16 and 18.

I remain available.
Marcia

From: Moncrieffe, Marcia
Sent: Tuesday, March 29, 2022 8:14 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: Denka RCRA 3007 Information Request

Margaret,

As a follow-up to our call of moments ago and my call with Denka this morning, I share the following:

We were promised responses to questions 7 and 12 through 15 this coming Thursday (3/31);
We should expect responses to question 20 through 25 the following Thursday (4/7); and
I have shared the goal of having the remaining information 16-19 and 9 through 11 by April 15th. I will be able to say form after next Tuesday (4/5), as we will continue to have the Tuesday calls.

According to counsel for Denka, the process of exporting some of the data, for example to a question like 17, is time consuming. I will talk with the technical team as to some options that were shared with me about viewing the data, though I believe these options would not provide us with the scope of review that is necessary to determine compliance beyond a day or few days. I have asked if Denka's technology is sophisticated enough to allow us to plug directly into its database and view discretely the records that are responsive to any of the remaining questions, and counsel for Denka will follow-up. He however said if someone came on site the person would be able to view the records.

I hope this is helpful as to our progress as I remain available for any follow-ups.

Cheers to your day,
Marcia

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 4/15/2022 4:21:29 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: DENKA FW: PROOF-OF-CONCEPT DEMONSTRATION RECOMMENDS CONTINUOUS AIR MONITORING & OTHER PRECAUTIONARY PRACTICES IN ST. JOHN PARISH

Thanks I hadn't seen the new article. I had jeff forward the LSU report to me yesterday.

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 15, 2022 9:18 AM
To: Penland, John <Penland.John@epa.gov>
Subject: DENKA FW: PROOF-OF-CONCEPT DEMONSTRATION RECOMMENDS CONTINUOUS AIR MONITORING & OTHER PRECAUTIONARY PRACTICES IN ST. JOHN PARISH

I cant get the link to load but this might be useful to your inspection team.

Fred

From: Schleifstein, Mark <mschleifstein@theadvocate.com>
Sent: Monday, April 11, 2022 11:54 AM
To: Durant, Jennah <Durant.Jennah@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: FW: PROOF-OF-CONCEPT DEMONSTRATION RECOMMENDS CONTINUOUS AIR MONITORING & OTHER PRECAUTIONARY PRACTICES IN ST. JOHN PARISH

In light of the decision by EPA to investigate DEQ and Dept. of Health concerning Denka last week, wondering if EPA will be following up on this report.
And in that light, whether EPA was already aware of the results here, and if that resulted in the decision to ask Denka for information about chloroprene possibly being held as hazardous waste at the site, in this February letter:
https://caedtor.epa.gov/ords/caedtor/apex_util.get_blob?s=2013686469547&a=174&c=32426055226915530&p=72&k1=7739&k2=&ck=u7jxuYMyfD1eMqb7eI4LVM0Wk9AqVsDkn1tB95FALQAAwV-WAbq1oEBrJI8dDBzihkT4Y8heDMTuifKMOWFSXw&rt=IR

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

From: Capo, Leslie <LCapo@lsuhsc.edu>
Sent: Monday, April 11, 2022 11:28 AM
To: Capo, Leslie <LCapo@lsuhsc.edu>
Subject: PROOF-OF-CONCEPT DEMONSTRATION RECOMMENDS CONTINUOUS AIR MONITORING & OTHER PRECAUTIONARY PRACTICES IN ST. JOHN PARISH

LSU Health NEW ORLEANS | Health Sciences Center

FOR IMMEDIATE RELEASE

CONTACT: LESLIE CAPO
504-568-4806; CELL 504-452-9166

PROOF-OF-CONCEPT DEMONSTRATION RECOMMENDS CONTINUOUS AIR MONITORING & OTHER PRECAUTIONARY PRACTICES IN ST. JOHN PARISH

New Orleans, LA – A small monitoring demonstration around the Denka facility in St. John the Baptist Parish conducted by LSU Health New Orleans School of Public Health reports detectable chloroprene in two air samples and metabolites indicating exposure to volatile organic compounds in most urine samples, even when the plant was not operating. The demonstration was part of a larger project commissioned by the Louisiana Department of Health to review cancer cases in St. John the Baptist Parish, Louisiana, "Cancer Risk in St John Parish" (CRISP), around the Denka Performance Elastomer facility. The report is available here.

"This was not a formal study to characterize exposures to chloroprene,' says Edward Trapido, ScD, FACE, Professor and Associate Dean for Research in the School of Public Health and Deputy Director for Population Science in the Stanley S. Scott Cancer Center at LSU Health New Orleans, who reviewed the report. "It was a proof-of-concept demonstration to evaluate an analytical protocol."

Ten air samples were collected at offsite locations at different proximities from Denka conducted in September 2021. Urine samples were collected from seven residents at three of the residential locations. No production of chloroprene or neoprene was reported that month due to Hurricane Ida.

Two of the ten air samples had detectable chloroprene at levels above EPA's recommendation for maximum annual average chloroprene air concentration for lifetime exposures. These samples were taken near an elementary school. Some sites had detectable levels of other volatile organic compounds (VOCs), including toluene, benzene, xylene and 1,2,4-trimethylbenzene, but none exceeded EPA's chemical-specific lifetime recommendations for non-cancer health effects.

"Chloroprene levels at or across the street from the elementary school were estimated to be 0.78 and 0.85 μg/m3 on September 23rd— approximately four times above the EPA's recommended maximum annual average chloroprene air concentration of 0.2 μg/m3," notes Adrienne Katner, DEnv, MS, Associate Professor of Environmental and Occupational Health Sciences at LSU Health New Orleans School of Public Health, who led the project. "This recommended chloroprene air concentration was set to limit cancer risk among 1 million

persons to 100 cancer cases per year. Denka's air monitors also detected chloroprene in September 2021, with concentrations as high as 4.7 μg/m3 (September 22nd) at the western edge of Denka's property, and 24 μg/m3 (September 27th) at the eastern edge. These levels were between 23 and 2120 times above 0.2 μg/m3. The EPA's chloroprene air limit is a recommendation not a required regulatory standard. However, it is important to understand that levels below state and national air quality standards cannot always ensure zero health risks, especially when considered in the context of simultaneous exposures to other facility-specific emissions."

Of nine urine samples from seven residents, all had detectable levels of DHBMA, a metabolite of chloroprene and 1,3-butadiene. HOBMA, CHPMA, Cl-MA metabolites were detected in urine samples, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin; however, the researchers were unable to verify the identity of these metabolites.

"Chloroprene continues to be detected offsite by EPA and Denka officials at levels of potential concern where vulnerable populations congregate or live, Katner says. "Biomonitoring indicates resident exposure is occurring to likely known and/or probable carcinogens associated with plastics production. Gaps in scientific knowledge about the cancer and non-cancer health impacts of lifetime exposures to low levels of chloroprene and VOC mixtures on vulnerable populations like children, the elderly, immunocompromised, sick and pregnant women, support a need for precautionary practices by state and parish officials. There is a need for a cumulative risk assessment for all Denka emissions, especially considering the similarities in health outcomes from many of the VOCs. Health outcomes which are common for VOC's include irritation to eyes, nose and throat, headaches and nausea, skin reactions, fatigue, damage to lungs, liver, kidneys, and central nervous systems, and blurred vision."

The report makes the following recommendations:

- Cumulative risk assessments should be conducted by LDH and LDEQ for health assessments and permit applications, respectively.
- In addition to cancer outcomes, LDH should track non-cancer health outcomes to evaluate potential impacts to the population from multiple emissions released by Denka and other facilities in the area.
- LDH should implement a school-based health surveillance system.
- If funds allow, biomonitoring should be used by LDH to quantify resident and child exposures to chloroprene.
- Denka should be required by LDEQ to conduct online real-time fence line and offsite continuous air monitoring to track the spatial dispersion and temporal patterns of chloroprene and other VOC air emissions.
- It is critical that the LDH and the LDEQ work together to adopt proactive precautionary practices and policies and establish a trust-based supportive relationship with the community.

Donna Williams, DrPH, Professor and Director of the Louisiana Cancer Prevention and Control Program at LSU Health New Orleans School of Public Health says, "The call for public health intervention is the main message of this report. When risks to a population are plausible, mitigation and exposure prevention should be implemented."

LSU Health Sciences Center New Orleans *educates Louisiana's health care professionals. The state's flagship health sciences university, LSU Health New Orleans includes a School of Medicine with branch campuses in Baton Rouge and Lafayette, the state's only School of Dentistry, Louisiana's only public School of Public Health, and Schools of Allied Health Professions, Nursing, and Graduate Studies. LSU Health New Orleans faculty take care of patients in public and private hospitals and clinics throughout the region. In the vanguard of biosciences research in a number of areas in a worldwide arena, the LSU Health New Orleans research enterprise generates jobs and enormous economic impact. LSU Health New Orleans faculty have made lifesaving discoveries and continue to work to prevent, advance treatment, or cure disease. To learn more, visit http://www.lsuhsc.edu, http://www.twitter.com/LSUHealthNO, or http://www.facebook.com/LSUHSC.*

# # #

Leslie Capo
Director of Information Services
LSU Health Sciences Center New Orleans
Office: 504-568-4806
Cell: 504-452-9166
lcapo@lsuhsc.edu

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 1/31/2022 4:55:52 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: Denka 3007/onsite inspection/7003

I'm unavailable the week of March 21. March 28 is an inspection at General Motors in Arlington, but Gabe may be able to run that one himself if Denka is more important for me to be at. Do we have any NEIC resources available?

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 10:49 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Good morning, Margaret,

I need to discuss with Russell before I make any commitments.

At first impression, I share as follows:

I did not receive any comments for DOJ on the draft 3007 information request that would be crucial to have as DOJ has stated it could impact the CAA case.

Regarding the RCRA 7003 Order, timing is important but more so to ensure Fred and I have enough time to review the responses to the RCRA 3007 Information Request (Assuming Denka response) and as well for us to properly review the Inspection Report after it is written.

I think we need as well to discuss further as a group. Thanks

Best for your today,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 9:52 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka 3007/onsite inspection/7003
Importance: High

Hi all:

There is renewed interest in using RCRA authorities at the Denka facility as the CAA settlement negotiations are not proceeding apace. HQ would like us to proceed with our plans to issue a 7003 to the facility. We had previously discussed the need for a 3007 to obtain the information we need for the 7003. HQ would also like us to conduct an onsite inspection prior to 7003 issuance. Therefore, I am proposing the following schedule:

2/2/2022	Put 3007 in eRouting
2/8/2022	Send approved 3007 to OECA for final review
2/14/2022	Issue 3007
2/28/2022	Receive 3007 response
3/21/2022	Conduct onsite inspection
4/?/2022	Issue 7003

Attached is the latest version of the 3007 information request that we drafted back in the Fall. Could you please review it and let me know if you have any comments or questions you think should be added? And could you put it in the final form of a formal 3007 and then place it into eRouting? John, I'm including you since we'd like you to conduct the inspection and you may have some additional questions you think should be included in the 3007.

Thanks so much!
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, January 5, 2022 9:44 AM
To: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Oif, Leslie <Oif.Leslie@epa.gov>
Subject: Denka 3007

Hi Russell and Margaret – happy New Year!

Leslie Oif and I worked on the questions for Denka (please see the attached). It was based on the draft questions provided earlier by Marcia.

If you're ok with these questions, I can input this into formal correspondence (with the certification, definitions, etc). Also, if you have R6 letterhead, I can use that and put a final document together for you.

We are happy to collaborate further on Denka with you!

Best,
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/20/2022 11:17:55 AM
To: Penland, John [Penland.John@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; McDonald, Ashley [McDonald.Ashley@epa.gov]
Subject: RE: DPE | Availability for Discussion

Good morning, John,

As a follow-up to the emails below, I ask the following question-

Is there a nexus between the ambient air sample and any hazardous waste (statutory definition) at the facility? If yes, then the ambient air sample concerns hazardous waste at the facility and EPA would be acting within its authority to collect the samples.

Please see counsel for Denka request for a call with me and my response below, which you were copied on. My morning is really pack, but if you need to talk with me, I can arrange a call for us (you, Fred, Russell, and your RCRA managers for 8:30 am). Actually, I will send the invitation just to hold the space.

Thanks,
Marcia

From: Moncrieffe, Marcia
Sent: Wednesday, April 20, 2022 6:07 AM
To: Penland, John <Penland.John@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: FW: DPE | Availability for Discussion

From: Moncrieffe, Marcia
Sent: Wednesday, April 20, 2022 6:06 AM
To: 'Voelkel, Kevin' <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: DPE | Availability for Discussion

Good morning, Kevin,

My calendar is solidly book this morning and why I am up this early working. I will copy John on this email so that he has the information as well.

Congress gave EPA broad authority under Section 3007 of RCRA.

As long as the information EPA is gathering concerns Hazardous Waste (as defined by the statute – See Section 1004(5) of RCRA) and for the purpose of enforcement or rulemaking, in this case enforcement, then EPA is operating within its authority. Please see the definition for "Solid Waste" at Section 1004 (27) of RCRA, which is incorporated into the definition of "Hazardous Waste" at Section 1004(5) of RCRA.

If you still need to talk I can be available at 10:30 am (CST) this morning and can send an invitation.

Kind regards,
Marcia

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, April 19, 2022 9:39 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: DPE | Availability for Discussion

Marcia,

Thank you for your response. Sorry we were not available during your window today.

During today's inspection at the DPE facility, EPA inspectors collected an ambient air sample during a field walk through. Before the next field walk through tomorrow, Jason and I would like to have a call with you and the inspectors to discuss the appropriate role of the ambient air sampling in support of a RCRA inspection. Are you available to join a call tomorrow between 8-9:30a CT?

Regards,
Kevin

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Tuesday, April 19, 2022 9:13 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: DPE | Availability for Discussion

Good morning, Kevin,

No worries. I can be available at 4:30 pm today up until 6:00 pm for 30 mins. If you confirm a 30 mins window, I will send an invitation. Thanks, MM

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, April 19, 2022 7:15 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: DPE | Availability for Discussion

Marcia,

Apologies for the delayed reply; I traveled down last night to facilitate EPA's RCRA inspection at DPE's facility this week. Are you available for a call tomorrow morning before 7:30 CT, or late in the day tomorrow? Jason may be available at additional (and more convenient) times today and tomorrow.

Regards,

Kevin

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, April 18, 2022 7:14 PM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: DPE | Availability for Discussion

All, the email below was sent in error Elizabeth Ash, whom I have asked to please ignore. I am now copying Elizabeth George. Thanks, MM

From: Moncrieffe, Marcia
Sent: Monday, April 18, 2022 6:04 PM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Ash, Elizabeth (Elizabeth.Ash@CVSCaremark.com) <Elizabeth.Ash@CVSCaremark.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>
Subject: RE: DPE | Availability for Discussion

Good afternoon, Kevin,

I was off for most of this morning and had calls for all afternoon until this point. I could schedule our 7:00 am call for Tomorrow (4/18) if that works for you and Jason. Thanks, Marcia

---

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Monday, April 18, 2022 10:57 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>
Subject: DPE | Availability for Discussion

Marcia,

We understand that EPA inspectors are at the gate to DPE's facility to conduct a RCRA audit. We would like to schedule a call to touch base. Do you have availability today to discuss?

Thank you,
Kevin

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Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/20/2022 11:53:30 AM
To: Hutt, Jason [jason.hutt@bracewell.com]
CC: Voelkel, Kevin [kevin.voelkel@bracewell.com]; McDonald, Ashley [McDonald.Ashley@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: DPE | Availability for Discussion

Good morning, Jason,

Thanks for the follow-up.

I will send the invitation.

Regards,
Marcia

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, April 20, 2022 6:24 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; McDonald, Ashley <McDonald.Ashley@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: Re: DPE | Availability for Discussion

Marcia — good morning. We will need to talk before additional sampling takes place by EPA or its contractors. Tabletop exercises are scheduled for this morning, so I think 10:30A CT will work. I am available earlier if that's your preference.

JASON B. HUTT
Partner
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T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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CONFIDENTIALITY STATEMENT
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On Apr 20, 2022, at 7:06 AM, Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov> wrote:

Good morning, Kevin,

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Subject: DPE | Availability for Discussion

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Thank you,
Kevin

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Associate
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Message

From: Stephanos, Ann [Stephanos.Ann@epa.gov]
Sent: 4/20/2022 12:43:05 PM
To: Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: Denka IRL Q's and A's
Attachments: Denka RCRA IRL Q's and A's.docx

Flag: Follow up

Stephanos, Ann has shared a OneDrive for Business file with you. To view it, click the link below.

Denka RCRA IRL Q's and A's.docx

I am assisting in the communications effort at Denka and EPA will be releasing the first round of fenceline monitoring data collected earlier this year next week. In the messaging on this data, we are including current enforcement efforts (to the extent that we can talk about them) including the issuance of the RCRA IRL and the current RCRA inspection.

I am putting together some q's and a's on the RCRA IRL and was hoping that you could help me fill in the blanks. Remember, these are not public q's and a's – we put them together for the press people so in case they get questions, they can hopefully answer them (so we are guessing with what will be asked). So if you could provide an answers or if you have additional q's and a's that you think we might get on the IRLs, feel free to include them as well. I need something quick (sorry – things don't move for awhile then they need everything yesterday) so if you could look at this today, I would greatly appreciate it. And yes, I'm working with Jennah Durant in R6's public affairs office so we are coordinating our efforts with R6. Thanks!

Ann Stephanos (she/her)
Attorney Advisor
Waste Enforcement Branch
202-564-4006

Q: What is the purpose of the information request letter that EPA sent to Denka?

A: To obtain information from Denka regarding

Q: Where can I get a copy of the information request letters that EPA sent to Denka?

A: The letter is available from

Q: When will the Agency get the requested information from Denka? When and how will EPA make data collected from the information request letter publicly available?

A:

Q: What data does EPA currently have on chloroprene emissions from Denka?

A: [I will prepare an answer on what we have as far as Air monitoring data but if we have anything outside of Air, please let me know]

Q: If the data provided in response to the information request letter shows additional sources of chloroprene emissions, what will EPA do to address these sources?

A:

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 4/21/2022 8:54:23 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: Chloroprene half-life in water
Attachments: chloroprene.pdf

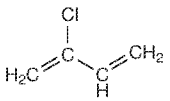
Chloroprene

CAS No. 126-99-8

Reasonably anticipated to be a human carcinogen

First listed in the *Ninth Report on Carcinogens* (2000)

Also known as 2-chloro-1,3-butadiene



Carcinogenicity

Chloroprene is *reasonably anticipated to be a human carcinogen* based on evidence of carcinogenicity from studies in experimental animals.

Cancer Studies in Experimental Animals

Inhalation exposure to chloroprene caused tumors at several different tissue sites in mice and rats. It caused lung tumors (alveolar/bronchiolar adenoma and/or carcinoma) in mice of both sexes and in male rats; kidney tumors in rats of both sexes and in male mice (renal-tubule adenoma); and mammary-gland tumors in female rats (fibroadenoma) and mice. In rats of both sexes, it also caused tumors of the oral cavity (squamous-cell papilloma and carcinoma) and thyroid gland (follicular-cell adenoma or carcinoma). In mice, it also caused tumors of the forestomach (squamous-cell papilloma), Harderian gland (adenoma or carcinoma), and blood vessels (hemangioma and hemangiosarcoma) in both sexes and tumors of the liver (hepatocellular adenoma and carcinoma), Zymbal gland (carcinoma), skin (sarcoma), and mesentery (sarcoma) in females (NTP 1998).

Cancer Studies in Humans

Data from two early epidemiological studies suggested that occupational exposure to chloroprene may increase the risks of cancer of the liver, lung, and digestive and lymphohematopoietic systems (Pell 1978, Li *et al.* 1989). Since chloroprene was listed in the *Ninth Report on Carcinogens,* additional epidemiological studies have been identified. Mortality from leukemia and liver cancer was significantly increased among shoe-manufacturing workers, and liver-cancer incidence and mortality were signficantly increased among chloroprene-production workers (Bulbulyan *et al.* 1998, 1999). However, two other cohort studies of chloroprene-production workers found no excess of liver cancer (Colonna and Laydevant 2001, Marsh *et al.* 2007a,b). These two studies reported increased risks of lung or respiratory cancer; however, the risk estimates were not statistically significant or related to exposure category in the small cohort study (Colonna and Laydevant 2001) and were significantly elevated in only one of several plants in the large multi-plant study (Marsh *et al.* (2007a,b).

Studies on Mechanisms of Carcinogenesis

Chloroprene (the 2-chloro analogue of 1,3-butadiene) caused all of the same types of tumors that 1,3-butadiene caused in mice except for lymphoma and tumors of the preputial gland and ovary (NTP 1998).

In vitro metabolism of chloroprene by mouse, rat, hamster, and human microsomes produced (1-chloroethenyl)oxirane, an epoxide that is thought to react with DNA and can be further metabolized by hydrolysis and glutathione conjugation (Himmelstein *et al.* 2001). However, many studies on the genotoxicity of chloroprene have given negative results, and positive results from earlier studies were attributed to differences in the age and purity of the chloroprene samples (Westphal 1994, NTP 1998). The mutagenicity of chloroprene in bacteria (Bartsch *et al.* 1975, 1979) was considered to be due to cyclic dimers that accumulate in aged samples (Westphal *et al.* 1994).

At the same exposure concentrations as used in the inhalation-exposure studies of cancer in mice, chloroprene did not cause sister chromatid exchange or chromosomal aberrations in mouse bone-marrow cells, nor did it increase the frequency of micronucleated erythrocytes in peripheral blood (Tice *et al.* 1988). During another inhalation-exposure study in mice and rats, chloroprene caused dominant lethal mutations in both species and chromosomal aberrations in mouse bone marrow cells (Sanotskii 1976). However, despite the largely negative findings for genotoxicity, chloroprene-induced lung and Harderian-gland tumors from mice had a high frequency of unique mutations of the K-*ras* proto-oncogene (NTP 1998). In addition, occupational-exposure studies reported increased frequencies of chromosomal aberrations in the lymphocytes of workers (IARC 1979).

Properties

Chloroprene is a halogenated alkene that exists at room temperature as a clear colorless liquid with a pungent ether-like odor. It is practically insoluble in water, soluble in alcohol, and miscible with acetone, benzene, and ethyl ether. It is highly flammable and polymerizes on standing, making it unstable in the environment (Akron 2009). Physical and chemical properties of chloroprene are listed in the following table.

Property	Information
Molecular weight	88.5[a]
Specific gravity	0.956 at 20°C/4°C[a]
Melting point	−130°C[a]
Boiling point	59°C[a]
Log K_{ow}	2.53[b]
Water solubility	0.875 g/L at 25°C[b]
Vapor pressure	215 mm Hg at 25°C[a]
Vapor density relative to air	3[a]

Sources: [a]HSDB 2009, [b]ChemIDplus 2009.

Use

The only commercial use identified for chloroprene is as a monomer in the production of the elastomer polychloroprene (neoprene), a synthetic rubber used in the production of automotive and mechanical rubber goods, adhesives, caulks, flame-resistant cushioning, construction materials, fabric coatings, fiber binding, and footwear. Other uses of this polymer include applications requiring chemical, oil, or weather resistance or high gum strength. The U.S. Food and Drug Administration permits the use of chloroprene as a component of adhesives used in food packaging and also permits the use of polychloroprene in products intended for use with food (IARC 1979, 1999, NTP 1998).

Production

In 2009, chloroprene was produced by one manufacturer each in the United States and China and two manufacturers in Europe (SRI 2009) and was available from eleven suppliers, including seven U.S. suppliers (ChemSources 2009). Under the U.S. Environmental Protection Agency's Toxic Substances Control Act Chemical Data Reporting Rule, U.S. production plus imports of chloroprene were reported to be in the range of 50 million to 100 million pounds in 2015 (EPA 2016).

Exposure

The routes of human exposure to chloroprene are inhalation, ingestion, and dermal contact. Chloroprene is not known to occur naturally in the environment (IARC 1999). The main sources of environmental releases are effluent and emissions from facilities that use chloroprene

to produce polychloroprene elastomers. According to EPA's Toxics Release Inventory, environmental releases of chloroprene have decreased steadily from a high of over 2 million pounds in 1988 (the year reporting started). In 2007, two facilities reported chloroprene releases of over 275,000 lb, and seven facilities reported releases of 1,300 lb or less, almost all to air (TRI 2009). When released to air, chloroprene reacts with photochemically generated hydroxyl radicals, with a half-life of 18 hours, and smaller amounts are removed by reaction with ozone, with a half-life of 10 days. Based on the Henry's law constant and octanol-water partition coefficient, chloroprene is expected to be removed from water and damp soil primarily by volatilization. If released to water, chloroprene is expected to volatilize from the surface, with a half-life of 3 hours from streams and 4 days from lakes. It will not adsorb to sediment or suspended solids or bioaccumulate in aquatic organisms. If released to soil, chloroprene is expected to volatilize or may leach into groundwater (HSDB 2009). In 1991, EPA's Urban Air Toxics Monitoring Program identified chloroprene in 88 of 349 samples (25.2%), at concentrations ranging from 0.01 to 1.78 ppb (0.036 to 6.44 μg/m^3). The results were similar in 1996, but in 2000 and 2005, chloroprene was detected in only one sample.

The main source of occupational exposure to chloroprene is the manufacture of chloroprene or polychloroprene (NTP 1998). In 1977, it was estimated that 2,500 to 3,000 workers were exposed to chloroprene during its manufacture and polymerization (Infante 1977). Chloroprene monomer is manufactured in a closed system, which is then used on site to make the polymer. The National Occupational Exposure Survey (conducted from 1981 to 1983) estimated that 17,700 workers, including 650 women, potentially were exposed to chloroprene or polychloroprene (NIOSH 1990). Time-weighted 8-hour average concentrations at three facilities (two in the United States and one in Northern Ireland) from 1975 to 1992 were 1 ppm in all but three samples, and chloroprene concentrations in the monomer manufacturing phase were below 1.8 ppm in all samples (Hall *et al.* 2007). During the polymer manufacturing phase, chloroprene concentrations were as high as 4.66 ppm in Northern Ireland and 3.42 ppm in the United States. By 1992, concentrations in all polymer facilities were lower (1.4 and 0.53 ppm in the United States and 0.37 ppm in Northern Ireland).

Regulations

Department of Transportation (DOT)

Chloroprene is considered a hazardous material, and special requirements have been set for marking, labeling, and transporting this material.

Environmental Protection Agency (EPA)

Clean Air Act

National Emission Standards for Hazardous Air Pollutants: Listed as a hazardous air pollutant.
New Source Performance Standards: Manufacture is subject to certain provisions for the control of volatile organic compound emissions.

Comprehensive Environmental Response, Compensation, and Liability Act

Reportable quantity (RQ) = 100 lb.

Emergency Planning and Community Right-To-Know Act

Toxics Release Inventory: Listed substance subject to reporting requirements.

Resource Conservation and Recovery Act

Listed as a hazardous constituent of waste.

Occupational Safety and Health Administration (OSHA, Dept. of Labor)

While this section accurately identifies OSHA's legally enforceable PELs for this substance in 2018, specific PELs may not reflect the more current studies and may not adequately protect workers.
Permissible exposure limit (PEL) = 25 ppm (90 mg/m^3).
Potential for dermal absorption.

Guidelines

American Conference of Governmental Industrial Hygienists (ACGIH)

Threshold limit value – time-weighted average (TLV-TWA) = 10 ppm (36 mg/m^3).
Potential for dermal absorption.

National Institute for Occupational Safety and Health (NIOSH, CDC, HHS)

Ceiling recommended exposure limit = 1 ppm (3.6 mg/m^3) (15-min exposure).
Immediately dangerous to life and health (IDLH) limit = 300 ppm (1,086 mg/m^3).
Listed as a potential occupational carcinogen.

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ED_013532_00001849-00003

Accessibility Report

Filename: Chloroprene.pdf

Report created by: Tracey Saunders
Organization:
[Personal and organization information from the Preferences > Identity dialog.]

Summary

The checker found no problems in this document.

- Needs manual check: 0
- Passed manually: 2
- Failed manually: 0
- Skipped: 0
- Passed: 30
- Failed: 0

Detailed Report

Document

Rule Name	Status	Description
Accessibility permission flag	Passed	Accessibility permission flag must be set
Image-only PDF	Passed	Document is not image-only PDF
Tagged PDF	Passed	Document is tagged PDF
Logical Reading Order	Passed manually	Document structure provides a logical reading order
Primary language	Passed	Text language is specified
Title	Passed	Document title is showing in title bar
Bookmarks	Passed	Bookmarks are present in large documents
Color contrast	Passed manually	Document has appropriate color contrast

Page Content

Rule Name	Status	Description
Tagged content	Passed	All page content is tagged
Tagged annotations	Passed	All annotations are tagged
Tab order	Passed	Tab order is consistent with structure order
Character encoding	Passed	Reliable character encoding is provided
Tagged multimedia	Passed	All multimedia objects are tagged
Screen flicker	Passed	Page will not cause screen flicker
Scripts	Passed	No inaccessible scripts
Timed responses	Passed	Page does not require timed responses
Navigation links	Passed	Navigation links are not repetitive

Forms

Rule Name	Status	Description
Tagged form fields	Passed	All form fields are tagged
Field descriptions	Passed	All form fields have description

Alternate Text

Rule Name	Status	Description
Figures alternate text	Passed	Figures require alternate text
Nested alternate text	Passed	Alternate text that will never be read
Associated with content	Passed	Alternate text must be associated with some content
Hides annotation	Passed	Alternate text should not hide annotation
Other elements alternate text	Passed	Other elements that require alternate text

Tables

Rule Name	Status	Description
Rows	Passed	TR must be a child of Table, THead, TBody, or TFoot
TH and TD	Passed	TH and TD must be children of TR
Headers	Passed	Tables should have headers
Regularity	Passed	Tables must contain the same number of columns in each row and rows in each column
Summary	Passed	Tables must have a summary

Lists

Rule Name	Status	Description
List items	Passed	LI must be a child of L
Lbl and LBody	Passed	Lbl and LBody must be children of LI

Headings

Rule Name	Status	Description
Appropriate nesting	Passed	Appropriate nesting

Back to Top

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/26/2022 11:35:45 AM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Penland, John [Penland.John@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: call with Denka tomorrow

Good morning, Margaret,

It might be best if you join the call and lead the discussion on the RCRA inspection team's return to the facility and the purpose for the return. In so doing, I will focus on the previous conversations regarding the completion of the RCRA 3007 information request.

I hope this helps, as I will be there to manage any legal discussion or objection.
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, April 25, 2022 9:55 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: call with Denka tomorrow

Hi Marcia:

On the call tomorrow morning, might I suggest that you first tell them that we will be coming back at some point to finish up the RCRA sampling that we were unable to accomplish last week. In order to facilitate our scheduling, we need to know when they plan to shut the plant down in May. Then, ask them for a general schedule for kettle clean-outs.

Do you think it would be advisable for me to attend the call? If so, can you forward me the invitation? If not, I look forward to hearing about how it went.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 1/31/2022 5:25:53 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: Denka 3007/onsite inspection/7003

You are welcome.
MM

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 11:13 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Thanks Marcia. I appreciate your feedback and you can certainly discuss with Russell. We do not need to wait for DOJ's comments since they will be included in the OECA review period.

Dr. Nance is very interested and has requested a briefing on using RCRA authorities at Denka so this is definitely a priority for her. I'm going to set something up with the RA's office and will include you.

The draft timeline below can be adjusted. The point is simply that Rosemarie requested us to move forward with the plan for issuing the 7003 and Cheryl requested that we get the letter into eRouting asap.

Thanks,
Margaret

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 10:49 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Good morning, Margaret,

I need to discuss with Russell before I make any commitments.

At first impression, I share as follows:

I did not receive any comments for DOJ on the draft 3007 information request that would be crucial to have as DOJ has stated it could impact the CAA case.

Regarding the RCRA 7003 Order, timing is important but more so to ensure Fred and I have enough time to review the responses to the RCRA 3007 Information Request (Assuming Denka response) and as well for us to properly review the Inspection Report after it is written.

I think we need as well to discuss further as a group. Thanks

Best for your today,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 9:52 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka 3007/onsite inspection/7003
Importance: High

Hi all:

There is renewed interest in using RCRA authorities at the Denka facility as the CAA settlement negotiations are not proceeding apace. HQ would like us to proceed with our plans to issue a 7003 to the facility. We had previously discussed the need for a 3007 to obtain the information we need for the 7003. HQ would also like us to conduct an onsite inspection prior to 7003 issuance. Therefore, I am proposing the following schedule:

2/2/2022	Put 3007 in eRouting
2/8/2022	Send approved 3007 to OECA for final review
2/14/2022	Issue 3007
2/28/2022	Receive 3007 response
3/21/2022	Conduct onsite inspection
4/?/2022	Issue 7003

Attached is the latest version of the 3007 information request that we drafted back in the Fall. Could you please review it and let me know if you have any comments or questions you think should be added? And could you put it in the final form of a formal 3007 and then place it into eRouting? John, I'm including you since we'd like you to conduct the inspection and you may have some additional questions you think should be included in the 3007.

Thanks so much!
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, January 5, 2022 9:44 AM
To: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Oif, Leslie <Oif.Leslie@epa.gov>
Subject: Denka 3007

Hi Russell and Margaret – happy New Year!

Leslie Oif and I worked on the questions for Denka (please see the attached). It was based on the draft questions provided earlier by Marcia.

If you're ok with these questions, I can input this into formal correspondence (with the certification, definitions, etc). Also, if you have R6 letterhead, I can use that and put a final document together for you.

We are happy to collaborate further on Denka with you!

Best,
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/28/2022 5:47:34 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: Are we ready to send the list of documents to Denka?

The inspection team should, with copy to all of us. Thanks, MM

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 28, 2022 11:55 AM
To: Young, Justin <Young.Justin@epa.gov>; Penland, John <Penland.John@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Are we ready to send the list of documents to Denka?

I know that Ken provided information on the water side so I think we should be good to go. Is Marcia going to transmit the request to the company or is the inspection team? We need language that prioritizes the three documents we want right away (and address their CBI concerns), and then a deadline of May 6 for the rest of it. Remind the company that we need the scheduling information asap.

I realize we're talking today at 12:30 so perhaps we can discuss this then.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/28/2022 5:49:53 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]
Subject: RE: Are we ready to send the list of documents to Denka?

I do not believe I have to remind them today about the schedule. Kevin and Jason have been responsive and timely. So I would prefer if the reminder is not coming from me. MM

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 28, 2022 11:55 AM
To: Young, Justin <Young.Justin@epa.gov>; Penland, John <Penland.John@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Are we ready to send the list of documents to Denka?

I know that Ken provided information on the water side so I think we should be good to go. Is Marcia going to transmit the request to the company or is the inspection team? We need language that prioritizes the three documents we want right away (and address their CBI concerns), and then a deadline of May 6 for the rest of it. Remind the company that we need the scheduling information asap.

I realize we're talking today at 12:30 so perhaps we can discuss this then.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/29/2022 5:26:51 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: Denka

Fred,

I look forward to talking at 2:00 pm.

Russell and I just spoke so I am up- to-date. However, I would like to offer another solution as a recommendation and why I sent the schedule for 2:30 pm (CST) with counsel for Denka.

Marcia

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 29, 2022 11:08 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: Denka

Marcia,

I am not sure what time Margaret gets back but I am available so I can tell you what happened this morning about Denka, I am being told to send another 3007 and they want it in e-routing today for sampling which is occuring on Tuesday.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 11:05 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RE: Denka

Yes we can. I just sent an invitation to include Russell, Elizabeth, and Fred. Marcia

---

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 29, 2022 11:03 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Re: Denka

No problem. I'm sorry to double book but we had an urgent matter to discuss. Elizabeth and Russell can fill you in. I'm on leave and will be back at 2:00. We can talk then.

Thanks,
Margaret

Sent from my iPhone

On Apr 29, 2022, at 11:01 AM, Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov> wrote:

Good morning, Margaret,

I did not have an opportunity to join the Denka call you scheduled this morning, double booked. We were scheduled to brief Dr. Nance for 30 mins, and the call went for an hour. It was necessary, but through off some portion of my schedule and so I did not see your invitation in time.

Did you need anything from me?

Marcia

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/29/2022 6:45:14 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
CC: Penland, John [Penland.John@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: Denka sampling
Attachments: questions Denka.docx

Fred,

Please see the attached document and how I have made delicate changes to make them read a bit better. If the corrections have changed the meaning of the questions, please share. I have also copied John so that he may weigh-in.

Thanks,
Marcia

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 29, 2022 1:09 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka sampliing

1. Please provide confirmation that the Dredging of the brine pit for removal of neoprene popcorn will be conducted during the week of May 2, 2022. Also confirm what time or times of day this activity will take place.

2. If the dredging of the Outside Brine Pit is not required during the week of May 2, 2022, please provide the day(s) and time(s) the activity will be taking place next.

3. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn during the week of May 2, 2022. Also confirm the time or times of day this activity will take place.

4. If the cleaning of the Poly Kettle Screens is not required to take place during the week of May 2, 2022, please provide the day and time the Poly Kettle Screens will be cleaned next.

5. Background sampling data will take and estimated one hour prior to sampling respectively of the Outside Brine Pit and Poly Kettle Screens; so, please confirm that this will be possible in relation to the times these units will be cleaned or dredged.

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	8	VOC	TO-15	28	--	6L Summa Canister	1	None
Liquid	4	VOC	8260B	14	--	40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14	--	EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Include additional containers as needed for QA/QC samples required by Denka's lab

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 4/29/2022 8:12:09 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: Denka sampling
Attachments: questions Denka - JP revision.docx

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 1:45 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Penland, John <Penland.John@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka sampling

Fred,

Please see the attached document and how I have made delicate changes to make them read a bit better. If the corrections have changed the meaning of the questions, please share. I have also copied John so that he may weigh-in.

Thanks,
Marcia

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 29, 2022 1:09 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka sampliing

1. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

2. If the cleaning of the Poly Kettle Screens is not required to take place during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

3. Please provide confirmation that the Dredging of the brine pit for removal of neoprene popcorn will be conducted during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

4. If the dredging of the Outside Brine Pit is not required during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

5) Background samples for the Outside Brine Pit and Poly Kettle Screens will need to be collected 1 hour prior to the beginning of any cleanout activities, so please confirm access will be will be possible in relation to the times these units will be cleaned or dredged.

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	8	VOC	TO-15	28	--	6L Summa Canister	1	None
Liquid	4	VOC	8260B	14	--	40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14	--	EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Include additional containers as needed for QA/QC samples required by Denka's lab

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/29/2022 8:48:59 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: Denka Questions
Attachments: questions Denka.pdf

Fred and John,

Please confirm this is the correct version as I write the cover email. Thanks, MM

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, April 29, 2022 3:18 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Denka Questions

EPA's Questions to Denka Performance Polymers for Sampling the week of May 2, 2022

1. Please provide confirmation that the Poly Kettle Screens will be cleaned of neoprene popcorn during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

2. If the cleaning of the Poly Kettle Screens is not required to take place during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

3. Please provide confirmation that the Dredging of the brine pit for removal of neoprene popcorn will be conducted during the week of May 2, 2022. In addition, please provide the best estimate of what date this operation will cease.

4. If the dredging of the Outside Brine Pit is not required during the week of May 2, 2022, please provide the best estimated date that the cleanout operations will resume.

5) Background samples for the Outside Brine Pit and Poly Kettle Screens will need to be collected 1 hour prior to the beginning of any cleanout activities, so please confirm access will be will be possible in relation to the times these units will be cleaned or dredged.

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	8	VOC	TO-15	28	--	6L Summa Canister	1	None
Liquid	4	VOC	8260B	14	--	40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14	--	EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Include additional containers as needed for QA/QC samples required by Denka's lab

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 4/29/2022 9:26:50 PM
To: Voelkel, Kevin [kevin.voelkel@bracewell.com]; Hutt, Jason [jason.hutt@bracewell.com]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: EPA's Request to Denka
Attachments: Requests for Denka.pdf

Importance: High

Good afternoon, Kevin and Jason,

Again, we thank you for taking the time this afternoon to engage with us here at EPA, R6 on the referenced matter and in furtherance of EPA's plan to return to Denka and to conduct a Section 3007 RCRA Sampling Inspection ("Inspection").

To ensure that the agency is using its resources efficiently and to be transparent to you and your client, we had the call of this afternoon (4/29) to inform you and hence your client of the agency's intentions for returning to Denka's facility and during the week of May 2, 2022.

As we explained this afternoon, it will help greatly our planning and coordination with Denka for EPA to have the responses to the requests in the attached document on Monday, May 2, 2022 by noon (CST).

Further, as you are aware of my leave schedule that is upcoming, I ask that you please copy all on your responses to this communication and subsequent communications from May 3rd through May 16th.

Thank you in advance, and with kind regards,
Marcia

-----Original Appointment-----
From: Moncrieffe, Marcia
Sent: Friday, April 29, 2022 12:23 PM
To: Voelkel, Kevin; Hutt, Jason; Deppe, Fred; George, Elizabeth A; Murdock, Russell; Osbourne, Margaret
Subject: Denka
When: Friday, April 29, 2022 2:30 PM-3:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Denka

Good afternoon, Kevin and Jason,

I know that is short notice, but we would like to talk with both or either of you at the scheduled time. If this time does not work for you, I can be available at 4:30 pm (CST)

Your availability would be helpful.

Thanks in advance,
Marcia

Microsoft Teams meeting

Join on your computer or mobile app
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Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 117 088 978 9
Alternate VTC instructions

Or call in (audio only)
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Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 1/31/2022 7:12:54 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka 3007/onsite inspection/7003
Attachments: Denka RCRA 3007 Information Request Jan 31.docx

Importance: High

Thanks Fred.

I will share the most current version with you as I worked on our last version (since I saw Margaret's email) to address comments I received from HQs last year.

This is still in draft, as I have not done my first read through after addressing all the comments and so there may still be issues with spaces, etc.

Please review for our meet and let and use as a guide during the meeting.

Thanks,
Marcia

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Monday, January 31, 2022 1:07 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Marcia,

This is the most current version that I have of the 3007 letter.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, January 31, 2022 12:18 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka 3007/onsite inspection/7003

Good afternoon, Fred,

I see that Margaret attached a RCRA 3007 Information Request to the email below but it is not the last version we work on. I will send you an invitation for this afternoon so we can be sure of the version that will go into e-routing is the most compete and current. Of the scheduled below, I can commit to placing the RCRA 3007 in e-routing tomorrow (2/1) since we need no comments from DOJ.

Thanks,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, January 31, 2022 9:52 AM

To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka 3007/onsite inspection/7003
Importance: High

Hi all:

There is renewed interest in using RCRA authorities at the Denka facility as the CAA settlement negotiations are not proceeding apace. HQ would like us to proceed with our plans to issue a 7003 to the facility. We had previously discussed the need for a 3007 to obtain the information we need for the 7003. HQ would also like us to conduct an onsite inspection prior to 7003 issuance. Therefore, I am proposing the following schedule:

2/2/2022	Put 3007 in eRouting
2/8/2022	Send approved 3007 to OECA for final review
2/14/2022	Issue 3007
2/28/2022	Receive 3007 response
3/21/2022	Conduct onsite inspection
4/?/2022	Issue 7003

Attached is the latest version of the 3007 information request that we drafted back in the Fall. Could you please review it and let me know if you have any comments or questions you think should be added? And could you put it in the final form of a formal 3007 and then place it into eRouting? John, I'm including you since we'd like you to conduct the inspection and you may have some additional questions you think should be included in the 3007.

Thanks so much!
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, January 5, 2022 9:44 AM
To: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Oif, Leslie <Oif.Leslie@epa.gov>
Subject: Denka 3007

Hi Russell and Margaret – happy New Year!

Leslie Oif and I worked on the questions for Denka (please see the attached). It was based on the draft questions provided earlier by Marcia.

If you're ok with these questions, I can input this into formal correspondence (with the certification, definitions, etc). Also, if you have R6 letterhead, I can use that and put a final document together for you.

We are happy to collaborate further on Denka with you!

Best,
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.

Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

DRAFT

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.
4. For question number three above, please provide copies of hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   - i. Provide a process flow diagram of all processes that take place in the Poly-Building? Identify inputs, outputs, and points of waste generation.
   - ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   - iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   - iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   - v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) of each clean-out event?
   - vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   - vii. Describe where is the waste taken to be stored, managed, treated, and ultimately disposed?

---

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

viii. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility?

6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event.
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements. Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.
7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair?
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in your UIC Wells?
   iii. Provide copies of waste determination for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations made in response to clean up of all releases.

ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).

9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other Containers:
   i. Provide photographs of each Roll-off Box and other Containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other Containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from its Roll-off Box(es) and other Containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other Containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
   i. What emission control devices are on each unit?
   ii. What type of emission could potentially leak and/or escape for each unit?
   iii. What is the inspection maintenance protocol for each unit?
   iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the unites listed in questions five through nine) at its Facility.
11. Have there been any runoffs of any kind into the Mississippi or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of emissions, discharges, and/or disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. , Please submit these records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to subpart is applicable to the

respect unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.

18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls, and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? , How does Denka determine whether there are stormwater run-offs ? How does Denka mange and contain its stormwater run-offs from its Facility?

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 5/3/2022 7:31:49 PM
To: Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: RE: EPA's Request to Denka

We are not taking samples of the popcorn so the safety discussion isn't necessary.

From: Murdock, Russell <Murdock.Russell@epa.gov>
Sent: Tuesday, May 3, 2022 2:30 PM
To: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

I suggest we do the 1pm.

Would we be prepared to discuss the Safety considerations?

Russell Murdock
Chief, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
(214) 665-3189
Murdock.Russell@epa.gov

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Tuesday, May 3, 2022 2:15 PM
To: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

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Subject: RE: EPA's Request to Denka

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Subject: RE: EPA's Request to Denka

Good afternoon Jason and Kevin,

Would you both be available for a Teams call tomorrow at 2pm cst?

Thank you,

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
1201 Elm St. Suite 500
Dallas, Texas 75270
(214) 665-6751
George.Elizabeth.A@epa.gov

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From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Monday, May 2, 2022 12:32 PM
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JASON B. HUTT
Partner

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T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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Subject: RE: EPA's Request to Denka
Importance: High

Good day, Kevin,

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We appreciate you and your client working to a have a response to us by noon on Monday (5/2). Also, we are aware of the timing of EPA's request. However, we ask as well that you please make your client aware that EPA is working to coordinate with Denka's schedule and that certain information as to Denka's schedule became known to EPA during the course of this week.

I look forward to hearing from you on Monday(5/2), with thanks in advance.

Good wishes for your weekend,
Marcia

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Thank you, Marcia. We are in receipt of EPA's requests. We have scheduled the first-available time with relevant DPE personnel for late morning on Monday. We will work to provide responses as soon as practicable, bearing in mind the timing that EPA requested.

Regards,
Kevin

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Importance: High

Good afternoon, Kevin and Jason,

Again, we thank you for taking the time this afternoon to engage with us here at EPA, R6 on the referenced matter and in furtherance of EPA's plan to return to Denka and to conduct a Section 3007 RCRA Sampling Inspection ("Inspection").

To ensure that the agency is using its resources efficiently and to be transparent to you and your client, we had the call of this afternoon (4/29) to inform you and hence your client of the agency's intentions for returning to Denka's facility and during the week of May 2, 2022.

As we explained this afternoon, it will help greatly our planning and coordination with Denka for EPA to have the responses to the requests in the attached document on Monday, May 2, 2022 by noon (CST).

Further, as you are aware of my leave schedule that is upcoming, I ask that you please copy all on your responses to this communication and subsequent communications from May 3rd through May 16th.

Thank you in advance, and with kind regards,
Marcia

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From: Moncrieffe, Marcia
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When: Friday, April 29, 2022 2:30 PM-3:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Denka

Good afternoon, Kevin and Jason,

I know that is short notice, but we would like to talk with both or either of you at the scheduled time. If this time does not work for you, I can be available at 4:30 pm (CST)

Your availability would be helpful.

Thanks in advance,
Marcia

Microsoft Teams meeting

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Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 5/3/2022 7:34:25 PM
To: Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
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By the way, John will be on travel tomorrow so he won't be on the call.

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Subject: RE: EPA's Request to Denka

I suggest we do the 1pm.

Would we be prepared to discuss the Safety considerations?

Russell Murdock
Chief, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
(214) 665-3189
Murdock.Russell@epa.gov

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Message

From: Penland, John [Penland.John@epa.gov]
Sent: 5/6/2022 2:47:17 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: Daily Summary May 5, 2022 - FY2022 RCRA Sampling Investigation at the Denka facility located in LaPlace, LA (LAR000009415)

Flag: Follow up

From: Penland, John
Sent: Thursday, May 5, 2022 11:23 PM
To: christopher-meyers@denkape.com; Bordelon, David <David.Bordelon@WestonSolutions.com>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>
Subject: Daily Summary May 5, 2022 - FY2022 RCRA Sampling Investigation at the Denka facility located in LaPlace, LA (LAR000009415)

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Participants

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Chris Meyers		Denka Performance Elastomer, LLC.		christopher-meyers@denkape.com
Cory Green	Sr. SHE Consultant	Denka Performance Elastomer, LLC.	985-536-7583	cory-green@denkape.com
Patrick Walsh	SHE/PSM Manager	Denka Performance Elastomer, LLC.	985-536-7573	patrick-walsh@denkape.com
David Bordelon		EPA - START		david.bordelon@westonsolutions.com
Derrick Cobb		EPA - START		derrick.cobb@westonsolutions.com
Jose Ojeda		EPA - START		jose.ojeda@westonsolutions.com
Jeff Wright		EPA - START		jeff.wright@westonsolutions.com
Luke Murray		EPA - START		luke.murray@mecx.net
Bob Holden		Jones Walker		
Jason Hutt		Bracewell		
Kevin Volkell		Bracewell		
Jorge Lavastida		Denka Performance Elastomer, LLC.		

Introduction

On May 5, 2022, I conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). Denka has notified as a large quantity generator

of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality. This inspection is a follow-up to the April 18-21, 2021, RCRA inspection where initial concerns were raised about the generation and management of the "neoprene popcorn" generated in the poly unit. This inspection involved observation of the facility's standard operating procedures and sample collection of air, liquid, and solid media associated with or impacted by the "neoprene popcorn" generation and management procedures.

Summary

- Inspection start – approximately 09:30am
- I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility.
- Denka had been notified of this sampling inspection through their counsel on April 29, 2022 and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.
- During our initial meeting I explained that the purpose of this sampling inspection was to collect information and samples related to the generation and management of the "neoprene popcorn". At this time, EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022 inspection.
- According to Chris Meyers, following the completion of the April 18-21, 2022 inspection, additional information concerning the amount of residual chloroprene present in the "neoprene popcorn" was located and will be provided as part of the response to the records request originating from EPA during that inspection.
- I asked whether Denka considered the "neoprene popcorn" to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had sold the stabilized "neoprene popcorn" for its commercial value previously, though it does not currently do so.
- I explained the D001 flammable solids definition and asked whether that could apply as the "neoprene popcorn" had been previously described by the Poly Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated.
- I explained the D003 reactivity definition and its association with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the "neoprene popcorn".
- As part of this inspection, I requested and received the following documents marked as Confidential:
    - PK Pump Out and Strainer Cleaning Operation
    - Clearing Unstripped Emulsion Storage Tank for Cleaning
    - 3 Engineering Drawings of the Brine Pit
    - Raw Materials Characteristics and Hazards
    - Emergency Stabilizer Make-up
- David Bordelon arrived at approximately 12:00pm
- At approximately 12:30pm we conducted our initial reconnaissance of the planned sample collection area and equipment staging location.
- We departed the facility for lunch at approximately 1:00pm
- We returned to the facility at approximately 2:15pm and briefed the START contractors.
- Initiated sampling at approximately 3:30pm
- A detailed sampling report will be prepared by the START contractors to accompany the report from the laboratory
- Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel.
- During this inspection I collected both photos and video recordings which are being claimed as Confidential by Denka.

- For all Confidential claims asserted by Denka please refer to the Region 6 CBI letter provided during the April 18-21, 2022 inspection.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: George, Elizabeth A [George.Elizabeth.A@epa.gov]
Sent: 5/9/2022 5:54:08 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: EPA Summary of 5/5/2022 Inspection of DPE Facility

Flag: Follow up

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
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(214) 665-6751
George.Elizabeth.A@epa.gov

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From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Friday, May 6, 2022 11:17 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Bordelon, David <David.Bordelon@WestonSolutions.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Walsh, Patrick <patrick-walsh@denka-pe.com>; Hutt, Jason <jason.hutt@bracewell.com>; Holden, Bob <bholden@joneswalker.com>
Subject: EPA Summary of 5/5/2022 Inspection of DPE Facility

Good afternoon,

Chris Meyers forwarded an email from John Penland summarizing certain activities during yesterday's inspection. DPE appreciates the opportunity to review the summary of EPA's notes from the inspection. We understand from the closeout meeting that EPA was able to conduct and complete all of its planned sampling activities. Below are DPE's revisions to the summary for EPA's consideration. As John's notes indicate, the purpose of EPA's site visit was to complete follow-up observations. DPE personnel sought to facilitate EPA's sampling efforts, but their statements were not provided for purposes of recording in an enforcement inspection summary. Separately, we were expecting the summary to focus on the sampling activities (i.e., methods and locations), which we might be able to clarify or correct. Is that summary forthcoming in a different document? DPE requested a copy of the sampling plan for our records. Please send that over when available.

Thanks,
Kevin

***

Introduction

On May 5, 2022, I conducted an onsite inspection of the Denka Performance ~~Elastomers~~ Elastomer, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality. This inspection is a follow-up to the April 18-21, 2021, RCRA inspection where initial concerns were raised about the generation and management of the "neoprene popcorn" generated in the poly unit. This inspection involved observation of the facility's standard operating procedures and sample collection of air, liquid, and solid media associated with or impacted by the "neoprene popcorn" generation and management procedures.

Summary

- Inspection start – approximately 09:30am
- I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris ~~Meyer~~ Meyers and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility.
- Denka had been notified of this sampling inspection through their counsel on April 29, 2022 and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned ~~samples~~ sampling methods and offered Denka the opportunity to prepare containers for the collection of split samples. Denka has consented to the inspection, but reserved its rights regarding EPA's authority to conduct the sampling or use the resulting data for enforcement or other purposes.
- During our initial meeting I explained that the purpose of this sampling inspection was to collect information and samples related to the generation and management of the "neoprene popcorn". At this time, EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified by EPA during the April 18-21, 2022 inspection.
- According to Chris Meyers, following the completion of the April 18-21, 2022 inspection, additional information concerning the amount of residual chloroprene present in the "neoprene popcorn" was located and will be provided as part of the response to the records request originating from EPA during that inspection.
- ~~I asked whether Denka considered the "neoprene popcorn" to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had sold the stabilized "neoprene popcorn" for its commercial value previously, though it does not currently do so.~~ [As noted above, the purpose of the inspection was to make observations, not to interview DPE employees.]
- I explained the D001 flammable solids definition and asked whether that could apply as the "neoprene popcorn" had been previously described by the Poly Unit Production Manager as a self-heating material. ~~Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated.~~ [Same comment.]
- I explained the D003 reactivity definition and its association with the property of auto-polymerization. ~~Both Patrick Walsh and Cory Green acknowledged that~~ Auto-polymerization is an attribute of the "neoprene popcorn".
- As part of this inspection, I requested and received the following documents marked as Confidential:
    - PK Pump Out and Strainer Cleaning Operation
    - Clearing Unstripped Emulsion Storage Tank for Cleaning
    - 3 Engineering Drawings of the Brine Pit
    - Raw Materials Characteristics and Hazards
    - Emergency Stabilizer Make-up
- David Bordelon arrived at approximately 12:00pm
- At approximately 12:30pm we conducted our initial reconnaissance of the planned sample collection area and equipment staging location.
- We departed the facility for lunch at approximately 1:00pm
- We returned to the facility at approximately 2:15pm and briefed the START contractors.
- Initiated sampling at approximately 3:30pm
- A detailed sampling report will be prepared by the START contractors to accompany the report from the laboratory

- Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel.
- During this inspection I collected both photos and video recordings which are being claimed as Confidential by Denka.
- ~~For all Confidential claims asserted by Denka please refer to the Region 6 CBI letter provided during~~ During the April 18-21, 2022 inspection, counsel for DPE indicated that substantiation of asserted CBI would continue to be discussed with Region 6 counsel.

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Message

From: George, Elizabeth A [George.Elizabeth.A@epa.gov]
Sent: 5/9/2022 7:50:56 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: Denka Sampling - Summary of samples

This is what John said

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
1201 Elm St. Suite 500
Dallas, Texas 75270
(214) 665-6751
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From: Penland, John <Penland.John@epa.gov>
Sent: Monday, May 9, 2022 2:39 PM
To: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: Denka Sampling - Summary of samples

Its fine. I mean its just a factual accounting of our sample numbers so far. The QAPP is too much at this time since it tends to be a living document that is subject to revision during the project's duration.

From: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Sent: Monday, May 9, 2022 2:37 PM
To: Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: FW: Denka Sampling - Summary of samples

Hi John and Fred,

Russell asked me to check with y'all if I should share the sampling summary with Kevin and Jason?

Thank you,

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
1201 Elm St. Suite 500
Dallas, Texas 75270
(214) 665-6751
George.Elizabeth.A@epa.gov

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From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 9, 2022 11:34 AM
To: Penland, John <Penland.John@epa.gov>
Cc: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: FW: Denka Sampling - Summary of samples

Do we want to send this list to the company?

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Monday, May 9, 2022 10:22 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: Denka Sampling - Summary of samples

Wanted to pass along that all samples were shipped on Friday. Pace samples were shipped via courier, received Friday. Summa canisters were shipped Friday for receipt today. I have asked both labs for a quick turnaround.

Sample IDs are as follows:
Air

- DR-A-BK-05052022-01 – background sample at kettle, prior to initiation of event.
- DR-A-KP-05052022-01 – Sample at kettle during popcorn poly removal
- DR-A-KD-05052022-01 – Inside of process building, 20' east of kettle
- DR-A-KD-05052022-02 – duplicate of above
- DR-A-KT-05052022-01 – travel sample from kettle to pit, then downwind of pit
- DR-A-PU-05052022-01 – Upwind of brine pit
- DR-A-BU-05052022-01 – Upwind sample during brine pit solid removal
- DR-A-BD-05052022-01 – Brine pit downwind during solids removal

Liquid

- DR-L-LB-05052022-01 – Liquid from brine pit before addition of "new" popcorn
- DR-L-LA-05052022-01- Liquid from brine pit after addition of "new" popcorn

Solid

- DR-S-BP-05052022-01 – Solid from brine pit during cleanout operation

David

David Bordelon
Weston Solutions, Inc.

13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Bordelon, David
Sent: Friday, May 6, 2022 8:23 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

It should be much earlier than that. Liquid and Solid results should be back before the end of next week depending on how many dilutions they'll have to do. I'll check with ERG to see what their turnaround time will be. Air samples usually take a little longer.

David

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(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, May 6, 2022 8:21 AM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

Hi David:

Thanks to you and your team for getting the sampling done yesterday! We would like the results as soon as possible – 30 days or less if we can. Is that reasonable?

Thanks again,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Friday, May 6, 2022 7:58 AM

To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: RE: [EXT]:Sampling

What turnaround time would you all like to request for the analytical? Submitting the samples today.

David Bordelon
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Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, May 4, 2022 2:08 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

The attorneys said that Denka had ordered the sample containers so we should be good there.

I told them you'd arrive tomorrow.

There is a <30 min video for you to watch.

They requested a closing conference.

They indicated that they aren't fully staffed on Saturday so if the inspection will need to extend into Saturday, to let them know as soon as possible.

I told them that John would be taking photos and videos and aside from claiming it CBI, they didn't think that would be a problem.

I requested that you be provided hard copy versions of the SOPs and as-built drawing and they said they would pass that along.

They said that they would confirm that "normal operations" are continuing until Saturday and would let us know if they aren't.

And I asked for a schedule of brine pit cleanout over the Thursday-Saturday timeframe.

Let me know if you have any questions.

Thanks,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 12:53 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: RE: [EXT]:Sampling

Thank you. We'll have a PID.

David Bordelon
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Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, May 4, 2022 12:41 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

John is on the way to the airport, but he texted me that you will probably have to watch a 15 minute video when you get there and will be provided with and escape respirator by Denka. You'll need a phot ID to get access badges for the facilities gates, but your START credentials should work. You don't need to provide PII.

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 12:21 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Need to confirm that we do not need the Denka site specific health and safety training courses for our people.

David Bordelon
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13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, May 4, 2022 12:11 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

Hi David:

Are you talking about for splits? I assume they will provide their own containers since we provided them with a list of the planned samples. I have a call with them today so I can ask them if you'd like me to.

A site visit tomorrow sounds good. You may also get to do sampling depending on when the canisters arrive – John will be there so I recommend you coordinate with him. Do you have his phone number?

Thanks,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 11:12 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will Denka provide their own sample containers for the liquids and solids? Our lab is providing voa vials and the TerraCores.

We were talking through the process and it would be a good idea for us to have a site visit on Thursday and plan to sample on Friday.

Please let me know what you think.

David

David Bordelon
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(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Bordelon, David
Sent: Tuesday, May 3, 2022 4:05 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will our people need any of the Denka specific safety requirements prior to the event?

David Bordelon
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David.Bordelon@westonsolutions.com

-----Original Appointment-----
From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, May 3, 2022 11:43 AM
To: Osbourne, Margaret; Eric Delgado; Penland, John; Bordelon, David; Wright, Jeff; Yurk, Jeffrey
Subject: [EXT]:Sampling
When: Tuesday, May 3, 2022 12:30 PM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

CAUTION: ***External Message***

Microsoft Teams meeting

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Video Conference ID: 113 734 862 0
Alternate VTC instructions

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+1 202-991-0477,,954317904# United States, Washington DC
Phone Conference ID: 954 317 904#
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Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 5/16/2022 11:53:12 PM
To: Voelkel, Kevin [kevin.voelkel@bracewell.com]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Hutt, Jason [jason.hutt@bracewell.com]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]
Subject: RE: EPA's Request to Denka

Kevin,

Thanks for the follow-up.

The time-off was worthwhile, thanks!

I will make sure that Negin is copied to this email so that EPA HQs may address the CBI conversation. Thanks, Marcia

---

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Monday, May 16, 2022 6:46 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: EPA's Request to Denka

Good evening, Marcia (and welcome back from what I hope was a restful break).

We also look forward to our discussion tomorrow morning at 7:30a CT. As an update, we met with DPE this evening and learned that a key member of DPE's RCRA team missed work today due to a minor medical procedure. DPE expects his return this week, but is not certain on the specific date of return. Accordingly, we anticipate that DPE's fifth response to the 3007 request may be finalized and submitted to EPA later this week. If time allows tomorrow, we would also like to discuss the path forward for CBI substantiation.

Regards,
Kevin

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Monday, May 16, 2022 6:29 PM
To: Hutt, Jason <jason.hutt@bracewell.com>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: EPA's Request to Denka

Good afternoon, Jason and Kevin,

I have reviewed your email below and look forward to our call of tomorrow (5/17).

I know that Elizabeth is on leave and will not join. Also, I will forward the invitation to Fred so that he may join if he can.

Thanks,
Marcia

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, May 04, 2022 7:42 PM
To: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

All,

Thank you for your time this afternoon to discuss EPA's planned sampling at the DPE Facility. We conveyed the information you shared about the inspection to DPE. We would like to raise two items for your attention.

Safety Rating of Photo/Video Equipment. DPE personnel asked us to convey that the photo and video equipment used during the inspection must be "intrinsically safe." The inspection team should expect that DPE personnel will ask EPA to confirm the safety rating of the equipment prior to entering the process areas with the equipment.

Timing of Response to Document Request. Based on our meeting on Friday (4/29), DPE personnel have been working to provide EPA with a response to EPA's document request (sent by Justin Young on 4/28) by this Friday (5/6). The information sought in the document request requires the time and attention of the same personnel that will be necessary during EPA's inspection on Thursday, Friday and possible Saturday. Accordingly, DPE now anticipates providing a response to the document request by Tuesday 5/10. We will remain in dialogue concerning the timing of DPE's responses to the remaining questions sent in EPA's 2/24 RCRA § 3007 information request, but that timing may slip a couple of days as well.

Thanks, - Jason and Kevin

From: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Sent: Tuesday, May 3, 2022 3:51 PM
To: Hutt, Jason <jason.hutt@bracewell.com>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

Jason,

1pm tomorrow works – I will send an invite shortly. We will not be sampling the popcorn so we will not need to discuss safety.

Thank you,

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch
Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
1201 Elm St. Suite 500

Dallas, Texas 75270
(214) 665-6751
George.Elizabeth.A@epa.gov

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From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Tuesday, May 3, 2022 2:15 PM
To: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

I have confirmed that Kevin Voelkel is also available during the same windows tomorrow. Please let me know if we are going to discuss safety considerations related to EPA's anticipated sampling of solids. In that case, I would suggest that we plan to include SH&E representatives from DPE.

Thanks.

From: Hutt, Jason
Sent: Tuesday, May 3, 2022 2:55 PM
To: 'George, Elizabeth A' <George.Elizabeth.A@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

I have conflicts at 2P and 3P CST. Could we talk at 1P CT (or, between 10:30A and 1P CT)?

From: George, Elizabeth A <George.Elizabeth.A@epa.gov>
Sent: Tuesday, May 3, 2022 2:47 PM
To: Hutt, Jason <jason.hutt@bracewell.com>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: EPA's Request to Denka

Good afternoon Jason and Kevin,

Would you both be available for a Teams call tomorrow at 2pm cst?

Thank you,

Elizabeth George
Assistant Regional Counsel, RCRA & Toxics Enforcement Branch

Office of Regional Counsel (ORC-ER)
U.S. Environmental Protection Agency, Region 6
1201 Elm St. Suite 500
Dallas, Texas 75270
(214) 665-6751
George.Elizabeth.A@epa.gov

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From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Monday, May 2, 2022 12:32 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: EPA's Request to Denka

Marcia – we just concluded a meeting with DPE's plant personnel. We are revising a written response now. In short (and unofficially), sampling at the Poly Kettles and OBP conducted this week would encounter production-related circumstances. OBP cleanout is done "as needed" but DPE should be able to look 24 hours ahead to tell EPA what's planned for the next day. There are considerable safety concerns with sampling and offsite transportation of solids from the PK strainers. An additional technical dialogue will be required for everyone to get comfortable with that type of sampling. If you'd like to start comparing calendars for that discussion, that might help us to shorten the timeline. Thanks, - Jason

JASON B. HUTT
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T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Saturday, April 30, 2022 10:55 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>

Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: EPA's Request to Denka
Importance: High

Good day, Kevin,

Thank you for your follow-up and confirmation of receipt of my email of yesterday(4/30) to you and Jason.

We appreciate you and your client working to a have a response to us by noon on Monday (5/2). Also, we are aware of the timing of EPA's request. However, we ask as well that you please make your client aware that EPA is working to coordinate with Denka's schedule and that certain information as to Denka's schedule became known to EPA during the course of this week.

I look forward to hearing from you on Monday(5/2), with thanks in advance.

Good wishes for your weekend,
Marcia

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Saturday, April 30, 2022 9:43 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: EPA's Request to Denka

Thank you, Marcia. We are in receipt of EPA's requests. We have scheduled the first-available time with relevant DPE personnel for late morning on Monday. We will work to provide responses as soon as practicable, bearing in mind the timing that EPA requested.

Regards,
Kevin

KEVIN M. VOELKEL
Associate
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T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

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From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, April 29, 2022 5:27 PM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: EPA's Request to Denka
Importance: High

Good afternoon, Kevin and Jason,

Again, we thank you for taking the time this afternoon to engage with us here at EPA, R6 on the referenced matter and in furtherance of EPA's plan to return to Denka and to conduct a Section 3007 RCRA Sampling Inspection ("Inspection").

To ensure that the agency is using its resources efficiently and to be transparent to you and your client, we had the call of this afternoon (4/29) to inform you and hence your client of the agency's intentions for returning to Denka's facility and during the week of May 2, 2022.

As we explained this afternoon, it will help greatly our planning and coordination with Denka for EPA to have the responses to the requests in the attached document on Monday, May 2, 2022 by noon (CST).

Further, as you are aware of my leave schedule that is upcoming, I ask that you please copy all on your responses to this communication and subsequent communications from May 3rd through May 16th.

Thank you in advance, and with kind regards,
Marcia

-----Original Appointment-----
From: Moncrieffe, Marcia
Sent: Friday, April 29, 2022 12:23 PM
To: Voelkel, Kevin; Hutt, Jason; Deppe, Fred; George, Elizabeth A; Murdock, Russell; Osbourne, Margaret
Subject: Denka
When: Friday, April 29, 2022 2:30 PM-3:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Denka

Good afternoon, Kevin and Jason,

I know that is short notice, but we would like to talk with both or either of you at the scheduled time. If this time does not work for you, I can be available at 4:30 pm (CST)

Your availability would be helpful.

Thanks in advance,
Marcia

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device

sip:teams@video.epa.gov
Video Conference ID: 117 088 978 9
Alternate VTC instructions

Or call in (audio only)

+1 202-991-0477,,72083879# United States, Washington DC

Phone Conference ID: 720 838 79#
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Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/1/2022 6:01:00 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: RCRA 3007- Denka
Attachments: Denka RCRA 3007 Information Request.docx

Fred,

I have attached the referenced RCRA 3007 Information request for you to proceed with as we discussed this morning.

I made few additional changes to the paragraph in the letter since we spoke.

Just a few tweaks to the language below. You will see.

Could you also include the appropriate page numbers.

Thanks as I remain available.
Marcia

From: Moncrieffe, Marcia
Sent: Tuesday, February 01, 2022 8:01 AM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Subject: RCRA 3007

Good morning, Fred,

This is the revised paragraph that was in yellow.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and hazardous waste generation, storage and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that the solid waste in question is a known listed hazardous waste and a carcinogen of likely risk. EPA has community monitoring data, which reports that the solid waste being released is chloroprene. While these three facts taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that the solid waste in question is a known listed hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address.

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for each facility identified in question 4 below, within thirty (30) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the specified 30 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term "Facility" or "Facilities" shall mean Denka locations owned and/or operated by Denka in La Place Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

   d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by

which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.
4. For question number three above, please provide copies of hazardous waste determinations, whether by testing or by knowledge of process, which were made

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building? Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) of each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where is the waste taken to be stored, managed, treated, and ultimately disposed?
   viii. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility?
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event.
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements. Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.
7. For your **Underground Injection Wells**, please answer the following questions:

i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair?

ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in your UIC Wells?

iii. Provide copies of waste determination for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

8. Please provide information regarding all emergency and non-emergency response events associated with releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other Containers:
   i. Provide photographs of each Roll-off Box and other Containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other Containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from its Roll-off Box(es) and other Containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other Containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the unites listed in questions five through nine) at its Facility.
11. Have there been any runoffs of any kind into the Mississippi or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of emissions, discharges, and/or disposals? Please describe events (if any), dates, types of emissions, and amounts.

15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. , Please submit these records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to subpart is applicable to the respect unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls, and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? , How does Denka determine whether there are stormwater run-offs ? How does Denka mange and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 5/20/2022 9:17:36 PM
To: Welton, Patricia [Welton.Patricia@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Subject: Re: Denka May 5, 2022 - Liquid and Solid Sampling results
Attachments: 20243028_frc.pdf

Thanks John!

Sent from my iPhone

On May 20, 2022, at 4:14 PM, Osbourne, Margaret <osbourne.margaret@epa.gov> wrote:

FYI

Sent from my iPhone

Begin forwarded message:

From: "Penland, John" <Penland.John@epa.gov>
Date: May 20, 2022 at 3:45:14 PM CDT
To: "Young, Justin" <Young.Justin@epa.gov>, "Mostaghim, Negin" <Mostaghim.Negin@epa.gov>, "Davies, Lynne" <Davies.Lynne@epa.gov>, "Bellot, Michael" <Bellot.Michael@epa.gov>
Cc: "Osbourne, Margaret" <osbourne.margaret@epa.gov>, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>
Subject: Denka May 5, 2022 - Liquid and Solid Sampling results

Please find attached the analytical report for the liquid and solid phase samples collected during the May 5, 2022, sampling inspection at Denka, LLC in LaPlace, LA.

Background:

The Brine Pit at Denka is an inground tank used for the accumulation and stabilization of neoprene "popcorn" from the Polymer Building. On May 5, 2022, EPA observed the "popcorn" management process and collected samples from the Brine Pit and of gases emitted from the handling of the "popcorn." Air sample results are still pending.

Sample Summary:

Sample DR-S-BP-05052022-02

This grab sample is of neoprene "popcorn" which was being removed from the Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized "popcorn" normally shipped offsite for disposal. Residual chloroprene is present in the solids at 1080ppm.

Samples DR-L-LB-05052022-01 and DR-L-LB05052022-02

These grab samples are of liquids collected from the Brine Pit as found prior to the addition of the neoprene "popcorn" observed during the inspection. Chloroprene is present in the liquids at an average of 63.5ppm (stdev 0.9) before the addition of the neoprene "popcorn".

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Brine Pit approximately 10 minutes after the addition of the neoprene "popcorn" observed during the inspection. The Chloroprene concentration has increased 437% to 341ppm.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Friday, May 20, 2022 11:44 AM
To: Penland, John <Penland.John@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Denka QAPP

Analytical for liquids and solid sample. Reminder that there are two LB (liquids from pit before additions of waste materials) due to the duplicate sample. Single sample LA is the liquid after the addition of the waste material. Checking on the status of the air samples.

Thanks
David

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

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Pace Analytical Services, LLC
1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
(504)469-0333

May 19, 2022

Jeff Wright
Weston Solutions, Inc.
13702 Coursey Blvd.
Bldg #7, STE A
Baton Rouge, LA 70817

RE: Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Dear Jeff Wright:

Enclosed are the analytical results for sample(s) received by the laboratory on May 06, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Clay Ledet
clay.ledet@pacelabs.com
(504)469-0333
Project Manager

Enclosures

cc: David Bordelon, Weston Solutions, Inc.

REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 0025721
Kansas Department of Health and Environment (NELAC): E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP): 02006
Texas Commission on Env. Quality (NELAC): T104704405-09-TX
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119

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SAMPLE SUMMARY

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20243028001	**DR-L-LB-05052022-01**	Water	05/05/22 15:45	05/06/22 17:50
20243028002	**DR-L-LB-05052022-02**	Water	05/05/22 15:45	05/06/22 17:50
20243028003	**DR-L-LA-05052022-01**	Water	05/05/22 17:10	05/06/22 17:50
20243028004	**DR-S-BP-05052022-02**	Solid	05/05/22 16:10	05/06/22 17:50

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ED_013532_00001908-00003

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SAMPLE ANALYTE COUNT

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20243028001	**DR-L-LB-05052022-01**	EPA 8260	SLK	46
20243028002	**DR-L-LB-05052022-02**	EPA 8260	SLK	46
20243028003	**DR-L-LA-05052022-01**	EPA 8260	SLK	46
20243028004	**DR-S-BP-05052022-02**	EPA 8260	JRP	46

PASI-N = Pace Analytical Services - New Orleans

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
3 samples were analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255081

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20243028001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
- MS (Lab ID: 1213307)
  - Chloroprene
- MSD (Lab ID: 1213308)
  - Chloroprene

R1: RPD value was outside control limits.
- MSD (Lab ID: 1213308)
  - 1,2-Dibromo-3-chloropropane
  - Methyl acetate

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255081

D4: Sample was diluted due to the presence of high levels of target analytes.

- DR-L-LA-05052022-01 (Lab ID: 20243028003)
  - Chloroprene
  - Toluene
- DR-L-LB-05052022-01 (Lab ID: 20243028001)
  - Toluene
- DR-L-LB-05052022-02 (Lab ID: 20243028002)
  - Chloroprene
  - Toluene
- MS (Lab ID: 1213307)
  - Toluene
- MSD (Lab ID: 1213308)
  - Toluene

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
1 sample was analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 5035/5030B with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255724

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20242755001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MSD (Lab ID: 1217691)
  - Chloroethane

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255724

D4: Sample was diluted due to the presence of high levels of target analytes.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Vinyl chloride

E: Analyte concentration exceeded the calibration range. The reported result is estimated.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Chloroprene

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:01	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:01	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:01	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:01	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:01	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:01	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:01	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:01	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:01	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:01	74-87-3	
Chloroprene	**62.8**	mg/L	5.0	1000		05/12/22 13:08	126-99-8	M1
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:01	96-12-8	R1
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:01	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:01	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:01	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:01	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:01	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:01	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:01	79-20-9	R1
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:01	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:01	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:01	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:01	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:01	127-18-4	
Toluene	**8.4**	mg/L	0.50	100		05/11/22 23:01	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:01	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:01	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:01	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:08	2037-26-5	
Toluene-d8 (S)	104	%.	76-124	100		05/11/22 23:01	2037-26-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Surrogates								
4-Bromofluorobenzene (S)	101	%.	78-121	100		05/11/22 23:01	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	1000		05/12/22 13:08	460-00-4	
Dibromofluoromethane (S)	102	%.	74-128	1000		05/12/22 13:08	1868-53-7	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:01	1868-53-7	

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:19	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:19	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:19	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:19	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:19	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:19	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:19	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:19	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:19	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:19	74-87-3	
Chloroprene	**64.1**	mg/L	5.0	1000		05/12/22 13:26	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:19	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:19	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:19	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:19	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:19	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:19	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:19	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:19	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:19	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:19	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:19	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:19	100-42-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:19	127-18-4	
Toluene	**8.0**	mg/L	0.50	100		05/11/22 23:19	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:19	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:19	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:19	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:26	2037-26-5	
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:19	2037-26-5	
4-Bromofluorobenzene (S)	100	%.	78-121	100		05/11/22 23:19	460-00-4	
4-Bromofluorobenzene (S)	100	%.	78-121	1000		05/12/22 13:26	460-00-4	
Dibromofluoromethane (S)	103	%.	74-128	1000		05/12/22 13:26	1868-53-7	
Dibromofluoromethane (S)	100	%.	74-128	100		05/11/22 23:19	1868-53-7	

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:36	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:36	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:36	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:36	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:36	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:36	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:36	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:36	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:36	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:36	74-87-3	
Chloroprene	**341**	mg/L	50.0	10000		05/12/22 20:04	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:36	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:36	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:36	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-59-2	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:36	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:36	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:36	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:36	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:36	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:36	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:36	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:36	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:36	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:36	127-18-4	
Toluene	**7.6**	mg/L	0.50	100		05/11/22 23:36	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:36	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:36	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:36	95-47-6	
Surrogates								
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:36	2037-26-5	
Toluene-d8 (S)	101	%.	76-124	10000		05/12/22 20:04	2037-26-5	
4-Bromofluorobenzene (S)	98	%.	78-121	100		05/11/22 23:36	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	10000		05/12/22 20:04	460-00-4	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:36	1868-53-7	
Dibromofluoromethane (S)	103	%.	74-128	10000		05/12/22 20:04	1868-53-7	

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	67-64-1	
Benzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-43-2	
Bromodichloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-27-4	
Bromoform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-25-2	
Bromomethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-83-9	
2-Butanone (MEK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	78-93-3	
Carbon disulfide	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-15-0	
Carbon tetrachloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	56-23-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Chlorobenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-90-7	
Chloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-00-3	
Chloroform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	67-66-3	
Chloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-87-3	
Chloroprene	**1080**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	126-99-8	E
1,2-Dibromo-3-chloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	96-12-8	
Dibromochloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	106-93-4	
Dichlorodifluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-71-8	
1,1-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-34-3	
1,2-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	107-06-2	
1,1-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-35-4	
cis-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-59-2	
trans-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-60-5	
1,2-Dichloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	78-87-5	
cis-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-02-6	
Ethylbenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-41-4	
2-Hexanone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	98-82-8	
Methyl acetate	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	79-20-9	
Methylene Chloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	1634-04-4	
Styrene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-34-5	
Tetrachloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	127-18-4	
Toluene	**240**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-88-3	
1,1,1-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-00-5	
Trichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-01-6	
Trichlorofluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-69-4	
Vinyl chloride	ND	mg/kg	5.6	50	05/19/22 09:30	05/19/22 14:09	75-01-4	D4
m&p-Xylene	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	179601-23-1	
o-Xylene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	95-47-6	
Surrogates								
Toluene-d8 (S)	100	%.	75-125	50	05/19/22 09:30	05/19/22 14:09	2037-26-5	
4-Bromofluorobenzene (S)	103	%.	64-139	50	05/19/22 09:30	05/19/22 14:09	460-00-4	
Dibromofluoromethane (S)	97	%.	66-143	50	05/19/22 09:30	05/19/22 14:09	1868-53-7	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255081
QC Batch Method: EPA 8260
Analysis Method: EPA 8260
Analysis Description: 8260 MSV
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028001, 20243028002, 20243028003

METHOD BLANK: 1213305
Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloropropane	mg/L	ND	0.0050	05/11/22 19:49	
2-Butanone (MEK)	mg/L	ND	0.010	05/11/22 19:49	
2-Hexanone	mg/L	ND	0.010	05/11/22 19:49	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/11/22 19:49	
Acetone	mg/L	ND	0.010	05/11/22 19:49	
Benzene	mg/L	ND	0.0050	05/11/22 19:49	
Bromodichloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Bromoform	mg/L	ND	0.0050	05/11/22 19:49	
Bromomethane	mg/L	ND	0.0050	05/11/22 19:49	
Carbon disulfide	mg/L	ND	0.0050	05/11/22 19:49	
Carbon tetrachloride	mg/L	ND	0.0050	05/11/22 19:49	
Chlorobenzene	mg/L	ND	0.0050	05/11/22 19:49	
Chloroethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroform	mg/L	ND	0.0050	05/11/22 19:49	
Chloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroprene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	
Dibromochloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Ethylbenzene	mg/L	ND	0.0050	05/11/22 19:49	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/11/22 19:49	
m&p-Xylene	mg/L	ND	0.010	05/11/22 19:49	
Methyl acetate	mg/L	ND	0.010	05/11/22 19:49	
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/11/22 19:49	
Methylene Chloride	mg/L	ND	0.0050	05/11/22 19:49	
o-Xylene	mg/L	ND	0.0050	05/11/22 19:49	
Styrene	mg/L	ND	0.0050	05/11/22 19:49	
Tetrachloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Toluene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213305 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Trichlorofluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Vinyl chloride	mg/L	ND	0.0020	05/11/22 19:49	
4-Bromofluorobenzene (S)	%.	99	78-121	05/11/22 19:49	
Dibromofluoromethane (S)	%.	102	74-128	05/11/22 19:49	
Toluene-d8 (S)	%.	104	76-124	05/11/22 19:49	

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloropropane	mg/L	ND	0.0050	05/12/22 11:06	
2-Butanone (MEK)	mg/L	ND	0.010	05/12/22 11:06	
2-Hexanone	mg/L	ND	0.010	05/12/22 11:06	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/12/22 11:06	
Acetone	mg/L	ND	0.010	05/12/22 11:06	
Benzene	mg/L	ND	0.0050	05/12/22 11:06	
Bromodichloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Bromoform	mg/L	ND	0.0050	05/12/22 11:06	
Bromomethane	mg/L	ND	0.0050	05/12/22 11:06	
Carbon disulfide	mg/L	ND	0.0050	05/12/22 11:06	
Carbon tetrachloride	mg/L	ND	0.0050	05/12/22 11:06	
Chlorobenzene	mg/L	ND	0.0050	05/12/22 11:06	
Chloroethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroform	mg/L	ND	0.0050	05/12/22 11:06	
Chloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroprene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Dibromochloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Ethylbenzene	mg/L	ND	0.0050	05/12/22 11:06	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/12/22 11:06	
m&p-Xylene	mg/L	ND	0.010	05/12/22 11:06	
Methyl acetate	mg/L	ND	0.010	05/12/22 11:06	

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(504)469-0333

QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/12/22 11:06	
Methylene Chloride	mg/L	ND	0.0050	05/12/22 11:06	
o-Xylene	mg/L	ND	0.0050	05/12/22 11:06	
Styrene	mg/L	ND	0.0050	05/12/22 11:06	
Tetrachloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Toluene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Trichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Trichlorofluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Vinyl chloride	mg/L	ND	0.0020	05/12/22 11:06	
4-Bromofluorobenzene (S)	%.	98	78-121	05/12/22 11:06	
Dibromofluoromethane (S)	%.	103	74-128	05/12/22 11:06	
Toluene-d8 (S)	%.	102	76-124	05/12/22 11:06	

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.048	96	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.062	123	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.056	112	75-121	
1,1-Dichloroethane	mg/L	0.05	0.051	101	71-127	
1,1-Dichloroethene	mg/L	0.05	0.046	92	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.050	100	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.055	109	75-125	
1,2-Dichloroethane	mg/L	0.05	0.052	103	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	105	72-125	
2-Butanone (MEK)	mg/L	0.05	0.059	117	34-170	
2-Hexanone	mg/L	0.05	0.061	122	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.057	115	58-141	
Acetone	mg/L	0.05	0.068	135	16-192	
Benzene	mg/L	0.05	0.051	101	74-132	
Bromodichloromethane	mg/L	0.05	0.054	108	73-117	
Bromoform	mg/L	0.05	0.056	112	58-132	
Bromomethane	mg/L	0.05	0.037	74	47-157	
Carbon disulfide	mg/L	0.05	0.043	87	52-145	
Carbon tetrachloride	mg/L	0.05	0.049	98	68-129	
Chlorobenzene	mg/L	0.05	0.052	103	79-121	
Chloroethane	mg/L	0.05	0.043	86	34-160	
Chloroform	mg/L	0.05	0.050	100	70-120	
Chloromethane	mg/L	0.05	0.038	76	44-142	
Chloroprene	mg/L	0.05	0.047	94	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.048	95	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.052	105	77-121	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Dibromochloromethane	mg/L	0.05	0.053	106	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.031	62	28-148	
Ethylbenzene	mg/L	0.05	0.052	104	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.050	100	77-126	
m&p-Xylene	mg/L	0.1	0.10	103	78-119	
Methyl acetate	mg/L	0.05	0.053	106	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.053	106	58-135	
Methylene Chloride	mg/L	0.05	0.048	95	49-145	
o-Xylene	mg/L	0.05	0.051	103	77-121	
Styrene	mg/L	0.05	0.050	101	81-123	
Tetrachloroethene	mg/L	0.05	0.059	117	62-138	
Toluene	mg/L	0.05	0.051	102	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.048	95	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.050	99	77-117	
Trichlorofluoromethane	mg/L	0.05	0.040	79	45-164	
Vinyl chloride	mg/L	0.05	0.035	70	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			102	74-128	
Toluene-d8 (S)	%.			104	76-124	

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.050	100	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.057	115	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.054	108	75-121	
1,1-Dichloroethane	mg/L	0.05	0.054	108	71-127	
1,1-Dichloroethene	mg/L	0.05	0.051	102	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.047	95	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.051	103	75-125	
1,2-Dichloroethane	mg/L	0.05	0.054	107	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	106	72-125	
2-Butanone (MEK)	mg/L	0.05	0.055	110	34-170	
2-Hexanone	mg/L	0.05	0.053	106	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.052	104	58-141	
Acetone	mg/L	0.05	0.065	129	16-192	
Benzene	mg/L	0.05	0.053	106	74-132	
Bromodichloromethane	mg/L	0.05	0.053	106	73-117	
Bromoform	mg/L	0.05	0.050	99	58-132	
Bromomethane	mg/L	0.05	0.057	113	47-157	
Carbon disulfide	mg/L	0.05	0.049	97	52-145	
Carbon tetrachloride	mg/L	0.05	0.051	101	68-129	
Chlorobenzene	mg/L	0.05	0.053	107	79-121	
Chloroethane	mg/L	0.05	0.071	143	34-160	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloroform	mg/L	0.05	0.052	105	70-120	
Chloromethane	mg/L	0.05	0.063	127	44-142	
Chloroprene	mg/L	0.05	0.049	98	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.050	101	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.053	106	77-121	
Dibromochloromethane	mg/L	0.05	0.050	100	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.052	104	28-148	
Ethylbenzene	mg/L	0.05	0.053	106	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.051	102	77-126	
m&p-Xylene	mg/L	0.1	0.11	107	78-119	
Methyl acetate	mg/L	0.05	0.046	92	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.052	104	58-135	
Methylene Chloride	mg/L	0.05	0.054	107	49-145	
o-Xylene	mg/L	0.05	0.052	103	77-121	
Styrene	mg/L	0.05	0.051	101	81-123	
Tetrachloroethene	mg/L	0.05	0.051	102	62-138	
Toluene	mg/L	0.05	0.051	103	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.052	104	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.051	102	77-117	
Trichlorofluoromethane	mg/L	0.05	0.053	106	45-164	
Vinyl chloride	mg/L	0.05	0.053	106	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			104	74-128	
Toluene-d8 (S)	%.			102	76-124	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/L	ND	5	5	4.8	5.6	96	112	73-141	15	20	
1,1,2,2-Tetrachloroethane	mg/L	ND	5	5	5.5	6.8	110	135	48-148	20	20	
1,1,2-Trichloroethane	mg/L	ND	5	5	5.1	6.1	101	121	46-154	18	20	
1,1-Dichloroethane	mg/L	ND	5	5	5.8	6.7	116	134	63-145	15	20	
1,1-Dichloroethene	mg/L	ND	5	5	4.9	5.5	98	109	28-176	11	20	
1,2-Dibromo-3-chloropropane	mg/L	ND	5	5	4.4	5.5	89	110	40-152	21	20	R1
1,2-Dibromoethane (EDB)	mg/L	ND	5	5	4.9	5.8	98	116	69-134	17	20	
1,2-Dichloroethane	mg/L	ND	5	5	4.7	5.7	95	114	51-147	18	20	
1,2-Dichloropropane	mg/L	ND	5	5	4.9	5.7	98	113	64-140	15	20	
2-Butanone (MEK)	mg/L	ND	5	5	5.1	6.0	101	120	10-200	17	20	
2-Hexanone	mg/L	ND	5	5	5.2	6.3	105	125	40-157	18	20	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	5	5	5.0	6.1	99	121	36-165	20	20	
Acetone	mg/L	ND	5	5	6.1	7.2	122	143	10-200	16	20	
Benzene	mg/L	ND	5	5	5.0	5.8	100	117	29-186	16	20	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Bromodichloromethane	mg/L	ND	5	5	4.9	5.8	99	116	58-139	16	20	
Bromoform	mg/L	ND	5	5	5.0	6.0	101	121	57-135	18	20	
Bromomethane	mg/L	ND	5	5	4.0	4.1	80	81	42-168	1	20	
Carbon disulfide	mg/L	ND	5	5	4.9	5.1	97	102	44-170	4	20	
Carbon tetrachloride	mg/L	ND	5	5	5.1	5.9	101	119	45-162	16	20	
Chlorobenzene	mg/L	ND	5	5	4.9	5.8	99	116	71-135	17	20	
Chloroethane	mg/L	ND	5	5	4.7	4.8	95	96	32-175	1	20	
Chloroform	mg/L	ND	5	5	4.8	5.7	96	114	61-136	17	20	
Chloromethane	mg/L	ND	5	5	4.1	4.1	80	79	38-154	1	20	
Chloroprene	mg/L	62.8	5	5	64.6	62.7	37	-2	59-153	3	20	M1
cis-1,2-Dichloroethene	mg/L	ND	5	5	4.7	5.5	93	109	44-160	16	20	
cis-1,3-Dichloropropene	mg/L	ND	5	5	4.8	5.6	96	112	47-153	15	20	
Dibromochloromethane	mg/L	ND	5	5	4.8	5.8	97	116	64-130	18	20	
Dichlorodifluoromethane	mg/L	ND	5	5	3.6	3.6	72	72	22-160	0	20	
Ethylbenzene	mg/L	ND	5	5	5.0	6.0	100	119	51-153	17	20	
Isopropylbenzene (Cumene)	mg/L	ND	5	5	5.0	6.1	101	123	68-145	20	20	
m&p-Xylene	mg/L	ND	10	10	10.1	11.9	101	119	30-173	16	20	
Methyl acetate	mg/L	ND	5	5	4.5	5.7	90	114	20-173	23	20	R1
Methyl-tert-butyl ether	mg/L	ND	5	5	4.8	5.8	96	117	36-160	19	20	
Methylene Chloride	mg/L	ND	5	5	4.8	5.5	95	110	56-140	14	20	
o-Xylene	mg/L	ND	5	5	4.9	5.9	98	118	10-197	18	20	
Styrene	mg/L	ND	5	5	4.8	5.6	95	111	37-163	16	20	
Tetrachloroethene	mg/L	ND	5	5	5.1	5.9	102	117	18-193	14	20	
Toluene	mg/L	8.4	5	5	13.0	13.2	93	97	33-175	2	20	D4
trans-1,2-Dichloroethene	mg/L	ND	5	5	4.9	5.6	99	112	63-140	13	20	
trans-1,3-Dichloropropene	mg/L	ND	5	5	4.9	5.8	98	116	47-153	17	20	
Trichloroethene	mg/L	ND	5	5	4.9	5.6	97	112	24-181	14	20	
Trichlorofluoromethane	mg/L	ND	5	5	4.5	4.7	91	94	37-182	3	20	
Vinyl chloride	mg/L	ND	5	5	4.0	4.1	81	81	19-169	0	20	
4-Bromofluorobenzene (S)	%.						101	104	78-121			
Dibromofluoromethane (S)	%.						102	102	74-128			
Toluene-d8 (S)	%.						103	101	76-124			

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255724
QC Batch Method: EPA 5035/5030B
Analysis Method: EPA 8260
Analysis Description: 8260 MSV 5030 Med Level
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028004

METHOD BLANK: 1217688
Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromo-3-chloropropane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromoethane (EDB)	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloropropane	mg/kg	ND	0.25	05/19/22 10:03	
2-Butanone (MEK)	mg/kg	ND	0.50	05/19/22 10:03	
2-Hexanone	mg/kg	ND	0.50	05/19/22 10:03	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.50	05/19/22 10:03	
Acetone	mg/kg	ND	0.50	05/19/22 10:03	
Benzene	mg/kg	ND	0.25	05/19/22 10:03	
Bromodichloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Bromoform	mg/kg	ND	0.25	05/19/22 10:03	
Bromomethane	mg/kg	ND	0.25	05/19/22 10:03	
Carbon disulfide	mg/kg	ND	0.25	05/19/22 10:03	
Carbon tetrachloride	mg/kg	ND	0.25	05/19/22 10:03	
Chlorobenzene	mg/kg	ND	0.25	05/19/22 10:03	
Chloroethane	mg/kg	ND	0.25	05/19/22 10:03	
Chloroform	mg/kg	ND	0.25	05/19/22 10:03	
Chloromethane	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Dibromochloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Dichlorodifluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Ethylbenzene	mg/kg	ND	0.25	05/19/22 10:03	
Isopropylbenzene (Cumene)	mg/kg	ND	0.25	05/19/22 10:03	
m&p-Xylene	mg/kg	ND	0.50	05/19/22 10:03	
Methyl acetate	mg/kg	ND	0.50	05/19/22 10:03	
Methyl-tert-butyl ether	mg/kg	ND	0.25	05/19/22 10:03	
Methylene Chloride	mg/kg	ND	0.25	05/19/22 10:03	
o-Xylene	mg/kg	ND	0.25	05/19/22 10:03	
Styrene	mg/kg	ND	0.25	05/19/22 10:03	
Tetrachloroethene	mg/kg	ND	0.25	05/19/22 10:03	
Toluene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Trichloroethene	mg/kg	ND	0.25	05/19/22 10:03	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1217688 Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichlorofluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Vinyl chloride	mg/kg	ND	0.10	05/19/22 10:03	
4-Bromofluorobenzene (S)	%.	101	64-139	05/19/22 10:03	
Dibromofluoromethane (S)	%.	102	66-143	05/19/22 10:03	
Toluene-d8 (S)	%.	101	75-125	05/19/22 10:03	

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	2.5	2.4	97	76-126	
1,1,2,2-Tetrachloroethane	mg/kg	2.5	2.7	107	65-129	
1,1,2-Trichloroethane	mg/kg	2.5	2.5	101	75-121	
1,1-Dichloroethane	mg/kg	2.5	2.5	99	71-127	
1,1-Dichloroethene	mg/kg	2.5	2.1	82	63-130	
1,2-Dibromo-3-chloropropane	mg/kg	2.5	2.4	98	59-131	
1,2-Dibromoethane (EDB)	mg/kg	2.5	2.6	102	75-125	
1,2-Dichloroethane	mg/kg	2.5	2.4	94	65-131	
1,2-Dichloropropane	mg/kg	2.5	2.6	104	72-125	
2-Butanone (MEK)	mg/kg	2.5	2.9	116	34-170	
2-Hexanone	mg/kg	2.5	2.8	112	52-147	
4-Methyl-2-pentanone (MIBK)	mg/kg	2.5	2.7	110	58-141	
Acetone	mg/kg	2.5	2.9	117	16-192	
Benzene	mg/kg	2.5	2.6	106	74-132	
Bromodichloromethane	mg/kg	2.5	2.4	96	73-117	
Bromoform	mg/kg	2.5	2.6	102	58-132	
Bromomethane	mg/kg	2.5	2.0	81	47-157	
Carbon disulfide	mg/kg	2.5	2.0	80	52-145	
Carbon tetrachloride	mg/kg	2.5	2.5	101	68-129	
Chlorobenzene	mg/kg	2.5	2.5	101	79-121	
Chloroethane	mg/kg	2.5	1.9	77	34-160	
Chloroform	mg/kg	2.5	2.5	98	70-120	
Chloromethane	mg/kg	2.5	3.1	122	44-142	
cis-1,2-Dichloroethene	mg/kg	2.5	2.5	100	71-124	
cis-1,3-Dichloropropene	mg/kg	2.5	2.5	102	77-121	
Dibromochloromethane	mg/kg	2.5	2.5	100	67-122	
Dichlorodifluoromethane	mg/kg	2.5	2.5	99	28-148	
Ethylbenzene	mg/kg	2.5	2.5	101	79-116	
Isopropylbenzene (Cumene)	mg/kg	2.5	2.6	103	77-126	
m&p-Xylene	mg/kg	5	5.0	100	78-119	
Methyl acetate	mg/kg	2.5	2.6	103	47-155	
Methyl-tert-butyl ether	mg/kg	2.5	2.4	97	58-135	
Methylene Chloride	mg/kg	2.5	2.4	97	49-145	
o-Xylene	mg/kg	2.5	2.5	101	77-121	
Styrene	mg/kg	2.5	2.5	99	81-123	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Tetrachloroethene	mg/kg	2.5	2.6	105	62-138	
Toluene	mg/kg	2.5	2.5	99	79-120	
trans-1,2-Dichloroethene	mg/kg	2.5	2.6	102	68-125	
trans-1,3-Dichloropropene	mg/kg	2.5	2.4	98	77-121	
Trichloroethene	mg/kg	2.5	2.6	104	77-117	
Trichlorofluoromethane	mg/kg	2.5	2.1	82	45-164	
Vinyl chloride	mg/kg	2.5	1.9	77	48-130	
4-Bromofluorobenzene (S)	%.			101	64-139	
Dibromofluoromethane (S)	%.			98	66-143	
Toluene-d8 (S)	%.			100	75-125	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	106	73-141	3	20	
1,1,2,2-Tetrachloroethane	mg/kg	ND	2.6	2.6	2.9	2.9	110	110	48-148	0	20	
1,1,2-Trichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	105	106	46-154	1	20	
1,1-Dichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	106	108	63-145	1	20	
1,1-Dichloroethene	mg/kg	ND	2.6	2.6	2.1	2.1	80	81	28-176	1	20	
1,2-Dibromo-3-chloropropane	mg/kg	ND	2.6	2.6	2.5	2.7	96	101	40-152	5	20	
1,2-Dibromoethane (EDB)	mg/kg	ND	2.6	2.6	2.8	2.9	105	109	69-134	3	20	
1,2-Dichloroethane	mg/kg	ND	2.6	2.6	2.6	2.6	97	99	51-147	2	20	
1,2-Dichloropropane	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	64-140	2	20	
2-Butanone (MEK)	mg/kg	ND	2.6	2.6	2.8	2.9	94	100	10-200	5	20	
2-Hexanone	mg/kg	ND	2.6	2.6	2.9	3.1	108	116	40-157	7	20	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	2.6	2.6	2.8	2.9	107	110	36-165	2	20	
Acetone	mg/kg	ND	2.6	2.6	2.8	3.1	94	105	10-200	10	20	
Benzene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	29-186	2	20	
Bromodichloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	104	58-139	1	20	
Bromoform	mg/kg	ND	2.6	2.6	2.7	2.8	102	107	57-135	4	20	
Bromomethane	mg/kg	ND	2.6	2.6	2.0	2.0	75	75	42-168	0	20	
Carbon disulfide	mg/kg	ND	2.6	2.6	2.0	2.0	75	76	44-170	2	20	
Carbon tetrachloride	mg/kg	ND	2.6	2.6	2.8	2.9	107	109	45-162	2	20	
Chlorobenzene	mg/kg	ND	2.6	2.6	2.9	2.9	109	111	71-135	2	20	
Chloroethane	mg/kg	ND	2.6	2.6	0.90	0.74	34	28	32-175	19	20	M1
Chloroform	mg/kg	ND	2.6	2.6	2.7	2.8	104	106	61-136	2	20	
Chloromethane	mg/kg	ND	2.6	2.6	3.4	3.4	128	127	38-154	1	20	
Chloroprene	mg/kg				2.8	2.8				2	20	
cis-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	44-160	1	20	
cis-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	47-153	1	20	
Dibromochloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	102	104	64-130	2	20	
Dichlorodifluoromethane	mg/kg	ND	2.6	2.6	2.8	2.7	105	103	22-160	2	20	
Ethylbenzene	mg/kg	ND	2.6	2.6	2.9	2.9	110	111	51-153	1	20	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Isopropylbenzene (Cumene)	mg/kg	ND	2.6	2.6	3.0	3.0	114	114	68-145	0	20	
m&p-Xylene	mg/kg	ND	5.3	5.3	5.7	5.8	108	110	30-173	1	20	
Methyl acetate	mg/kg	ND	2.6	2.6	2.6	2.7	99	103	20-173	4	20	
Methyl-tert-butyl ether	mg/kg	ND	2.6	2.6	2.7	2.7	100	102	36-160	2	20	
Methylene Chloride	mg/kg	ND	2.6	2.6	2.9	2.9	108	109	56-140	1	20	
o-Xylene	mg/kg	ND	2.6	2.6	3.0	3.0	113	113	10-197	1	20	
Styrene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	37-163	1	20	
Tetrachloroethene	mg/kg	ND	2.6	2.6	3.2	3.4	120	127	18-193	6	20	
Toluene	mg/kg	ND	2.6	2.6	2.8	2.8	107	108	33-175	0	20	
trans-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.9	2.9	108	108	63-140	0	20	
trans-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.7	2.7	101	102	47-153	1	20	
Trichloroethene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	24-181	1	20	
Trichlorofluoromethane	mg/kg	ND	2.6	2.6	1.9	2.0	73	74	37-182	1	20	
Vinyl chloride	mg/kg	ND	2.6	2.6	2.1	2.1	78	81	19-169	3	20	
4-Bromofluorobenzene (S)	%.						104	103	64-139			
Dibromofluoromethane (S)	%.						95	96	66-143			
Toluene-d8 (S)	%.						101	100	75-125			

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QUALIFIERS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The Nelac Institute

ANALYTE QUALIFIERS

D4	Sample was diluted due to the presence of high levels of target analytes.
E	Analyte concentration exceeded the calibration range. The reported result is estimated.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
R1	RPD value was outside control limits.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20243028001	**DR-L-LB-05052022-01**	EPA 8260	255081		
20243028002	**DR-L-LB-05052022-02**	EPA 8260	255081		
20243028003	**DR-L-LA-05052022-01**	EPA 8260	255081		
20243028004	**DR-S-BP-05052022-02**	EPA 5035/5030B	255724	EPA 8260	255848

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Pace

CHAIN-OF-CUSTODY / Analytical Request Docum

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be com

Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at https://info.pacelabs.com/

WO# : 20243028

20243028

Section A	Section B	Section C
uired Client Information:	**Required Project Information:**	**Invoice Information:**
pany: weston solution inc.	Report To: Jeff Wright	Attention:
ress: 4324 S. Sherwood Forest Blvd #100	Copy To:	Company Name:
n Rouge , LA 70816		Address:
il: jeff.wright@westonsolutions.com	Purchase Order #:	Pace Quote:
ne: 225-772-7929 Fax:	Project Name:	Pace Project Manager: clay.ledet@pacelabs.com,
uested Due Date: 48 hr	Project #:	Pace Profile #: 17402/1

Regulatory Agency

State / Location

Requested Analysis Filtered (Y/N)

SAMPLE ID (One Character per box. (A-Z, 0-9 / , -) Sample Ids must be unique)	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED START DATE	COLLECTED START TIME	COLLECTED END DATE	COLLECTED END TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Other	Analysis Test Y/N	8260 Full List	8260 Full List	8260 Full List	Residual Chlorine (Y/N)
DR-L-LB-05052022-01	WW	G	5/5/22	1545				3				X						X			
DR-L-LB-05052022-02	WW	G	5/5/22	1545				3				X						X			
DR-L-LA-05052022-01	WW	G	5/5/22	~~1715~~ 1710				3				X						X			
DR-S-BP-05052022-01	SO	G	5/5/22	1610				2	X									X			

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
	Weston	5/6/22	14:15	Tylea Smith	5/6/22	14:15	
	Tylea Smith	5/6/22	14:15	[illegible]	5/6/22	15:5	
	[illegible]	5/6/22	1750	[illegible]	5/6/2022	1750	1.8 Y Y Y

SAMPLER NAME AND SIGNATURE	
PRINT Name of SAMPLER:	
SIGNATURE of SAMPLER:	DATE Signed:

TEMP in C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

E34 3.0

ED_013532_00001908-00026

WO#: 20243028

Pace

1000 Riverbend. Blvd., Suite F
St. Rose, LA 70087

Project : PM: CAL Due Date: 05/12/22
CLIENT: 20-WestonSol

Courier: ☑ Pace Courier ☐ Hired Courier ☐ Fed X ☐ UPS ☐ DHL ☐ USPS ☐ Customer ☐ Other

Custody Seal on Cooler/Box Present: ☐ YES ☑ NO **Custody Seals intact:** ☐ YES ☐ NO

Samples on ice: ☑ YES ☐ NO **Type of Ice:** Wet Blue None

Date and Initials of person examining contents: 5/9/22 CAL

Temp should be ≤6°C *Temp must be measured from Temperature blank when present

Cooler #1 Thermometer Used: 10 Cooler Temp °C: (Observed) 1.8 (CF) 0 (Actual) 1.8
Cooler #2 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #3 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #4 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____

Tracking #: ____

Temperature Blank Present*?	☐Yes ☐No ☑N/A	
Chain of Custody Present:	☑Yes ☐No ☐N/A	
Chain of Custody Complete:	☑Yes ☐No ☐N/A	
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	
Sampler Name & Signature on COC:	☐Yes ☑No ☐N/A	
Samples Arrived within Hold Time:	☑Yes ☐No ☐N/A	
Sufficient Volume:	☑Yes ☐No ☐N/A	
Correct Containers Used:	☑Yes ☐No ☐N/A	
Filtered vol. Rec. for Diss. tests	☐Yes ☐No ☑N/A	
Sample Labels match COC:	☑Yes ☐No ☐N/A	
All containers received within manafacture's precautionary and/or expiration dates.	☑Yes ☐No ☐N/A	
All containers needing chemical preservation have been checked (except VOA, coliform, & O&G).	☐Yes ☐No ☑N/A	If No, was preserative added? ☐Yes ☐No If added record lot #.: HNO3 ____ H2SO4 ____ Date: ____ Time: ____
All containers preservation checked found to be in compliance with EPA recommendation.	☐Yes ☐No ☑N/A	
~~Headspace in VOA Vials (>6mm):~~	~~☐Yes ☑No ☐N/A~~	
Trip Blank Present:	☐Yes ☑No	

Client Notification/ Resolution:

Person Contacted: ____ Date/Time: ____

Comments/ Resolution: ____

Message

From: Voelkel, Kevin [kevin.voelkel@bracewell.com]
Sent: 5/20/2022 11:35:31 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Celena Cage [celena.cage@la.gov]; Craig Easley [craig.easley@la.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Hutt, Jason [jason.hutt@bracewell.com]; Holden, Bob [bholden@joneswalker.com]
Subject: DPE | Fifth Submission in Response to Feb. 2022 Information Request
Attachments: 2022.05.20 . DPE - Fifth Response to 2.24 RCRA Information Request.pdf

Flag: Follow up

Please find attached a letter providing DPE's fifth submission in response to EPA's February 24, 2022 information request. Information referenced in the letter is being made available to Ms. Moncrieffe and Mr. Deppe via a secure filesharing website. As described in the letter, DPE asserts that certain such documents may qualify for confidential treatment and have been marked as "Company Confidential."

Given the electronic form of transmittal, we would ask for a reply email confirming receipt of this submission.

Please feel free to contact me with any questions.

Regards,
Kevin

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Associate
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BRACEWELL

May 20, 2022

VIA EMAIL

Ms. Cheryl T. Seager
Director
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
Seager.Cheryl@epa.gov

Re: Denka Performance Elastomer LLC – Fifth Submission in Response to EPA's February 24, 2022 Information Request

Dear Ms. Seager,

I write on behalf of Denka Performance Elastomer, LLC ("DPE") to provide the Environmental Protection Agency ("EPA") with DPE's fifth submission in response to EPA's Resource Conservation and Recovery Act ("RCRA"), Section 3007 information request sent by email to Mr. Jorge Lavastida on February 24, 2022 (the "Request Letter"). This submission supplements DPE's prior responses, which were submitted to EPA on March 17, March 24, March 31, and April 7, 2022 ("Prior Responses"). As discussed with Ms. Marcia Moncrieffe on April 5, 2022, this submission contains DPE's responses to Questions 9-11 and 16-19 of the Request Letter.

Please note that DPE asserts that certain documents, in whole or in part, related to this production may qualify for confidential treatment and protection from public disclosure. These documents have been marked as "Company Confidential." DPE will continue to confer with EPA regarding the substantiation of the information contained in this response and in DPE's Prior Responses.

Information referenced in this letter is being made available to EPA via a secure filesharing website. Although the information provided herein represents DPE's good faith efforts to address the identified questions, DPE reserves the right to supplement its response at any time in the future if it discovers additional, inconsistent, or conflicting information.

The following numbered paragraphs correspond with the questions posed in Section II of the Request Letter. DPE's responses are provided immediately below each restated question, including, where applicable, references to documents made available to EPA via the secure filesharing website. As

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kevin.voelkel@bracewell.com bracewell.com

discussed with Ms. Moncrieffe on March 15, 2022, the responses below relate to the past 3 years of operations at the DPE facility (the "Relevant Time Period") unless otherwise indicated.

On May 10, 2022, DPE submitted a response to EPA's April 28, 2022 RCRA document request ("RCRA Document Request"). Files made available to EPA as part of that response are hereby incorporated into DPE's response to the February 24, 2022 Request Letter. Such files contain the filename prefix "DPE-RCRA-INS" and are individually referenced in this submission, where applicable.

**

DPE Responses to Questions 9-11 and 16-19 of the Request Letter

9. How many Roll-off Boxes and other Containers are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:

i. Provide photographs of each Roll-off Box and other containers.

Photographs of the facility were taken by EPA during the April 18-21, 2022 inspection. DPE understands such photographs included the types of Roll-off boxes and containers maintained at the facility.

ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.

Please refer to document DPE-RCRA-05-1599, which provides an overview of the waste that is managed in the Roll-off Boxes and other containers. Please also refer to documents DPE-RCRA-01-0001 – 720, which contain waste characterization forms ("WCFs") for waste shipped off-site for disposal. The WCFs state the origination and final disposition of the subject waste stream. In addition, carboy containers are used for transferring samples to drums. Buggies are used to transport waste polymer from the Poly Area to the Outside Brine Pit ("OBP"). Hazardous wastes managed in connection with periodic maintenance activities are stored in vacuum boxes.

iii. How are emissions from Roll-off Box(es) and other containers controlled?

Hazardous wastes managed in connection with periodic maintenance activities are stored in vacuum boxes to control emissions. Drums that contain wastes are secured with lids outside of filling activities. Where the contents of roll-off boxes are expected to cause emissions, DPE uses roll-tarps to control such emissions.

iv. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.

The ultimate disposal site of the waste managed in containers is off-site. Information about the TSD facilities is provided in document DPE-RCRA-05-1599.

10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:

The responses to Question 10 relate to the hazardous waste units at the Facility, as well as the Outside Brine Pit, which is used to manage (i) coag from the Poly and Finishing Areas and (ii) process contact stormwater. Equipment related to the wastewater treatment unit are addressed in response to Question 11 below.

i. What emission control devices are on each unit?

Please refer to the supplemental narrative provided in DPE's May 10, 2022 response to Request 8 of EPA's RCRA Document Request, as well as the supporting files (Files DPE-RCRA-INS-08-001 – 014).

ii. What type of emission could potentially leak and/or escape for each unit?

Please refer to documents DPE-RCRA-05-0001 – 1591, which contain permit renewal applications and addendums for DPE's Title V permits ("Title V Permit Materials"). These materials describe emissions from the facility and speciate the types of emissions.

iii. What is the inspection maintenance protocol for each unit?

Please refer to Files DPE-RCRA-INS-03-001 – 077, which provide DPE Standard Operating Procedures, including maintenance protocols for hazardous waste units at the Facility. In addition, DPE conducts tank inspections in accordance with API Standards 653 and 510.

iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.

Please refer to Files DPE-RCRA-INS-03-001 – 077, which provide the Standard Operating Procedures provided to EPA on May 10, 2022 in response to EPA's April 28, 2022 document request.

11. Provide a description of specific waste streams that could contain Chloroprene, that are sent to the wastewater treatment plant, and identify if any of the streams are hazardous.

Please refer to Response 6 to the Request Letter (submitted to EPA on March 24), which identifies the waste streams that are placed in the OBP. The identified streams are routed to the wastewater treatment plant and have the potential to contain chloroprene. DPE has not developed a waste profile or determination for the coag removed from the Poly Kettle drop strainers since acquiring the facility in 2015. DPE continues to review historical records, including those provided by DuPont at the time of acquisition and those available through the lab that has processed analyticals for the facility.

16. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.

Information concerning air emissions, water discharges, and RCRA disposals are provided in the following documents.

- **Air Emissions.** DPE's Permit Materials are provided in documents DPE-RCRA-05-0001 – 1591. Files DPE-RCRA-05-1596 – 1598 provide relevant information from DPE's *Emissions Reporting and Inventory Center* reporting.
- **Water Discharges.** Discharge Monitoring Reports for the DPE facility are contained in EPA's Central Data Exchange ("CDX").
- **RCRA Disposals.** For information concerning RCRA disposals, please refer to DPE's response to Item 20 of the Request Letter, submitted to EPA on April 7, 2022.

17. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standardsand other RCRA management requirements.

Please refer to Files DPE-RCRA-INS-02-001 – 005.

18. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.

Subpart AA. Process vents at the facility are subject to either MON, HON or P&R MACT requirements. The regulatory applicability of each process vent is discussed in DPE's Title V permit materials (documents DPE-RCRA-05-0001 – 1591) and in Folder 9 of DPE's August 16, 2021 response to EPA's June 15, 2021 CAA 114 Request. In addition, please refer to File DPE-RCRA-INS-01-001, which provides process diagrams, including how process vents are controlled at the Facility.

Subpart BB. In accordance with the December 20, 2013 letter from LDEQ (documents DPE-RCRA-05-1592 – 1594), DPE consolidates the facility's fugitive emission programs, including requirements otherwise

applicable through RCRA subpart BB, through compliance with the HON (40 CFR Subpart H) as the most stringent and guiding fugitive rule. In addition, please refer to File DPE-RCRA-INS-14-001, the LDAR database backup file that was provided to EPA in response to EPA's RCRA Document Request. Please also refer to document DPE-RCRA-05-1595, which provides an LDAR applicability analysis spreadsheet for process streams.

Subpart CC. Please refer to the supplemental narrative provided in DPE's May 10, 2022 response to Request 8 of EPA's RCRA Document Request, as well as the supporting files (Files DPE-RCRA-INS-08-001 – 014).

On April 22, 2022, DPE provided Mr. John Penland (EPA Inspector, Region 6) with a list of P&IDs maintained by DPE at its facility. Upon notice from Mr. Penland of relevant P&IDs, DPE intends to provide electronic copies of such documents to EPA.

19. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.

Air emissions from specific units at the Facility are covered under three Title V permits: the Chloroprene Unit, the Neoprene Unit, and the hydrochloric acid recovery unit ("HCl Recovery Unit"). Such permit materials (documents DPE-RCRA-05-0001 – 1591) cover units otherwise subject to RCRA subparts AA, BB, and/or CC. The application materials for these permits were submitted by DuPont prior to DPE's acquisition of the Facility. DPE's renewal applications each contain a certification of compliance.

**

Please feel free to contact me should you have any questions.

Respectfully,

Kevin Voelkel

Kevin M. Voelkel
Counsel to Denka Performance Elastomer LLC

cc: *EPA*
Marcia Moncrieffe

LDEQ
Craig Easley
Phyllis Luke

DPE
Jorge Lavastida
Patrick Walsh

Counsel to DPE
Jason Hutt (Bracewell LLP)
Bob Holden (Jones Walker LLP)

STATEMENT OF CERTIFICATION

Denka Performance Elastomer LLC

I certify that I am authorized to respond to this information request on behalf of Denka Performance Elastomer LLC and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the foregoing is true and correct. Executed on May 20*, 2022.*

(Signature)

Patrick A. Walsh
(Name)

Manager, Safety, Health, and Environmental
(Title)

p

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 6/13/2022 1:32:27 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka Information requested during Inspection
Attachments: Denka officical document request information - OECA letterhead.pdf

Flag: Follow up

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, June 10, 2022 1:13 PM
To: Penland, John <Penland.John@epa.gov>
Subject: Denka Information requested during Inspection

Hey John,

Can you tell me why Denka submitted so many empty files in response to your information request? I guess the real question is did you ask for something and they refused to respond? Is there a list of your requests?

Thanks

Fred

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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Chris,

Below are documents that we are requesting as part of our inspection during the week of April 18th under RCRA § 3007(a) and CWA § 308. Items in blue are requested as soon as possible, otherwise we have agreed upon a date of May 6th to provide all remaining documents. Please let us know in writing which requests you cannot provide and the reason.

EPA has established standards of practice for transferring, storing, and accessing CBI. Only EPA approved file transfer tools such as FTP Go Anywhere are utilized. Access to CBI is restricted to authorized individuals using one of EPA's secure information systems.

RCRA Documents

- Process flow diagrams, including WWT facility
- Waste management unit inspection records from the past 3 years
- SOPs for hazardous waste management
- Contingency Plan proof of delivery to local emergency agencies
- Monomer process diagram, to include WWT process
- Any analytical data for heads make column and recovery tails column
- Profiles/determinations on each of the waste streams leading to the Aqueous Clarifier Tank headers to WWT
- Records regarding CC determination under 265.1084 for all waste generated onsite
- Heads Make profile (from monomer synthesis unit)
- Recovery Tails profile (from monomer synthesis unit)
- DCB Coke profile (from Isom unit)
- Profiles/determination for waste brine coming from the flasher in CD Synthesis unit and conveyed to the Brine Tanks
- Profiles/determination for strainer cleanout neoprene "popcorn" in the poly unit; analytical data if available
- LDAR backup file (.bak file from LeakDAS)
- List of raw materials used
- Municipal landfill receiving roll-off of popcorn neoprene dredged from the open Brine Pit and the landfill's waste profile.
- SOPs/methods for separating incompatible wastes (may include excerpt from training materials given to operators)
- Flyers posted in the Poly area (identifications INMSC #04, NMSC #39, and NMSC #40)
- SOPs associated with LDAR monitoring program, including calibration process document.
- Container inventory for hazardous waste containers present onsite during inspection (excerpt from facility's Access database used for waste container inventory management)
- Profiles/determination for cleaning pad sludge (identified as AW-015 while on the walkthrough)

- Profiles/determination for COD vials (FIN-159) in the neoprene lab
- Profiles/determination for inhibited brine container present in the lab
- Profiles/determination for material in "Low pH water" totes (seen in 90-day area next to 2MM lb Storage Tank)
- Award letter for HCl unit waste management
- As-built diagram of brine pit
- A list of known material/inputs into the brine pit. Includes the evaluation of contributing waste streams developed in response to the 2016 NEIC inspection.
- Analytical, if available of liquid leaving the brine pit
- Analytical, if available of popcorn neoprene sent to landfill
- Analytical, if available, indicating residual chloroprene content of neoprene "popcorn" removed from the poly strainers

CWA Documents

- Box emissions study for the WWTP
- Sump gate procedures for the Monomer unit
- Analytical of feed streams to the WWTP

Thanks,
Justin

JUSTIN X YOUNG

Digitally signed by JUSTIN YOUNG
Date: 2022.04.28 18:44:06 -04'00'

Justin Young
Physical Scientist/Inspector

Message

From: Young, Justin [Young.Justin@epa.gov]
Sent: 6/15/2022 2:52:44 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]
Subject: Young, Justin shared the folder "Draft Inspection Report 6.14.22" with you.

Young, Justin shared a folder with you

Jeff/John/Fred,

The Denka inspection report is available to review and comment.

Draft Inspection Report 6.14.22

This link only works for the direct recipients of this message.

Open

Microsoft

Privacy Statement

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 6/16/2022 12:38:32 AM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: Denka Performance Elastomer Response to EPA Document Request
Attachments: 2022.05.10 . DPE Response to EPA 4.28 Document Request.pdf

We you able to access the link below? Thanks, MM

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, May 10, 2022 10:52 PM
To: Young, Justin <Young.Justin@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Mostaghim, Negin <Mostaghim.Negin@epa.gov>; Penland, John <Penland.John@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Holden, Bob <bholden@joneswalker.com>; 'Kusaka, Akihiko' <Akihiko-Kusaka@denka-pe.com>; Walsh, Patrick <patrick-walsh@denka-pe.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>
Subject: Denka Performance Elastomer Response to EPA Document Request

Please find attached a letter on behalf of DPE in response to EPA's 4/28/22 document request. Enclosed with the letter is a table to facilitate EPA's review of the documents.

The table references files containing information responsive to the 4/28/22 document request. These files have been made available to the recipients of this email via a secure file sharing website (https://www.sharefile.com/). Each recipient should receive separate emails providing access to such information shortly. Please contact me if you have any questions regarding how to access the website.

Regards,
Kevin

KEVIN M. VOELKEL
Associate
kevin.voelkel@bracewell.com | download v-card
T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

BRACEWELL LLP
2001 M Street NW, Suite 900 | Washington, D.C. | 20036-3310
bracewell.com | profile | LinkedIn | Twitter

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BRACEWELL

May 10, 2022

BY EMAIL

Mr. Justin Young
Inspector
Environmental Protection Agency
1200 Pennsylvania Avenue NW
WJC Building South
Washington, DC 20004

Re: Denka Performance Elastomer Response to EPA April 28, 2022 Document Request

Dear Mr. Young:

I write on behalf of Denka Performance Elastomer, LLC ("DPE") to provide the Environmental Protection Agency ("EPA") with DPE's response to EPA's document request sent by email to Mr. Christopher Meyers on April 28, 2022 (the "Request Letter").

DPE has dedicated significant resources to reviewing the Request Letter and identifying responsive documents. Such documents have been made available to the recipients of this letter via a secure file sharing website (https://sharefile.com). DPE has provided the enclosed table to help guide EPA's review of the documents. Although the information provided herein represents DPE's good faith efforts to address the information sought in the Request Letter, DPE reserves the right to supplement its response at any time in the future if it discovers additional, inconsistent, or conflicting information.

Please note that DPE asserts that certain information, in whole or in part, related to this response, including the materials provided via the secure file sharing website, qualifies for confidential treatment and protection from public disclosure. Such information is confidential, not disclosed to the public, not routinely available to the public through other sources, and treated as private information. DPE has marked such information "Company Confidential." DPE reserves the right to make available redacted copies of any document entitled to protection.

Mr. Kevin M. Voelkel
Associate

T:+1.202.828.1713 F: +1.800.404.3970
2001 M Street NW, Suite 900, Washington,DC 20036-3310
kevin.voelkel@bracewell.com bracewell.com

Please feel free to contact me should you have any questions.

Respectfully,

Mr. Kevin M. Voelkel
Counsel to Denka Performance Elastomer LLC

cc: Ms. Marcia Moncrieffe, EPA

Mr. Akihiko Kusaka, DPE

Mr. Patrick Walsh, DPE

Mr. Christopher Meyers, DPE

Mr. Jason Hutt, Bracewell LLP (Counsel to DPE)

Mr. Robert Holden, Jones Walker LLP (Counsel to DPE)

ENCLOSURE

Denka Performance Elastomer, LLC
Response to EPA April 28, 2022 Document Request

The table below references files containing information responsive to EPA's April 28, 2022 document request (the "Request Letter"). These files have been made available to the recipients of this table via a secure file sharing website. The numbers assigned in the first column ("Request Item Number") correspond to the bullet-point items identified in the Request Letter (e.g., Request Item 1 below corresponds to the first bullet-point item in the Request Letter).

Please note that DPE asserts that certain information, in whole or in part, related to this response, including the materials provided via the secure file sharing website, qualifies for confidential treatment and protection from public disclosure. Such information is confidential, not disclosed to the public, not routinely available to the public through other sources, and treated as private information. DPE has marked such information "Company Confidential." DPE reserves the right to make available redacted copies of any document entitled to protection.

Request Item Number	Location of Responsive Documents	Supplemental Narrative
1	Folder 01	n/a
2	Folder 02	n/a
3	Folder 03	Folder 3 provides Standard Operating Procedures ("SOPs") involving the handling of material at the facility, including the removal of polymer coag from the Poly Kettle drop strainers. During certain removal and inspection activities, DPE personnel place corrugated flexible negative pressure piping to direct vapors to the RTO through the Air Rich Header. The flexible negative pressure piping remains in place for the duration of the activity. To the extent such activities are performed inside the Poly Building, any de minimis emissions that remain after the activities are further dispersed by the Poly Building Wall Fans. DPE has described this practice in responses to EPA information requests issued under Section 114 of the Clean Air Act.
4	Folder 04	n/a
5	Folder 05	n/a
6	Folder 06	n/a

Request Item Number	Location of Responsive Documents	Supplemental Narrative
7	Folder 07	File DPE-RCRA-INS-07-001 provides the available information on streams to the Aqueous Clarifier Tank. In addition to the streams discussed in File DPE-RCRA-INS-07-001, contact stormwater is also routed to the Aqueous Clarifier Tank (please refer to DPE's LPDES permit for additional information). Analytical for the Dynawave Scrubber effluent are provided in File DPE-RCRA-INS-07-002.
8	Folder 08	Per discussions with Mr. John Penland, Folder 8 includes File DPE-RCRA-INS-08-001, which provides a table addressing Subpart CC requirements for applicable tanks at DPE's Facility. File DPE-RCRA-INS-08-002 provides the Title V source identification numbers for such tanks. File DPE-RCRA-INS-08-003 provides DPE's container compliance plan for containers typically used at DPE's Facility. Files DPE-RCRA-INS-08-004—14 provide available information concerning the vapor pressure of applicable tanks and supporting calculations.
9	*please refer to narrative*	DPE has not developed a waste profile or determination for the Heads Make Column since acquiring the facility in 2015. DPE continues to review historical records, including those provided by DuPont at the time of acquisition and those available through the lab that has processed analyticals for the facility. DPE will supplement this response if responsive information is identified. Please refer to File DPE-RCRA-INS-06-001, which provides analyticals for the Heads Make Column. In addition, please refer to File DPE-RCRA-INS-09-001, which provides the waste characterization form for the Catalyst Sludge Receiver.
10	*please refer to narrative*	DPE has not developed a waste profile or determination for the Recovery Tails Column since acquiring the facility in 2015. DPE continues to review historical records, including those provided by DuPont at the time of acquisition and those available through the lab that has processed analyticals for the facility. DPE will supplement this response if responsive information is identified. Please refer to File DPE-RCRA-INS-06-002, which provides analyticals for the Recovery Tails Column. In addition, please refer to File DPE-RCRA-INS-09-001, which provides the waste characterization form for the Catalyst Sludge Receiver.
11	Folder 11	n/a

Request Item Number	Location of Responsive Documents	Supplemental Narrative
12	Folder 12	n/a
13	*please refer to narrative*	DPE has not developed a waste profile or determination for the coag removed from the Poly Kettle drop strainers since acquiring the facility in 2015. DPE continues to review historical records, including those provided by DuPont at the time of acquisition and those available through the lab that has processed analyticals for the facility. DPE will supplement this response if responsive information is identified. Analytical data providing information on the chloroprene concentration of the coag is provided in Files DPE-RCRA-INS-30-001—010.
14	Folder 14	As discussed during EPA's inspection, Folder 14 provides the LeakDAS backup file that was provided to the Department of Justice in December 2021.
15	Folder 15	n/a
16	Folder 16	n/a
17	Folder 17	File DPE-RCRA-INS-17-001 provides guidance material used to train DPE personnel responsible for using, storing, and transporting waste containers at the DPE facility.
18	Folder 18	n/a
19	Folder 19	n/a
20	Folder 20	n/a
21	Folder 21	File DPE-RCRA-INS-21-001 provides the waste characterization form for monomer sump solids.
22	Folder 22	n/a
23	*please refer to narrative*	DPE has not developed a waste profile or determination for the inhibited brine container present in the neoprene lab. The neoprene lab test samples of calcium chloride for corrosion inhibitor and

Request Item Number	Location of Responsive Documents	Supplemental Narrative
		returns the samples to the process. The testing is for process control, not waste handling, to ensure that the calcium chloride brine has adequate levels of corrosion inhibitor.
24	Folder 24	n/a
25	*please refer to narrative*	DPE Personnel is reviewing historical records and will update Folder 25 upon identifying the award letter.
26	Folder 26	n/a
27	Folder 27	The files in Folder 27 provide analytical results of streams entering the outside brine pit ("OBP"). The analyzed samples were collected inside the Poly Building during 2016 and 2017. File DPE-RCRA-INS-27-003 provides analytical results of a sample collected during EPA's NEIC inspection in 2016 using a container that is not designated in the applicable method. The remaining files in Folder 27 document analyses of samples that were collected in containers designated in the applicable method.
28	Folder 28	The Files in Folder 28 provide analytical results of streams entering DPE's wastewater treatment unit. Each report in Folder 28 contains information on two types of samples: a grab sample from the OBP and a grab sample from the Finishing Sump. These samples are analyzed in support of DPE's annual emission report calculations. The "OBP GRAB SAMPLE" section found in each report provides results based on a direct 24-hour composite measurement of organics in the water leaving the OBP. These are taken from a valve located adjacent to the OBP itself, prior to wastewater treatment. All results are 24-hour composite sample results.
29	Folder 16	Please refer to File DPE-RCRA-INS-16-002 which provides analytical results for a waste neoprene sample.
30	Folder 30	n/a
31	Folder 31	n/a

Request Item Number	Location of Responsive Documents	Supplemental Narrative
32	*please refer to narrative*	The Monomer area has four sump gates which are intended for use during emergency events such as spills to reduce the risk of a fire inside the building. The sumps, gates, and associated equipment are designed such that collected wastewater does not overflow to area ditches during normal operation. These sumps include: • CD (normal position is open); • Refining (normal position is closed); • DCB Synthesis (normal position is closed); and • ISOM (normal position is open). Each sump includes a level instrument with a high level alarm that sounds in the Monomer control room. Monomer control room can remotely open and close the CD, Refining, and DCB Synthesis sump gates. The ISOM sump gate is manually operated. The gate positions are inspected by field operators and recorded once per shift. Each sump includes a pump that transfers wastewater to the Aqueous Waste area for disposal in permitted UIC injection wells. These pumps are appropriately sized to handle most rainfall events. During heavy rainfall events, the sumps are monitored to make sure the pumps are not cavitating. DPE also uses vacuum trucks during heavy rain events to prevent sump overflow. In the event of a spill to the ditch, DPE follows area spill response procedures to prevent material spreading to other areas of the plant or being released off-site.
33	Folder 28	Please refer to the supplemental narrative provided for Item 28.

***

Appointment

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/2/2022 9:23:02 PM
To: Mostaghim, Negin [Mostaghim.Negin@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]

Subject: Denka (Employee) Attorney Work-Product, Please do not share.
Location: Microsoft Teams Meeting

Start: 7/5/2022 7:30:00 PM
End: 7/5/2022 8:00:00 PM
Show Time As: Tentative

Importance: High

Required Attendees: Mostaghim, Negin; George, Elizabeth A
Optional Attendees: Deppe, Fred

Hello again, Negin,

This will be a short call as there are two paragraphs in HQs draft that I need to verify with you if HQs considers them Conclusion of Law and Determination. They are not together in the draft and without a caption, I cannot be sure. I have other comments in the draft and will share on the 7th so as to explain what I included from the HQs draft and what was already addressed in the R6/Master draft of the Order.
Thanks, MM

First is this paragraph, which you stated that you will need to confirm with Jason.
Denka employees who clean out and empty the poly kettle strainer waste in the polymer building may suffer serious adverse health effects from exposure to chloroprene. The solid, liquid, and air samples collected during EPA's Sampling Event exceed standards and instructions indicated in Respondent's company documents: (1) Denka's Raw Materials and Chemical Hazards Standard of Procedure indicating an acceptable exposure limit of .2 ppm for chloroprene in the polymer area; and (2) the Profile Recertification Form for Waste Neoprene (2021 MSDS) instructing the use of a supplied air respirator if exposure limits indicated are exceeded. Furthermore, EPA Screening Levels discussed in the next section calculate these sample emissions as an unacceptable risk for the employees at the Facility.

Second is this paragraph:
Based on RCRA Inspection observations, the Sampling Event, and the May 5th EPA Video, Denka employees are exposed to unsafe levels of chloroprene at various locations in the Facility during their workday.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device

sip:teams@video.epa.gov
Video Conference ID: 118 262 739 1
Alternate VTC instructions

Or call in (audio only)

+1 202-991-0477,,251468721# United States, Washington DC

Phone Conference ID: 251 468 721#
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Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/6/2022 1:40:47 PM
To: Welton, Patricia [Welton.Patricia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Penland, John [Penland.John@epa.gov]
Subject: Attorney Work Product, PLEASE DO NOT SHARE
Attachments: DENKA 7003 ORDER R6 Draft July 5.docx

Importance: High

Good morning, all,

Attached you will find the draft order in good condition for your review. Yes, there are few yellows but the information form R6 will be included today when the draft is being reviewed by the named team member. I did not place the draft in a share drive, because I am expecting that each person will review and return to me their individual track document and I will address the issues in the master document that I have. Any outstanding questions, we can discuss per paragraph during tomorrow's call.

Notes to keep in mind as your review:

Strategy: The order names both Denka and Dupont, and the focus is on Denka to do the Work while holding both liable. There is no one approach here and this can be easily changed to named only Denka as the Respondent.

Law: Although I have included allegations of regulatory solid and hazardous waste, they are not needed and are more suited for the RCRA 3008(a). Also, a technical declarant will need to include in his submittal why these are regulatory solid and hazardous waste since we do not have samples that I have seen. It makes the case stronger, but not needed.

Facts: Several of the facts are supported by documents that are currently claimed as CBI by Denka. It would be best if the inspector could support these assertions from observations, sampling, and/or other data not claimed as CBI. I made the decision to be more streamlined with the facts in general and specifically on the process, because for a RCRA 7003 order we do not need to delve into the specificities of the process since we have a point of waste generation and can track the waste for generation through is management on site and before the waste is sent for disposal.

Information received from EPA HQs was not included although allowance are may for HQs to include for the following reasons:

- The Risk for workers have several challenges, not fully developed, and Jeff and HQs are aware;
- Some of the facts included inaccuracies and I discussed with John to confirm;
- Other facts were already addressed by the R6 order;
- EJ data that HQs included is problematic;
- HQs document did not include any language for remedies for workers;
- I have concerns with the level of detail in which the process is described, when it is not necessary and could be challenged for accuracy and CIB; and
- So, I propose that R6 complete this drafting process, send the R6 draft to HQs, and allow HQs to review the R6 draft and include the additional information HQs deems appropriate to complete the draft. This will be in accordance with Lynne's request, I want my team, however, to be part

of the drafting process and development of the administrative record." Of course since it is a R6 order, there will have to be subsequent conversations to finalize the Order.

Regarding the Admin Record, HQs has the lead. Elizabeth has transferred the files and folders we had to Negin. We (Elizabeth and Negin, me) had a call scheduled yesterday (7/5) to discussed what we shared, how the records are cited in the order, and to answer any questions Negin has, but the call was rescheduled by Negin for this afternoon.

I hope these notes are helpful, and I really thank Jeff, John, Fred, and Elizabeth for helping to get the draft to this point- all my calls and emails.

I remain available throughout the day,
Marcia

From: Moncrieffe, Marcia
Sent: Tuesday, July 05, 2022 5:21 PM
To: Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Penland, John <Penland.John@epa.gov>; Jackson, Lori <jackson.lori@epa.gov>
Subject: Update on Status
Importance: High

Good evening, all,

Since I promised you the draft by COB today, this is a quick update.

Our team is work to make this happened, and I have all confidence that I will be able to share the draft with you first thing in the morning (by 10:00 am) so we can have a productive R6 meeting on the 7th.

This will make allowances for others copied to this email to response to certain questions I have outstanding by 7:00 pm this evening.

Thanks everyone,
Marcia

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 7/6/2022 3:00:41 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Request

Here's my comments. Also, in regard to the photograph of the rolloff container at the brine pit, the photo is unclear. I believe it shows the container at least 75% full, but I want to discuss with ERG this afternoon.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Friday, July 1, 2022 8:18 PM
To: Penland, John <Penland.John@epa.gov>
Cc: Deppe, Fred <Deppe.Fred@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Request

John,

I would like to please have a response from you on the 5th and before COB for the request below. Thanks in advance, as I remain available. Marcia

I am not sure I want to include such detail about the process in the Order, as any error could create problems for EPA. The important point is that the process generates waste and at the point of waste generation is where RCRA has jurisdiction. At the same time since I received this language from Negin/HQs to be included, please review and confirm it accuracy so if we have to include you have reviewed. The excerpts below came from HQs.

C. Denka's Polymerization Area and Poly Kettle Strainer Waste Management

X. The polymerization process of converting chloroprene monomer to polychloroprene (neoprene) occurs in poly kettle reactors located in the polymerization area ("polymer area").
[AR: Draft Inspection Report, Attachment 1 photos 17-19]

X. After a batch reaction in a poly kettle reactor, poly kettle strainer waste (also referred to as "popcorn" or "waste neoprene") is generated from in-line strainers in the polymer area. Poly kettle strainer waste is an emulsion (not an emulsion. Emulsion has a very specific technical definition) that includes VOCs and other chemicals, not limited to partially unreacted chloroprene, neoprene, water(yes but why bother including this?), toluene, and acetic acid (Maybe we're referencing something that I've over looked, but I don't recall there being any vinegar in the waste). The emulsion is a combination of solids, liquids, and volatile components (The volatile components in question here are generated as liquids).
[AR: October 2016 Focused Clean Air Act Compliance Investigation; DPE-RCRA-INS-03-073]
DPE-RCRA-INS-16-001 Profile Recertification Form (2021 MSDS) Dry Neoprene Coagulate (4.28 submission Folder #16)].

X. During EPA's RCRA Inspection of the poly kettle area, the inspection team observed several flyers posted on the walls warning employees of the of potential ignition and fire hazard associated with management of the poly kettle strainer waste. Specifically, the flyers said – [if the poly kettle strainer waste] is "exposed to air, [it] can catch fire and serve as a potential ignition source for other flammable material." Further, the flyers also said: "The more, the more, the hotter, the more"…"popcorn polymer can be dangerous."(The hazard being communicated in this flyer is related to the exothermic reaction that the waste undergoes and its insulating

properties that prevent that heat from escaping. This idea is important, but I don't believe it is communicated appropriately here
[*AR: Draft Inspection Report Attachments 12-14]*

X. In response to EPA's Information Request, Denka submitted a "Raw Materials Chemicals and Hazards Polymer Area Standard of Procedures (SOP) for the Polymer area" document. This document describes the SOP for chloroprene at the Facility: "chloroprene is flammable and constitutes a serious fire hazard, small spills should be washed down with water and large spills should be contained, if possible, and covered with foam; chloroprene is also a toxic material with an Acceptable Exposure Limit (AEL) in the air of .2 ppm. Rubber gloves and coverall goggles are required for valving, and a full-face respirator is required when handling chloroprene liquid or when the presence of chloroprene vapor is possible."
[AR: DPE-RCRA-INS-03-075 (Raw Materials, Chemicals and Hazards in the poly area)]

During this removal process, heat and pressure are accelerated in the poly kettle strainer waste as it is pulled and scraped out into the open cart (What is this? Where did it come from? I don't think I can say this), and the poly kettle strainer waste continues to release chloroprene and other VOCs into the air. The waste has the potential to ignite when exposed to oxygen in the air.
[AR: Draft Inspection Report Attachment 1 photos 17-20; Inspection Report Attachment 18 (SOPs for cleaning the poly kettle strainers; LDEQ Hazardous Waste Permit LAR 000 009 415-OP-1 definition of "release": means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping leaching, dumping or disposing of hazardous waste (including hazardous constituents) into the environment.]

Another Review is needed for confirmation regarding the HQs language.
In response to EPA's Information Request, Denka submitted a "Raw Materials Chemicals and Hazards Polymer Area Standard of Procedures (SOP) for the Polymer area" document. This document describes the SOP for chloroprene at the Facility: "chloroprene is flammable and constitutes a serious fire hazard, small spills should be washed down with water and large spills should be contained, if possible, and covered with foam; chloroprene is also a toxic material with an Acceptable Exposure Limit (AEL) in the air of .2 ppm. Rubber gloves and coverall goggles are required for valving, and a full-face respirator is required when handling chloroprene liquid or when the presence of chloroprene vapor is possible."
[AR: DPE-RCRA-INS-03-075 (Raw Materials, Chemicals and Hazards in the poly area)]

Below is what you shared and reviewed with me.

1. During the Inspection, EPA's inspector conducted a records' review and documented the following information.

    A. Denka's Standard Operating Procedure ("SOP")[1] described the cleaning of the Poly Kettle Stainer Waste to include the flushing with water, removing the waste material (Poly Kettle Stainer Waste) from the strainer, and placing the material into a bucket.
    B. After which the bucket is steamed for two hours to deactivate the polymer.
    C. According to the Raw Material Summary, which is referenced in the SOP[2] the Poly Kettle Strainer Waste composed of the following constituencies:
        i. Toluene;
        ii. ACR (2,3-Dichloro-1,3-Butadiene);
        iii. Unstripped neoprene emulsion
        iv. Chloroprene; and
        v. Emergency stablizer.

[1] See Appendix II: Copy of Denka's SOP obtained during the Inspection.
[2] Id.

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/7/2022 1:47:02 PM
To: Penland, John [Penland.John@epa.gov]
CC: George, Elizabeth A [George.Elizabeth.A@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: This is what I need- Thanks

Importance: High

Good morning, John,

Please review the statement below for technical accuracy and general accuracy.

"Based on EPA's inspector's observation during the RCRA Investigation, "the point of waste generation" for the Polymerization Process Unit, is the point at which Denka removes the Poly Kettle Strainer from the Unit to wash and dump the solids (the Poly-Kettle Strainer Waste) on to the flooring of the building and into the Container before transferring the Poly-Kettle Strainer Waste to the OBP."

Thanks,
Marcia

From: Moncrieffe, Marcia
Sent: Wednesday, July 06, 2022 4:43 PM
To: Penland, John <Penland.John@epa.gov>
Subject: RE: This is what I need- Thanks

Thank you John!!
MM

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 06, 2022 4:07 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: This is what I need- Thanks

Air Samples were shipped by Weston via FedEx to the Eastern Research Group Laboratory located at 601 Keystone Park Drive, Suite 700, Morrisville, NC 27560. I've requested that Weston include a copy of the Chain of Custody in the report.

Liquid and solid samples were sent via courier to the Pace Analytical Services, LLC Laboratory located at 1000 Riverbend Blvd - Suite F, St. Rose, LA 70087 – That Chain of Custody is included in attachment J of the Weston Report

---

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, July 6, 2022 2:04 PM
To: Penland, John <Penland.John@epa.gov>
Subject: This is what I need- Thanks

A. DR-S-BP-05052022-01 – Solid sample collected from the OPB: Reported amounts, 1,080 mg/kg;
B. DR-A-BU-05052022-01 – Air sample collected upwind (south) of the OBP during the removal of the Poly Kettle Strainer Waste from the OBP: Reported amounts, 10,200 ug/m^3;

C. DR-A-BD-05052022-01 – Air sample collected downwind (north) of the OBP during the removal of the Poly Kettle Strainer Waste taken from the OBP: Reported amounts, 969 ug/m^3;
D. DR-L-LB-05052022-01 – Liquid sample collected from the OBP and before the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 62.8 mg/L ;
E. DR-L-LB-05052022-02 – Duplicate, liquid sample collected from the OBP and before the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 64.1 mg/L;
F. DR-L-LA-05052022-01 – Liquid sample collected from the OBP after the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 341 mg/L ;
G. DR-A-BK-05052022-01 – Background air sample collected in the Poly Building and from the area at or around the kettle[1] prior to the waste removal: Reported amounts, 1,050 ug/m^3;
H. DR-A-KP-05052022-01 – Air sample collected from the kettle[2] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 193,000 ug/m^3;
I. DR-A-KD-05052022-01 – Air sample collected 15' east of the kettle[3] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 18,400 ug/m^3;
J. DR-A-KD-05052022-02 – Duplicate, air sample collected 15' east of the kettle[4] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 19,000 ug/m^3;
K. DR-A-KT-05052022-01 – Air sample collected in and around the Container that transported the Poly Kettle Strainer Waste to the OBP: Reported amounts, 243,000 ug/m^3; and
L. DR-A-PU-05052022-01 – Air sample collected approximately 15' upwind (south) of the OBP during the servicing of the kettle,[5] Reported amounts, 4,390 ug/m^3. (Appendix VII: Sample Inspection).

[1] *See* Appendix IV: Video File, which shows one of the five (5) kettles where samples were taken from.
[2] *Id.*
[3] *Id.*
[4] *Id.*
[5] *Id.*

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/7/2022 3:06:46 PM
To: Penland, John [Penland.John@epa.gov]
CC: George, Elizabeth A [George.Elizabeth.A@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: This is what I need- Thanks

Thank you!!
MM

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, July 07, 2022 9:59 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: This is what I need- Thanks

Please see my revised language below. They're not supposed to be dumping it on the floor but they're also not cleaning up spills of the material.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, July 7, 2022 8:47 AM
To: Penland, John <Penland.John@epa.gov>
Cc: George, Elizabeth A <George.Elizabeth.A@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: This is what I need- Thanks
Importance: High

Good morning, John,

Please review the statement below for technical accuracy and general accuracy.

"Based on the EPA's inspector's observations during the RCRA Investigation, "the point of waste generation" for the Poly-Kettle Strainer Waste from the Polymerization Process Unit, is the point at which Denka removes the filter baskets from the Poly Kettle Strainer Unit to wash and dump the solids (the Poly-Kettle Strainer Waste) into the Container before transferring the Poly-Kettle Strainer Waste to the OBP."

Thanks,
Marcia

From: Moncrieffe, Marcia
Sent: Wednesday, July 06, 2022 4:43 PM
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Subject: RE: This is what I need- Thanks

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MM

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Sent: Wednesday, July 06, 2022 4:07 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: This is what I need- Thanks

Air Samples were shipped by Weston via FedEx to the Eastern Research Group Laboratory located at 601 Keystone Park Drive, Suite 700, Morrisville, NC 27560. I've requested that Weston include a copy of the Chain of Custody in the report.

Liquid and solid samples were sent via courier to the Pace Analytical Services, LLC Laboratory located at 1000 Riverbend Blvd - Suite F, St. Rose, LA 70087 – That Chain of Custody is included in attachment J of the Weston Report

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, July 6, 2022 2:04 PM
To: Penland, John <Penland.John@epa.gov>
Subject: This is what I need- Thanks

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B. DR-A-BU-05052022-01 – Air sample collected upwind (south) of the OBP during the removal of the Poly Kettle Strainer Waste from the OBP: Reported amounts, 10,200 ug/m^3;
C. DR-A-BD-05052022-01 – Air sample collected downwind (north) of the OBP during the removal of the Poly Kettle Strainer Waste taken from the OBP: Reported amounts, 969 ug/m^3;
D. DR-L-LB-05052022-01 – Liquid sample collected from the OBP and before the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 62.8 mg/L ;
E. DR-L-LB-05052022-02 – Duplicate, liquid sample collected from the OBP and before the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 64.1 mg/L;
F. DR-L-LA-05052022-01 – Liquid sample collected from the OBP after the addition of the Ploy Kettle Strainer Waste to the OBP: Reported amounts, 341 mg/L ;
G. DR-A-BK-05052022-01 – Background air sample collected in the Poly Building and from the area at or around the kettle[1] prior to the waste removal: Reported amounts, 1,050 ug/m^3;
H. DR-A-KP-05052022-01 – Air sample collected from the kettle[2] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 193,000 ug/m^3;
I. DR-A-KD-05052022-01 – Air sample collected 15' east of the kettle[3] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 18,400 ug/m^3;
J. DR-A-KD-05052022-02 – Duplicate, air sample collected 15' east of the kettle[4] during the removal of the Poly Kettle Strainer Waste: Reported amounts, 19,000 ug/m^3;
K. DR-A-KT-05052022-01 – Air sample collected in and around the Container that transported the Poly Kettle Strainer Waste to the OBP: Reported amounts, 243,000 ug/m^3; and
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[1] *See* Appendix IV: Video File, which shows one of the five (5) kettles where samples were taken from.
[2] *Id.*
[3] *Id.*
[4] *Id.*
[5] *Id.*

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 7/9/2022 9:21:56 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Young, Justin [Young.Justin@epa.gov]
Subject: Additional chloroprene analytical data submitted by Denka

Good afternoon, all,

In preparing my inspection report for the May 5 Sampling inspection at Denka, I followed up on a statement made by Chris Meyers. Mr. Meyers stated that Denka had located analytical data related to the chloroprene concentration of the strainer waste. I believe this information was submitted as Folder 30 in the Inspection Document response. These documents appear to be analytical reports from gas chromatography of the liquid portion of the poly kettle strainer waste. Unfortunately these records do not include enough information for me to determine how the samples were collected. However, the results do indicate the volumetric percent compositions of beta-chloroprene (BCD), Alpha-chloroprene (ACD), Anticrystallization reagent (ACR), toluene, and heptane. The reported total chloroprene volumetric percentages range between 2.2% and 8.4%. Ultimately this just reinforces our case that chloroprene is generated as a liquid component of the poly-kettle strainer waste, but I thought it might be of some interest.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/13/2022 3:48:18 PM
To: Mostaghim, Negin [Mostaghim.Negin@epa.gov]
CC: George, Elizabeth A [George.Elizabeth.A@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: LDH Urine Study Attorney Work-Product
Attachments: LSU_Chloroprene Monitoring Report_2022_DRAFT_04112022.pdf

Please find attached the document that supports the urine study that was conducted by LDH and QA/QC by ORD. Thanks, MM

St. John the Baptist Parish Chloroprene Monitoring Demonstration

Subproject of

"Cancer Reporting in St. John the Baptist Parish (CRISP") Project

Prepared for

Louisiana Department of Health
Office of Public Health

April 11, 2022

Prepared by
Adrienne Katner, D.Env., M.S.
Associate Professor
Environmental and Occupational Health
School of Public Health
Louisiana State University Health- New Orleans

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Disclaimer: The Louisiana State Health Sciences Center (LSUHSC) or LSUHSC School of Public Health (SPH) bear no responsibility for analyses or interpretations of data presented here. Opinions expressed herein, including policy implications, are those of the authors and not of LSUHSC or SPH.

Acknowledgements: This report is based on work supported by the Louisiana Department of Health, Office of Public Health. Drs. Edward Trapido and Donna Williams are acknowledged for their critical review of this report and generous feedback.

ED_013532_00001995-00002

SUMMARY

This report is part of a larger project to review cancer cases in St. John the Baptist Parish, Louisiana "Cancer Risk in St John Parish" (CRISP).[1] This report presents the results of a proof-of-concept demonstration to evaluate the feasibility of applying specific analytical procedures for detecting chloroprene in air and urine. This demonstration was not designed to characterize average chloroprene concentrations at resident homes or to estimate ongoing resident exposures to Denka's chloroprene emissions. Due to limited financial resources, we could collect and analyze only a small number of air and biomonitoring samples.

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to the US Environmental Protection Agency (EPA) for September 2021 revealed that facility operators reported that all chloroprene and neoprene production had ceased throughout the entire month of September.[2] Thus, the air monitoring and biomonitoring results in this report are more characteristics of months in which there is no chloroprene production.

However, the limited air and biomonitoring that was conducted indicate there is a need for further investigation and precautionary policies. Air monitoring revealed chloroprene in the air offsite in areas downwind of the facility, including one elementary school, at levels exceeding the EPA's recommended maximum annual average chloroprene concentration of 0.2 μg/m^3 (0.78 and 0.85 μg/m^3), during a month in which no chloroprene was being produced and emissions were reportedly the lowest on record (Sept 2021). Biomonitoring of residents in the surrounding area also suggested the presence of metabolites of three parent compounds, chloroprene, 1,3-butadiene, and epichlorohydrin, which EPA classifies as likely, known and probable carcinogens, respectively.

[1] For more information about this project see: https://louisianacancer.org/st-john/

[2] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

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APPROACH

Ten residents within a half mile of the Denka Performance Elastomer facility in LaPlace, LA were recruited by word of mouth for air and urine sampling at locations #1,3 and 4 on **Figure 1**). Participants were recruited in the month prior to field sampling, but Hurricane Ida hit the area on August 29, 2021, disrupting monitoring plans as many residents had evacuated and could not return due to widespread destruction. Between September 22nd and 23rd, 2021, air monitoring around the Denka Performance Elastomer on River Road, LaPlace, LA commenced. Prior to sample collection we asked study participants to avoid using products or engaging in activities that would ordinarily expose them to VOCs, in an attempt to isolate exposures that may be coming from Denka. Air samplers were situated outside at the residence location. There were no active generators or other potential sources of VOCs in the area of air sample collection. Active sampling was used where air is pumped through a tube with sorbent material to capture volatile organic compounds (VOCs). On the 22nd wind was blowing from the northwest to the southeast and air samples were collected at sites 1,2, 3, 4 and 8 (**Figure 1**). On the 23rd wind was blowing from the northeast to the southwest and air samples were collected at sites 4, 5, 6, 7 and 9 (**Figure 1**). Urine samples (30 mL) were also collected from available participants residing at the locations where air samples were collected. Urine samples were collected on the night of September 22 and/or the morning of September 23 (sites 1,3 and 4, **Figure 1**). All urine samples were coded for de-identification purposes, double-wrapped in zip lock bags, placed in ice chests immediately after collection, transferred to a freezer and frozen for 24 hours before being packed in ice and shipped to the appropriate laboratory overnight. Dr. Adrienne Katner of LSU Health conducted all sample collection. Dr. Chung-Ho Lin conducted all sample analyses at the University of Missouri-Columbia.[3] Air samples were evaluated for chloroprene and other VOCs; and urine samples were evaluated for chloroprene metabolites. **Appendix A** presents the laboratory report on the air sample analysis, QA/QC protocols and results. **Appendix B** presents the laboratory report on urine sample analysis, QA/QC protocols and results.[4] **Appendix C** presents a summary of all air and urine sample results.

---

[3] Sorbent Tube Analysis: INSTAAR Labs (Institute of Arctic and Alpine Research—Dr Detlev Helmig) INSTARR uses FID/MS protocols for VOC analysis in air samples collected in sorbent tubes. Sorbent tubes (SKC Inc. Eighty Four, PA, Cat# MX062131 4-1/2" L packed with 20:35 mesh Tenax-TA/ Carboxen 1000/Carbosieve SIII) are the most widely used collection media for sampling hazardous gases and vapors in air, mostly as it relates to industrial hygiene. They were developed by the US National Institute for Occupational Safety and Health (NIOSH) for air quality testing of workers. Sorbent tubes are typically made of glass and contain various types of solid adsorbent material). Commonly used sorbents include activated charcoal, silica gel, and organic porous polymers. Solid sorbents are selected for sampling specific compounds in air because they: 1. Trap and retain the compound(s) of interest even in the presence of other compounds 2. Do not alter the compound(s) of interest 3. Allow collected compounds to be easily desorbed or extracted for analysis. Sorbent tubes are attached to air sampling pumps for sample collection. A pump with a calibrated flow rate in ml/min is normally placed on a study participant's belt or other clothing, and it draws a known volume of air through the sorbent tube. Chemicals are trapped onto the sorbent material throughout the sampling period. The absorbent tube is then placed in a heated chamber and purged with an inert gas. VOCs are thermally desorbed into a cryogenic trap, cryofocused onto the transfer line, separated by GC and analyzed by a positive ion electron impact Mass Spectrometer (MS).

[4] Urine Analysis Protocol: Dr Chung-Ho Li (University of Missouri) Analysis of VOCs by SPME followed by GC-MS To quantify the volatile organic compounds (VOCs) in the urine samples, including benzene, toluene, xylene, trimethylbenzene, the toluene-d8 was spiked into the samples as the internal standard, the VOCs were extracted by a headspace solid-phase microextraction (SPME) using a 85mm carboxen/polydimethylsiloxane fiber followed by the analysis with an Agilent 6890N gas chromatography coupled with an Agilent 5973N quadrupole mass spectrometer (GC-MS). Analysis of Hydrophobic Metabolites by Liquid-Liquid Extraction followed by GC-MS The hydrophobic metabolites in the urine samples were extracted by a water:dichloromethane (1:1, v/v) liquid– liquid procedure described

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RESULTS

Air Sampling and Analysis

Two out of ten air samples had detectable chloroprene (Sample #4 and 5 in **Figure 1** and **Appendix C**). Both sampling sites were downwind of the Denka plant on the day the sample was collected (9/23/2021). **Chloroprene was not detected in the air samples collected for the remaining samples on September 22 or 23, 2021.** This could occur if there were no chloroprene in the air at the specific sample collection site on that date or if the chloroprene levels were below the analytical limits of detection (<0.005 µg/m^3).

- **One positive air sample (0.78 µg/m^3) was collected on September 23, 2021 by the 5th Ward Elementary School** at the gate of the EPA air monitor (west of Denka) at 158 Panther Dr. Reserve LA 70084 (site #5 in **Figure 1**). No air samples were collected from this site on Sept 22nd. Active air sampling started at 11:33 am on this day and lasted until 5:58 pm. Winds were from the northeast to the southwest that day, thus this area would be in the direction of winds blowing from Denka. On this same day, the school also had relatively higher levels of toluene, benzene and xylene (**Appendix C**); however, air concentrations for these VOCs did not exceed EPA's chronic exposure Reference Concentrations (RfC) for non-cancer health effects. It should be remembered that Denka was not operational during the month of September 2021 due to Hurricane Ida.[5] EPA had previously requested that Denka undertake air monitoring for 1,3-butadiene, along with chloroprene, toluene, benzene, xylene and ethylbenzene.[6] Results for 1,3-butadiene are still pending due to delays in the specific reference standards.
- **Another positive chloroprene sample (0.85 µg/m^3) was collected on September 23, 2001**, at residence #4 across the street from the 5th Ward Elementary School (see **Figure 1**). Active air sampling started at 11:37 am and lasted until 5:58 pm. Winds were blowing in this direction from Denka. This residence also had relatively higher concentrations of benzene and toluene on the same day; however, air concentrations for these VOCs did not exceed EPA's RfC. The prior day (Sept 22nd), this residence had relatively higher concentrations of benzene, 1,2,4-trimethylbenzene,[7] toluene and xylene; however levels were lower than EPA's RfC. The resident at this home also had detectable DHBMA, HOBMA, CHPMA, Cl-MA-II

by Lin (2007 and 2008). The identification and quantification of these metabolites were performed using a Varian 3400cx GC with a Hewlett Packard cross-linked methylsiloxane DB-5 capillary column (30 m x 0.25 mm I.D.) coupled with a Varian Saturn 2000 ion-trap mass selective detector (Varian Inc., Walnut Creek, CA).

[5] The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

[6] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

[7] We could not find reports of 1,2,4-trimethyebenzene emissions from Denka. This compound is used to make high performance polymers and resins.

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and III metabolites in their urine on Sept 23rd, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin, which are all used in the plastics industry.

- **Other sites had detectable levels of other VOCs.** Relatively higher levels of toluene were detected at Sites 1, 2, 3, 7 and 8; and higher levels of benzene (>1 μg/m³) were detected at Sites residences 1 and 4, and site 5, the Fifth Ward Elementary School (see **Figure 1** and **Appendix C**).[8] A resident at site #1 also had detectable levels of DHBMA, HOBMA, CHPMA, Cl-MA-I, II, and III, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin. EPA monitoring detected other VOCs around Denka on Sept. 16 and 18, 2021, and found acrylonitrile and vinyl chloride at air levels above Response Screening Values.[9]

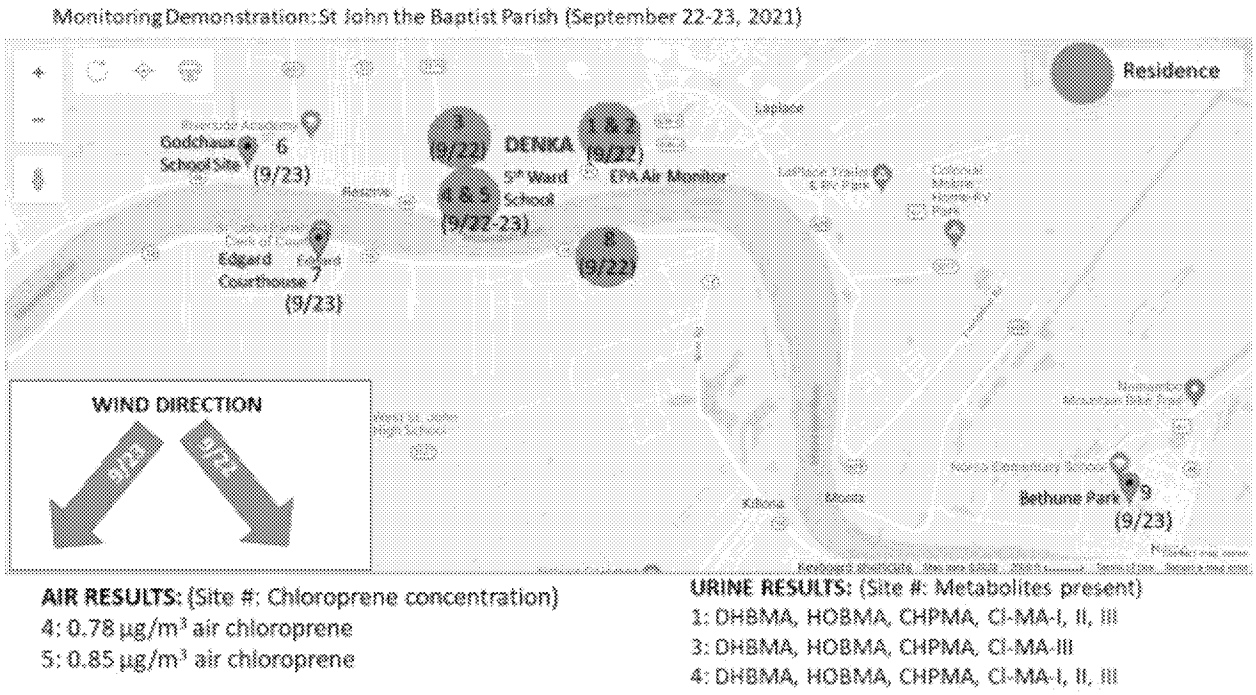

Figure 1. Air sample locations around the Denka facility (2021). In total nine sites were monitored numbered 1 through 9). Dates in which air samples were collected are indicated in parentheses near each site in the map. Sites in bold red are residential areas where urine samples were collected from residents. The locations of residences are shielded with a larger circle to protect residents' privacy.

[8] For every 1 μg/m³ of benzene there is 2.2 cancers per every one million people exposed, based on EPA's Inhalation Unit Risk value for benzene of 2.2E-06 per μg/m³. Benzene is formed from both natural processes and human activities. Sources include fires, gasoline, cigarette smoke, but it is also emitted by Denka.
[9] EPA performed 24 hour summa canister collected air samples upwind and downwind of the Denka facility beginning on September 11, 2021. September 16, 2021, the Denka downwind air sample contained Acrylonitrile above the Response Screening Level of 2.09 ug/m3. The value was 3.62 ug/m3. On September 18, 2021, the Denka downwind air sample contained Vinyl Chloride above the Response Screening Level of 2.24 ug/m3. The value was 2.61 ug/m3. **Acrylonitrile** causes severe irritation of the skin and blistering. It can irritate the eyes, nose and throat. Breathing Acrylonitrile can irritate the lungs, causing coughing and/or shortness of breath. Acrylonitrile can cause headaches, dizziness, confusion, nausea, vomiting. **Vinyl Chloride** causes severe irritation and burns the skin and eyes with possible eye damage. Breathing Vinyl Chloride can irritate the nose, throat and lungs, causing coughing wheezing and/or shortness of breath. Vinyl Chloride can cause headaches, nausea, vomiting, dizziness, fatigue, weakness and confusion. Acrylonitrile is used to produce high-impact plastics; while vinyl chloride is used to make polyvinyl chloride (PVC), which is used to make a variety of products, including plastics.

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Urine Sampling and Analysis

Metabolites indicating VOC exposures were detected in all of the nine urine samples collected from seven participants residing at the three locations sampled (#4, #3 and #1) (**Figure 1**). These were the only sites where non-evacuee residents were available to provide urine samples. **Metabolites detected included DHBMA, HOBMA, CL-MA-I, II, and III,** suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin.

- **DHBMA, a metabolite of both chloroprene and 1,3-butadiene, was detected in all urine samples collected.** The highest levels of DHBMA were from the participant at site #1, adjacent to EPA's air monitor southeast of Denka (**Figure 1**).[10] DHBMA is the main product in chloroprene metabolism, but it is also a product of 1,3-butadiene metabolism. Denka is the sole source of chloroprene in the area— it does not occur naturally (NTP 2011)[11].Chloroprene is classified by EPA as likely to be carcinogenic to humans; and is associated with irritation to eyes, skin, and airways, damage to lungs, liver and kidneys, headaches, fatigue, irritability, dermatitis, hair loss, and cardiovascular and immune systems disorders. While chloroprene is Denka's highest risk emission release (35,718 pounds), the third highest risk emission from Denka based on EPA's analysis is 1,3-butadiene (2,039 pounds), a known carcinogen.[12] Denka's production of chloroprene is dependent on 1,3-butadiene to produce synthetic rubber, but it is also found in smaller amounts in automobile exhaust, tobacco smoke and other sources. EPA requested Denka monitor for 1,3-butadiene, which began in December, 2021, along with monitoring for toluene, chloroprene, xylene, benzene and ethylbenzene. 1,3 Butadiene was detected at the Western edge of Denka property on August 26, 2021 (7.7 $\mu g/m^3$); at Ochsner Hospital on August 31, 2021 (4.4 $\mu g/m^3$); and at the Western edge of the Denka property on January 12, 2022 (2.6 $\mu g/m^3$), and January 26, 2022 (8.1 $\mu g/m^3$).
- **We suspect the presence of HOBMA, CHPMA, and Cl-MA-I, II, and III metabolites in participant urine;[13] however, we could not verify the identity of these metabolites due to the lack of specific reference standards.** Cl-MA-I, II and III are unique metabolites of chloroprene; HOBMA is a metabolite of both chloroprene and 1,3-butadiene; and CHPMA is a specific metabolite of the probable carcinogen epichlorohydrin.[14-15] Five of seven residents had CHPMA in urine— the highest levels were at sites 1 and 4 (**Figure 1** and **Appendix C**).

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[10] For non-smokers, median DHBMA were 100-300 µg/l creatinine. In this demonstration, DHBMA concentrations ranged from 139 $\mu g/m^3$ to 568 $\mu g/m^3$.
[11] NTP (National Toxicology Program). (1998). Toxicology and Carcinogenesis Studies of Chloroprene (CAS No. 126-99-8). National Toxicology Program Technical Report Series, 9(467), 1–379. Retrieved from http://www.ncbi.nlm.nih.gov/pubmed/12579206
[12] EPA classifies 1,3-butadiene as a known human carcinogen. It is also associated with irritation to the eyes, throat, nose, and lungs; damage to the central nervous system, distorted vision, vertigo, fatigue, decreased blood pressure, headache, nausea and fainting. EPA EasyRSEI Dashboard V 2.3.10 for Denka: LINK
[13] **Notes:** (1) 3,4-dihydroxybutyl mercapturic acid (DHBMA); (2) 4-hydroxy-3-oxobutyl mercapturic acid (HOBMA); (3) 3-chloro-2-hydroxypropyl mercapturic acid (CHPMA); (4) 4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I); (5) 4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II); (6) 3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III). See: https://onlinelibrary.wiley.com/doi/pdf/10.1002/3527600418.bi12699e2115
[14] Epichlorohydrin is a highly reactive compound used in the production of glycerol, plastics, epoxy glues and resins, epoxy diluents and elastomers. Exposure to epichlorohydrin may irritate mucous membranes, and cause nausea, cough, labored breathing, lung inflammation, renal lesions, and hematological effects.
[15] The only source of epichlorohydrin in the area appears to be Shell Norco (7-8 miles away). LDEQ EDMS Query for "epichlorohydrin". Available at: https://edms.deq.louisiana.gov/edms-v2/advanced-search

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DISCUSSION

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to EPA for September 2021 revealed that facility operators reported no chloroprene production throughout the entire month of September.[16] Denka calculated a monthly average chloroprene emission of 0.04 µg/m³ for September 2021, the lowest on record.

However, chloroprene was detected downwind of Denka on September 23rd, 2021, during a period of no reported chloroprene production. Chloroprene does not occur naturally in the environment— Denka is the sole source of emissions in the area. Chloroprene levels at or across the street from the elementary school were estimated to be 0.78 and 0.85 µg/m³ on Sept. 23rd—approximately four times above the EPA's recommended maximum annual average chloroprene air concentration of 0.2 µg/m³. This recommended chloroprene air concentration was set to limit cancer risk among 1 million persons to 100 cancer cases per year. Denka's air monitors also detected chloroprene in September 2021, with concentrations as high as 4.7 µg/m³ (Sept. 22) at the western edge of Denka's property, and 24 µg/m³ (Sept. 27) at the eastern edge. These levels were between 23 and 2120 times above 0.2 µg/m³.[17] The EPA's chloroprene air limit is a recommendation, not a required regulatory standard. However, it is important to understand that levels below state and national air quality standards cannot always ensure zero health risks,[18] especially when considered in the context of simultaneous exposures to other facility-specific emissions.

The facts presented support concerns about a likelihood of chronic exposure to low doses of chloroprene at levels which may have potential health impacts on vulnerable populations. Children attending 5th Ward Elementary School and residing in the community may be regularly exposed to levels of chloroprene at or above 0.2 µg/m³, which when considered in conjunction

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[16] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

[17] LDEQ Electronic Document Management System. AI: 199310 for monthly monitoring and emission estimate reports: LIHK

[18] For example, extensive research suggests that certain pollutants (e.g., PM2.5) have negative health impacts below current air quality standards. See the Oct 22, 2019 Letter to EPA Secretary Andrew Wheeler from the Independent Particulate Matter Review Panel summarizing the scientific evidence that the current PM2.5 standard is inadequate to protect public health. Available at https://yosemite.epa.gov/sab/sabproduct.nsf/81DF5685460CC14F8526849800431448/%24File/Independent+Particulate+Matter+Review+Panel+Letter+on+Draft+PA.pdf/.

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with exposures to other VOC emissions from Denka, is a concern.[19] Chloroprene has been manufactured at this site since 1969, thus it constitutes a chronic (>5 decades) exposure. Based on air monitoring data from both EPA and Denka, chloroprene continues to occur with some regularity at levels exceeding 0.2 μg/m^3, even after emission control technologies were installed in February 2018.[20] In 2021, chloroprene air concentrations were as high as 1.8 μg/m^3 at a site two miles away from the facility (at Edgard Courthouse, site #7 on **Figure 1**); and as high as 20.2 μg/m^3 at a site one mile from the facility (at Ochsner Hospital). When the proximity of 5th Ward Elementary School is considered (0.3 miles or 500 yards from the Denka facility), it is not unexpected that levels were detected at the school in 2021 as high as 20.7 μg/m^3 by Denka (103 times higher than 0.2 μg/m^3), and as high as 3.34 μg/m^3 by EPA (16 times higher than 0.2 μg/m^3).

While biomonitoring data did not conclusively link exposures to chloroprene, the presence of metabolites of chloroprene, 1,3-butadiene and/or epichlorohydrin are a concern as these are likely, known and probable carcinogens, respectively, which are associated with plastics production. Furthermore, their presence was unanticipated, given the absence of chloroprene production throughout September (2021). While the source of epichlorohydrin is currently unknown, it was not entirely unexpected to find metabolites of chloroprene and/or 1,3-butadiene in resident urine. On June 15, 2021, the EPA requested Denka to undertake air monitoring for 1,3-butadiene, which commenced in Dec. of 2021, along with monitoring for chloroprene.[21] 1,3 Butadiene was detected at the Western edge of Denka property on Aug. 26, 2021 (7.7 μg/m^3); at Ochsner Hospital on Aug. 31, 2021 (4.4 μg/m^3); and again at the Western edge of Denka property on Jan. 12, 2022 (2.6 μg/m^3), and Jan. 26, 2022 (8.1 μg/m^3).

There is a need for a cumulative risk assessment for all Denka emissions, both carcinogens and non-carcinogens, especially considering the similarities in health outcomes from many of the VOCs found in resident air space and/or urine. The current health assessment approach used by LDH which bases risk decisions on one chemical, chloroprene, is unrealistic and underestimates risks faced by this population from other emissions and emission sources. Currently, LDEQ's process for evaluating whether or not there is an environmental injustice prior to approving a permit application is also limited in scope, such that the real-world exposures to communities are

[19] Even with the decrease in production of Chloroprene and Neoprene from July to August 2021, the August 2021 monthly average Chloroprene ambient air emissions concentration increased 3.4 fold when compared to July 2021 (0.81 ug/m3 to 2.76 ug/m3 monthly average).

[20] A review of chloroprene air concentrations based on data collected in 2021, revealed that the highest chloroprene levels occurred in January 2021 at three of the six air monitoring locations: 1) the Intersection of Hwy 44 and IC Railroad (36.9 μg/m^3); 2) the southwest corner of Ochsner Hospital (20.2 μg/m^3); and 3) the Mississippi River Levee (19.2 μg/m^3). During this month (Jan 2021), Denka estimated a monthly average chloroprene emission of 3.49 μg/m^3.

[21] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

not considered, i.e., the cumulative and synergistic effects of multiple pollutants from all facilities within an area. Cumulative health impacts from population exposures beyond cancer have largely been ignored in studies of this population. The single-minded focus on cancer may have distracted authorities from identifying other health impacts of Denka's emissions. Cancer has a long latency of years to decades, yet, the increasing frequency of disasters like Hurricane Katrina, the Great Flood of 2016, and Hurricane Ida makes it improbable that this population will remain in place long enough to enable a prospective study of cancer rates in this population. It could also be that many in the population aren't living long enough to develop cancer due to earlier deaths from respiratory or cardiovascular diseases, or they may be moving away for access to better healthcare or jobs. It is a widespread and oft-repeated misconception that the lack of significantly higher cancer rates for a larger geographic area means there is no problem in a subpopulation within that area. It is hard to achieve statistical significance for any health statistic when the population is small, as is the case in fenceline communities. One also cannot assume that data for a broader geographic area characterizes health effects of a smaller circumscribed community, as rates for the relevant community are often diluted by those of the larger unexposed population. This makes detection of problems difficult to identify in fenceline communities, even if they do exist.[22-23]

There is a lack of prompt risk communication and transparency from several agencies within the State that is frustrating efforts to establish trust with the surrounding community. Despite years of air monitoring that is now available in the aftermath of the installation of Denka's chloroprene emissions reduction technology, no follow-up to the "Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish" of 2018 has ever been conducted by the Louisiana Department of Health (LDH).[24-25] However, biomonitoring conducted for this and prior investigations by the lab supporting this demonstration confirms community exposure to chloroprene is occurring.[26] In another event from 2015, LDH documented two separate incidents of sudden onset student illnesses that occurred down the street from the Fifth Ward Elementary School, at St. John the Baptist District's Leon Godchaux School, in which it concluded that

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[22] LDH dismissed the "all cancer" incidence rate on the basis that it "is not very useful for explaining or exploring potential etiologies since there are many known risk factors for cancer such as smoking, occupational exposures, etc. that are not controlled in the cancer incidence rates." While this is true, it should be acknowledged that it is often difficult to link some chemicals to a specific disease especially when the chemical has been associated with different diseases, as is the case with chloroprene. This is particularly important given the fact that chloroprene is a mutagen. One characteristic of mutagenesis is induction of tumors at multiple sites and in different species, and this can be triggered theoretically by a single molecule. In mice, chloroprene caused tumors "in a wide variety of mouse tissues, including lung, kidney, Haderian gland, mammary gland, forestomach, liver, skin, mesentery, and Zymbal's gland." Thus, there is the likelihood that different exposed individuals in a population may manifest cancer in different organs, thereby rendering the investigation of an "all cancer" rate necessary in such cases. See "Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John Parish: Evaluation of Potential Health Risks for Elementary School Students based on Early Sampling Results following Emissions Reduction". Louisiana Department of Health, Office of Public Health, Section of Environmental Epidemiology and Toxicology. New Orleans, LA June 14, 2018. LINK

[23] ATSDR. 2005. Ch 7: Health Effects Evaluation: Screening Analysis, Public Health Assessment Guidance Manual. LINK; EPA Toxicological Review of Chloroprene (CAS No. 126-99-8). In Support of Summary Information on the Integrated Risk Information System (IRIS). September 2010. Washington DC: US EPA. LINK

[24] LDH. A Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish. June 14, 2018. OPH, SEET. Available at: https://ldh.la.gov/assets/oph/Center-EH/DENA/PreliminaryChloropreneReport.pdf

[25] Katner A. Independent assessment of the environmental conditions of public school locations within St. John the Baptist Parish, Louisiana. Prepared for the NAACP. September 30, 2020.

student illnesses, which included respiratory ailments, headache, vomiting, burning eyes and weakness, were likely due to industry emissions.[26] LDH has never released its report of this public health emergency— it is unknown whether school district administrators, parents, residents and other parish officials were ever aware of these incidents. The school impacted by these releases is adjacent to Air Product/Evonik, which made the EPA's 2018 list of the 25 facilities releasing the most ethylene oxide in the nation. The specific health symptoms reported by the LDH during the prior 2015 events are similar to those reported in the literature for ethylene oxide and methyl isobutyl ketone, both chemicals emitted from the Evonik. EPA advised Louisiana Department of Environmental Quality (LDEQ) officials to alert the community around this facility about potential risks, but this information was also not communicated to the public. It would not be until August 24th, 2021 when these communications were finally made by EPA to individuals within this population, six years after the events at the Leon Godchaux school.

These and other facts support the need for further investigation and precautionary practices, considering the five decades of chloroprene use at the site and ongoing release of VOCs during that period, the ongoing detection of chloroprene at levels of potential concern at offsite areas where vulnerable populations congregate and live, the gaps in scientific knowledge about the carcinogenic and noncarcinogenic health effects of chronic exposure to industrially released VOC mixtures, and the plausibility of adverse cumulative health impacts on vulnerable populations from chronic exposures to low levels of chloroprene and VOC mixtures. The presence of children a mere 500 yards from the Denka facility should trigger proactive precautionary measures in the absence of direct evidence of harm, to address gaps in public health protection that may be brought on by weaknesses in LA's regulatory oversight and public risk communications that were previously reported by other government oversight officials.[27] Given LA's history of industrial accidents,[28] it is also critical that authorities put in place systems to protect children and residents from adverse outcomes in the event of accidental releases and emergency incidents. Between 2017 and 2021, there were nine emergency incidents reported at Denka alone based on LDEQ records (averaging >1 per year). Louisiana's Administrative code defines an emergency condition as any "which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land,

[26] Action Plan: Denka Performance Elastomer, LLC- Pontchartrain Facility: LaPlace, St. John Parish, Louisiana. US EPA, Washington, DC. June 2016. LINK

[27] The years-long delayed risk communications by LDEQ to the public regarding ethylene oxide emissions from Evonik and Union Carbide which results in excess risks in every census tract in St. John the Baptist Parish was admonished by the EPA- see EPA Office of Inspector General. 2020. Report #20-N-0128. Management Alert- Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns. Available at: https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide/inspector-general-follow-ethylene-oxide-0).

[28] Surveillance reports are limited due to lack of ongoing funding, but state incidents recorded by the State include: (1) Louisiana Hazardous Substances Emergency Events Surveillance (HSEES) System. 2001-2009: A Cumulative Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2001-2009_HSEES_Report.pdf; and (2) Louisiana Toxic Substances Incident Program (LATSIP). 2010-2013: A Summation Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2010-2013_LaSTSIP_Report.pdf

water or air environment, or cause severe damage to property" (LAC 33:I.3915). Currently, communities are only notified of emergency incidents in their area when there is an order for shelter-in-place or evacuation. Incidents reported to LDEQ, State Police or parish emergency response agencies are often not posted publically, rather they are posted on LDEQ's Electronic Documents Management System (EDMS), a system which the public is unfamiliar with, and which only reports emergency incidents after delays of up to a week.

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RECOMMENDATIONS

It is important to note that the academic reaction to data such as those in this project is to call for more studies. While it is always important to add to the body of knowledge concerning public health, particularly when it is sparse, as is the case with chloroprene, when there are expected risks to a population, the emphasis should be on proactive monitoring, mitigation and exposure prevention.

- **Cumulative risk assessments should be conducted by LDH and LDEQ for health assessments, and permit applications, respectively.** In the case of Denka, both carcinogenic and non-carcinogenic health risks should be estimated, based on the mixtures of chemical releases by source and in association to other sources. These risks can be based on both reported estimated emissions and offsite air monitoring results for chloroprene and other VOCs. Chemicals of potential concern include: chloroprene, 1,3-butadiene, BTEX (benzene, toluene, ethylbenzene, xylene), and 1,4-dichloro-2-butene. Further investigation of the source and levels of epichlorohydrin in the air may also be warranted. Other emissions of potential concern may be released by other facilities in the area, like Union Carbide's and Evonik's release of ethylene oxide. EPA is releasing a revision of its 2003 "Framework for Cumulative Risk Assessment", which enables consideration of chemical mixtures.[29] It is recommended that LDH and LDEQ follow this framework to conduct more real-world analyses of risks to fenceline communities.[30] Chemicals of potential concern will have to be determined for each site, but they should be based on EPA's Toxic Release Inventory Risk Screening Indicator (RSEI) model.

- **In addition to cancer outcomes, LDH should track non-cancer health outcomes** to evaluate potential impacts to the population from multiple emissions released by Denka and other facilities in the area. Other adverse health outcomes which may be due to cumulative exposures to pollutant mixtures should be evaluated including, but not limited to those which are common for VOC's like irritation to eyes, nose and throat, headaches and nausea, skin reactions, fatigue, damage to lungs, liver, kidneys, and central nervous systems, blurred vision. Other health effects of potential concern include: cardiovascular and respiratory diseases like COPD and asthma, reproductive and immune system disorders, hematological effects and psychosocial impacts. Some of the more serious diseases can be tracked via Louisiana's

[29] U.S. EPA. Framework for Cumulative Risk Assessment. Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.
[30] U.S. EPA. Framework for Cumulative Risk Assessment. US EPA, Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.

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Hospital Inpatient Discharge Database (LAHIDD), but other sources like Louisiana's Emergency Department dataset will be more useful for documenting less impactful, sudden onset outcomes like asthma outbreaks.

- **LDH should implement a school-based health surveillance system.** High risk schools in fenceline communities should have the infrastructure necessary to implement active health surveillance and support programs. Case counts should be collected daily for asthma, rashes, nausea, vomiting, burning nose and eyes, headache, dizziness, etc. In instances where health risks and/or effects are documented, LDH should be proactive in ensuring access to appropriate health care for affected communities. If a health surveillance system were established in high-risk fenceline schools, this information should be released to the public to enable informed decision-making, especially by parents of sick or immune-suppressed children. School officials should also be taught how to engage with LDH, LDEQ, Parish, and neighboring industry officials to investigate adverse health outcomes and events in relation to suspected industry emissions.

- **If funds allow, biomonitoring should be used by LDH to quantify resident and child exposures to chloroprene.** It is advised to use reference standards specific to chloroprene's unique metabolites, Cl-MA-I, II and III, in conjunction with reference standards specific to DHBMA, chloroprene's predominant metabolite. Simultaneous collection of personal air samples of both chloroprene and 1,3-butadiene will be useful to better characterize exposures and related metabolites by gender, age group, physical activities, and other associated factors. Biomonitoring will establish population exposures to a unique industrially produced compound. It will enable further tracking of these residents over time to establish potential health effects, both carcinogenic and noncarcinogenic. Epidemiologists should be engaged to ensure the study design meets scientific standards needed to characterize dose-response relationships.

- **Denka should to be required by LDEQ to conduct online real-time fenceline and offsite continuous air monitoring** to track the spatial dispersion and temporal patterns of chloroprene and other VOC air emissions (i.e., 1,3-butadiene, 1,4-dichloro-2-butene, and BTEX) in areas around the facility used by vulnerable individuals (e.g., 5th Ward Elementary School). This online air monitoring system should allow for real-time text messages or email alerts to residents, authorities and vulnerable groups (e.g., school authorities, day care operators, etc.) when concentrations exceed regulatory standards and health-based guidance.

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- **It is critical that the LDH and the LDEQ work together to adopt proactive precautionary practices and policies and establish a trust-based supportive relationship with the community.** Frequent public communication, timely follow-up of concerns, prompt risk communication during emergencies, and data and report transparency is essential to establishing trust within this and other fenceline communities. Ultimately, there is a need for the LDH and LDEQ to adopt proactive precautionary practices and policies to prevent future siting of industries adjacent to residences, schools, daycares, parks, hospitals, nursing homes, and low-income housing, when these industries put citizens at risk. It is of paramount importance that LDH and LDEQ set higher standards for the safety and well-being of this, and other fenceline communities.

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Analysis of Pollutants in the Air Samples by Thermal-Desorption coupled with Gas-Chromatography Mass Spectrometry (TDU-GC/MS)

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Sample collection

The volatile organic compounds (VOCs) were sampled by passing approximately 74 liters of air at flow rate of 0.18 L/min (depending on the sampling duration and individual calibrated pump flow rate) through pre-conditioned sampling tubes (70 mm long and 6 mm in outer diameter) containing layers of sorbent material (CDS 20:35 mesh Tenax-TA/Carboxen1000/Carbosieve). The air pump (SKC Model 222-3, SKC Inc., Pennsylvania, USA) with the sampling tube was carried (or attached) by the individual who worked or lived near by the sources of the pollutants. After completion of the sampling, the tubes were removed from the samplers and sealed in clean glass tubes, and stored at –20°C until analysis.

Thermal desorption and GC-MS analysis

The VOCs were analyzed using a thermal desorption unit (TDU) interfaced to gas chromatography–mass spectrometry. In brief, air sampling tubes were loaded in CDS Model 7500 Thermal Desorption Autosampler (Oxford, PA) which was followed by Dynatherm 9300 TDA (Oxford, PA) interfaced to an Agilent 6890N Gas chromatograph. The VOCs were thermally desorbed by TDU at 300°C for 5 min. Helium was used as carrier gas at a flow rate of 20 mL/min. Following the desorption process, the VOCs were concentrated by a focusing trap packed with 60:80 mesh Tenax-TA/Carboxen 1000/Carbosieve SIII. The focusing trap was initially set at 45°C, and the oven temperature was then raised to 300°C. The analytes were then transferred to an Agilent 6890N gas chromatography system coupled with an Agilent 5973 quadrupole mass spectrometer (GC-MS) through a transfer line set at 225°C. The VOCs were separated by a 5% phenyl 95% dimethylarylene siloxane Agilent DB-5MS capillary column (30 m x 0.25 mm I.D.). The GC temperature program was initially set at 45°C for 3 minutes, then increased to 250°C at 15°C/min, and was held for 10 minutes, using split injection with split ratio 5:1 and constant carrier gas flow (He, 1.0 mL/min). Injector temperature was held at 275°C, transfer line between the GC and mass spectrometer was held at 150°C, and the MS source (quadrupole) was held at 230°C. The mass spectra of each peak identified on chromatograms were characterized by comparison with the mass spectra of commercially available reference standards and mass spectral libraries supplied by National Institute for Standard and Technology (NIST/EPA/NIH). Acquisition was started after a 3 minute solvent delay (Lin et al. 2007). The selected ions, retention times, calibration equations, extraction recovery rates, reproducibility and correlation coefficients of the calibration equations, limits of detection (LOD) for the detection and quantification were summarized in **Table 1** as described from our previous air quality studies (Vu et al. 2018).

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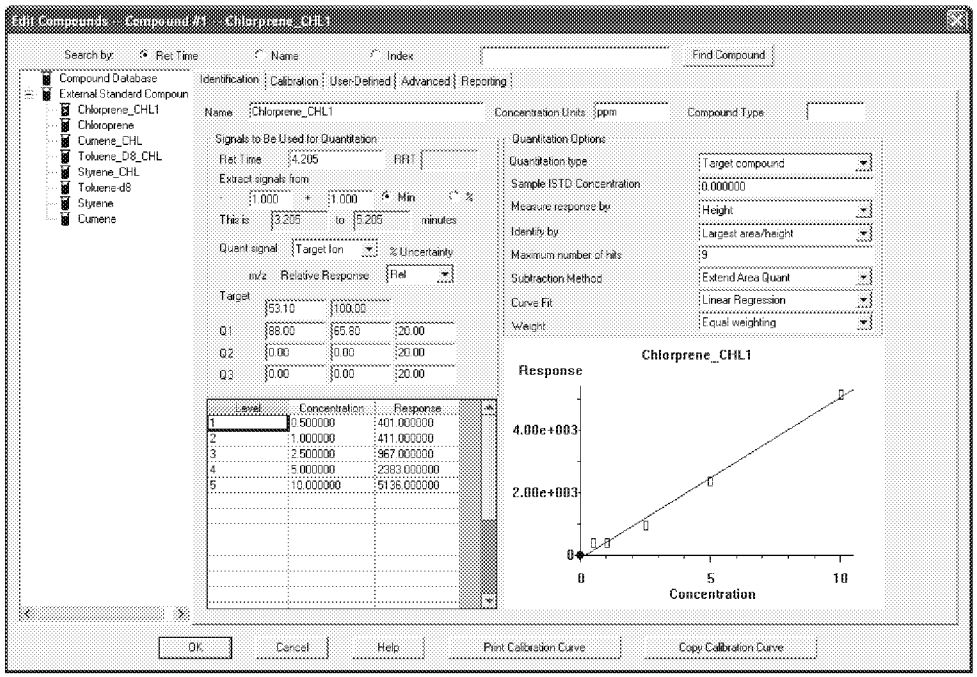
Chloroprene

The instrument LOD is 0.25ppm (ng/µL) x 2 µL = 0.5 ng

LOD = 0.5 ng/100L = 0.005 ng/L = 0.005 µg/m^3

The signals responses were determined by the signal height and signal peak areas. The R^2 of the correlation for the calibration equation is 0.992.



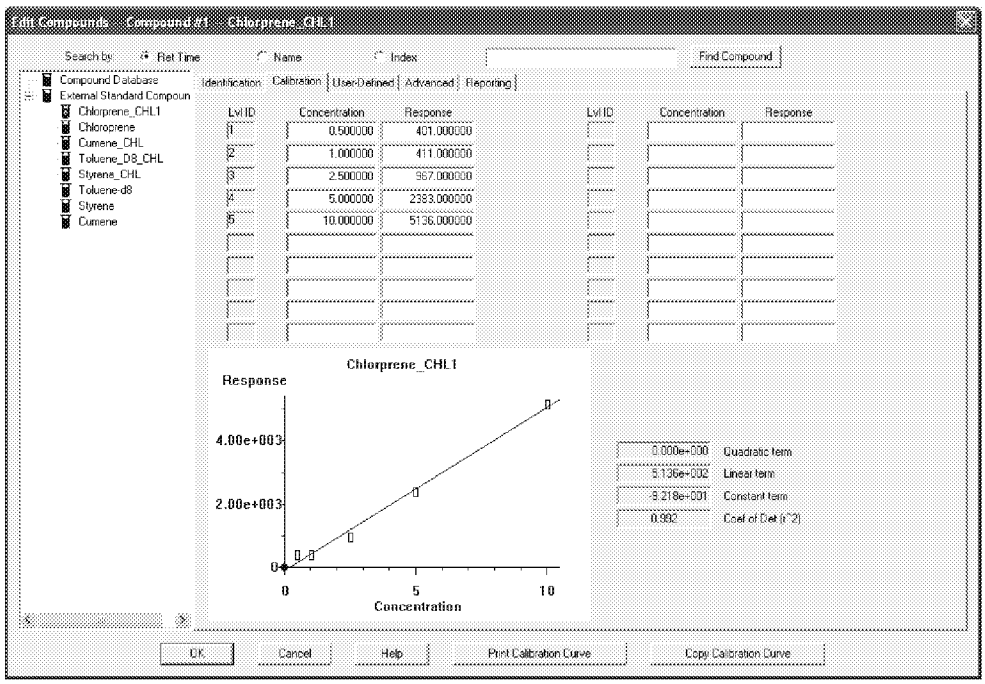


Table 1. Summary of retention times, monitored ions, calibration curves, and recoveries, precisions and detection limits of the other targeted VOCs

No.	Compounds	Retention time (min)	Monitored primary* and secondary ions	Equation	Coefficient of determination R^2	LOD, $\mu g/m^3$	LOQ, $\mu g/m^3$
1	1,2,3-Trimethylbenzene	10.73	105, 120	1	y = 10650x	0.0026	0.0087
2	1,2,4,5-Tetramethylbenzene	11.81	119, 134, 91	1	y = 13000x	0.0014	0.0047
3	1,2,4-Trimethylbenzene	10.33	105, 120	1	y = 10350x	0.0009	0.0030
4	1,3,5-Trimethylbenzene	9.98	105, 120	1	y = 9590x	0.0007	0.0023
5	1-Dodecanol	15.15	55, 69, 83, 97	0.992	y = 1693x	0.0163	0.0543
6	1-Methylnaphthalene	14.07	142, 141, 115	1	y = 13640x	0.0013	0.0043
7	2 ethyl 1 hexanol	10.58	57, 70, 83, 112	0.998	y = 4391x	0.0121	0.0402
8	2-Heptanone	8.79	58, 71, 114, 59	1	y = 3471x	0.0017	0.0058
9	2-Methylnaphthalene	13.88	142, 141, 115	1	y = 13010x	0.0012	0.0040
10	4-Heptanone	8.55	71, 58, 114, 91	1	y = 4924x	0.0016	0.0055
11	alpha-pinene	9.62	93, 92, 91, 77	0.999	y = 4864x	0.0034	0.0114
12	Benzaldehyde	9.89	77, 106, 105, 78	1	y = 4359x	0.0042	0.0140
13	Benzene	5.34	78, 77	0.999	y = 11790x	0.0021	0.0070
14	Butylcyclohexane	10.81	83, 82, 55, 140	1	y = 5596x	0.0016	0.0054
15	Cumene	9.40	105, 120	1	y = 11090x	0.0011	0.0035
16	Decanal	12.60	57, 70, 82, 112	0.999	y = 1399x	0.0074	0.0247
17	Decane	10.25	57, 71, 85, 142	0.998	y = 3651x	0.0016	0.0053
18	D-Limonene	10.77	68, 93, 67, 79	0.999	y = 3536x	0.0039	0.0131
19	Dodecane	12.51	57, 71, 85, 170	1	y = 4964x	0.0026	0.0084
20	Ethylbenzene	8.52	91, 106	1	y = 11430x	0.0012	0.0039
21	Ethylcyclohexane	8.13	83, 82, 55, 112	1	y = 1723x	0.0062	0.0206
22	Heptanal	8.95	70, 55, 57, 81	1	y = 1602x	0.0071	0.0236
23	Hexanal	7.46	56, 57, 72, 82	1	y = 1643x	0.0047	0.0159
24	m/p-Diethylbenzene	10.98	105, 119, 134	0.998	y = 3193x	0.0061	0.0201
25	m/p-Ethyltoluene	9.89	105, 120	0.998	y = 12780x	0.0006	0.0018
26	m/p-Xylene	8.63	91, 106	1	y = 17860x	0.0004	0.0014
27	Methyl salicylate	12.70	120, 92, 152, 121	0.998	y = 6674x	0.0033	0.0110
28	Naphthalene	12.73	128	1	y = 19720x	0.0011	0.0033
29	n-Nonane	8.94	57, 71, 85, 128	0.998	y = 3049x	0.0034	0.0114
30	n-Octanal	10.28	56, 57, 84, 69	0.999	y = 1081x	0.0048	0.0160
31	n-propylbenzene	9.80	91, 120	1	y = 13520x	0.0004	0.0013
32	Octane	7.48	57, 71, 85, 114	0.995	y = 851.6x	0.0047	0.0156
33	o-Diethylbenzene	11.07	119, 105, 134	0.997	y = 4038x	0.0032	0.0106
34	o-Xylene	8.97	91, 106	1	y = 9568x	0.0007	0.0025
35	Pentadecane	15.36	57, 71, 85, 212	1	y = 5415x	0.0039	0.0132
36	Styrene	8.94	104, 103, 78	1	y = 7932x	0.0015	0.0051
37	Tetradecane	14.47	57, 71, 85, 198	1	y = 5415x	0.0021	0.0069
38	Toluene	7.05	91, 92	0.998	y = 7523x	0.0013	0.0046
39	Tridecane	13.52	57, 71, 85, 184	1	y = 4913x	0.0012	0.0038
40	Undecane	11.43	57, 71, 85, 156	0.999	y = 4510x	0.0011	0.0036

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Table 3. Toxicity values

Compounds	RfC, mg/m^3	IUR $\times 10^{-6}$, $(\mu g/m^3)^{-1}$	References
1,2,3-Trimethylbenzene	0.06		EPA
1,2,4-Trimethylbenzene	0.06		EPA
1,3,5-Trimethylbenzene	0.06		EPA
Benzene	0.03	29	EPA, OEHHA
Cumene	0.4		EPA
Ethylbenzene	1	2.5	EPA, OEHHA
Xylenes	0.1		EPA
Naphthalene	0.003	34	EPA, OEHHA
Styrene	1		EPA
Toluene	5		EPA
2-Butoxyethanol	1.6		EPA
1,4-Dichlorobenzene	0.8	11	EPA, OEHHA
Tetrachloroethylene (PERC)	0.04	6.1	EPA, OEHHA
Trichloroethylene (TCE)	0.002	2	EPA, OEHHA

EPA. 2009. Risk Assessment Guidance for Superfund (RAGS): Part F. 2009. https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf
Integrated Risk Information System (IRIS) Assessments. 2018. https://cfpub.epa.gov/ncea/iris/search/index.cfm. Assessed July 4th 2018 The Office of Environmental Health Hazard Assessment (OEHHA). Toxicity criteria on chemicals evaulated by OEHHA.

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Results

1. #6 A-1B-23-LF and #9 A-4B-23-FW have the highest concentrations of chloroprene, with 0.85 and 0.78 $\mu g/m^3$, repectively. The LOD is 0.005 μg/m3
2. Significantly higher concentration of beneze (>1 $\mu g/m^3$) were detected at A-1A-22-LF (#1), A-2A-22-GH (#2), A-1B-23-LF (#6), A-4B-23-FW (#9), the inhalation unit risks [IURs] and EPA Reference Concentration (RfC) were listed in the Table 3.
3. A-1A-22-LF (#1) and A-2A-22-GH (#2) have the highest concentartions of the naphthalene
4. A-1A-22-LF (#1) and A-4B-23-FW (#9) have signtificantly higher concentrations of the 1,2,4-trimethylbenzene.
5. A-1A-22-LF (#1), A-4A-22-AM (#4), A-5A-22-LS (#5) and A-4B-23-FW (#9) have signtificantly higher concentrations of toluene.
6. A-1A-22-LF (#1) and A-4B-23-FW (#9) have significantly higher concentrations of xylene
7. A-1A-22-LF (#1) has the highest concnetration of M-methyltoluene.

References

Lin, C. H., R. N. Lerch, H. E. Garrett, and M. F. George. 2007. Improved GC-MS/MS Method for Determination of Atrazine and Its Chlorinated Metabolites in Forage Plants—Laboratory and Field Experiments. Communications in soil science and plant analysis 38: 1753-1773.

Vu, D. C., T. L. Ho, P. H. Vo, G. Carlo, J. A. McElroy, A. N. Davis, S. C. Nagel, and C.-H. Lin. 2018. Determination of volatile organic compounds in child care centers by thermal desorption gas chromatography-mass spectrometry Analytical Method 10: 730-742.

EPA. 2009. Risk Assessment Guidance for Superfund (RAGS): Part F. 2009. https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf

Integrated Risk Information System (IRIS) Assessments. 2018. https://cfpub.epa.gov/ncea/iris/search/index.cfm. Assessed July 4th 2018

The Office of Environmental Health Hazard Assessment (OEHHA). Toxicity criteria on chemicals eva

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APPENDIX B. Laboratory Analysis of Chloroprene Metabolites in Urine Samples

Chung-Ho Lin, PhD
Research Associate Professor
Bioremediation and Phytochemistry
School of Natural Resources
University of Missouri-Columbia

Metabolites of the Chloroprene

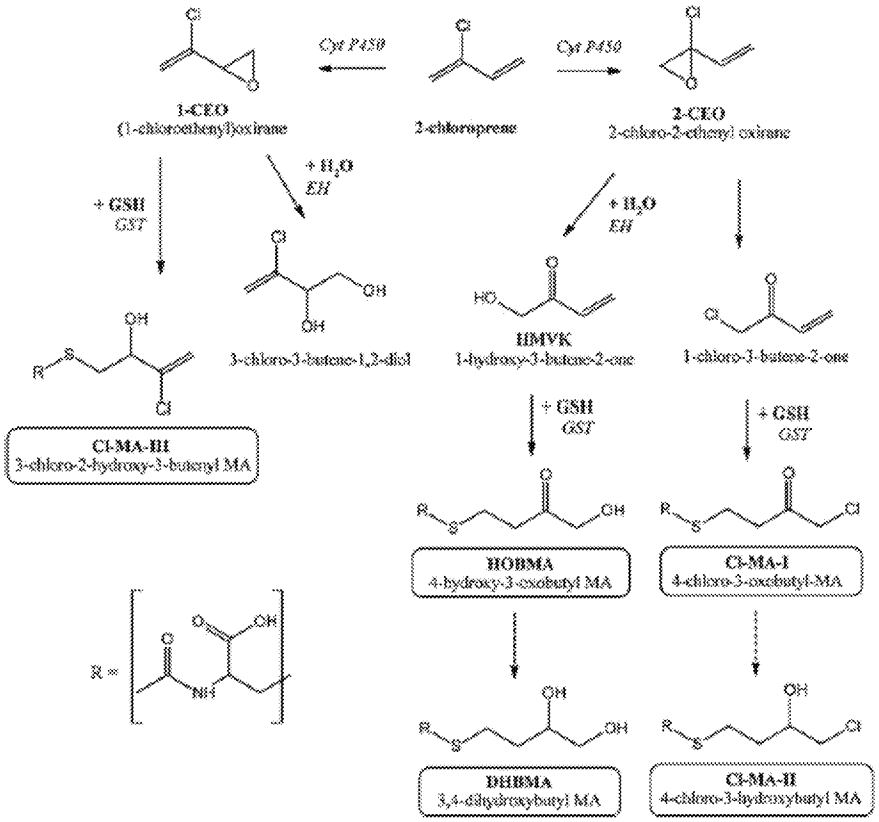

Fig. 1. Proposed biotransformation of 2-chloroprene according to Munter et al. [5,6], modified (Cyt P450 – cytochrome P450; GSH – glutathione; GST – glutathione-S-transferase; EH – epoxide hydrolase; MA – mercapturic acid).

Analysis of the Chloroprene Metabolites in the Urine Samples by UPLC-MS/MS

Sample Preparation

Take 0.5 ml of urine + 9.5 ml (10 mM ammonium acetate with formic acid). Fifty microliter of 40 ppm (mg/L) internal standard enrofloxin-D5** (stable isotope) was added into each sample to achieve concentration of 200 ppb (□g/L) for quality control and quality assurance.

The concentrations of the chloroprene metabolites DHBMA**, HOBMA, CHPMA, Cl-MA-I, Cl-MA-II , Cl-MA-III, creatinine (for dilution factor adjustment) and internal standard creatinine-D3 were determined by a Waters Ultra-Performance Liquid Chromatography connected to a Xevo triple-quadrupole mass spectrometer (UPLC-MS/MS). All the samples were injected with triplicates (n =3).

Analytical Standards https://www.trc-canada.com/checkout/

3,4-dihydroxybutyl mercapturic acid (DHBMA)** (A173710) (D-Isotope A173712)
4-hydroxy-3-oxobutyl mercapturic acid (HOBMA) (H949823)
3-chloro-2-hydroxypropyl mercapturic acid (CHPMA) (A187838)
4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I) (A187828)
4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II)
3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III)

The compounds and the internal standards were separated by a Synergi Max RP C12 150 × 3.0 mm, 4□m reverse-phase Phenomenex column (Torrance, CA). A guard column (C12 4×3 mm from Phenomenex) was used. The elution gradient consists of: 1. mobile phase A (mixture of 88% water, 12% methanol and 0.02% formic acid), 2. mobile phase B (mixture of 10% water, 90% methanol and 0.02% formic acid) and 3. mobile phase C (0.5% aqueous formic acid) with a constant flow rate of 0.3 mL/min as shown in Table 1.

Time (min)	Mobile Phase A (%)	Mobile Phase B (%)	Mobile Phase C (%)	Flow Rate (ml/min)
0.0	100	0	0	0.3
2.0	100	0	0	0.3
5.0	75	25	0	0.3
6.5	50	38	12	0.3
11.5	0	88	12	0.3
13.0	0	88	12	0.3
14.5	12	88	0	0.3
19.0	100	0	0	0.3
30.0	100	0	0	0.3

The MS/MS system operated in the multi-reaction monitoring (MRM) mode with the electrospray ionization sources (ES- or ES+). The ionization energy, MRM transition ions (precursor and product ions; Table 1), capillary and cone voltage, desolvation gas flow and collision energy were optimized by Waters optimization software package. The Table 1 summarizes the ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. **Table 1.** The ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. To optimize the method, the gradient was shortened to 15min as follows: Initial conditions 0%B, 1min 0%B; 2.5min 25%B; 3.25min 38%B, 12%C; 5.625min 88%B, 12%C; 6.5min 88%/12%C; 7.25min 88%B, 0%C; 9.5min 100%A; 15min 100%A.

Chloroprene Metabolites (UPLC-MSMS)					
	ES	Retention time	Precursor ion	Product ion	qualifer ions
DHBMA** (STD)	ES-	4.96	250.0	121.0	75
HOBMA	ES-	4.95 (confirmed)	248.0	162.0	84
CHPMA	ES-	4.96 (confirmed)	254.0	218.0	89
Cl-MA-1	ES-	4.95/7.2	266.0	162.0	84
Cl-MA-II	ES-	4.97 (confirmed)	268.0	232.0	75
Cl-MA-III	ES-	*4.97/5.97/6.94/7.2	266.0	137.0	128

Results

I. The concentrations of DHBMA in urine samples (absolutely confirmed and quantified using analytical standards)

No.	Samples	DHBMA (ppb; ug/L)	Creatinine (ppb; ug/L)	Creatinine (g/L)	DHBMA ug per g of Creatinine
1	U1B23LF	65	348116	0.35	186
2	U1A22LF	485	1826755	1.83	265
3	U2B23LHW	458	3308768	3.31	139
4	U2B23BLW	652	1147677	1.15	568
5	U2B23LEH	299	653870	0.65	457
6	U2B23GAHSR	1032	1926979	1.93	535
7	U2B23GAH2	535	1880189	1.88	285
8	U3B23BT	331	1035490	1.04	319
9	U3A22BT	360	1096646	1.10	329

The chloroprene metabolite DHBMA was detected in all the urine samples. The highest concentrations of DHBMA (ug/g of creatinine) were found in the samples U2B23BLW, U2B23LEH, and U2B23GA

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II. Relative concentrations (signal intensity- number of the ions) of other metabolites HOBMA, CHPMA, Cl-MA-I, Cl-MA-II, Cl-MA-III (no analytical standards available)

		[redacted]		CHPMA RT = 7.38 min		Cl-MA-I RT = 7.5 min		[redacted]		Cl-MA-II** RT = 7.98 min		Cl-MA-III RT = 6.84 min		Cl-MA-III RT = 7.64 min		Cl-MA-III RT = 8.34 min	
No.	Samples	248>162	248>84 (q)	254>218	254>89 (q)	266>162	266>84(q)	266>162	266>84(q)	268>232	268>75 (q)	266>137	266>128 (q)	266>137	266>128 (q)	266>137	266>128 (q)
1	U1B23LF	4864.81	930.42	4607.34	0.00	27.08	244.73	0.00	0.00	339.42	1.27	98.97	216.06	100.74	2931.40	33.89	435.54
2	U1A22LF	24048.26	4670.74	51.42	1.61	0.00	1277.68	0.00	0.00	0.79	186.30	666.38	992.11	731.91	6973.20	259.64	3042.21
3	U2B23LHW	49677.89	9577.78	1.41	1.18	0.00	0.00	[redacted]		0.00	3.12	231.19	390.11	375.28	4459.15	46523.66	23064.76
4	U2B23BLW	70541.73	14684.31	50.37	0.00	0.00	859.02	0.00	0.00	0.00	11.40	963.81	1860.41	525.81	704.47	125.17	1116.11
5	U2B23LEH	111718.53	23060.38	1.07	5.07	0.01	564.29	0.00	0.00	0.33	0.85	802.15	1497.76	420.55	4416.46	19692.81	10414.69
6	U2B23GAHSR	92727.61	19181.89	0.00	0.15	0.00	1531.14	0.00	0.00	0.00	4.91	423.03	1111.24	1041.74	3289.71	464.16	1224.19
7	U2B23GAH2	62944.75	12538.85	0.03	3.02	0.00	0.00	[redacted]		0.00	0.62	149.39	513.94	141.54	2968.98	161115.79	81873.15
8	U3B23BT	31637.88	6137.57	3132.29	0.25	0.00	36.42	0.00	0.00	75.00	0.01	351.74	738.04	40.06	3092.81	8.16	264.68
9	U3A22BT	43426.81	9065.61	0.25	0.92	0.00	144.77	0.00	0.00	0.02	0.00	567.36	1002.85	129.66	3221.70	8.12	643.51

Similar to the findings from DHBMA analysis, HOBMA was detected in all the samples, and the relative concentrations of HOBMA were highest in the samples U2B23BLW, U2B23LEH, and U2B23GAHSR.

For the analysis of CHPMA, Cl-MA-I and Cl-MA-II, due to lack of reference analytical standards, we have to rely on the molecular ions and fragmented product ions and qualifier for the confirmation and quantification purpose. The inconsistence between qualifier ion and pair of molecular/product ions made it impossible to draw any conclusion.

For the analysis of Cl-MA-III, 3 possible signals could be the Cl-MA-III. It could be the signals with retention time 6.84 min, 7.64 min, or 8.34 min. By comparing the results of DHBMA and HOBMA, it is most likely the signal at the retention time of 6.84 min. If that is the case, Cl-MA-III were detected in all the urine samples, and the samples U2B23BLW, U2B23LEH and U2B23GAHSR have the highest concentrations of the metabolite Cl-MA-III.

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APPENDIX C. Summary of Urine Metabolites and Volatile Organic Compounds in Air (St. John Parish, Sept. 2021)

		Urine Metabolites										Volatile Organic Compounds (RfC ug/m3)							
SITE NO.	Name	**Urine Sample Date**	**DHBMA** ug/g creatinine (metabolite of chloroprene and 1,3-butadiene)	**HOBMA** Signal Intensity/ g creatinine (metabolite of chloroprene and 1,3-butadiene)	**CHPMA** Signal Intensity/ g creatinine (metabolite of epichlorohydrin)	**CL-MA-I** Signal Intensity/ g creatinine (metabolite of chloroprene)		**CL-MA-II** Signal Intensity/ g creatinine (metabolite of chloroprene)	**CL-MA-III** Signal Intensity/ g of creatinine (metabolite of chloroprene)			**Air Sample Date** (Duration hr:min)	**Chloroprene** (ug/m3) (20)	**Benzene** (ug/m3) (30)	**Napthalene** (ug/m3) (3)	**1,2,4-trimethyl-benzene** (ug/m3) (60)	**Toluene** (ug/m3) (5000)	**Xylene** (ug/m3) (100)	**Ethylbenzene** (ug/m3) (1000)
1	Residence 1-Resident 1	9/23 (am)	139	300280	304	0	0	0	1397	2268	281214	9/22 (8:00)	below LOD	1.36	0.17	0.26	1.69	0.63	0.18
1	Residence 1-Resident 2	9/23 (am)	568	1229295	19	0	0	6	16796	9163	2181								
1	Residence 1-Resident 3	9/23 (am)	457	3417148	0	0	0	0	24536	12863	602346								
1	Residence 1-Resident 4	9/23 (am)	535	962414	0	0	36587	0	4391	10812	4818								
1	Residence 1-Resident 5	9/23 (am)	285	669558	33319	0	0	798	1589	1506	1713826								
2	River Road EPA Air Monitor SE of Denka, La Place, LA											9/22 (7:56)	below LOD	0.78	0.07	0.34	7.58	1.14	0.31
3	Residence 3	9/22 (pm)	329	791993	0	0	0	0	10347	2365	148	9/22 (8:00)	below LOD	0.59	0.05	0.11	2.71	0.47	0.12
3	Residence 3	9/23 (am)	319	611071	5	0	0	0	6794	774	158								
4	Residence 2	9/22 (pm)	265	263289	15	0	11135	0	7296	8013	2843	9/22 (8:00)	below LOD	1.87	0.16	1.37	3.03	2.54	0.63
4	Residence 2	9/23 (am)	186	279493	2954	0	0	45	5686	5788	1947	9/23 (6:58)	0.85	1.08	0.07	0.19	2.16	0.42	0.12
5	5th Ward School (by EPA monitor)											9/23 (6:58)	0.78	2.11	0.18	0.95	10.82	2.49	0.66
6	Godchaux School Site, Reserve LA											9/23 (7:33)	below LOD	0.59	0.02	0.06	1.14	0.24	0.06
7	Edgard Courthouse (westbank)											9/23 (9:45)	below LOD	0.86	0.04	0.23	2.86	0.89	0.21
8	Residence 4											9/22 (7:21)	below LOD	0.72	0.04	0.15	5.09	0.73	0.23
9	Bethune Park (between Norco Manufacturing Complex and Shell Refinery, Destrehan LA, St Charles Parish											9/23 (7:08)	below LOD	0.55	0.04	0.09	0.28	0.32	0.07

The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

ED_013532_00001995-00025

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/19/2022 4:21:53 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: RE: RCRA 7003 Order Agenda Items

Margaret,

Thanks for the follow-up.

As a note, I intend to participate as always during the call of today answering/asking questions and providing rationale for positions taken. However, as you have been in calls where decisions have been made, I thought it best for HQs to hear the Region's position form you.

To answer your questions:

- All documents cited in the order will be made part of the administrative records and should all be reviewed in their entirety to ensure for example that if there are contradictory statements we are aware and can we would be able to explain if called upon to do so.

- All the documents are currently in a folder that Fred has, which I will need to review as well for completeness.

I use the risk documents only as one example and because I believe Jeff should know by now that I trust his knowledge.

I remain available.
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, July 19, 2022 11:06 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: RCRA 7003 Order Agenda Items

Hi Marcia:

I can lead the call for the first half hour but then Jeff will have to step in as I have a 3:30 appointment.

Good question about the SOP. I would think we can put that in our administrative record along with the photo log.

On the risk documents, can we put those in the admin record as well? Do we have a shared folder where all of these admin record documents can be placed so we can start reviewing them?

Thanks,
Margaret

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Tuesday, July 19, 2022 10:59 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: RCRA 7003 Order Agenda Items

Margaret,

Thank you for the follow-up information below. Also, do I conclude correctly that you will lead the call with HQs this afternoon?

Further, as several citations in the current draft Order are to the CEI, if the sample inspection report cannot support these assertions, then John's declarative statement will need to address. I therefore ask John to please look at the July 15th version that I shared with him yesterday (7/18) to determine the scope of his declarative statement.

An important question: How do we get around several citations to Denka's SOP and attachments to the SOP, which were obtained during CEI?

As to the review of documents, beyond the inspection reports, the photo log(s), and John's declarative statement, we have made several references to links and documents. For example in the risk section, I have taken the word Jeff through interviews with him and **have no reason for doubt**. However, I have not independently review these documents. As an attorney, I cannot sign off/concur on an Order that will be filed/issue citing to these documents without my review.

Thanks,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, July 19, 2022 10:25 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: RCRA 7003 Order Agenda Items

Hi Marcia:

The take-aways from our discussion at the 8:30 with Cheryl and Tricia are below:

Work to be performed/remedies and schedules – will include immediate actions plus long term plan – discuss on AED 1:00 call and WCED 3:00 call;
Workers' risk and the supporting documents and/or who is the declarant who will support worker's risk; - recommend outlining the sampling report (video plus sample results) and then telling the company to evaluate the concentrations of chloroprene in the poly building and ensure that employees wear the appropriate PPE. Recommend taking out DOE numbers and other worker risk descriptions in the order.
The extent of Dupont's liabilities under the order - Ask AED at 1:00
Expected dates for receiving the final CEI report and the Sampling report – discuss on the WCED 3:00 call. Suggest that the RCRA order only cite to the sampling report and video. If photos are needed, can we get the photo log for the CEI report now? Recommend not including the CEI in the administrative record since it's not final and will slow down the order if it's part of the administrative record.

Time built into the schedule to review these reports and the other documents cited in the administrative record – the only new items will be the sampling report, John's declarant statement, and the photo log (if needed). Hopefully the review of these items will not affect the overall schedule for the order.
Completion of the administrative record;
Who will sign the order; Dr. Nance will sign the order, not HQ.
Who will certify the administrative records; the case team and branch chief.
Revised date to file the order;- we'd like to hold firm on the 7/29 order issuance date if possible.
And who from RCRA will be in attendance at the opportunity to confer meeting and who will lead on behalf of RCRA?
Jeff, Fred, and John

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Tuesday, July 19, 2022 9:48 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RE: RCRA 7003 Order Agenda Items

Margaret,

Have you had an opportunity to review the list below with Jeff, Tricia, and Russell, to decided what items below R6 will be discussed with HQs today? Thanks, MM

From: Moncrieffe, Marcia
Sent: Monday, July 18, 2022 3:31 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>
Subject: RCRA 7003 Order Agenda Items
Importance: High

Good afternoon,

As a follow-up to our call of this morning (7/18) and in preparation for our call with HQs tomorrow, please find listed below the agenda items:
Work to be performed/remedies and schedules;
Workers' risk and the supporting documents and/or who is the declarant who will support worker's risk;
The extent of Dupont's liabilities under the order;
Expected dates for receiving the final CEI report and the Sampling report;
Time built into the schedule to review these reports and the other documents cited in the administrative record;
Completion of the administrative record;
Who will sign the order;
Who will certify the administrative records;
Revised date to file the order;
And who from RCRA will be in attendance at the opportunity to confer meeting and who will lead on behalf of RCRA?

I hope this is helpful.
Marcia

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/20/2022 5:52:53 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Thanks,
MM

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, July 20, 2022 12:10 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

FYI

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
Subject: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Mr. Meyers,

On May 5, 2022, the United States Environmental Protection Agency conducted a sampling inspection at your facility under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA) and your Denka's RCRA Permit. A copy of the final inspection report is attached to this email. Please review the report, note the areas of concern, and take any actions necessary to ensure compliance with RCRA. The attached inspection report will be posted to EPA's public website after July 29, 2022.

Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 7/20/2022 7:30:33 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
CC: George, Elizabeth A [George.Elizabeth.A@epa.gov]
Subject: FW: LDH Urine Study Attorney Work-Product
Attachments: LSU_Chloroprene Monitoring Report_2022_DRAFT_04112022.pdf

Flag: Follow up

Please confirm that the attached is the document in the Admin Record that supports the Urine study by LDH. Thanks, MM

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, July 13, 2022 10:42 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: LDH Urine Study Attorney Work-Product

Marcia: I attached the LDH urine study. It is not a link, but the document itself and it appears to be a continuation of the LSU study you attached. The LDH appears to have funded the study done by LSU. I don't know if anyone from EPA reviewed the study you attached. It really should have no affect on our risk position, since our risk level of concern is the probability of getting cancer is 1 in 10,000 over a life time and a survey of a population of less than 2000 people cannot statistically disprove we are under this level of concern. I'm not sure what document and paragraph you are asking about in your last sentence.

Jeff

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, July 13, 2022 9:22 AM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: LDH Urine Study Attorney Work-Product

Good morning, Jeff,

I hope your day has started well.

I seem to recall that you sent me a link to support the LDH urine study, and I just cannot find, could you resend please?

Also, I have attached a LSU study, has anyone in EPA QA/QC this study and could it be harmful to our risk position? I did a research on chloroprene in the document, could you read that paragraph and let me know what you think please. What say you?

Thanks,
MM

St. John the Baptist Parish Chloroprene Monitoring Demonstration

Subproject of

"Cancer Reporting in St. John the Baptist Parish (CRISP") Project

Prepared for

Louisiana Department of Health
Office of Public Health

April 11, 2022

Prepared by
Adrienne Katner, D.Env., M.S.
Associate Professor
Environmental and Occupational Health
School of Public Health
Louisiana State University Health- New Orleans

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Disclaimer: The Louisiana State Health Sciences Center (LSUHSC) or LSUHSC School of Public Health (SPH) bear no responsibility for analyses or interpretations of data presented here. Opinions expressed herein, including policy implications, are those of the authors and not of LSUHSC or SPH.

Acknowledgements: This report is based on work supported by the Louisiana Department of Health, Office of Public Health. Drs. Edward Trapido and Donna Williams are acknowledged for their critical review of this report and generous feedback.

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SUMMARY

This report is part of a larger project to review cancer cases in St. John the Baptist Parish, Louisiana "Cancer Risk in St John Parish" (CRISP).[1] This report presents the results of a proof-of-concept demonstration to evaluate the feasibility of applying specific analytical procedures for detecting chloroprene in air and urine. This demonstration was not designed to characterize average chloroprene concentrations at resident homes or to estimate ongoing resident exposures to Denka's chloroprene emissions. Due to limited financial resources, we could collect and analyze only a small number of air and biomonitoring samples.

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to the US Environmental Protection Agency (EPA) for September 2021 revealed that facility operators reported that all chloroprene and neoprene production had ceased throughout the entire month of September.[2] Thus, the air monitoring and biomonitoring results in this report are more characteristics of months in which there is no chloroprene production.

However, the limited air and biomonitoring that was conducted indicate there is a need for further investigation and precautionary policies. Air monitoring revealed chloroprene in the air offsite in areas downwind of the facility, including one elementary school, at levels exceeding the EPA's recommended maximum annual average chloroprene concentration of 0.2 μg/m^3 (0.78 and 0.85 μg/m^3), during a month in which no chloroprene was being produced and emissions were reportedly the lowest on record (Sept 2021). Biomonitoring of residents in the surrounding area also suggested the presence of metabolites of three parent compounds, chloroprene, 1,3-butadiene, and epichlorohydrin, which EPA classifies as likely, known and probable carcinogens, respectively.

[1] For more information about this project see: https://louisianacancer.org/st-john/

[2] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

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APPROACH

Ten residents within a half mile of the Denka Performance Elastomer facility in LaPlace, LA were recruited by word of mouth for air and urine sampling at locations #1,3 and 4 on **Figure 1**). Participants were recruited in the month prior to field sampling, but Hurricane Ida hit the area on August 29, 2021, disrupting monitoring plans as many residents had evacuated and could not return due to widespread destruction. Between September 22nd and 23rd, 2021, air monitoring around the Denka Performance Elastomer on River Road, LaPlace, LA commenced. Prior to sample collection we asked study participants to avoid using products or engaging in activities that would ordinarily expose them to VOCs, in an attempt to isolate exposures that may be coming from Denka. Air samplers were situated outside at the residence location. There were no active generators or other potential sources of VOCs in the area of air sample collection. Active sampling was used where air is pumped through a tube with sorbent material to capture volatile organic compounds (VOCs). On the 22nd wind was blowing from the northwest to the southeast and air samples were collected at sites 1,2, 3, 4 and 8 (**Figure 1**). On the 23rd wind was blowing from the northeast to the southwest and air samples were collected at sites 4, 5, 6, 7 and 9 (**Figure 1**). Urine samples (30 mL) were also collected from available participants residing at the locations where air samples were collected. Urine samples were collected on the night of September 22 and/or the morning of September 23 (sites 1,3 and 4, **Figure 1**). All urine samples were coded for de-identification purposes, double-wrapped in zip lock bags, placed in ice chests immediately after collection, transferred to a freezer and frozen for 24 hours before being packed in ice and shipped to the appropriate laboratory overnight. Dr. Adrienne Katner of LSU Health conducted all sample collection. Dr. Chung-Ho Lin conducted all sample analyses at the University of Missouri-Columbia.[3] Air samples were evaluated for chloroprene and other VOCs; and urine samples were evaluated for chloroprene metabolites. **Appendix A** presents the laboratory report on the air sample analysis, QA/QC protocols and results. **Appendix B** presents the laboratory report on urine sample analysis, QA/QC protocols and results.[4] **Appendix C** presents a summary of all air and urine sample results.

---

[3] Sorbent Tube Analysis: INSTAAR Labs (Institute of Arctic and Alpine Research—Dr Detlev Helmig) INSTARR uses FID/MS protocols for VOC analysis in air samples collected in sorbent tubes. Sorbent tubes (SKC Inc. Eighty Four, PA, Cat# MX062131 4-1/2" L packed with 20:35 mesh Tenax-TA/ Carboxen 1000/Carbosieve SIII) are the most widely used collection media for sampling hazardous gases and vapors in air, mostly as it relates to industrial hygiene. They were developed by the US National Institute for Occupational Safety and Health (NIOSH) for air quality testing of workers. Sorbent tubes are typically made of glass and contain various types of solid adsorbent material). Commonly used sorbents include activated charcoal, silica gel, and organic porous polymers. Solid sorbents are selected for sampling specific compounds in air because they: 1. Trap and retain the compound(s) of interest even in the presence of other compounds 2. Do not alter the compound(s) of interest 3. Allow collected compounds to be easily desorbed or extracted for analysis. Sorbent tubes are attached to air sampling pumps for sample collection. A pump with a calibrated flow rate in ml/min is normally placed on a study participant's belt or other clothing, and it draws a known volume of air through the sorbent tube. Chemicals are trapped onto the sorbent material throughout the sampling period. The absorbent tube is then placed in a heated chamber and purged with an inert gas. VOCs are thermally desorbed into a cryogenic trap, cryofocused onto the transfer line, separated by GC and analyzed by a positive ion electron impact Mass Spectrometer (MS).

[4] Urine Analysis Protocol: Dr Chung-Ho Li (University of Missouri) Analysis of VOCs by SPME followed by GC-MS To quantify the volatile organic compounds (VOCs) in the urine samples, including benzene, toluene, xylene, trimethylbenzene, the toluene-d8 was spiked into the samples as the internal standard, the VOCs were extracted by a headspace solid-phase microextraction (SPME) using a 85mm carboxen/polydimethylsiloxane fiber followed by the analysis with an Agilent 6890N gas chromatography coupled with an Agilent 5973N quadrupole mass spectrometer (GC-MS). Analysis of Hydrophobic Metabolites by Liquid-Liquid Extraction followed by GC-MS The hydrophobic metabolites in the urine samples were extracted by a water:dichloromethane (1:1, v/v) liquid– liquid procedure described

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RESULTS

Air Sampling and Analysis

Two out of ten air samples had detectable chloroprene (Sample #4 and 5 in **Figure 1** and **Appendix C**). Both sampling sites were downwind of the Denka plant on the day the sample was collected (9/23/2021). **Chloroprene was not detected in the air samples collected for the remaining samples on September 22 or 23, 2021.** This could occur if there were no chloroprene in the air at the specific sample collection site on that date or if the chloroprene levels were below the analytical limits of detection (<0.005 µg/m^3).

- **One positive air sample (0.78 µg/m^3) was collected on September 23, 2021 by the 5th Ward Elementary School** at the gate of the EPA air monitor (west of Denka) at 158 Panther Dr. Reserve LA 70084 (site #5 in **Figure 1**). No air samples were collected from this site on Sept 22nd. Active air sampling started at 11:33 am on this day and lasted until 5:58 pm. Winds were from the northeast to the southwest that day, thus this area would be in the direction of winds blowing from Denka. On this same day, the school also had relatively higher levels of toluene, benzene and xylene (**Appendix C**); however, air concentrations for these VOCs did not exceed EPA's chronic exposure Reference Concentrations (RfC) for non-cancer health effects. It should be remembered that Denka was not operational during the month of September 2021 due to Hurricane Ida.[5] EPA had previously requested that Denka undertake air monitoring for 1,3-butadiene, along with chloroprene, toluene, benzene, xylene and ethylbenzene.[6] Results for 1,3-butadiene are still pending due to delays in the specific reference standards.
- **Another positive chloroprene sample (0.85 µg/m^3) was collected on September 23, 2001**, at residence #4 across the street from the 5th Ward Elementary School (see **Figure 1**). Active air sampling started at 11:37 am and lasted until 5:58 pm. Winds were blowing in this direction from Denka. This residence also had relatively higher concentrations of benzene and toluene on the same day; however, air concentrations for these VOCs did not exceed EPA's RfC. The prior day (Sept 22nd), this residence had relatively higher concentrations of benzene, 1,2,4-trimethylbenzene,[7] toluene and xylene; however levels were lower than EPA's RfC. The resident at this home also had detectable DHBMA, HOBMA, CHPMA, Cl-MA-II

by Lin (2007 and 2008). The identification and quantification of these metabolites were performed using a Varian 3400cx GC with a Hewlett Packard cross-linked methylsiloxane DB-5 capillary column (30 m x 0.25 mm I.D.) coupled with a Varian Saturn 2000 ion-trap mass selective detector (Varian Inc., Walnut Creek, CA).

[5] The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

[6] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

[7] We could not find reports of 1,2,4-trimethyebenzene emissions from Denka. This compound is used to make high performance polymers and resins.

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and III metabolites in their urine on Sept 23rd, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin, which are all used in the plastics industry.

- **Other sites had detectable levels of other VOCs.** Relatively higher levels of toluene were detected at Sites 1, 2, 3, 7 and 8; and higher levels of benzene (>1 μg/m³) were detected at Sites residences 1 and 4, and site 5, the Fifth Ward Elementary School (see **Figure 1** and **Appendix C**).[8] A resident at site #1 also had detectable levels of DHBMA, HOBMA, CHPMA, Cl-MA-I, II, and III, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin. EPA monitoring detected other VOCs around Denka on Sept. 16 and 18, 2021, and found acrylonitrile and vinyl chloride at air levels above Response Screening Values.[9]

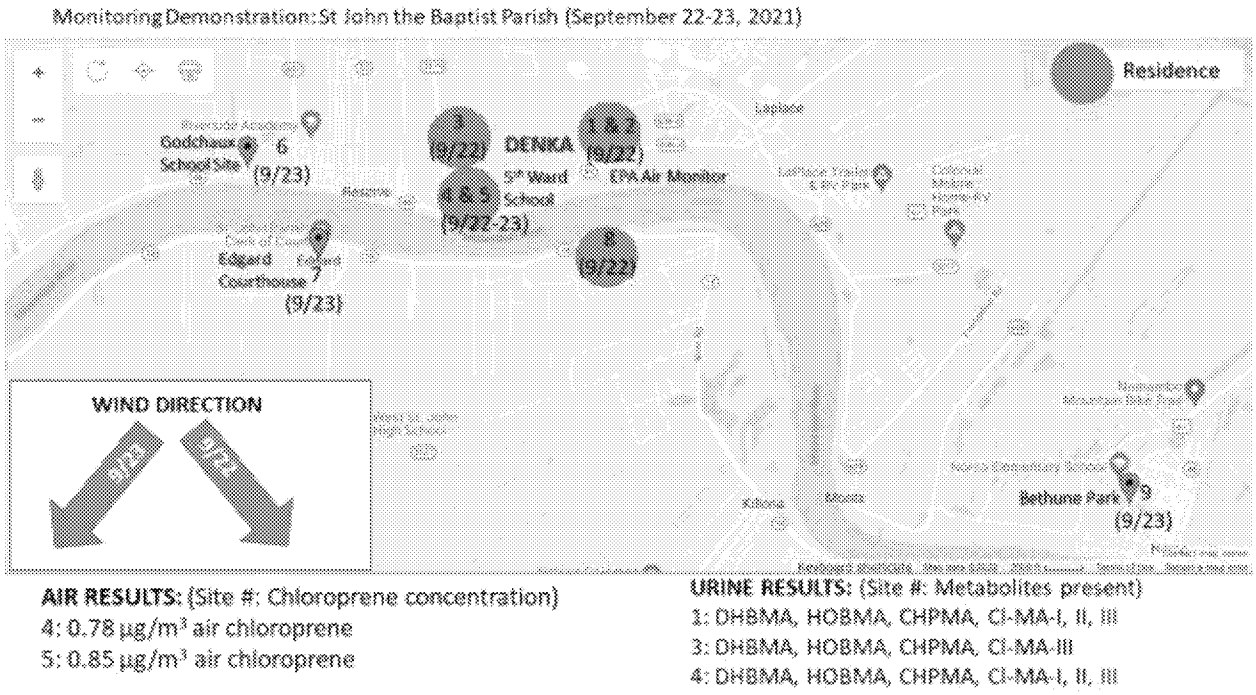

Figure 1. Air sample locations around the Denka facility (2021). In total nine sites were monitored numbered 1 through 9). Dates in which air samples were collected are indicated in parentheses near each site in the map. Sites in bold red are residential areas where urine samples were collected from residents. The locations of residences are shielded with a larger circle to protect residents' privacy.

[8] For every 1 μg/m³ of benzene there is 2.2 cancers per every one million people exposed, based on EPA's Inhalation Unit Risk value for benzene of 2.2E-06 per μg/m³. Benzene is formed from both natural processes and human activities. Sources include fires, gasoline, cigarette smoke, but it is also emitted by Denka.
[9] EPA performed 24 hour summa canister collected air samples upwind and downwind of the Denka facility beginning on September 11, 2021. September 16, 2021, the Denka downwind air sample contained Acrylonitrile above the Response Screening Level of 2.09 ug/m3. The value was 3.62 ug/m3. On September 18, 2021, the Denka downwind air sample contained Vinyl Chloride above the Response Screening Level of 2.24 ug/m3. The value was 2.61 ug/m3. **Acrylonitrile** causes severe irritation of the skin and blistering. It can irritate the eyes, nose and throat. Breathing Acrylonitrile can irritate the lungs, causing coughing and/or shortness of breath. Acrylonitrile can cause headaches, dizziness, confusion, nausea, vomiting. **Vinyl Chloride** causes severe irritation and burns the skin and eyes with possible eye damage. Breathing Vinyl Chloride can irritate the nose, throat and lungs, causing coughing wheezing and/or shortness of breath. Vinyl Chloride can cause headaches, nausea, vomiting, dizziness, fatigue, weakness and confusion. Acrylonitrile is used to produce high-impact plastics; while vinyl chloride is used to make polyvinyl chloride (PVC), which is used to make a variety of products, including plastics.

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Urine Sampling and Analysis

Metabolites indicating VOC exposures were detected in all of the nine urine samples collected from seven participants residing at the three locations sampled (#4, #3 and #1) (**Figure 1**). These were the only sites where non-evacuee residents were available to provide urine samples. **Metabolites detected included DHBMA, HOBMA, CL-MA-I, II, and III,** suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin.

- **DHBMA, a metabolite of both chloroprene and 1,3-butadiene, was detected in all urine samples collected.** The highest levels of DHBMA were from the participant at site #1, adjacent to EPA's air monitor southeast of Denka (**Figure 1**).[10] DHBMA is the main product in chloroprene metabolism, but it is also a product of 1,3-butadiene metabolism. Denka is the sole source of chloroprene in the area— it does not occur naturally (NTP 2011)[11].Chloroprene is classified by EPA as likely to be carcinogenic to humans; and is associated with irritation to eyes, skin, and airways, damage to lungs, liver and kidneys, headaches, fatigue, irritability, dermatitis, hair loss, and cardiovascular and immune systems disorders. While chloroprene is Denka's highest risk emission release (35,718 pounds), the third highest risk emission from Denka based on EPA's analysis is 1,3-butadiene (2,039 pounds), a known carcinogen.[12] Denka's production of chloroprene is dependent on 1,3-butadiene to produce synthetic rubber, but it is also found in smaller amounts in automobile exhaust, tobacco smoke and other sources. EPA requested Denka monitor for 1,3-butadiene, which began in December, 2021, along with monitoring for toluene, chloroprene, xylene, benzene and ethylbenzene. 1,3 Butadiene was detected at the Western edge of Denka property on August 26, 2021 (7.7 $\mu g/m^3$); at Ochsner Hospital on August 31, 2021 (4.4 $\mu g/m^3$); and at the Western edge of the Denka property on January 12, 2022 (2.6 $\mu g/m^3$), and January 26, 2022 (8.1 $\mu g/m^3$).
- **We suspect the presence of HOBMA, CHPMA, and Cl-MA-I, II, and III metabolites in participant urine;[13] however, we could not verify the identity of these metabolites due to the lack of specific reference standards.** Cl-MA-I, II and III are unique metabolites of chloroprene; HOBMA is a metabolite of both chloroprene and 1,3-butadiene; and CHPMA is a specific metabolite of the probable carcinogen epichlorohydrin.[14-15] Five of seven residents had CHPMA in urine— the highest levels were at sites 1 and 4 (**Figure 1** and **Appendix C**).

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[10] For non-smokers, median DHBMA were 100-300 µg/l creatinine. In this demonstration, DHBMA concentrations ranged from 139 $\mu g/m^3$ to 568 $\mu g/m^3$.
[11] NTP (National Toxicology Program). (1998). Toxicology and Carcinogenesis Studies of Chloroprene (CAS No. 126-99-8). National Toxicology Program Technical Report Series, 9(467), 1–379. Retrieved from http://www.ncbi.nlm.nih.gov/pubmed/12579206
[12] EPA classifies 1,3-butadiene as a known human carcinogen. It is also associated with irritation to the eyes, throat, nose, and lungs; damage to the central nervous system, distorted vision, vertigo, fatigue, decreased blood pressure, headache, nausea and fainting. EPA EasyRSEI Dashboard V 2.3.10 for Denka: LINK
[13] **Notes:** (1) 3,4-dihydroxybutyl mercapturic acid (DHBMA); (2) 4-hydroxy-3-oxobutyl mercapturic acid (HOBMA); (3) 3-chloro-2-hydroxypropyl mercapturic acid (CHPMA); (4) 4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I); (5) 4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II); (6) 3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III). See: https://onlinelibrary.wiley.com/doi/pdf/10.1002/3527600418.bi12699e2115
[14] Epichlorohydrin is a highly reactive compound used in the production of glycerol, plastics, epoxy glues and resins, epoxy diluents and elastomers. Exposure to epichlorohydrin may irritate mucous membranes, and cause nausea, cough, labored breathing, lung inflammation, renal lesions, and hematological effects.
[15] The only source of epichlorohydrin in the area appears to be Shell Norco (7-8 miles away). LDEQ EDMS Query for "epichlorohydrin". Available at: https://edms.deq.louisiana.gov/edms-v2/advanced-search

DISCUSSION

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to EPA for September 2021 revealed that facility operators reported no chloroprene production throughout the entire month of September.[16] Denka calculated a monthly average chloroprene emission of 0.04 µg/m³ for September 2021, the lowest on record.

However, chloroprene was detected downwind of Denka on September 23rd, 2021, during a period of no reported chloroprene production. Chloroprene does not occur naturally in the environment— Denka is the sole source of emissions in the area. Chloroprene levels at or across the street from the elementary school were estimated to be 0.78 and 0.85 µg/m³ on Sept. 23rd—approximately four times above the EPA's recommended maximum annual average chloroprene air concentration of 0.2 µg/m³. This recommended chloroprene air concentration was set to limit cancer risk among 1 million persons to 100 cancer cases per year. Denka's air monitors also detected chloroprene in September 2021, with concentrations as high as 4.7 µg/m³ (Sept. 22) at the western edge of Denka's property, and 24 µg/m³ (Sept. 27) at the eastern edge. These levels were between 23 and 2120 times above 0.2 µg/m³.[17] The EPA's chloroprene air limit is a recommendation, not a required regulatory standard. However, it is important to understand that levels below state and national air quality standards cannot always ensure zero health risks,[18] especially when considered in the context of simultaneous exposures to other facility-specific emissions.

The facts presented support concerns about a likelihood of chronic exposure to low doses of chloroprene at levels which may have potential health impacts on vulnerable populations. Children attending 5th Ward Elementary School and residing in the community may be regularly exposed to levels of chloroprene at or above 0.2 µg/m³, which when considered in conjunction

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[16] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

[17] LDEQ Electronic Document Management System. AI: 199310 for monthly monitoring and emission estimate reports: LIHK

[18] For example, extensive research suggests that certain pollutants (e.g., PM2.5) have negative health impacts below current air quality standards. See the Oct 22, 2019 Letter to EPA Secretary Andrew Wheeler from the Independent Particulate Matter Review Panel summarizing the scientific evidence that the current PM2.5 standard is inadequate to protect public health. Available at https://yosemite.epa.gov/sab/sabproduct.nsf/81DF5685460CC14F8526849800431448/%24File/Independent+Particulate+Matter+Review+Panel+Letter+on+Draft+PA.pdf/.

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with exposures to other VOC emissions from Denka, is a concern.[19] Chloroprene has been manufactured at this site since 1969, thus it constitutes a chronic (>5 decades) exposure. Based on air monitoring data from both EPA and Denka, chloroprene continues to occur with some regularity at levels exceeding 0.2 μg/m^3, even after emission control technologies were installed in February 2018.[20] In 2021, chloroprene air concentrations were as high as 1.8 μg/m^3 at a site two miles away from the facility (at Edgard Courthouse, site #7 on **Figure 1**); and as high as 20.2 μg/m^3 at a site one mile from the facility (at Ochsner Hospital). When the proximity of 5th Ward Elementary School is considered (0.3 miles or 500 yards from the Denka facility), it is not unexpected that levels were detected at the school in 2021 as high as 20.7 μg/m^3 by Denka (103 times higher than 0.2 μg/m^3), and as high as 3.34 μg/m^3 by EPA (16 times higher than 0.2 μg/m^3).

While biomonitoring data did not conclusively link exposures to chloroprene, the presence of metabolites of chloroprene, 1,3-butadiene and/or epichlorohydrin are a concern as these are likely, known and probable carcinogens, respectively, which are associated with plastics production. Furthermore, their presence was unanticipated, given the absence of chloroprene production throughout September (2021). While the source of epichlorohydrin is currently unknown, it was not entirely unexpected to find metabolites of chloroprene and/or 1,3-butadiene in resident urine. On June 15, 2021, the EPA requested Denka to undertake air monitoring for 1,3-butadiene, which commenced in Dec. of 2021, along with monitoring for chloroprene.[21] 1,3 Butadiene was detected at the Western edge of Denka property on Aug. 26, 2021 (7.7 μg/m^3); at Ochsner Hospital on Aug. 31, 2021 (4.4 μg/m^3); and again at the Western edge of Denka property on Jan. 12, 2022 (2.6 μg/m^3), and Jan. 26, 2022 (8.1 μg/m^3).

There is a need for a cumulative risk assessment for all Denka emissions, both carcinogens and non-carcinogens, especially considering the similarities in health outcomes from many of the VOCs found in resident air space and/or urine. The current health assessment approach used by LDH which bases risk decisions on one chemical, chloroprene, is unrealistic and underestimates risks faced by this population from other emissions and emission sources. Currently, LDEQ's process for evaluating whether or not there is an environmental injustice prior to approving a permit application is also limited in scope, such that the real-world exposures to communities are

[19] Even with the decrease in production of Chloroprene and Neoprene from July to August 2021, the August 2021 monthly average Chloroprene ambient air emissions concentration increased 3.4 fold when compared to July 2021 (0.81 ug/m3 to 2.76 ug/m3 monthly average).

[20] A review of chloroprene air concentrations based on data collected in 2021, revealed that the highest chloroprene levels occurred in January 2021 at three of the six air monitoring locations: 1) the Intersection of Hwy 44 and IC Railroad (36.9 μg/m^3); 2) the southwest corner of Ochsner Hospital (20.2 μg/m^3); and 3) the Mississippi River Levee (19.2 μg/m^3). During this month (Jan 2021), Denka estimated a monthly average chloroprene emission of 3.49 μg/m^3.

[21] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

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not considered, i.e., the cumulative and synergistic effects of multiple pollutants from all facilities within an area. Cumulative health impacts from population exposures beyond cancer have largely been ignored in studies of this population. The single-minded focus on cancer may have distracted authorities from identifying other health impacts of Denka's emissions. Cancer has a long latency of years to decades, yet, the increasing frequency of disasters like Hurricane Katrina, the Great Flood of 2016, and Hurricane Ida makes it improbable that this population will remain in place long enough to enable a prospective study of cancer rates in this population. It could also be that many in the population aren't living long enough to develop cancer due to earlier deaths from respiratory or cardiovascular diseases, or they may be moving away for access to better healthcare or jobs. It is a widespread and oft-repeated misconception that the lack of significantly higher cancer rates for a larger geographic area means there is no problem in a subpopulation within that area. It is hard to achieve statistical significance for any health statistic when the population is small, as is the case in fenceline communities. One also cannot assume that data for a broader geographic area characterizes health effects of a smaller circumscribed community, as rates for the relevant community are often diluted by those of the larger unexposed population. This makes detection of problems difficult to identify in fenceline communities, even if they do exist.[22-23]

There is a lack of prompt risk communication and transparency from several agencies within the State that is frustrating efforts to establish trust with the surrounding community. Despite years of air monitoring that is now available in the aftermath of the installation of Denka's chloroprene emissions reduction technology, no follow-up to the "Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish" of 2018 has ever been conducted by the Louisiana Department of Health (LDH).[24-25] However, biomonitoring conducted for this and prior investigations by the lab supporting this demonstration confirms community exposure to chloroprene is occurring.[26] In another event from 2015, LDH documented two separate incidents of sudden onset student illnesses that occurred down the street from the Fifth Ward Elementary School, at St. John the Baptist District's Leon Godchaux School, in which it concluded that

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[22] LDH dismissed the "all cancer" incidence rate on the basis that it "is not very useful for explaining or exploring potential etiologies since there are many known risk factors for cancer such as smoking, occupational exposures, etc. that are not controlled in the cancer incidence rates." While this is true, it should be acknowledged that it is often difficult to link some chemicals to a specific disease especially when the chemical has been associated with different diseases, as is the case with chloroprene. This is particularly important given the fact that chloroprene is a mutagen. One characteristic of mutagenesis is induction of tumors at multiple sites and in different species, and this can be triggered theoretically by a single molecule. In mice, chloroprene caused tumors "in a wide variety of mouse tissues, including lung, kidney, Haderian gland, mammary gland, forestomach, liver, skin, mesentery, and Zymbal's gland." Thus, there is the likelihood that different exposed individuals in a population may manifest cancer in different organs, thereby rendering the investigation of an "all cancer" rate necessary in such cases. See "Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John Parish: Evaluation of Potential Health Risks for Elementary School Students based on Early Sampling Results following Emissions Reduction". Louisiana Department of Health, Office of Public Health, Section of Environmental Epidemiology and Toxicology. New Orleans, LA June 14, 2018. LINK

[23] ATSDR. 2005. Ch 7: Health Effects Evaluation: Screening Analysis, Public Health Assessment Guidance Manual. LINK; EPA Toxicological Review of Chloroprene (CAS No. 126-99-8). In Support of Summary Information on the Integrated Risk Information System (IRIS). September 2010. Washington DC: US EPA. LINK

[24] LDH. A Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish. June 14, 2018. OPH, SEET. Available at: https://ldh.la.gov/assets/oph/Center-EH/DENA/PreliminaryChloropreneReport.pdf

[25] Katner A. Independent assessment of the environmental conditions of public school locations within St. John the Baptist Parish, Louisiana. Prepared for the NAACP. September 30, 2020.

student illnesses, which included respiratory ailments, headache, vomiting, burning eyes and weakness, were likely due to industry emissions.[26] LDH has never released its report of this public health emergency— it is unknown whether school district administrators, parents, residents and other parish officials were ever aware of these incidents. The school impacted by these releases is adjacent to Air Product/Evonik, which made the EPA's 2018 list of the 25 facilities releasing the most ethylene oxide in the nation. The specific health symptoms reported by the LDH during the prior 2015 events are similar to those reported in the literature for ethylene oxide and methyl isobutyl ketone, both chemicals emitted from the Evonik. EPA advised Louisiana Department of Environmental Quality (LDEQ) officials to alert the community around this facility about potential risks, but this information was also not communicated to the public. It would not be until August 24th, 2021 when these communications were finally made by EPA to individuals within this population, six years after the events at the Leon Godchaux school.

These and other facts support the need for further investigation and precautionary practices, considering the five decades of chloroprene use at the site and ongoing release of VOCs during that period, the ongoing detection of chloroprene at levels of potential concern at offsite areas where vulnerable populations congregate and live, the gaps in scientific knowledge about the carcinogenic and noncarcinogenic health effects of chronic exposure to industrially released VOC mixtures, and the plausibility of adverse cumulative health impacts on vulnerable populations from chronic exposures to low levels of chloroprene and VOC mixtures. The presence of children a mere 500 yards from the Denka facility should trigger proactive precautionary measures in the absence of direct evidence of harm, to address gaps in public health protection that may be brought on by weaknesses in LA's regulatory oversight and public risk communications that were previously reported by other government oversight officials.[27] Given LA's history of industrial accidents,[28] it is also critical that authorities put in place systems to protect children and residents from adverse outcomes in the event of accidental releases and emergency incidents. Between 2017 and 2021, there were nine emergency incidents reported at Denka alone based on LDEQ records (averaging >1 per year). Louisiana's Administrative code defines an emergency condition as any "which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land,

[26] Action Plan: Denka Performance Elastomer, LLC- Pontchartrain Facility: LaPlace, St. John Parish, Louisiana. US EPA, Washington, DC. June 2016. LINK
[27] The years-long delayed risk communications by LDEQ to the public regarding ethylene oxide emissions from Evonik and Union Carbide which results in excess risks in every census tract in St. John the Baptist Parish was admonished by the EPA- see EPA Office of Inspector General. 2020. Report #20-N-0128. Management Alert- Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns. Available at: https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide/inspector-general-follow-ethylene-oxide-0).
[28] Surveillance reports are limited due to lack of ongoing funding, but state incidents recorded by the State include: (1) Louisiana Hazardous Substances Emergency Events Surveillance (HSEES) System. 2001-2009: A Cumulative Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2001-2009_HSEES_Report.pdf; and (2) Louisiana Toxic Substances Incident Program (LATSIP). 2010-2013: A Summation Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2010-2013_LaSTSIP_Report.pdf

water or air environment, or cause severe damage to property" (LAC 33:I.3915). Currently, communities are only notified of emergency incidents in their area when there is an order for shelter-in-place or evacuation. Incidents reported to LDEQ, State Police or parish emergency response agencies are often not posted publically, rather they are posted on LDEQ's Electronic Documents Management System (EDMS), a system which the public is unfamiliar with, and which only reports emergency incidents after delays of up to a week.

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RECOMMENDATIONS

It is important to note that the academic reaction to data such as those in this project is to call for more studies. While it is always important to add to the body of knowledge concerning public health, particularly when it is sparse, as is the case with chloroprene, when there are expected risks to a population, the emphasis should be on proactive monitoring, mitigation and exposure prevention.

- **Cumulative risk assessments should be conducted by LDH and LDEQ for health assessments, and permit applications, respectively.** In the case of Denka, both carcinogenic and non-carcinogenic health risks should be estimated, based on the mixtures of chemical releases by source and in association to other sources. These risks can be based on both reported estimated emissions and offsite air monitoring results for chloroprene and other VOCs. Chemicals of potential concern include: chloroprene, 1,3-butadiene, BTEX (benzene, toluene, ethylbenzene, xylene), and 1,4-dichloro-2-butene. Further investigation of the source and levels of epichlorohydrin in the air may also be warranted. Other emissions of potential concern may be released by other facilities in the area, like Union Carbide's and Evonik's release of ethylene oxide. EPA is releasing a revision of its 2003 "Framework for Cumulative Risk Assessment", which enables consideration of chemical mixtures.[29] It is recommended that LDH and LDEQ follow this framework to conduct more real-world analyses of risks to fenceline communities.[30] Chemicals of potential concern will have to be determined for each site, but they should be based on EPA's Toxic Release Inventory Risk Screening Indicator (RSEI) model.

- **In addition to cancer outcomes, LDH should track non-cancer health outcomes** to evaluate potential impacts to the population from multiple emissions released by Denka and other facilities in the area. Other adverse health outcomes which may be due to cumulative exposures to pollutant mixtures should be evaluated including, but not limited to those which are common for VOC's like irritation to eyes, nose and throat, headaches and nausea, skin reactions, fatigue, damage to lungs, liver, kidneys, and central nervous systems, blurred vision. Other health effects of potential concern include: cardiovascular and respiratory diseases like COPD and asthma, reproductive and immune system disorders, hematological effects and psychosocial impacts. Some of the more serious diseases can be tracked via Louisiana's

[29] U.S. EPA. Framework for Cumulative Risk Assessment. Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.
[30] U.S. EPA. Framework for Cumulative Risk Assessment. US EPA, Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.

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Hospital Inpatient Discharge Database (LAHIDD), but other sources like Louisiana's Emergency Department dataset will be more useful for documenting less impactful, sudden onset outcomes like asthma outbreaks.

- **LDH should implement a school-based health surveillance system.** High risk schools in fenceline communities should have the infrastructure necessary to implement active health surveillance and support programs. Case counts should be collected daily for asthma, rashes, nausea, vomiting, burning nose and eyes, headache, dizziness, etc. In instances where health risks and/or effects are documented, LDH should be proactive in ensuring access to appropriate health care for affected communities. If a health surveillance system were established in high-risk fenceline schools, this information should be released to the public to enable informed decision-making, especially by parents of sick or immune-suppressed children. School officials should also be taught how to engage with LDH, LDEQ, Parish, and neighboring industry officials to investigate adverse health outcomes and events in relation to suspected industry emissions.

- **If funds allow, biomonitoring should be used by LDH to quantify resident and child exposures to chloroprene.** It is advised to use reference standards specific to chloroprene's unique metabolites, Cl-MA-I, II and III, in conjunction with reference standards specific to DHBMA, chloroprene's predominant metabolite. Simultaneous collection of personal air samples of both chloroprene and 1,3-butadiene will be useful to better characterize exposures and related metabolites by gender, age group, physical activities, and other associated factors. Biomonitoring will establish population exposures to a unique industrially produced compound. It will enable further tracking of these residents over time to establish potential health effects, both carcinogenic and noncarcinogenic. Epidemiologists should be engaged to ensure the study design meets scientific standards needed to characterize dose-response relationships.

- **Denka should to be required by LDEQ to conduct online real-time fenceline and offsite continuous air monitoring** to track the spatial dispersion and temporal patterns of chloroprene and other VOC air emissions (i.e., 1,3-butadiene, 1,4-dichloro-2-butene, and BTEX) in areas around the facility used by vulnerable individuals (e.g., 5th Ward Elementary School). This online air monitoring system should allow for real-time text messages or email alerts to residents, authorities and vulnerable groups (e.g., school authorities, day care operators, etc.) when concentrations exceed regulatory standards and health-based guidance.

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- **It is critical that the LDH and the LDEQ work together to adopt proactive precautionary practices and policies and establish a trust-based supportive relationship with the community.** Frequent public communication, timely follow-up of concerns, prompt risk communication during emergencies, and data and report transparency is essential to establishing trust within this and other fenceline communities. Ultimately, there is a need for the LDH and LDEQ to adopt proactive precautionary practices and policies to prevent future siting of industries adjacent to residences, schools, daycares, parks, hospitals, nursing homes, and low-income housing, when these industries put citizens at risk. It is of paramount importance that LDH and LDEQ set higher standards for the safety and well-being of this, and other fenceline communities.

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Analysis of Pollutants in the Air Samples by Thermal-Desorption coupled with Gas-Chromatography Mass Spectrometry (TDU-GC/MS)

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Sample collection

The volatile organic compounds (VOCs) were sampled by passing approximately 74 liters of air at flow rate of 0.18 L/min (depending on the sampling duration and individual calibrated pump flow rate) through pre-conditioned sampling tubes (70 mm long and 6 mm in outer diameter) containing layers of sorbent material (CDS 20:35 mesh Tenax-TA/Carboxen1000/Carbosieve). The air pump (SKC Model 222-3, SKC Inc., Pennsylvania, USA) with the sampling tube was carried (or attached) by the individual who worked or lived near by the sources of the pollutants. After completion of the sampling, the tubes were removed from the samplers and sealed in clean glass tubes, and stored at –20°C until analysis.

Thermal desorption and GC-MS analysis

The VOCs were analyzed using a thermal desorption unit (TDU) interfaced to gas chromatography–mass spectrometry. In brief, air sampling tubes were loaded in CDS Model 7500 Thermal Desorption Autosampler (Oxford, PA) which was followed by Dynatherm 9300 TDA (Oxford, PA) interfaced to an Agilent 6890N Gas chromatograph. The VOCs were thermally desorbed by TDU at 300°C for 5 min. Helium was used as carrier gas at a flow rate of 20 mL/min. Following the desorption process, the VOCs were concentrated by a focusing trap packed with 60:80 mesh Tenax-TA/Carboxen 1000/Carbosieve SIII. The focusing trap was initially set at 45°C, and the oven temperature was then raised to 300°C. The analytes were then transferred to an Agilent 6890N gas chromatography system coupled with an Agilent 5973 quadrupole mass spectrometer (GC-MS) through a transfer line set at 225°C. The VOCs were separated by a 5% phenyl 95% dimethylarylene siloxane Agilent DB-5MS capillary column (30 m x 0.25 mm I.D.). The GC temperature program was initially set at 45°C for 3 minutes, then increased to 250°C at 15°C/min, and was held for 10 minutes, using split injection with split ratio 5:1 and constant carrier gas flow (He, 1.0 mL/min). Injector temperature was held at 275°C, transfer line between the GC and mass spectrometer was held at 150°C, and the MS source (quadrupole) was held at 230°C. The mass spectra of each peak identified on chromatograms were characterized by comparison with the mass spectra of commercially available reference standards and mass spectral libraries supplied by National Institute for Standard and Technology (NIST/EPA/NIH). Acquisition was started after a 3 minute solvent delay (Lin et al. 2007). The selected ions, retention times, calibration equations, extraction recovery rates, reproducibility and correlation coefficients of the calibration equations, limits of detection (LOD) for the detection and quantification were summarized in **Table 1** as described from our previous air quality studies (Vu et al. 2018).

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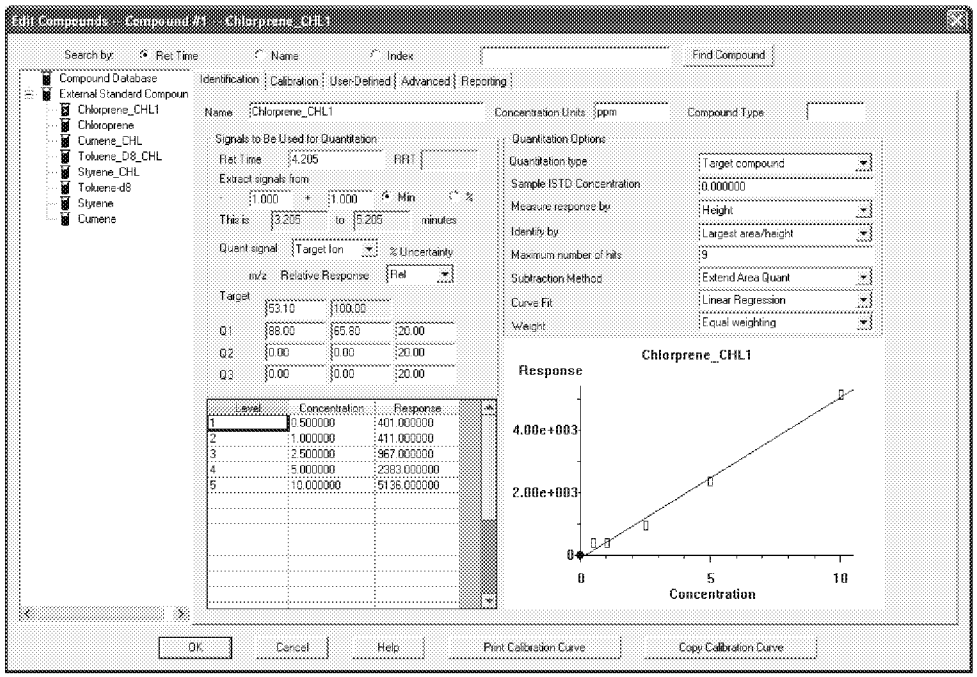
Chloroprene

The instrument LOD is 0.25ppm (ng/µL) x 2 µL = 0.5 ng

LOD = 0.5 ng/100L = 0.005 ng/L = 0.005 µg/m^3

The signals responses were determined by the signal height and signal peak areas. The R^2 of the correlation for the calibration equation is 0.992.



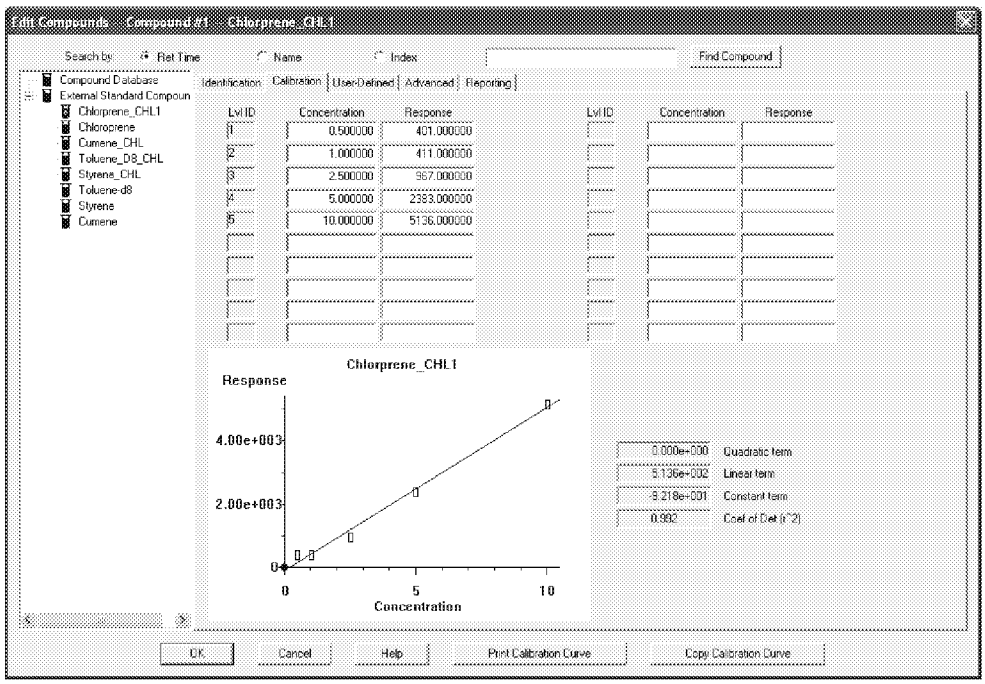


Table 1. Summary of retention times, monitored ions, calibration curves, and recoveries, precisions and detection limits of the other targeted VOCs

No.	Compounds	Retention time (min)	Monitored primary* and secondary ions	Equation	Coefficient of determination R^2	LOD, $\mu g/m^3$	LOQ, $\mu g/m^3$
1	1,2,3-Trimethylbenzene	10.73	105, 120	1	y = 10650x	0.0026	0.0087
2	1,2,4,5-Tetramethylbenzene	11.81	119, 134, 91	1	y = 13000x	0.0014	0.0047
3	1,2,4-Trimethylbenzene	10.33	105, 120	1	y = 10350x	0.0009	0.0030
4	1,3,5-Trimethylbenzene	9.98	105, 120	1	y = 9590x	0.0007	0.0023
5	1-Dodecanol	15.15	55, 69, 83, 97	0.992	y = 1693x	0.0163	0.0543
6	1-Methylnaphthalene	14.07	142, 141, 115	1	y = 13640x	0.0013	0.0043
7	2 ethyl 1 hexanol	10.58	57, 70, 83, 112	0.998	y = 4391x	0.0121	0.0402
8	2-Heptanone	8.79	58, 71, 114, 59	1	y = 3471x	0.0017	0.0058
9	2-Methylnaphthalene	13.88	142, 141, 115	1	y = 13010x	0.0012	0.0040
10	4-Heptanone	8.55	71, 58, 114, 91	1	y = 4924x	0.0016	0.0055
11	alpha-pinene	9.62	93, 92, 91, 77	0.999	y = 4864x	0.0034	0.0114
12	Benzaldehyde	9.89	77, 106, 105, 78	1	y = 4359x	0.0042	0.0140
13	Benzene	5.34	78, 77	0.999	y = 11790x	0.0021	0.0070
14	Butylcyclohexane	10.81	83, 82, 55, 140	1	y = 5596x	0.0016	0.0054
15	Cumene	9.40	105, 120	1	y = 11090x	0.0011	0.0035
16	Decanal	12.60	57, 70, 82, 112	0.999	y = 1399x	0.0074	0.0247
17	Decane	10.25	57, 71, 85, 142	0.998	y = 3651x	0.0016	0.0053
18	D-Limonene	10.77	68, 93, 67, 79	0.999	y = 3536x	0.0039	0.0131
19	Dodecane	12.51	57, 71, 85, 170	1	y = 4964x	0.0026	0.0084
20	Ethylbenzene	8.52	91, 106	1	y = 11430x	0.0012	0.0039
21	Ethylcyclohexane	8.13	83, 82, 55, 112	1	y = 1723x	0.0062	0.0206
22	Heptanal	8.95	70, 55, 57, 81	1	y = 1602x	0.0071	0.0236
23	Hexanal	7.46	56, 57, 72, 82	1	y = 1643x	0.0047	0.0159
24	m/p-Diethylbenzene	10.98	105, 119, 134	0.998	y = 3193x	0.0061	0.0201
25	m/p-Ethyltoluene	9.89	105, 120	0.998	y = 12780x	0.0006	0.0018
26	m/p-Xylene	8.63	91, 106	1	y = 17860x	0.0004	0.0014
27	Methyl salicylate	12.70	120, 92, 152, 121	0.998	y = 6674x	0.0033	0.0110
28	Naphthalene	12.73	128	1	y = 19720x	0.0011	0.0033
29	n-Nonane	8.94	57, 71, 85, 128	0.998	y = 3049x	0.0034	0.0114
30	n-Octanal	10.28	56, 57, 84, 69	0.999	y = 1081x	0.0048	0.0160
31	n-propylbenzene	9.80	91, 120	1	y = 13520x	0.0004	0.0013
32	Octane	7.48	57, 71, 85, 114	0.995	y = 851.6x	0.0047	0.0156
33	o-Diethylbenzene	11.07	119, 105, 134	0.997	y = 4038x	0.0032	0.0106
34	o-Xylene	8.97	91, 106	1	y = 9568x	0.0007	0.0025
35	Pentadecane	15.36	57, 71, 85, 212	1	y = 5415x	0.0039	0.0132
36	Styrene	8.94	104, 103, 78	1	y = 7932x	0.0015	0.0051
37	Tetradecane	14.47	57, 71, 85, 198	1	y = 5415x	0.0021	0.0069
38	Toluene	7.05	91, 92	0.998	y = 7523x	0.0013	0.0046
39	Tridecane	13.52	57, 71, 85, 184	1	y = 4913x	0.0012	0.0038
40	Undecane	11.43	57, 71, 85, 156	0.999	y = 4510x	0.0011	0.0036

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Table 3. Toxicity values

Compounds	RfC, mg/m^3	IUR $\times 10^{-6}$, $(\mu g/m^3)^{-1}$	References
1,2,3-Trimethylbenzene	0.06		EPA
1,2,4-Trimethylbenzene	0.06		EPA
1,3,5-Trimethylbenzene	0.06		EPA
Benzene	0.03	29	EPA, OEHHA
Cumene	0.4		EPA
Ethylbenzene	1	2.5	EPA, OEHHA
Xylenes	0.1		EPA
Naphthalene	0.003	34	EPA, OEHHA
Styrene	1		EPA
Toluene	5		EPA
2-Butoxyethanol	1.6		EPA
1,4-Dichlorobenzene	0.8	11	EPA, OEHHA
Tetrachloroethylene (PERC)	0.04	6.1	EPA, OEHHA
Trichloroethylene (TCE)	0.002	2	EPA, OEHHA

EPA. 2009. Risk Assessment Guidance for Superfund (RAGS): Part F. 2009. https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf
Integrated Risk Information System (IRIS) Assessments. 2018. https://cfpub.epa.gov/ncea/iris/search/index.cfm. Assessed July 4th 2018 The Office of Environmental Health Hazard Assessment (OEHHA). Toxicity criteria on chemicals evaulated by OEHHA.

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Results

1. #6 A-1B-23-LF and #9 A-4B-23-FW have the highest concentrations of chloroprene, with 0.85 and 0.78 $\mu g/m^3$, repectively. The LOD is 0.005 μg/m3
2. Significantly higher concentration of beneze (>1 $\mu g/m^3$) were detected at A-1A-22-LF (#1), A-2A-22-GH (#2), A-1B-23-LF (#6), A-4B-23-FW (#9), the inhalation unit risks [IURs] and EPA Reference Concentration (RfC) were listed in the Table 3.
3. A-1A-22-LF (#1) and A-2A-22-GH (#2) have the highest concentartions of the naphthalene
4. A-1A-22-LF (#1) and A-4B-23-FW (#9) have signtificantly higher concentrations of the 1,2,4-trimethylbenzene.
5. A-1A-22-LF (#1), A-4A-22-AM (#4), A-5A-22-LS (#5) and A-4B-23-FW (#9) have signtificantly higher concentrations of toluene.
6. A-1A-22-LF (#1) and A-4B-23-FW (#9) have significantly higher concentrations of xylene
7. A-1A-22-LF (#1) has the highest concnetration of M-methyltoluene.

References

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The Office of Environmental Health Hazard Assessment (OEHHA). Toxicity criteria on chemicals eva

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APPENDIX B. Laboratory Analysis of Chloroprene Metabolites in Urine Samples

Chung-Ho Lin, PhD
Research Associate Professor
Bioremediation and Phytochemistry
School of Natural Resources
University of Missouri-Columbia

Metabolites of the Chloroprene

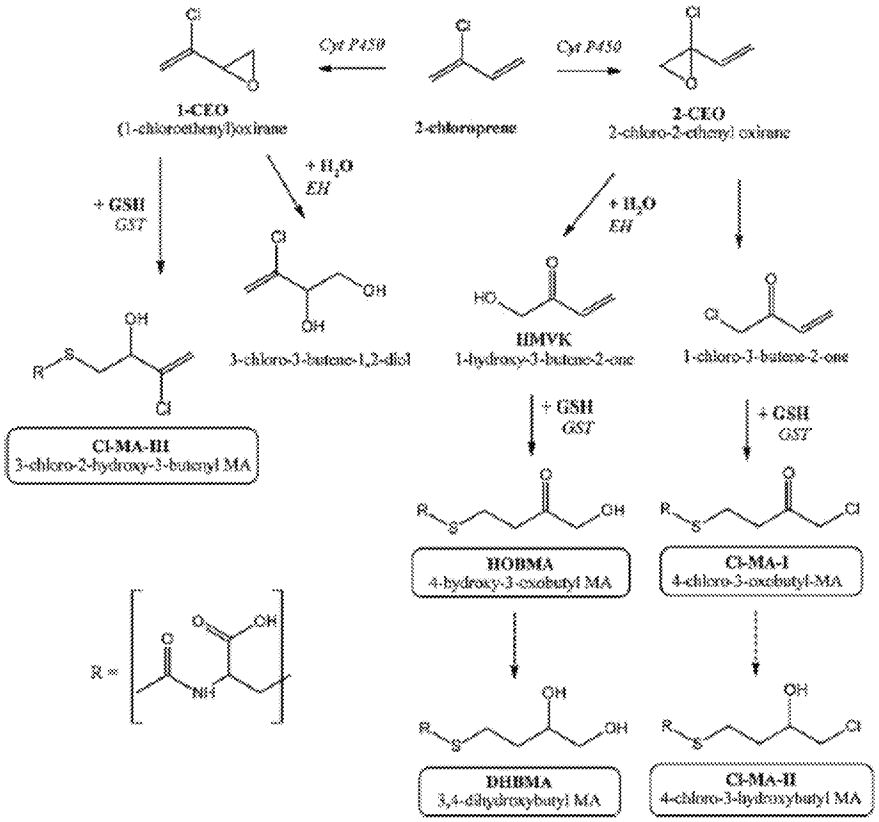

Fig. 1. Proposed biotransformation of 2-chloroprene according to Munter et al. [5,6], modified (Cyt P450 – cytochrome P450; GSH – glutathione; GST – glutathione-S-transferase; EH – epoxide hydrolase; MA – mercapturic acid).

Analysis of the Chloroprene Metabolites in the Urine Samples by UPLC-MS/MS

Sample Preparation

Take 0.5 ml of urine + 9.5 ml (10 mM ammonium acetate with formic acid). Fifty microliter of 40 ppm (mg/L) internal standard enrofloxin-D5** (stable isotope) was added into each sample to achieve concentration of 200 ppb (□g/L) for quality control and quality assurance.

The concentrations of the chloroprene metabolites DHBMA**, HOBMA, CHPMA, Cl-MA-I, Cl-MA-II , Cl-MA-III, creatinine (for dilution factor adjustment) and internal standard creatinine-D3 were determined by a Waters Ultra-Performance Liquid Chromatography connected to a Xevo triple-quadrupole mass spectrometer (UPLC-MS/MS). All the samples were injected with triplicates (n =3).

Analytical Standards https://www.trc-canada.com/checkout/

3,4-dihydroxybutyl mercapturic acid (DHBMA)** (A173710) (D-Isotope A173712)
4-hydroxy-3-oxobutyl mercapturic acid (HOBMA) (H949823)
3-chloro-2-hydroxypropyl mercapturic acid (CHPMA) (A187838)
4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I) (A187828)
4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II)
3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III)

The compounds and the internal standards were separated by a Synergi Max RP C12 150 × 3.0 mm, 4□m reverse-phase Phenomenex column (Torrance, CA). A guard column (C12 4×3 mm from Phenomenex) was used. The elution gradient consists of: 1. mobile phase A (mixture of 88% water, 12% methanol and 0.02% formic acid), 2. mobile phase B (mixture of 10% water, 90% methanol and 0.02% formic acid) and 3. mobile phase C (0.5% aqueous formic acid) with a constant flow rate of 0.3 mL/min as shown in Table 1.

Time (min)	Mobile Phase A (%)	Mobile Phase B (%)	Mobile Phase C (%)	Flow Rate (ml/min)
0.0	100	0	0	0.3
2.0	100	0	0	0.3
5.0	75	25	0	0.3
6.5	50	38	12	0.3
11.5	0	88	12	0.3
13.0	0	88	12	0.3
14.5	12	88	0	0.3
19.0	100	0	0	0.3
30.0	100	0	0	0.3

The MS/MS system operated in the multi-reaction monitoring (MRM) mode with the electrospray ionization sources (ES- or ES+). The ionization energy, MRM transition ions (precursor and product ions; Table 1), capillary and cone voltage, desolvation gas flow and collision energy were optimized by Waters optimization software package. The Table 1 summarizes the ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. **Table 1.** The ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. To optimize the method, the gradient was shortened to 15min as follows: Initial conditions 0%B, 1min 0%B; 2.5min 25%B; 3.25min 38%B, 12%C; 5.625min 88%B, 12%C; 6.5min 88%/12%C; 7.25min 88%B, 0%C; 9.5min 100%A; 15min 100%A.

Chloroprene Metabolites (UPLC-MSMS)					
	ES	Retention time	Precursor ion	Product ion	qualifer ions
DHBMA** (STD)	ES-	4.96	250.0	121.0	75
HOBMA	ES-	4.95 (confirmed)	248.0	162.0	84
CHPMA	ES-	4.96 (confirmed)	254.0	218.0	89
Cl-MA-1	ES-	4.95/7.2	266.0	162.0	84
Cl-MA-II	ES-	4.97 (confirmed)	268.0	232.0	75
Cl-MA-III	ES-	*4.97/5.97/6.94/7.2	266.0	137.0	128

Results

I. The concentrations of DHBMA in urine samples (absolutely confirmed and quantified using analytical standards)

No.	Samples	DHBMA (ppb; ug/L)	Creatinine (ppb; ug/L)	Creatinine (g/L)	DHBMA ug per g of Creatinine
1	U1B23LF	65	348116	0.35	186
2	U1A22LF	485	1826755	1.83	265
3	U2B23LHW	458	3308768	3.31	139
4	U2B23BLW	652	1147677	1.15	568
5	U2B23LEH	299	653870	0.65	457
6	U2B23GAHSR	1032	1926979	1.93	535
7	U2B23GAH2	535	1880189	1.88	285
8	U3B23BT	331	1035490	1.04	319
9	U3A22BT	360	1096646	1.10	329

The chloroprene metabolite DHBMA was detected in all the urine samples. The highest concentrations of DHBMA (ug/g of creatinine) were found in the samples U2B23BLW, U2B23LEH, and U2B23GA

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II. Relative concentrations (signal intensity- number of the ions) of other metabolites HOBMA, CHPMA, Cl-MA-I, Cl-MA-II, Cl-MA-III (no analytical standards available)

		[redacted]		CHPMA RT = 7.38 min		Cl-MA-I RT = 7.5 min		[redacted]		Cl-MA-II** RT = 7.98 min		Cl-MA-III RT = 6.84 min		Cl-MA-III RT = 7.64 min		Cl-MA-III RT = 8.34 min	
No.	Samples	248>162	248>84 (q)	254>218	254>89 (q)	266>162	266>84(q)	266>162	266>84(q)	268>232	268>75 (q)	266>137	266>128 (q)	266>137	266>128 (q)	266>137	266>128 (q)
1	U1B23LF	4864.81	930.42	4607.34	0.00	27.08	244.73	0.00	0.00	339.42	1.27	98.97	216.06	100.74	2931.40	33.89	435.54
2	U1A22LF	24048.26	4670.74	51.42	1.61	0.00	1277.68	0.00	0.00	0.79	186.30	666.38	992.11	731.91	6973.20	259.64	3042.21
3	U2B23LHW	49677.89	9577.78	1.41	1.18	0.00	0.00	[redacted]		0.00	3.12	231.19	390.11	375.28	4459.15	46523.66	23064.76
4	U2B23BLW	70541.73	14684.31	50.37	0.00	0.00	859.02	0.00	0.00	0.00	11.40	963.81	1860.41	525.81	704.47	125.17	1116.11
5	U2B23LEH	111718.53	23060.38	1.07	5.07	0.01	564.29	0.00	0.00	0.33	0.85	802.15	1497.76	420.55	4416.46	19692.81	10414.69
6	U2B23GAHSR	92727.61	19181.89	0.00	0.15	0.00	1531.14	0.00	0.00	0.00	4.91	423.03	1111.24	1041.74	3289.71	464.16	1224.19
7	U2B23GAH2	62944.75	12538.85	0.03	3.02	0.00	0.00	[redacted]		0.00	0.62	149.39	513.94	141.54	2968.98	161115.79	81873.15
8	U3B23BT	31637.88	6137.57	3132.29	0.25	0.00	36.42	0.00	0.00	75.00	0.01	351.74	738.04	40.06	3092.81	8.16	264.68
9	U3A22BT	43426.81	9065.61	0.25	0.92	0.00	144.77	0.00	0.00	0.02	0.00	567.36	1002.85	129.66	3221.70	8.12	643.51

Similar to the findings from DHBMA analysis, HOBMA was detected in all the samples, and the relative concentrations of HOBMA were highest in the samples U2B23BLW, U2B23LEH, and U2B23GAHSR.

For the analysis of CHPMA, Cl-MA-I and Cl-MA-II, due to lack of reference analytical standards, we have to rely on the molecular ions and fragmented product ions and qualifier for the confirmation and quantification purpose. The inconsistence between qualifier ion and pair of molecular/product ions made it impossible to draw any conclusion.

For the analysis of Cl-MA-III, 3 possible signals could be the Cl-MA-III. It could be the signals with retention time 6.84 min, 7.64 min, or 8.34 min. By comparing the results of DHBMA and HOBMA, it is most likely the signal at the retention time of 6.84 min. If that is the case, Cl-MA-III were detected in all the urine samples, and the samples U2B23BLW, U2B23LEH and U2B23GAHSR have the highest concentrations of the metabolite Cl-MA-III.

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APPENDIX C. Summary of Urine Metabolites and Volatile Organic Compounds in Air (St. John Parish, Sept. 2021)

		Urine Metabolites										Volatile Organic Compounds (RfC ug/m3)							
SITE NO.	Name	**Urine Sample Date**	**DHBMA** ug/g creatinine (metabolite of chloroprene and 1,3-butadiene)	**HOBMA** Signal Intensity/ g creatinine (metabolite of chloroprene and 1,3-butadiene)	**CHPMA** Signal Intensity/ g creatinine (metabolite of epichlorohydrin)	**CL-MA-I** Signal Intensity/ g creatinine (metabolite of chloroprene)		**CL-MA-II** Signal Intensity/ g creatinine (metabolite of chloroprene)	**CL-MA-III** Signal Intensity/ g of creatinine (metabolite of chloroprene)			**Air Sample Date** (Duration hr:min)	**Chloroprene** (ug/m3) (20)	**Benzene** (ug/m3) (30)	**Napthalene** (ug/m3) (3)	**1,2,4-trimethyl-benzene** (ug/m3) (60)	**Toluene** (ug/m3) (5000)	**Xylene** (ug/m3) (100)	**Ethylbenzene** (ug/m3) (1000)
1	Residence 1-Resident 1	9/23 (am)	139	300280	304	0	0	0	1397	2268	281214	9/22 (8:00)	below LOD	1.36	0.17	0.26	1.69	0.63	0.18
1	Residence 1-Resident 2	9/23 (am)	568	1229295	19	0	0	6	16796	9163	2181								
1	Residence 1-Resident 3	9/23 (am)	457	3417148	0	0	0	0	24536	12863	602346								
1	Residence 1-Resident 4	9/23 (am)	535	962414	0	0	36587	0	4391	10812	4818								
1	Residence 1-Resident 5	9/23 (am)	285	669558	33319	0	0	798	1589	1506	1713826								
2	River Road EPA Air Monitor SE of Denka, La Place, LA											9/22 (7:56)	below LOD	0.78	0.07	0.34	7.58	1.14	0.31
3	Residence 3	9/22 (pm)	329	791993	0	0	0	0	10347	2365	148	9/22 (8:00)	below LOD	0.59	0.05	0.11	2.71	0.47	0.12
3	Residence 3	9/23 (am)	319	611071	5	0	0	0	6794	774	158								
4	Residence 2	9/22 (pm)	265	263289	15	0	11135	0	7296	8013	2843	9/22 (8:00)	below LOD	1.87	0.16	1.37	3.03	2.54	0.63
4	Residence 2	9/23 (am)	186	279493	2954	0	0	45	5686	5788	1947	9/23 (6:58)	0.85	1.08	0.07	0.19	2.16	0.42	0.12
5	5th Ward School (by EPA monitor)											9/23 (6:58)	0.78	2.11	0.18	0.95	10.82	2.49	0.66
6	Godchaux School Site, Reserve LA											9/23 (7:33)	below LOD	0.59	0.02	0.06	1.14	0.24	0.06
7	Edgard Courthouse (westbank)											9/23 (9:45)	below LOD	0.86	0.04	0.23	2.86	0.89	0.21
8	Residence 4											9/22 (7:21)	below LOD	0.72	0.04	0.15	5.09	0.73	0.23
9	Bethune Park (between Norco Manufacturing Complex and Shell Refinery, Destrehan LA, St Charles Parish											9/23 (7:08)	below LOD	0.55	0.04	0.09	0.28	0.32	0.07

The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

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Message

From: Voelkel, Kevin [kevin.voelkel@bracewell.com]
Sent: 7/29/2022 2:39:28 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka CEI Inspection Report

Thanks very much. I have created a separate folder per your suggestion. You should be receiving an email from the ShareFile service shortly. Alternatively, the below link should provide you access with your existing credentials. If you could let me know when all of the files have been uploaded, it would be very helpful.

Direct Link: https://bracewell.sharefile.com/home/shared/fo1346fc-35a3-4537-b6f3-d2a429d93844

Thank you,
Kevin

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From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Friday, July 29, 2022 10:17 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Subject: Denka CEI Inspection Report

Mr. Voelkel,

Yesterday I uploaded the Denka sampling inspection report which occurred on May 5th 2022, today I need to upload the CEI Inspection report that occurred prior to the sampling inspection. Would Bracewell prefer I upload to the same ftp as yesterday or would you like me to upload to a new link? I think a new link is preferable as a significant number of files travel with each report.

Just let me know which you prefer.

Thank You

Fred Deppe
EPA Region 6
Hazardous Waste Enforcement

Dallas TX

214-665-7591

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 8/1/2022 11:05:31 PM
To: Murdock, James [Murdock.James@epa.gov]
CC: Murdock, Russell [Murdock.Russell@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Penland, John [Penland.John@epa.gov]
Subject: CBI

Good evening, James,

Hoping you are having a good start your week.

As you may recall, Denka has claimed CBI for almost every piece of document shared with us and as well for information EPA gathered during our inspection and previous sampling data.

We are currently at the stage where we have informed the State of Louisiana (LDEQ) about our RCRA Order that is pending and which includes CBI information, would it be sufficient for LDEQ to sign with EPA a confidentiality agreement (as we normally do in settlements when the state is party) or would EPA need to know more about how LDEQ would manage the information? For example what CBI procedure the state has in place, and/or would we need approval from Denka before we share any information beyond what we would share with the public (public available documents)?

Thanks in advance,
Marcia

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 8/9/2022 3:43:25 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: redacted sampling report
Attachments: May RCRA Inspection Report Redacted(100583903.1).pdf

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
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Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	May 05, 2022	
Media Program:	Resource Conservation and Recovery Act	
Regulatory Program(s)	Large Quantity Generator, Treatment Storage and Disposal Facility	
Company Name:	**Denka Performance Elastomer, LLC.**	
Facility Name:	**Pontchartrain Site**	
Facility Physical Location:	560 Highway 44	
(city, state, zip code)	LaPlace, LA 70068	
Mailing address:		
(city, state, zip code)		
County/Parish:	St. John the Baptists Parish	
Facility Phone Number		
Facility Contact:	Christopher Meyers	Sr. Consultant
	Christopher-meyers@denka-pe.com	
FRS Number:	110067396669	
Identification/Permit Number:	LAR000009415	
Media Identifier Number:	See above	
NAICS:	325110, 325212, 325199	
SIC:	2822, 2869	

Personnel participating in inspection:		
John Penland	USEPA Region 6 - ECAD	Sr. RCRA Inspector
Christopher Meyers	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Cory Green	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Patrick Walsh	Denka Performance Elastomer, LLC.	SHE/PSM Manager
David Bordelon	USEPA START	
Derrick Cobb	USEPA START	
Jose Ojeda	USEPA START	
Jeff Wright	USEPA START	
Luke Murray	USEPA START	

EPA Lead Inspector Signature/Date		
	John Penland – Sr. RCRA Inspector	Date
Supervisor Signature/Date		
	Jeff Yurk – RCRA Enforcement Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On May 5, 2022, I, John Penland, conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). I was accompanied on this inspection by members of the Superfund Technical Assistance and Response Team (START) who were engaged to collect samples. This inspection is a follow-up to the April 18-21, 2022, Resource Conservation and Recovery Act (RCRA) inspection where initial concerns were raised about the generation and management of the waste generated from the strainers associated with the batch reactor vessels (kettles) located in the Polymer Unit (Poly-kettle Strainer Waste; also known as: waste neoprene; neoprene popcorn; or waste coag). This inspection focused on observation of the facility's standard operating procedures specific to the management of the Poly-kettle Strainer Waste and sample collection of air, liquid, and solid media associated with or impacted by the Poly-kettle Strainer Waste generation and management procedures.

This report serves as documentation of all onsite activities and observations during this inspection of the Denka facility. Photographs and video recordings taken during the inspection to document onsite observations are included as Attachment 1. A summary of all areas of concern identified during this inspection is provided in Section IV. Unless otherwise specified, the statements cited in this report reflect those claims made by facility personnel to me or documents reviewed by me during this inspection.

Facility Description

Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality.

Denka has been the focus of multiple inspections under the Clean Air Act, Resource Conservation and Recovery Act, and Clean Water Act. For a more complete description of the facility's units and operations refer to the report documenting the April 18-21, 2022, RCRA inspection. This inspection report is focused on the generation and management of the Poly-kettle Strainer Waste described below.

Poly-kettle Strainer Waste

[redacted]

[redacted]

Section II - OBSERVATIONS

I conducted the onsite inspection during the normal business hours of May 5, 2022, beginning at 0930 hours Central Time. During this inspection, the facility was in the process of winding down operations in preparation for a facility-wide turnaround. However, Denka was still conducting normal operations in the Polymer Unit. Denka was notified of this inspection through their counsel Bracewell, LLP on April 29, 2022, and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.

I began this inspection with an initial briefing where I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility. I explained that the purpose of this inspection was to collect information and samples related to the generation and management of the Poly-kettle Strainer Waste. I also informed them that EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022, inspection.

In furtherance of this inquiry, I asked whether Denka considered the Poly-kettle Strainer Waste to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had previously sold the stabilized Poly-kettle Strainer Waste for its commercial value, though it does not currently do so. I explained the D001 flammable solids definition as discussed in 40 CFR 261.21(a)(2) and the associated Background Information Document and asked whether that characteristic could apply since the Poly-kettle Strainer Waste had been previously described by the Polymer Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated. I explained the D003 reactivity definition in 40 CFR 261.23(a)(1), the associated Background Information Document, and its link with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the Poly-kettle Strainer Waste.

During the opening meeting, I also requested and received the following documents marked as Confidential:

1) PK Pump Out and Strainer Cleaning Operation
2) Clearing Unstripped Emulsion Storage Tank for Cleaning
3) Engineering Drawings of the Outside Brine Pit
4) Raw Materials Characteristics and Hazards

5) Emergency Stabilizer Make-up.

These documents are included as Attachments 2 through 6. In addition, according to Chris Meyers, following the completion of the April 18-21, 2022, inspection, additional information concerning the amount of residual chloroprene present in the Poly-kettle Strainer Waste was located and provided as part of the response to the records request originating from EPA during the April 18-21, 2022, inspection. Those records are included in the report documenting that April 18-21, 2022, inspection.

David Bordelon, an employee of Weston Solutions, LLC. and the team lead for a sampling team activated under the START contract for EPA, arrived at approximately 1200hours Central Time. Following his introduction and at approximately 1230hours Central Time we conducted our initial reconnaissance of the planned sample collection area and equipment staging location. We departed the facility for lunch and a separate planning discussion at approximately 1300hours. When we returned to the facility at approximately 1415hours, we briefed the rest of START sampling team who had arrived in the interim. After staging our sampling equipment and donning personal protective equipment (PPE), the START team initiated sample collection at approximately 1530hours. A detailed sampling report describing the collection and analysis of the samples has been prepared by the START contractors and is included as Attachment 7. This report from the START contractors also includes the final analytical results for the collected samples which are discussed in the next section.

During the Poly-kettle Strainer Cleaning operation, the Denka employee removing the Poly-kettle Strainer Waste from the strainer was wearing an air-purifying respirator as required by Denka's SOP. However, the sampling team observed and documented multiple Denka personnel observing the operation without any respiratory protection.

Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel who attended via video call. This meeting and the inspection concluded at approximately 1830hours.

Section III - FOLLOW-UP

Sample Result Summary

Sample DR-S-BP-05052022-01

This grab sample is of Poly-kettle Strainer Waste which was being removed from the Outside Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized Poly-kettle Strainer Waste normally shipped offsite for disposal. Residual chloroprene is present in this sample at 1,080 mg/kg.

Sample DR-L-LB-05052022-01 and Field Duplicate DR-L-LB-05052022-02

This grab sample and its field duplicate are of liquid collected from the Outside Brine Pit as found prior to the addition of the Poly-kettle Strainer Waste observed during the inspection.

Chloroprene is present in the sample at 62.8 mg/L and the field duplicate at 64.1 mg/L before the addition of the Poly-kettle Strainer Waste.

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Outside Brine Pit approximately 10 minutes after the addition of the Poly-kettle Strainer Waste observed during the inspection. The chloroprene concentration in this sample is 341 mg/L. The increase in the chloroprene concentration of this sample over the concentration of Sample DR-L-LB-05052022-01 is interpreted to represent the release of chloroprene from the Poly-kettle Strainer Waste to the liquid in the Outside Brine Pit where it will continue to evaporate.

Sample DR-A-BK-0502022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer approximately 30 minutes before the Poly-kettle Strainer Waste generating procedure. This sample serves as the background reading for the waste generating process inside the Polymer building. The reported chloroprene concentration is 1,050 $\mu g/m^3$.

Sample DR-A-KP-05052022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer during the Poly-kettle Strainer Waste generating procedure. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer and the evaporation of the chloroprene from the Poly-kettle Strainer Waste. Since this sample remained at the strainer following the removal of the waste, a difference between the measurement for this sample and sample DR-A-KT-05052022-01 would illustrate the impact of direct volatilization of chloroprene from the Poly-kettle Strainer Waste. The reported chloroprene concentration in this sample is 193,000 $\mu g/m^3$.

Sample DR-A-KT-05052022-01

This approximately 30-minute, 6-liter air sample, was started at the Poly-kettle Strainer, alongside sample DR-A-KP-05052022-01 during waste generation and traveled with the Poly-kettle Strainer Waste to the Outside Brine Pit. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the screen, the evaporation of the chloroprene from the Poly-kettle Strainer Waste, and the transport and dumping of that waste into the Outside Brine Pit. Since this sample remained near the waste throughout the process, the concentration of chloroprene in this sample is expected to be dependent on the volatilization of chloroprene from the waste during the strainer cleaning and disposal process. The reported Chloroprene concentration in this sample is 243,000 $\mu g/m^3$.

Samples DR-A-KD-05052022-01 and DR-A-KD-05052022-02

These approximately 30-minute, 6-liter air samples were collected approximately 20 feet from the Poly-kettle Strainer during the waste generating procedure. These are collocated samples serving the same purpose of a field duplicate in this context. These samples indicate the presence of

chloroprene in the air at a downflow location from the strainer. The concentration in these samples is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer, the volatilization of the chloroprene from the Poly-kettle Strainer Waste, and the rate of dispersion of chloroprene vapor. The reported chloroprene concentration in sample DR-A-05052022-01 is 19,000 μg/m^3 and in sample DR-A005052022-02 is 18,400 μg/m^3.

Sample DR-A-PU

This approximately 30-minute, 6-liter air sample was collected between the Polymer building and the Outside Brine Pit during the Poly-kettle Strainer Waste generation and Outside Brine Pit addition. This sample location was originally intended to measure the release of chloroprene from the Poly-kettle Strainer Waste during its addition to the Outside Brine Pit. However, this sample was collected 15 feet away from the Outside Brine Pit. Due to this distance and chloroprene's rate of dispersion, this sample does not serve its intended purpose. The reported chloroprene concentration in this sample is 4,390 μg/m^3.

Sample DR-A-BU

This approximately 30-minute, 6-liter air sample was collected from a location immediately adjacent to the Outside Brine Pit, on the upwind edge, during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit by Denka's employees using an excavator. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal. The reported chloroprene concentration in this sample is 10,200 μg/m^3.

Sample DR-A-BD

This approximately 30-minute, 6-liter sample was collected from a location 20 feet from the Outside Brine Pit, on the downwind side, during the removal of stabilized Poly-kettle Strainer Waste. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal activity and the rate of dispersion of chloroprene vapors in the air. The reported chloroprene concentration in this sample is 969 μg/m^3.

Section IV – AREAS OF CONCERN

<u>Generation and Management of the Poly-kettle Strainer Waste</u>

Based on its management and the written hazard descriptions provided by Denka, the Poly-kettle Strainer Waste may be a hazardous waste demonstrating the characteristics of ignitability and reactivity. Chloroprene is a Volatile Organic Compound present in this waste at its point of generation and is capable of being released to this environment through evaporation if not properly contained.

Based on the results for air samples taken during the Poly-kettle Strainer Waste generating procedure, the waste is being released to the air during this procedure as evidenced by the increase in chloroprene concentrations.

Based on the results for liquid samples DR-L-LB-05052022-01 and DR-L-LA-05052022-01, Poly-kettle Strainer Waste is introducing chloroprene to the Outside Brine Pit which is not designed to

contain Volatile Organic Compounds. Therefore, the Poly-kettle Strainer Waste is being released to the air as it evaporates from the Outside Brine Pit.

Based on the results for air samples taken during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit, Poly-kettle Strainer Waste is being released to the air during this process.

Based on the results for solid sample DR-S-BP-05052022-02 the stabilized Poly-kettle Strainer Waste has concentrations of chloroprene that require additional containment measures to prevent release to the environment. The Roll-off container used for the accumulation of this waste is not designed to prevent releases of Volatile Organic Compounds. Since the chloroprene component of the Poly-kettle Strainer Waste is a volatile organic compound, it will evaporate and be released from the roll-off container during storage.

Respiratory Protection of Facility Personnel

[redacted]

Section V – LIST OF ATTACHMENTS

Attachment 1 – Photo and Video Log (CBI)
Attachment 2 – PK Pump Out and Strainer Cleaning Operation (CBI)
Attachment 3 – Clearing Unstripped Emulsion Storage Tank for Cleaning (CBI)
Attachment 4 – Engineering Drawings of the Outside Brine Pit (CBI)
Attachment 5 – Raw Materials Characteristics and Hazards (CBI)
Attachment 6 – Emergency Stabilizer Make-up (CBI)
Attachment 7 – START Technical Support Report for ECAD - Denka Enforcement Multimedia Sampling
Attachment 8 – Daily Activity Summary for May 5, 2022 – FY2022 Denka Sampling Investigation

Message

From: Venn, Brett [bvenn@joneswalker.com]
Sent: 8/15/2022 10:53:53 PM
To: Holden, Bob [bholden@joneswalker.com]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Craig Easley [craig.easley@la.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Christopher Meyers (christopher-meyers@denka-pe.com) [christopher-meyers@denka-pe.com]; Jason B. Hutt (jason.hutt@bracewell.com) [jason.hutt@bracewell.com]; Kevin M. Voelkel (kevin.voelkel@bracewell.com) [kevin.voelkel@bracewell.com]; Bartholomew, Trey [tbartholomew@joneswalker.com]
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI

Flag: Follow up

Dear All.

On behalf of DPE, we appreciate the opportunity to submit revised CBI redactions to the April RCRA inspection report and appendix 10 thereto, and the May RCRA inspection report and attachment 7 thereto. At the outset, we thank Mr. Wieber for the very helpful comments/questions document he provided on Friday.

Please use this sharefile link to download DPE's revised CBI redactions to the documents listed below: https://joneswalker.sharefile.com/f/fo374615-9d76-4725-9221-4393e9c641a0 The documents are saved in the "8-15-22 CBI Redacted Documents" folder.

Please note that the link includes two versions of each document. In the first version (saved in the "Highlighted" folder), DPE's CBI redactions are highlighted in yellow for ease of review by EPA. In the second version (saved in the "Redacted" folder), the redactions are redacted in black for posting. The documents are:

1. Updated CBI redactions to April RCRA inspection report.
2. Updated CBI redactions to Appendix 10 to April report.
3. Updated CBI redactions to May RCRA inspection report.
4. Updated CBI redactions to Attachment 7 to May report.
5. Signed CBI form.

Please note that we have withdrawn DPE's original CBI redactions to appendices 20, 30, 32, and 33 to the April report, and to the descriptions in the photo log of attachment 1 to the May report.

As stated in the CBI form submitted today, DPE has redacted CBI for trade secrets, proprietary and company confidential information. Please advise if it is necessary for DPE to submit additional information in response to the nine questions contained in Attachment 1 to the Confidentiality Notice (regarding the bases for the CBI redactions).

Please let us know if you have any questions or comments.

Thank you for your continued attention to this matter,

Brett S. Venn | Partner
Jones Walker LLP
D: 504.582.8116 | M: 504.451.1170
bvenn@joneswalker.com

From: Holden, Bob <bholden@joneswalker.com>
Sent: Thursday, August 11, 2022 8:49 PM
To: 'Penland, John' <Penland.John@epa.gov>; 'Yurk, Jeffrey' <yurk.jeffrey@epa.gov>; 'Osbourne, Margaret' <osbourne.margaret@epa.gov>; 'Craig Easley' <craig.easley@la.gov>; 'Deppe.Fred@epa.gov' <Deppe.Fred@epa.gov>
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>; Venn, Brett

<bvenn@joneswalker.com>
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI

Hi John,

As we discussed yesterday and today, we have further reviewed for CBI the attachments to the May inspection report, and have made further CBI redactions to the table of the samples in Attachment 1, and to Attachment 7, specifically noted on pages i–ii; 1-2; and in Attachment E to Attachment 7, page 5. We have not identified CBI in Attachment 8.

You can find redacted copies of Attachments 1 and 7 on the Sharefile (line below) in the 8-11-22 folder.

https://joneswalker.sharefile.com/f/foa26bbb-df0a-4ba1-a3d8-d1cb5e043034

I believe that you already have instructions on the use of the Sharefile account.

We look forward to talking at 11:30 AM CDT tomorrow.

Bob

Robert E. Holden | Partner
Jones Walker LLP
D: 504.582.8139
BHolden@joneswalker.com

From: Holden, Bob
Sent: Monday, August 8, 2022 6:39 PM
To: Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>; Deppe.Fred@epa.gov
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI

Dear Mr. Penland and all:

On behalf of Denka Performance Elastomer LLC (DPE), we appreciate the opportunity to assert Confidential Business Information (CBI) protection from public disclosure of confidential process, trade secret, and business information contained in the appendices to the Resource Conservation and Recovery Act (RCRA) Inspection Report for the inspection of the DPE facility on April 18 – 21, 2022 and in the report and attachments to the RCRA Inspection Report for the inspection of the DPE facility on May 5, 2022.

Per the discussions between DPE counsel and EPA, we are submitting DPE's CBI-redactions of the following via this Sharefile: https://joneswalker.sharefile.com/f/fo374615-9d76-4725-9221-4393e9c641a0

1. Appendices to April Inspection Report
2. May Inspection Report
3. Attachments to May Inspection Report

We will separately each of you an email with Sharefile instructions and login information.

We are also submitting in the Sharefile CBI-redacted and unredacted copies of DPE's proposed Attachment 5.1 to the May report. We request that you replace Attachment 5 with DPE's proposed Attachment 5.1. Attachment 5 to the report is an out-of-date version of the Raw Materials Characteristics and Hazards document that EPA reviewed during the inspection and quotes in the May report. Attachment 5.1 is the updated version of the document. EPA's reliance on Attachment 5 resulted in an error in the May report. In the "Respiratory Protection of Facility Personnel" part of Section IV (page 7), it states that the AEL for chloroprene in air is .2 ppm (parts per million). This is incorrect. The proper

calculation is actually 2 ppm. Attachment 5 states .2 ppm. Proposed Attachment 5.1 correctly states 2 ppm – see page 4 under "CD Chloroprene – CAS #126-99-8."

We will provide a written response to the Areas of Concern in the May report within 30 days of today (September 7).

Please let us know if you have any questions or comments about this.

Robert E. Holden | Partner
Jones Walker LLP
D: 504.582.8139
BHolden@joneswalker.com

From: Holden, Bob
Sent: Friday, August 5, 2022 4:58 PM
To: 'Penland, John' <Penland.John@epa.gov>; 'Yurk, Jeffrey' <yurk.jeffrey@epa.gov>; 'Osbourne, Margaret' <osbourne.margaret@epa.gov>; 'Craig Easley' <craig.easley@la.gov>; 'Deppe.Fred@epa.gov' <Deppe.Fred@epa.gov>
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>
Subject: DPE April Inspection Report, Redactions for CBI

Dear Mr. Penland and all:

On behalf of Denka Performance Elastomer LLC (DPE), we appreciate the opportunity to assert Confidential Business Information (CBI) protection from public disclosure of confidential process, trade secret, and business information contained in the Resource Conservation and Recovery Act (RCRA) Inspection Report for the inspection of the DPE facility on April 18 – 21, 2022.

Per the discussions between DPE counsel and EPA, attached is a CBI-redacted of the April Inspection Report. We will provide CBI-redactions of the report appendices on Monday, August 8.

We are also working on the May Inspection Report, and plan to have our CBI –redactions to you by Monday, August 8.

We are reviewing the Areas of Concern in the April and May reports. We will provide a written response to the Areas of Concern for the April Report within 30 days from today (by September 6 in view of the Labor Day holiday), and we will provide a written response to the Areas of Concern in the May report within 30 days of our submittal of the CBI-redacted version.

Please let us know if you have any questions or comments about this.

Bob Holden

Robert E. Holden
Partner
D: 504.582.8139
BHolden@joneswalker.com

JONES WALKER

Jones Walker LLP
201 St. Charles Ave, Ste 5100
New Orleans, LA 70170
joneswalker.com

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 2/10/2022 1:29:32 PM
To: Penland, John [Penland.John@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Re: FLM data submittal from Denka - NOT FINAL under QA review by OAR
Attachments: 2022.02.04 - Denka Performance Elastomer LLC - FLM Submission No. 1 - Transmittal Letter.pdf; Enclosure 1 (2022.02.04) - Denka Performance Elastomer - Fenceline Monitoring Data.xlsx; Enclosure 2 (2022.02.4) - Beacon Environmental - Fenceline Monitoring Report.pdf; image001.png

Hi John,

Margaret asked that I share our Denka monitoring data with you, for you information. We should be getting FLM data every 2 weeks. Moving forward, I will find a better way to share than email, but for now here you go.

OAR is working on presenting a map of the sampler locations with a data overlay.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

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BRACEWELL

February 4, 2022

Ms. Penny Lassiter
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
Environmental Protection Agency
109 T.W. Alexander Drive
RTP, NC 27711
Lassiter.Penny@epa.gov

Ms. Mary Greene
Director, Air Enforcement Division
Office of Civil Enforcement
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Greene.Mary.E@epa.gov

Re: Denka Performance Elastomer LLC – Submission of Fenceline Monitoring Data

Dear Ms. Lassiter and Ms. Greene,

I write on behalf of Denka Performance Elastomer, LLC ("DPE") to provide the Environmental Protection Agency ("EPA") with DPE's first submission of monitoring and meteorological data in response to Component II of EPA's Clean Air Act Section 114 information request sent by email to Mr. Jorge Lavastida on June 15, 2021 (the "Request Letter").

On January 7, 2022, DPE commenced monitoring activities at 18 sampling locations around the fenceline of the Pontchartrain Works site in LaPlace, Louisiana in accordance with EPA Method 325A and 325B. Monitoring and meteorological data for the January 7 – January 21, 2022 period (the "Sampling Period") are enclosed as Enclosure 1, including updated geographic coordinates corresponding to each of the 18 sampling locations.

The monitoring data summarize the analysis performed by a third-party laboratory, Beacon Environmental. Based upon a request from EPA Office of Civil Enforcement received on February 4, 2022, a copy of Beacon Environmental's analytical report is enclosed as Enclosure 2. Pursuant to Component II, ¶ 1(f) of the Request Letter, a Tentatively Identified Compound analysis was also performed during the Sampling Period, a summary of which is provided in pages 35-56 of Enclosure 2.

Jason B. Hutt
Partner

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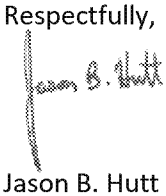
2001 M Street NW, Suite 900, Washington, DC 20036-3310
jason.hutt@bracewell.com bracewell.com

Please feel free to contact me should you have any questions.

Respectfully,



Jason B. Hutt
Counsel to Denka Performance Elastomer LLC

Cc: Jorge Lavastida
Denka Performance Elastomer, LLC, Executive Officer & Plant Manager

Patrick Walsh
Denka Performance Elastomer, LLC, Safety, Health, and Environmental Manager

Robert E. Holden
Jones Walker LLP

Enclosures:

Enclosure 1: Fenceline Monitoring and Meteorological Data

Enclosure 2: Beacon Environmental – Fenceline Monitoring Report

Certification Statement

I certify under penalty of law that the attached response was prepared under my direction or supervision and that qualified personnel properly gathered and evaluated the information submitted. The samples associated with the completion of this response were analyzed according to the correct methods and procedures as specified in this letter. Additionally, a registered Professional Engineer has observed the collection of at least one sample to ensure that proper sampling techniques and handling were followed according to the correct methodsand procedures specified in this letter and has verified that the results are properly documented in the report. The information submitted is, to the best of my knowledge and belief, accurate and complete. In those cases where we did not possess the requested information for questions applicable to our facility, we provided best estimates. We have to the best of our ability indicated what we believe to be company confidential business information as defined under 40 C.F.R. Part 2, Subpart B. We understand that we may be required at a later time to justify our claim in detail with respect to each item claimed confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment as explained in Section 113 of the Clean Air Act (42 USC § 7413).

Signature of Certifying Official	**2/4/22** Date
Patrick Walsh Printed Name of Certifying Official	985-536-7400 Telephone Number
Safety, Health, and Environmental Manager Title of Certifying Official	

Denka Performance Elastomer LLC
Fenceline Monitoring Data
Last Updated: February 4, 2022

Pursuant to an Environmental Protection Agency ("EPA") request dated June 15, 2021 and the Agency's asserted authority under Section 114 of the Clean Air Act, the monitoring data provided below ("Monitoring Data")

								Results, µg/m^3					
Map Location ID	Start Date	End Date	Sampling Tube ID	Sampler Type	Start Time	Stop Time	Note	BDN	CD	Below LOQ?	Note	Latitude	Longitude
1	1/7/2022	1/21/2022	1178020	Regular	9:23	10:56		ND	1.32			30.06177	-90.53368
2	1/7/2022	1/21/2022	1178017	Regular	9:29	11:01		ND	1.28			30.06447	-90.53427
3	1/7/2022	1/21/2022	1178138	Regular	9:34	11:07		ND	0.633			30.06922	-90.53522
4	1/7/2022	1/21/2022	1178320	Regular	12:38	13:05		ND	0.481			30.07083	-90.53035
5	1/7/2022	1/21/2022	1178274	Regular	12:57	13:17		ND	0.186			30.07378	-90.52622
6	1/7/2022	1/21/2022	1178212	Regular	13:16	13:29		ND	0.157 J	Y-CD	Results shown below the LOQ are not reliable and do not represent an accurate concentration of the analyte.	30.07077	-90.52227
7	1/7/2022	1/21/2022	1178339	Regular	10:53	13:46		ND	ND			30.0707	-90.51773
8	1/7/2022	1/21/2022	1178143	Regular	10:29	12:23		ND	0.114 J	Y-CD	Results shown below the LOQ are not reliable and do not represent an accurate concentration of the analyte.	30.06837	-90.51455
9	1/7/2022	1/21/2022	1178147	Regular	10:13	12:04		ND	0.21			30.0649	-90.51272
10	1/7/2022	1/21/2022	1178149	Regular	10:09	11:55		ND	0.464			30.06152	-90.5108
11	1/7/2022	1/21/2022	1178162	Regular	10:00	11:48		ND	0.566			30.05755	-90.5113
12	1/7/2022	1/21/2022	1178209	Regular	9:57	11:38		ND	0.575			30.05533	-90.5159
13	1/7/2022	1/21/2022	1178071	Regular	9:52	11:33		ND	0.511			30.05353	-90.51947
14	1/7/2022	1/21/2022	1178073	Regular	9:49	11:29		ND	0.715			30.05195	-90.52242
15	1/7/2022	1/21/2022	1178079	Regular	9:45	11:21		ND	2.12			30.05087	-90.52657
16	1/7/2022	1/21/2022	1178048	Regular	8:37	10:18		ND	0.594			30.05275	-90.52963
17	1/7/2022	1/21/2022	1178043	Regular	9:15	10:44		ND	2.91			30.0563	-90.53207
18	1/7/2022	1/21/2022	1178024	Regular	9:19	10:51		ND	1.02			30.05895	-90.53298
Dup 3	1/7/2022	1/21/2022	1178100	Duplicate	9:34	11:07		ND	0.405			30.06922	-90.53522
Dup 8	1/7/2022	1/21/2022	1178397	Duplicate	10:29	12:23		ND	0.160 J	Y-CD	Results shown below the LOQ are not reliable and do not represent an accurate concentration of the analyte.	30.06837	-90.51455
Blank 2	1/7/2022	1/21/2022	1178314	Blank	9:29	11:01		ND	ND			30.06447	-90.53427

Denka Performance Elastomer LLC
Meteorological Data
Last Updated: February 4, 2022

Avg Temp	53.6 degF

Start **1/7/22 12:00 AM**
End **1/22/22 12:00 AM**

KAPS
Port of South Louisiana Executive Regional Airport
LAT 30.08747

Date - Time	Pontchartain Site - Hourly Average			KAPS Barometric Pressure inHg
	Temperature DegF 11100004	Wind Speed MPH 11100003	Wind Direction Deg From N 11100002	
1/7/2022 12:00 AM	42.29	11.08	281.39	30.00
1/7/2022 1:00 AM	41.66	11.01	288.14	30.02
1/7/2022 2:00 AM	41.01	11.44	326.06	30.06
1/7/2022 3:00 AM	40.45	13.01	315.87	30.09
1/7/2022 4:00 AM	39.87	10.91	319.89	30.12
1/7/2022 5:00 AM	39.53	10.01	322	30.13
1/7/2022 6:00 AM	39.2	10.53	328.61	30.14
1/7/2022 7:00 AM	39.44	10.07	313.12	30.15
1/7/2022 8:00 AM	42.43	11.82	116.49	30.14
1/7/2022 9:00 AM	44.41	14.4	32.9	30.16
1/7/2022 10:00 AM	44.74	13.31	38.71	30.17
1/7/2022 11:00 AM	46.09	11.51	41.02	30.18
1/7/2022 12:00 PM	47.69	10.26	54.26	30.20
1/7/2022 1:00 PM	49.22	7.07	58.93	30.22
1/7/2022 2:00 PM	49.97	7.32	64.58	30.25
1/7/2022 3:00 PM	49.99	7.98	38.24	30.28
1/7/2022 4:00 PM	50.46	5.84	40.56	30.30
1/7/2022 5:00 PM	50.56	4.96	45.61	30.30
1/7/2022 6:00 PM	50.79	5.07	65.7	30.28
1/7/2022 7:00 PM	50.97	5.23	81.48	30.26

1/7/2022 8:00 PM	51.29	4.51	61.34	30.23
1/7/2022 9:00 PM	51.47	5.95	49.31	30.22
1/7/2022 10:00 PM	51.9	8.19	53.79	30.22
1/7/2022 11:00 PM	52.69	8.22	54.54	30.23
1/8/2022 12:00 AM	53.63	8.47	49.34	30.23
1/8/2022 1:00 AM	54.7	10.5	41.76	30.23
1/8/2022 2:00 AM	54.84	11.07	49.79	30.25
1/8/2022 3:00 AM	55.39	10.22	44.46	30.26
1/8/2022 4:00 AM	55.87	12.38	36.48	30.26
1/8/2022 5:00 AM	55.06	11.19	40.62	30.24
1/8/2022 6:00 AM	55.15	11.07	51.33	30.23
1/8/2022 7:00 AM	56.34	9.44	51.94	30.21
1/8/2022 8:00 AM	57.95	11.15	58.79	30.21
1/8/2022 9:00 AM	59.37	10.27	53.24	30.21
1/8/2022 10:00 AM	60.49	9.67	52.51	30.21
1/8/2022 11:00 AM	62.89	8.32	65.95	30.21
1/8/2022 12:00 PM	64.65	7.69	48.84	30.21
1/8/2022 1:00 PM	63.18	6.96	50.01	30.23
1/8/2022 2:00 PM	62.17	11.25	71.28	30.24
1/8/2022 3:00 PM	65.55	11.68	98.83	30.25
1/8/2022 4:00 PM	66.17	10.55	89.2	30.27
1/8/2022 5:00 PM	66.1	8.25	60.95	30.26
1/8/2022 6:00 PM	65.8	9.78	76.55	30.24
1/8/2022 7:00 PM	65.01	7.79	64.54	30.22
1/8/2022 8:00 PM	64.94	8.24	57.47	30.21
1/8/2022 9:00 PM	62.46	8.34	45.5	30.16
1/8/2022 10:00 PM	61.78	7.72	46.39	30.17
1/8/2022 11:00 PM	62.58	6.47	48.18	30.19
1/9/2022 12:00 AM	63.18	6.89	65.04	30.19
1/9/2022 1:00 AM	65.29	7.09	88.61	30.20
1/9/2022 2:00 AM	66.85	8.34	100.6	30.21
1/9/2022 3:00 AM	67.25	5.83	110.5	30.22
1/9/2022 4:00 AM	66.9	7.34	110.01	30.22
1/9/2022 5:00 AM	67	6.45	109.41	30.21
1/9/2022 6:00 AM	67.71	4.79	120.98	30.20
1/9/2022 7:00 AM	68.41	5.64	134.2	30.19

1/9/2022 8:00 AM	69.74	7.6	138.94	30.18
1/9/2022 9:00 AM	72.15	10.66	146.63	30.16
1/9/2022 10:00 AM	74.39	11.81	160.99	30.17
1/9/2022 11:00 AM	76.82	9.57	177.66	30.16
1/9/2022 12:00 PM	78.96	11.93	178.64	30.16
1/9/2022 1:00 PM	80.6	12.74	188.93	30.18
1/9/2022 2:00 PM	80.62	10.22	200.16	30.20
1/9/2022 3:00 PM	80.35	10.23	217.73	30.20
1/9/2022 4:00 PM	79.03	9.31	231.6	30.22
1/9/2022 5:00 PM	76.64	9.53	250.52	30.22
1/9/2022 6:00 PM	74.04	5.23	268.13	30.21
1/9/2022 7:00 PM	73.49	3.69	292.86	30.17
1/9/2022 8:00 PM	71.23	4.71	305.21	30.13
1/9/2022 9:00 PM	70.75	1.82	137.74	30.13
1/9/2022 10:00 PM	68.01	10.4	323.38	30.14
1/9/2022 11:00 PM	65.26	14.02	323.98	30.16
1/10/2022 12:00 AM	61.06	18.13	327.16	30.19
1/10/2022 1:00 AM	56.73	20.12	326.91	30.19
1/10/2022 2:00 AM	54.5	16.06	322.66	30.21
1/10/2022 3:00 AM	53.69	18.59	323.08	30.22
1/10/2022 4:00 AM	53	18.19	323.7	30.23
1/10/2022 5:00 AM	51.84	18.15	325.35	30.25
1/10/2022 6:00 AM	49.67	16.88	326.33	30.24
1/10/2022 7:00 AM	48.21	16.55	328.27	30.26
1/10/2022 8:00 AM	46.9	17.59	326.57	30.28
1/10/2022 9:00 AM	47	16.65	309.91	30.31
1/10/2022 10:00 AM	48.01	16.2	311.57	30.30
1/10/2022 11:00 AM	50.04	15.47	320.79	30.32
1/10/2022 12:00 PM	52.08	16.81	323.5	30.34
1/10/2022 1:00 PM	53.76	16.52	320.22	30.39
1/10/2022 2:00 PM	55	17.2	321.15	30.41
1/10/2022 3:00 PM	56.13	15.59	318.21	30.46
1/10/2022 4:00 PM	56.17	13.92	326.12	30.49
1/10/2022 5:00 PM	54.95	10.62	328.49	30.51
1/10/2022 6:00 PM	53.87	13.04	327.54	30.48
1/10/2022 7:00 PM	52.07	14.15	328.69	30.43

1/10/2022 8:00 PM	50.95	15.45	328.02	30.42
1/10/2022 9:00 PM	49.54	15.1	299.75	30.40
1/10/2022 10:00 PM	47.9	13.98	243.85	30.41
1/10/2022 11:00 PM	46.49	13.13	269.41	30.43
1/11/2022 12:00 AM	45.05	11.97	296.21	30.44
1/11/2022 1:00 AM	43.88	10.07	304.64	30.46
1/11/2022 2:00 AM	43.13	9.12	323.56	30.47
1/11/2022 3:00 AM	42.21	9.94	329.02	30.49
1/11/2022 4:00 AM	41.6	7.95	329.35	30.51
1/11/2022 5:00 AM	41.32	9.98	331.86	30.54
1/11/2022 6:00 AM	41.46	9.85	320.4	30.52
1/11/2022 7:00 AM	42.07	10.66	304.87	30.52
1/11/2022 8:00 AM	45	11.86	207.29	30.51
1/11/2022 9:00 AM	48.31	12.9	166.75	30.50
1/11/2022 10:00 AM	50.86	14.64	94.64	30.49
1/11/2022 11:00 AM	53.15	12.81	66.05	30.49
1/11/2022 12:00 PM	54.36	11.91	95.1	30.51
1/11/2022 1:00 PM	55.32	11.44	98.56	30.52
1/11/2022 2:00 PM	56.78	8.65	166.06	30.54
1/11/2022 3:00 PM	57.27	6.46	282.04	30.54
1/11/2022 4:00 PM	58.07	3.66	250.11	30.57
1/11/2022 5:00 PM	58.08	1.58	231.79	30.55
1/11/2022 6:00 PM	56.4	4.12	338.54	30.52
1/11/2022 7:00 PM	54.86	4.55	338.35	30.47
1/11/2022 8:00 PM	53.41	7.52	343.01	30.44
1/11/2022 9:00 PM	53.23	6.55	211.4	30.43
1/11/2022 10:00 PM	53.44	9.31	32.29	30.41
1/11/2022 11:00 PM	52.86	10.18	30.63	30.40
1/12/2022 12:00 AM	52.19	9.85	40.31	30.41
1/12/2022 1:00 AM	51.4	8.87	51.2	30.41
1/12/2022 2:00 AM	51.08	6.4	54.46	30.41
1/12/2022 3:00 AM	51.1	6.81	38.92	30.43
1/12/2022 4:00 AM	51.2	3.15	70.65	30.44
1/12/2022 5:00 AM	52.15	2.84	162.07	30.41
1/12/2022 6:00 AM	52.5	3.42	52.06	30.41
1/12/2022 7:00 AM	53	3.44	74.49	30.39

1/12/2022 8:00 AM	53.49	3.62	139.57	30.37
1/12/2022 9:00 AM	54.04	3.86	130.93	30.37
1/12/2022 10:00 AM	54.17	4.58	275.17	30.36
1/12/2022 11:00 AM	54.93	3.55	253.83	30.36
1/12/2022 12:00 PM	56.49	4.55	293.38	30.36
1/12/2022 1:00 PM	58.03	3.71	150.55	30.35
1/12/2022 2:00 PM	60.24	2.72	183.14	30.35
1/12/2022 3:00 PM	58.88	7.28	319.84	30.36
1/12/2022 4:00 PM	59.67	4.07	300.2	30.36
1/12/2022 5:00 PM	59.46	3.93	99.59	30.35
1/12/2022 6:00 PM	59.6	2	56.65	30.32
1/12/2022 7:00 PM	57.83	1.29	42.85	30.29
1/12/2022 8:00 PM	55.81	1.43	93.93	30.25
1/12/2022 9:00 PM	55.35	0.93	144.14	30.23
1/12/2022 10:00 PM	55.28	2.18	204.94	30.23
1/12/2022 11:00 PM	54.37	3.06	214.64	30.23
1/13/2022 12:00 AM	54.49	3.43	222.33	30.23
1/13/2022 1:00 AM	53.71	4.85	231.11	30.23
1/13/2022 2:00 AM	53.2	2.99	237.93	30.23
1/13/2022 3:00 AM	52.49	4.42	240.29	30.23
1/13/2022 4:00 AM	50.17	6.67	247.19	30.22
1/13/2022 5:00 AM	51.15	3.96	267.2	30.22
1/13/2022 6:00 AM	52.08	5.77	243.18	30.21
1/13/2022 7:00 AM	53.08	3.51	241.48	30.21
1/13/2022 8:00 AM	53.95	6.02	246.5	30.21
1/13/2022 9:00 AM	57.43	6.53	260.24	30.19
1/13/2022 10:00 AM	61.03	8.19	258.13	30.19
1/13/2022 11:00 AM	62.37	9.99	261.74	30.18
1/13/2022 12:00 PM	64.1	9.4	261.44	30.17
1/13/2022 1:00 PM	65.96	9.41	232.96	30.18
1/13/2022 2:00 PM	66.86	10.15	222.85	30.18
1/13/2022 3:00 PM	67.91	8.46	227.63	30.19
1/13/2022 4:00 PM	67.39	8.75	239.27	30.19
1/13/2022 5:00 PM	66	9.01	244.37	30.17
1/13/2022 6:00 PM	64.36	7.8	238.25	30.13
1/13/2022 7:00 PM	63.01	6.7	229.04	30.10

1/13/2022 8:00 PM	60.37	6.47	224.41	30.05
1/13/2022 9:00 PM	58.84	6.52	223.8	30.02
1/13/2022 10:00 PM	57.59	7.56	228.04	30.00
1/13/2022 11:00 PM	56.82	9.72	234.81	30.00
1/14/2022 12:00 AM	56.52	9.89	234.79	30.00
1/14/2022 1:00 AM	56.61	8.28	236.53	30.01
1/14/2022 2:00 AM	55.81	6.97	228.07	30.01
1/14/2022 3:00 AM	54.59	7.28	232.22	30.05
1/14/2022 4:00 AM	54.67	6.56	248.15	30.04
1/14/2022 5:00 AM	54	6.38	254.66	30.04
1/14/2022 6:00 AM	56.08	1.11	251.76	30.03
1/14/2022 7:00 AM	54.97	0.41	234.98	30.02
1/14/2022 8:00 AM	57.27	1.96	256.57	30.02
1/14/2022 9:00 AM	60.29	6.1	60.54	30.01
1/14/2022 10:00 AM	63	5.26	53.26	30.00
1/14/2022 11:00 AM	65.96	3.79	63.32	30.01
1/14/2022 12:00 PM	67.78	4.6	52.95	30.02
1/14/2022 1:00 PM	67.09	6.82	63.59	30.03
1/14/2022 2:00 PM	67.26	6.54	52.76	30.04
1/14/2022 3:00 PM	66	7.82	29.65	30.04
1/14/2022 4:00 PM	64.46	7.11	34.63	30.06
1/14/2022 5:00 PM	61.36	6.57	56.6	30.06
1/14/2022 6:00 PM	61.17	6.44	118.04	30.03
1/14/2022 7:00 PM	60.24	6.26	126.64	30.00
1/14/2022 8:00 PM	59.13	5.51	121.58	29.97
1/14/2022 9:00 PM	58.32	4.52	127.15	29.96
1/14/2022 10:00 PM	57.2	5.26	125.98	29.95
1/14/2022 11:00 PM	56.51	6.2	127.47	29.95
1/15/2022 12:00 AM	56.43	5.9	119.41	29.94
1/15/2022 1:00 AM	57.51	3.93	113.93	29.94
1/15/2022 2:00 AM	57.49	4.64	101.98	29.95
1/15/2022 3:00 AM	57.48	5.59	114.38	29.93
1/15/2022 4:00 AM	57.85	3.1	123.83	29.94
1/15/2022 5:00 AM	58.1	4.73	91	29.93
1/15/2022 6:00 AM	58.31	4.91	104.5	29.91
1/15/2022 7:00 AM	59.23	3.28	121	29.90

1/15/2022 8:00 AM	60.08	6.54	124.71	29.90
1/15/2022 9:00 AM	61.79	5.99	132.93	29.90
1/15/2022 10:00 AM	63.91	7.94	149.41	29.89
1/15/2022 11:00 AM	62.46	6.32	213.77	29.88
1/15/2022 12:00 PM	61.97	4.52	119.52	29.88
1/15/2022 1:00 PM	62.91	5.93	143.72	29.88
1/15/2022 2:00 PM	62.56	9.22	221.9	29.89
1/15/2022 3:00 PM	55.58	20	273.67	29.86
1/15/2022 4:00 PM	51.19	18.87	273.5	29.86
1/15/2022 5:00 PM	50.31	17.98	271.66	29.85
1/15/2022 6:00 PM	48.13	17.53	264.2	29.83
1/15/2022 7:00 PM	45.75	20.14	269.14	29.77
1/15/2022 8:00 PM	43.27	20.51	264.92	29.75
1/15/2022 9:00 PM	41.7	19.43	266.52	29.74
1/15/2022 10:00 PM	40.21	18.82	272.09	29.76
1/15/2022 11:00 PM	39.28	19.08	265.33	29.78
1/16/2022 12:00 AM	38.28	18.73	263.19	29.80
1/16/2022 1:00 AM	37.39	16.1	267.8	29.83
1/16/2022 2:00 AM	36.4	16.41	260.69	29.86
1/16/2022 3:00 AM	35.54	19.69	260.97	29.89
1/16/2022 4:00 AM	34.95	19.05	258.56	29.90
1/16/2022 5:00 AM	35.08	19.89	252.36	29.91
1/16/2022 6:00 AM	35.41	17.92	256.83	29.90
1/16/2022 7:00 AM	36.07	15.41	255.99	29.91
1/16/2022 8:00 AM	37.19	18.18	254.59	29.90
1/16/2022 9:00 AM	38.23	15.98	259.42	29.90
1/16/2022 10:00 AM	39.78	17.84	259.61	29.89
1/16/2022 11:00 AM	41.2	19.36	259.01	29.89
1/16/2022 12:00 PM	42.95	18.89	265.07	29.90
1/16/2022 1:00 PM	44.82	18.74	269.9	29.92
1/16/2022 2:00 PM	45.89	18.46	269.79	29.92
1/16/2022 3:00 PM	46.77	17.09	276.65	29.95
1/16/2022 4:00 PM	47.07	12.41	283.97	29.97
1/16/2022 5:00 PM	46.55	7.6	281.61	29.98
1/16/2022 6:00 PM	45.84	4.65	271.13	29.97
1/16/2022 7:00 PM	45.31	7.44	261.6	29.95

1/16/2022 8:00 PM	44.8	6.53	270.88	29.93
1/16/2022 9:00 PM	44.35	7.53	261.45	29.94
1/16/2022 10:00 PM	43.85	5.2	221.77	29.95
1/16/2022 11:00 PM	42.23	5.08	216.25	29.97
1/17/2022 12:00 AM	42.49	7.02	238.1	29.97
1/17/2022 1:00 AM	42.66	8.89	246.37	29.99
1/17/2022 2:00 AM	42.4	10.01	253.62	30.02
1/17/2022 3:00 AM	42.35	7.28	240.31	30.04
1/17/2022 4:00 AM	41.81	6.17	236.82	30.05
1/17/2022 5:00 AM	41.12	7.35	234.3	30.07
1/17/2022 6:00 AM	41.36	10.71	256.86	30.07
1/17/2022 7:00 AM	41.22	7.94	262.97	30.06
1/17/2022 8:00 AM	44.1	7.57	291.44	30.08
1/17/2022 9:00 AM	46.89	10.46	305.18	30.08
1/17/2022 10:00 AM	49.9	8.41	307.89	30.08
1/17/2022 11:00 AM	52.95	7.75	303.7	30.08
1/17/2022 12:00 PM	54.79	9.47	297.93	30.08
1/17/2022 1:00 PM	56.5	7.89	290.52	30.09
1/17/2022 2:00 PM	57.4	8.85	281.25	30.12
1/17/2022 3:00 PM	58.54	8.17	274.14	30.15
1/17/2022 4:00 PM	58.98	6.67	272.15	30.17
1/17/2022 5:00 PM	59.05	4.06	257.38	30.17
1/17/2022 6:00 PM	59.15	2.6	244.59	30.14
1/17/2022 7:00 PM	56	4.76	267.28	30.12
1/17/2022 8:00 PM	53.01	5.94	309.94	30.09
1/17/2022 9:00 PM	52.02	7.32	322.19	30.09
1/17/2022 10:00 PM	51.77	2.43	335.19	30.10
1/17/2022 11:00 PM	51.68	3.06	333.87	30.10
1/18/2022 12:00 AM	51.34	3.76	62.63	30.11
1/18/2022 1:00 AM	51.32	4.06	32.98	30.14
1/18/2022 2:00 AM	48.69	4.94	65.06	30.16
1/18/2022 3:00 AM	47.6	6.15	91.28	30.16
1/18/2022 4:00 AM	46.9	6.08	84.75	30.17
1/18/2022 5:00 AM	46.88	4.04	82.09	30.18
1/18/2022 6:00 AM	46.45	6.59	82.98	30.18
1/18/2022 7:00 AM	47.01	6.03	82.98	30.17

1/18/2022 8:00 AM	49.57	5.36	81.96	30.17
1/18/2022 9:00 AM	53.62	7.21	93.28	30.16
1/18/2022 10:00 AM	56.95	8.98	100.23	30.16
1/18/2022 11:00 AM	59.97	7.64	114.4	30.15
1/18/2022 12:00 PM	61.54	7.89	121.19	30.18
1/18/2022 1:00 PM	62.15	7.45	132.83	30.18
1/18/2022 2:00 PM	62.88	7.01	131.49	30.19
1/18/2022 3:00 PM	62.82	7.39	132.5	30.20
1/18/2022 4:00 PM	62.14	7.99	122.01	30.22
1/18/2022 5:00 PM	60.46	7.95	125.37	30.23
1/18/2022 6:00 PM	58.79	7.17	113.99	30.21
1/18/2022 7:00 PM	56.8	8.21	95.98	30.18
1/18/2022 8:00 PM	55.48	8.27	97.38	30.15
1/18/2022 9:00 PM	55.14	8.71	100.78	30.13
1/18/2022 10:00 PM	55.87	8.74	104.45	30.12
1/18/2022 11:00 PM	55.68	8.34	101.48	30.11
1/19/2022 12:00 AM	55.56	6.54	106.31	30.10
1/19/2022 1:00 AM	55.48	6.97	105.74	30.11
1/19/2022 2:00 AM	55.83	7.34	109.91	30.11
1/19/2022 3:00 AM	56.23	7.68	102.31	30.11
1/19/2022 4:00 AM	56.19	6.94	83.92	30.10
1/19/2022 5:00 AM	56.23	6.86	82.5	30.11
1/19/2022 6:00 AM	56.49	6.55	83.53	30.09
1/19/2022 7:00 AM	57.17	3.33	99.71	30.09
1/19/2022 8:00 AM	59.16	5.1	126.51	30.08
1/19/2022 9:00 AM	62.07	5.38	129.96	30.07
1/19/2022 10:00 AM	64.55	5.88	136.19	30.08
1/19/2022 11:00 AM	67.93	8.36	139.53	30.07
1/19/2022 12:00 PM	69.66	8.91	148.94	30.07
1/19/2022 1:00 PM	70.04	7.97	126.75	30.07
1/19/2022 2:00 PM	71.18	10.07	136.57	30.08
1/19/2022 3:00 PM	71.25	8.92	123.47	30.09
1/19/2022 4:00 PM	70.56	9.41	131.53	30.10
1/19/2022 5:00 PM	68.66	8.44	129.88	30.10
1/19/2022 6:00 PM	67.07	8.48	128.01	30.08
1/19/2022 7:00 PM	65.91	6.63	132.4	30.06

1/19/2022 8:00 PM	65.38	6.31	149.16	30.03
1/19/2022 9:00 PM	64.98	6.07	143.76	30.01
1/19/2022 10:00 PM	64.32	5.38	141.02	30.00
1/19/2022 11:00 PM	64.24	4.88	135.04	29.99
1/20/2022 12:00 AM	64.03	4.95	145.79	29.98
1/20/2022 1:00 AM	63.44	6.67	150.45	29.98
1/20/2022 2:00 AM	63.24	6.31	150.37	30.01
1/20/2022 3:00 AM	63.5	4.42	197.71	30.02
1/20/2022 4:00 AM	63.73	10.69	290.26	30.03
1/20/2022 5:00 AM	60.43	16.14	320.35	30.02
1/20/2022 6:00 AM	59.09	10.83	316.96	30.00
1/20/2022 7:00 AM	58.88	7.34	214.33	29.98
1/20/2022 8:00 AM	53.53	17.67	263.48	29.98
1/20/2022 9:00 AM	47.09	19.75	321.21	29.98
1/20/2022 10:00 AM	45.82	20.72	320.63	29.99
1/20/2022 11:00 AM	45.27	19.01	322.41	30.00
1/20/2022 12:00 PM	44.71	15.65	317.56	30.02
1/20/2022 1:00 PM	43.09	17.27	317.24	30.06
1/20/2022 2:00 PM	42.96	15.04	312.84	30.08
1/20/2022 3:00 PM	41.63	17.14	321.74	30.12
1/20/2022 4:00 PM	40.68	15.74	324.14	30.17
1/20/2022 5:00 PM	40.18	17.59	329.15	30.18
1/20/2022 6:00 PM	40.03	16.25	326.86	30.17
1/20/2022 7:00 PM	39.5	16.19	328.78	30.18
1/20/2022 8:00 PM	38.78	16.67	329.44	30.18
1/20/2022 9:00 PM	37.9	17.86	328.06	30.19
1/20/2022 10:00 PM	37.79	15.95	326.5	30.20
1/20/2022 11:00 PM	37.42	15.76	322.21	30.20
1/21/2022 12:00 AM	36.71	14.69	317.49	30.22
1/21/2022 1:00 AM	35.98	15.38	318.15	30.23
1/21/2022 2:00 AM	35.15	14.17	326.88	30.24
1/21/2022 3:00 AM	34.68	15.02	324.19	30.27
1/21/2022 4:00 AM	34.18	13.56	323.85	30.28
1/21/2022 5:00 AM	34.15	13.65	324.76	30.29
1/21/2022 6:00 AM	34.04	12.22	328.32	30.28
1/21/2022 7:00 AM	33.59	12.97	326.08	30.26

1/21/2022 8:00 AM	33.99	14.33	325.23	30.25
1/21/2022 9:00 AM	34.51	14.32	319.88	30.26
1/21/2022 10:00 AM	34.73	13.86	323.5	30.23
1/21/2022 11:00 AM	35.54	12.13	319.85	30.23
1/21/2022 12:00 PM	36.29	14.29	323.82	30.24
1/21/2022 1:00 PM	37.08	14.16	321.88	30.27
1/21/2022 2:00 PM	37.79	14.92	328.11	30.29
1/21/2022 3:00 PM	39.14	13.13	326.25	30.31
1/21/2022 4:00 PM	40.42	11.34	328.11	30.35
1/21/2022 5:00 PM	40.68	11.24	326.21	30.34
1/21/2022 6:00 PM	40.21	13.25	330.72	30.35
1/21/2022 7:00 PM	39.52	13.5	325.69	30.31
1/21/2022 8:00 PM	38.93	12.66	328.99	30.27
1/21/2022 9:00 PM	37.85	14.21	325.29	30.27
1/21/2022 10:00 PM	36.53	13.95	325.04	30.28
1/21/2022 11:00 PM	35.7	12.66	314.78	30.28

Beacon Environmental
2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

CERTIFICATE OF ANALYSIS

Beacon Proposal No.: 210923H01

Laboratory Work Order: 0006140

Project Description:
Fenceline Monitoring
LaPlace, LA

Client PO No.: 4500027925
Sampling Period: 001
Sample Start Date: 010722

Prepared for:
Patrick Walsh
Denka Performance Elastomer LLC
560 Highway 44
LaPlace, LA 70068

Peter B. Kelly For Ryan W. Schneider
Senior Project Manager

February 04, 2022

All data meet requirements as specified in the Beacon Environmental Quality Assurance Project Plan and the results relate only to the samples reported. The work performed was in accordance with ISO/IEC 17025:2017 and EPA 325B, except compounds reported with ∉ are not included in Beacon's scope of accreditation. This report shall not be reproduced, except in full, without written approval of the laboratory. Release of the data contained in this data package has been authorized by the Laboratory Director or his signee, as verified by the following signatures:

Steven C. Thornley
Laboratory Director

Peter B. Kelly
Quality Manager

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BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Summary

Lab Sample ID	Client Sample ID	Received	Analysis	Matrix
0006140-01	1	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-02	2	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-03	3	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-04	4	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-05	5	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-06	6	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-07	7	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-08	8	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-09	9	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-10	10	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-11	11	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-12	12	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-13	13	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-14	14	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-15	15	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-16	16	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-17	17	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-18	18	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-19	2 Blank	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			
0006140-20	3 Duplicate	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID	Client Sample ID	Received	Analysis	Matrix
0006140-21	8 Duplicate	01/25/2022	EPA 325B	Ambient Air
Sampler Type:	Sorbent Tube			

Project Completeness

Samples Received: 21
Samples Analyzed: 21

BEACON ENVIRONMENTAL

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CERTIFICATE OF ANALYSIS

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Case Narrative

Beacon Environmental provided thermally conditioned stainless steel tubes packed with Carbopack X for sampling, with analyses following U.S. EPA Method 325B and analytical results reported in µg/m3. Beacon calculated concentration results using the sampling period, target analyte mass, average temperature during sampling, and sampling uptake rates in accordance with U.S. EPA Method 325B and EPA's ALT 122 Letter (see Attachments section).

Beacon reports results and reporting limits to three significant digits.

Reporting Limits (RLs) for EPA Method 325B
The RLs represent a baseline above which results meet laboratory-determined limits of precision and accuracy. Beacon performed dilution analysis when results exceeded the upper calibration limit, bringing all reported results within the calibration range. The project method quantitation limit (MQL) is the limit of detection (LOD) as noted in the data tables.

Calibration Verification
All continuing calibration verification (CCV) values are within ±30% of the true values as defined by the initial calibration and met the requirements specified in BEACON's Quality Manual.

Internal Standards and Surrogates
Internal standards and surrogates are spiked on all blanks (ICB, BLK), field samples and laboratory control samples (ICV/CALV, BS, ICV and CCV). Acceptance criteria for internal standards are 60 to 140 percent and surrogate recoveries are 70 to 130 percent; all internal standards and surrogates are within the acceptance criteria unless noted in the **Case Narrative**.

Blank Contamination
No targeted compounds above the limit of detection (LOD) for each compound were observed in the Laboratory Method Blanks.

Laboratory Control Samples
Acceptance criteria for surrogate and analytes recoveries are 70 to 130 percent; all recoveries are within the acceptance criteria unless noted in the **Case Narrative** section.

Discussion
Samples were received in proper condition and laboratory control parameters were met unless otherwise noted below. The work performed was in accordance with ISO/IEC 17025:2017 and EPA 325B, except compounds reported with ∉ are not included in Beacon's scope of accreditation. The sampling uptake rates used are 0.61 ml/min for 1,3-Butadiene and 0.55 ml/min for Chloroprene per U.S. EPA communication dated January 23, 2022 (see Attachements section).

End of Case Narrative

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Analytical Results

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Summary of Compound Detections- Concentration

Lab Sample ID: 0006140-01 **1** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**1.32**		3.148	0.184	0.0919	A22012705.D

Lab Sample ID: 0006140-02 **2** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**1.28**		3.152	0.184	0.0919	A22012706.D

Lab Sample ID: 0006140-03 **3** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.633**		3.151	0.184	0.0919	A22012707.D

Lab Sample ID: 0006140-04 **4** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.481**		3.148	0.184	0.0922	A22012708.D

Lab Sample ID: 0006140-05 **5** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.186**		3.155	0.184	0.0922	A22012709.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Summary of Compound Detections- Concentration

Lab Sample ID: 0006140-06 **6** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.157**	J	3.152	0.184	0.0922	A22012710.D

Lab Sample ID: 0006140-08 **8** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.114**	J	3.148	0.184	0.0918	A22012712.D

Lab Sample ID: 0006140-09 **9** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.210**		3.151	0.184	0.0918	A22012713.D

Lab Sample ID: 0006140-10 **10** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.464**		3.152	0.184	0.0918	A22012714.D

Lab Sample ID: 0006140-11 **11** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.566**		3.158	0.184	0.0918	Ab22012706.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Summary of Compound Detections- Concentration

Lab Sample ID: 0006140-12 **12** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.575**		3.155	0.184	0.0918	Ab22012707.D

Lab Sample ID: 0006140-13 **13** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.511**		3.148	0.184	0.0918	Ab22012708.D

Lab Sample ID: 0006140-14 **14** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.715**		3.152	0.184	0.0918	Ab22012709.D

Lab Sample ID: 0006140-15 **15** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**2.12**		3.152	0.184	0.0919	Ab22012710.D

Lab Sample ID: 0006140-16 **16** Ambient Air Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.594**		3.151	0.184	0.0918	Ab22012711.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Summary of Compound Detections- Concentration

Lab Sample ID: 0006140-17 — **17** — Ambient Air — Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**2.91**		3.151	0.184	0.0919	Ab22012712.D

Lab Sample ID: 0006140-18 — **18** — Ambient Air — Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**1.02**		3.152	0.184	0.0919	Ab22012713.D

Lab Sample ID: 0006140-20 — **3 Duplicate** — Ambient Air — Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.405**		3.148	0.184	0.0919	Ab22012714.D

Lab Sample ID: 0006140-21 — **8 Duplicate** — Ambient Air — Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	RT	LOQ (µg/m³)	LOD (µg/m³)	File ID
≠ **Chloroprene**	126-99-8	**0.160**	J	3.148	0.184	0.0918	Ab22012717.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Data Summary Table- Concentration

Compound	Frequency	LOD (µg/m³)	Max Value (µg/m³)
Chloroprene	17	0.092	2.91

BEACON ENVIRONMENTAL

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CERTIFICATE OF ANALYSIS

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Detailed Analytical Results

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-01 **1** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 10:03	A22012705.D
∉ **Chloroprene**	126-99-8	**1.32**		0.0919	0.184	01/27/2022 10:03	A22012705.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*102%*	*70-130*		*01/27/2022 10:03*	*A22012705.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-02 **2** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 10:30	A22012706.D
∉ **Chloroprene**	126-99-8	**1.28**		0.0919	0.184	01/27/2022 10:30	A22012706.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*103%*	*70-130*		*01/27/2022 10:30*	*A22012706.D*

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CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-03 **3** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 10:57	A22012707.D
∉ **Chloroprene**	126-99-8	**0.633**		0.0919	0.184	01/27/2022 10:57	A22012707.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*102%*	*70-130*		*01/27/2022 10:57*	*A22012707.D*

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-04 **4** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0826	U	0.0826	0.165	01/27/2022 11:24	A22012708.D
∉ **Chloroprene**	126-99-8	**0.481**		0.0922	0.184	01/27/2022 11:24	A22012708.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*103%*	*70-130*		*01/27/2022 11:24*	*A22012708.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-05 **5** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0826	U	0.0826	0.165	01/27/2022 11:52	A22012709.D
∉ **Chloroprene**	126-99-8	**0.186**		0.0922	0.184	01/27/2022 11:52	A22012709.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*92.6%*	*70-130*		*01/27/2022 11:52*	*A22012709.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-06 **6** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0827	U	0.0827	0.165	01/27/2022 12:19	A22012710.D
∉ **Chloroprene**	126-99-8	**0.157**	J	0.0922	0.184	01/27/2022 12:19	A22012710.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*96.7%*	*70-130*		*01/27/2022 12:19*	*A22012710.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-07 **7** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0820	U	0.0820	0.164	01/27/2022 12:46	A22012711.D
∉ Chloroprene	126-99-8	<0.0915	U	0.0915	0.183	01/27/2022 12:46	A22012711.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*92.9%*	*70-130*		*01/27/2022 12:46*	*A22012711.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-08 **8** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 13:13	A22012712.D
∉ **Chloroprene**	126-99-8	**0.114**	J	0.0918	0.184	01/27/2022 13:13	A22012712.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*91.8%*	*70-130*		*01/27/2022 13:13*	*A22012712.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-09 **9** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 13:40	A22012713.D
∉ **Chloroprene**	126-99-8	**0.210**		0.0918	0.184	01/27/2022 13:40	A22012713.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*89.8%*	*70-130*		*01/27/2022 13:40*	*A22012713.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-10 **10** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 14:07	A22012714.D
∉ **Chloroprene**	126-99-8	**0.464**		0.0918	0.184	01/27/2022 14:07	A22012714.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*89.3%*	*70-130*		*01/27/2022 14:07*	*A22012714.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-11 **11** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 17:33	Ab22012706.D
∉ **Chloroprene**	126-99-8	**0.566**		0.0918	0.184	01/27/2022 17:33	Ab22012706.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*101%*	*70-130*		*01/27/2022 17:33*	*Ab22012706.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-12 **12** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 18:00	Ab22012707.D
∉ **Chloroprene**	126-99-8	**0.575**		0.0918	0.184	01/27/2022 18:00	Ab22012707.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*92.7%*	*70-130*		*01/27/2022 18:00*	*Ab22012707.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-13 **13** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 18:27	Ab22012708.D
∉ **Chloroprene**	126-99-8	**0.511**		0.0918	0.184	01/27/2022 18:27	Ab22012708.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*92.0%*	*70-130*		*01/27/2022 18:27*	*Ab22012708.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-14 **14** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 18:54	Ab22012709.D
∉ **Chloroprene**	126-99-8	**0.715**		0.0918	0.184	01/27/2022 18:54	Ab22012709.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*97.7%*	*70-130*		*01/27/2022 18:54*	*Ab22012709.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-15 **15** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 19:21	Ab22012710.D
∉ **Chloroprene**	126-99-8	**2.12**		0.0919	0.184	01/27/2022 19:21	Ab22012710.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*91.9%*	*70-130*		*01/27/2022 19:21*	*Ab22012710.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-16 **16** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 19:48	Ab22012711.D
∉ **Chloroprene**	126-99-8	**0.594**		0.0918	0.184	01/27/2022 19:48	Ab22012711.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*88.1%*	*70-130*		*01/27/2022 19:48*	*Ab22012711.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-17 **17** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 20:15	Ab22012712.D
∉ **Chloroprene**	126-99-8	**2.91**		0.0919	0.184	01/27/2022 20:15	Ab22012712.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*97.2%*	*70-130*		*01/27/2022 20:15*	*Ab22012712.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-18 **18** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 20:42	Ab22012713.D
∉ **Chloroprene**	126-99-8	**1.02**		0.0919	0.184	01/27/2022 20:42	Ab22012713.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*86.5%*	*70-130*		*01/27/2022 20:42*	*Ab22012713.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-19

2 Blank

Ambient Air

Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 17:05	Ab22012705.D
∉ Chloroprene	126-99-8	<0.0919	U	0.0919	0.184	01/27/2022 17:05	Ab22012705.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*99.7%*	*70-130*		*01/27/2022 17:05*	*Ab22012705.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-20

3 Duplicate

Ambient Air

Method: EPA 325B

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0824	U	0.0824	0.165	01/27/2022 21:10	Ab22012714.D
∉ **Chloroprene**	126-99-8	**0.405**		0.0919	0.184	01/27/2022 21:10	Ab22012714.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*87.6%*	*70-130*		*01/27/2022 21:10*	*Ab22012714.D*

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Lab Sample ID: 0006140-21 **8 Duplicate** Method: EPA 325B

Ambient Air

Analyte	CAS#	Result (µg/m³)	Q	LOD (µg/m³)	LOQ (µg/m³)	Analyzed	File ID
∉ 1,3-Butadiene	106-99-0	<0.0823	U	0.0823	0.165	01/27/2022 22:25	Ab22012717.D
∉ **Chloroprene**	126-99-8	**0.160**	J	0.0918	0.184	01/27/2022 22:25	Ab22012717.D

Analyte	*CAS#*	*% Recovery*	*Recovery Limits*	*Q*	*Analyzed*	*File ID*
Surrogate: 1,2-DCA-d4	17060-07-0	*80.7%*	*70-130*		*01/27/2022 22:25*	*Ab22012717.D*

BEACON ENVIRONMENTAL

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

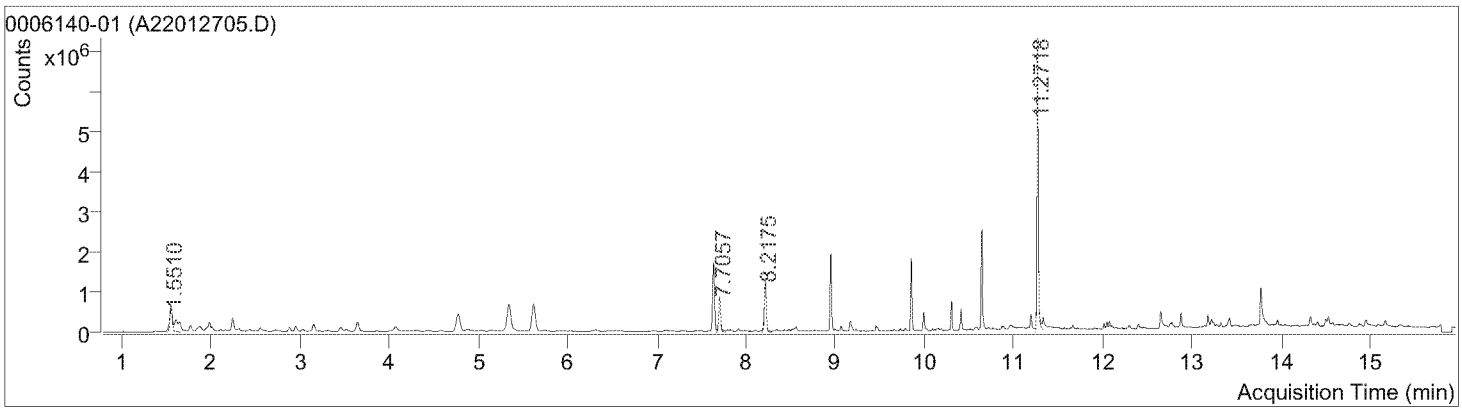
CERTIFICATE OF ANALYSIS

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

TIC Summary Report

BEACON TICs Analysis Report

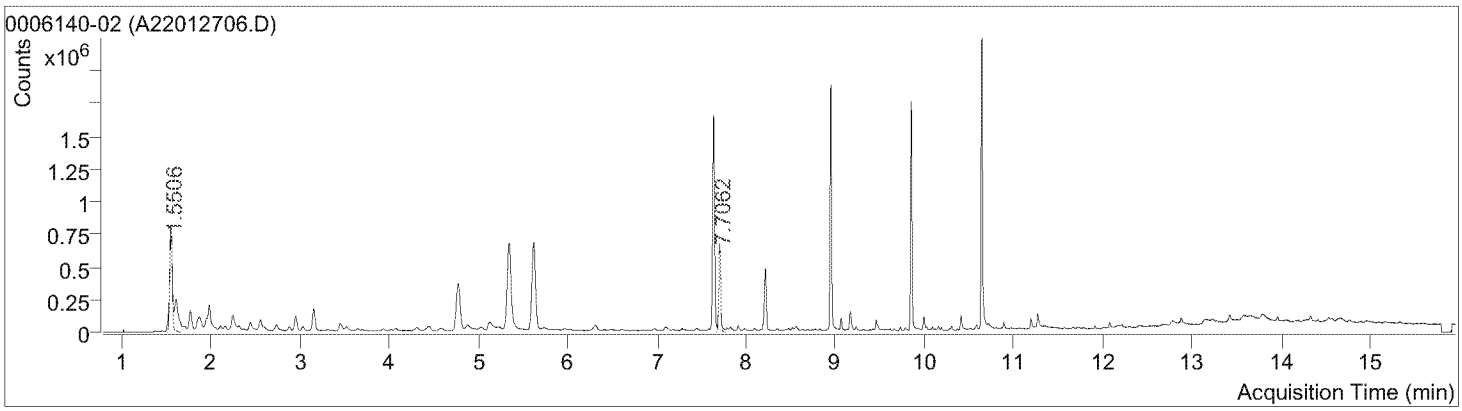
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012705.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-01	**Client Sample**	1, CX_11, 1
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 10:03:36 AM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5510	Methane, chloro-	74-87-3	CH3Cl	1125740	97.9	14
7.7057	Toluene	108-88-3	C7H8	1253938	98.4	16
8.2175	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	1870350	98.8	24
11.2718	Acetophenone	98-86-2	C8H8O	7945377	98.2	100

BEACON TICs Analysis Report

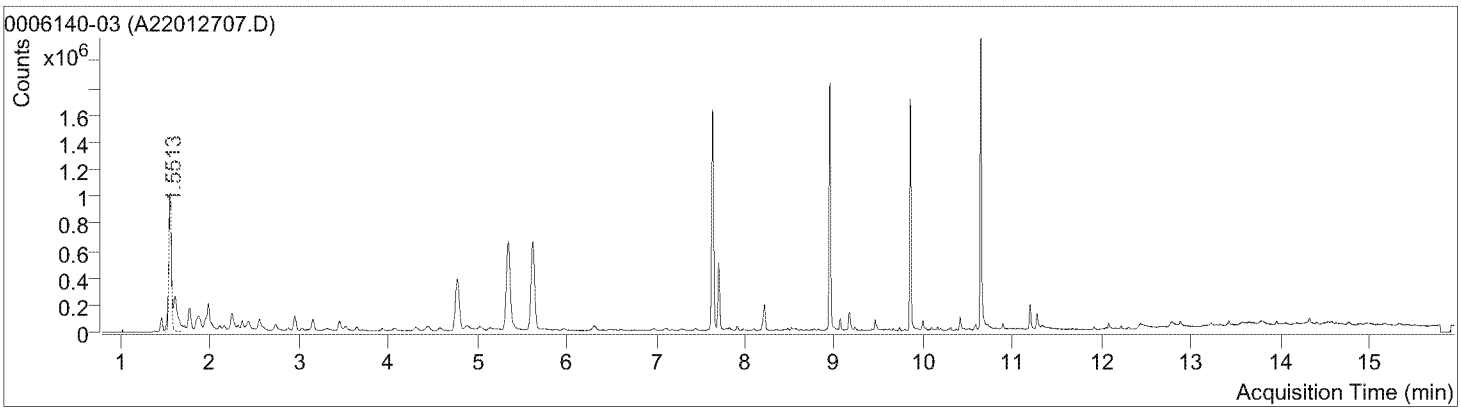
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012706.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-02	**Client Sample**	1, CX_12, 2
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 10:30:42 AM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5506	Methane, chloro-	74-87-3	CH3Cl	1493247	99.3	19
7.7062	Toluene	108-88-3	C7H8	945778	98.5	12

BEACON TICs Analysis Report

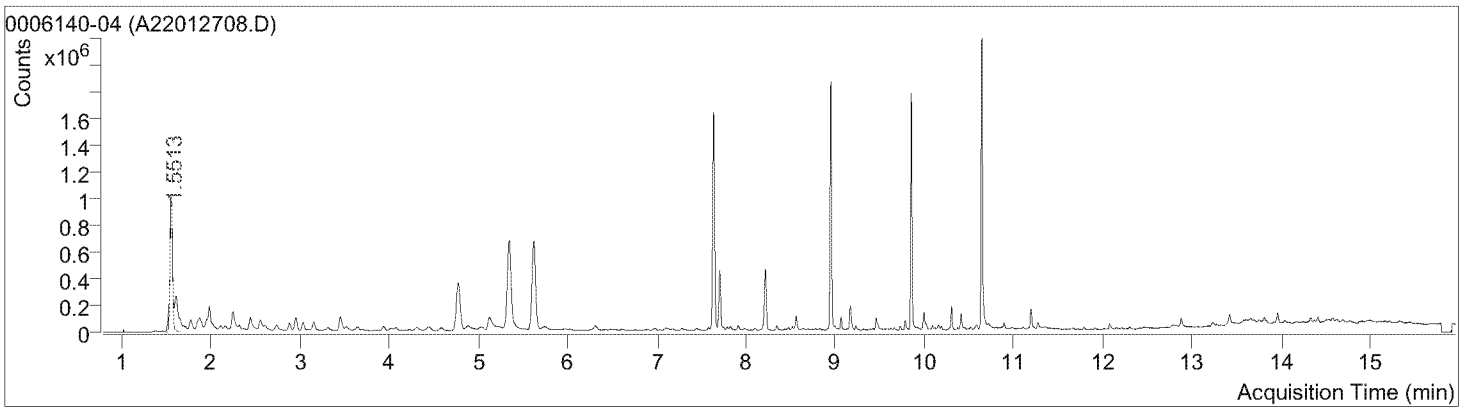
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012707.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-03	**Client Sample**	1, CX_13, 3
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 10:57:48 AM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5513	Methane, chloro-	74-87-3	CH3Cl	1910060	98.6	25

BEACON TICs Analysis Report

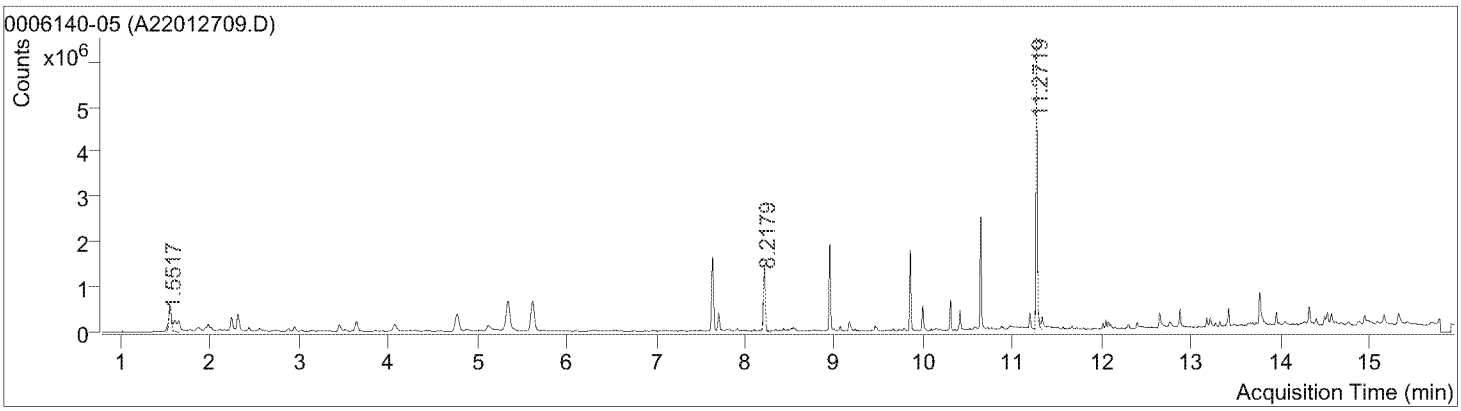
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012708.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-04	**Client Sample**	1, CX_14, 4
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 11:24:59 AM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5513	Methane, chloro-	74-87-3	CH3Cl	1902556	99.3	24

BEACON TICs Analysis Report

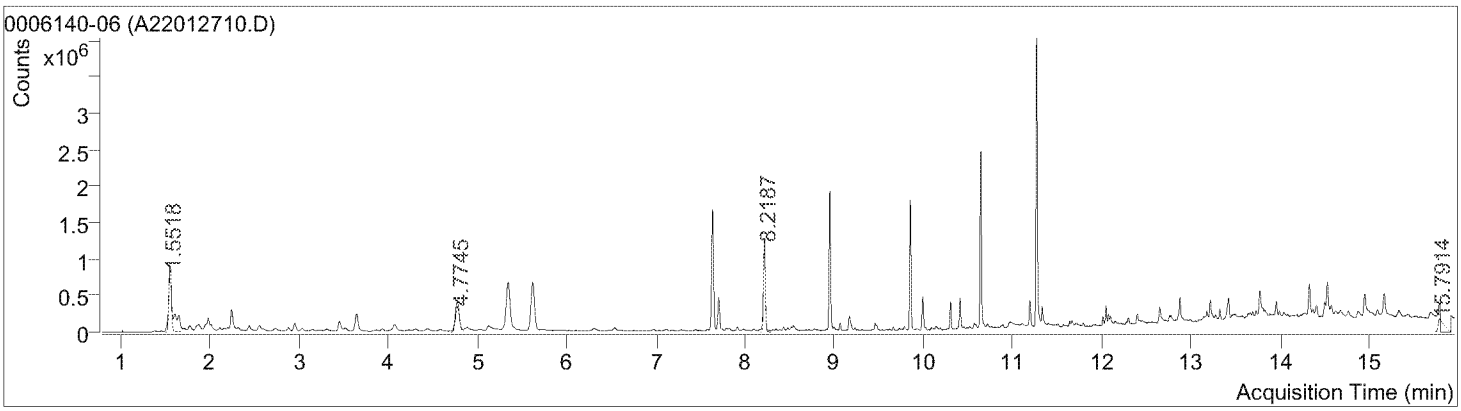
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012709.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-05	**Client Sample**	1, CX_15, 5
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 11:52:07 AM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5517	Methane, chloro-	74-87-3	CH3Cl	1020390	98.8	13
8.2179	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	2083867	98.9	27
11.2719	Acetophenone	98-86-2	C8H8O	7050840	98.1	93

BEACON TICs Analysis Report

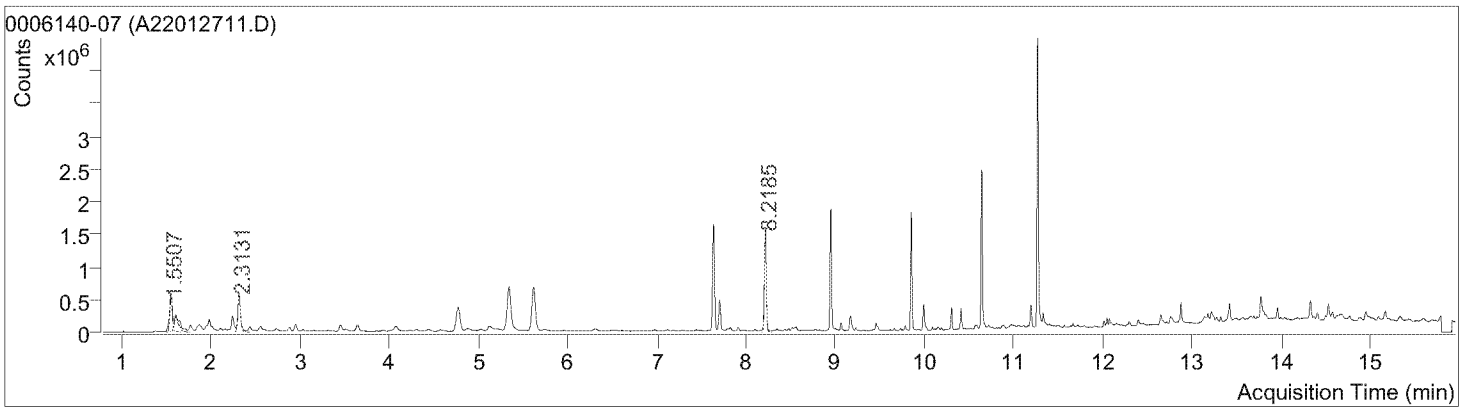
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012710.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-06	**Client Sample**	1, CX_16, 6
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 12:19:17 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5518	Methane, chloro-	74-87-3	CH3Cl	1702843	99.1	22
4.7745	Benzene	71-43-2	C6H6	1073690	83.4	14
8.2187	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	1808259	98.8	23
15.7914	Isopropyl Myristate	110-27-0	C17H34O2	811313	86.1	10

BEACON TICs Analysis Report

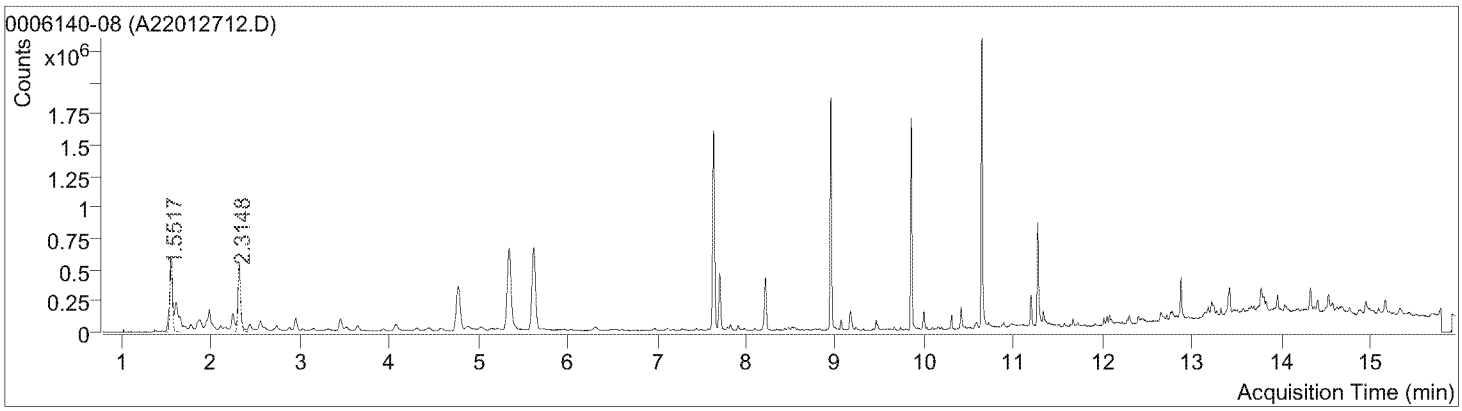
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012711.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-07	**Client Sample**	1, CX_17, 7
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 12:46:23 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5507	Methane, chloro-	74-87-3	CH3Cl	1039858	98.0	14
1.6053	Butane	106-97-8	C4H10	807099	82.6	11
2.3131	Methane, iodo-	74-88-4	CH3I	1127498	99.6	15
8.2185	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	2317407	98.8	30

BEACON TICs Analysis Report

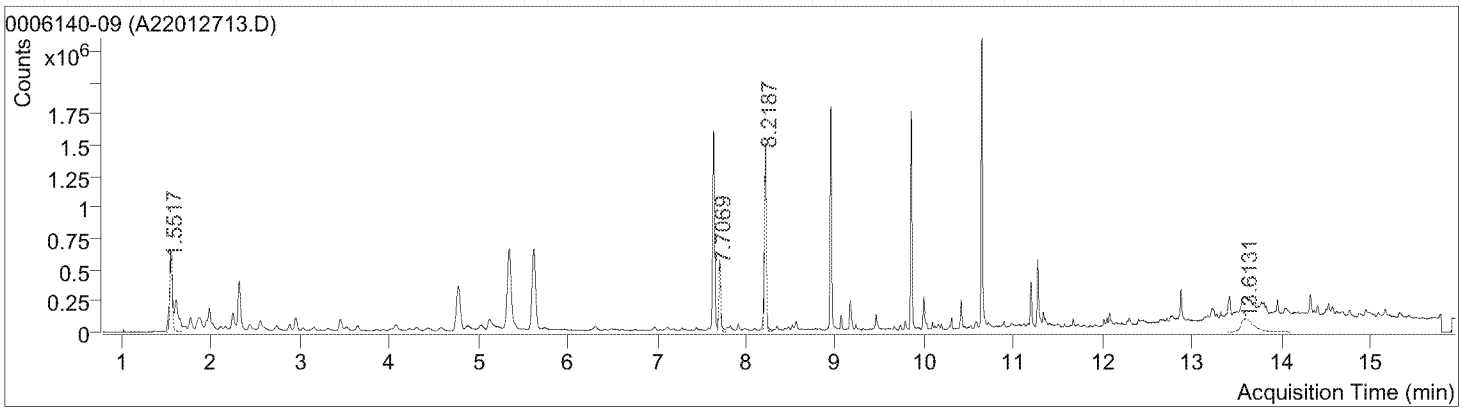
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012712.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-08	**Client Sample**	1, CX_18, 8
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 1:13:31 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5517	Methane, chloro-	74-87-3	CH3Cl	1072567	99.2	14
2.3148	Methane, iodo-	74-88-4	CH3I	1076704	99.3	14

BEACON TICs Analysis Report

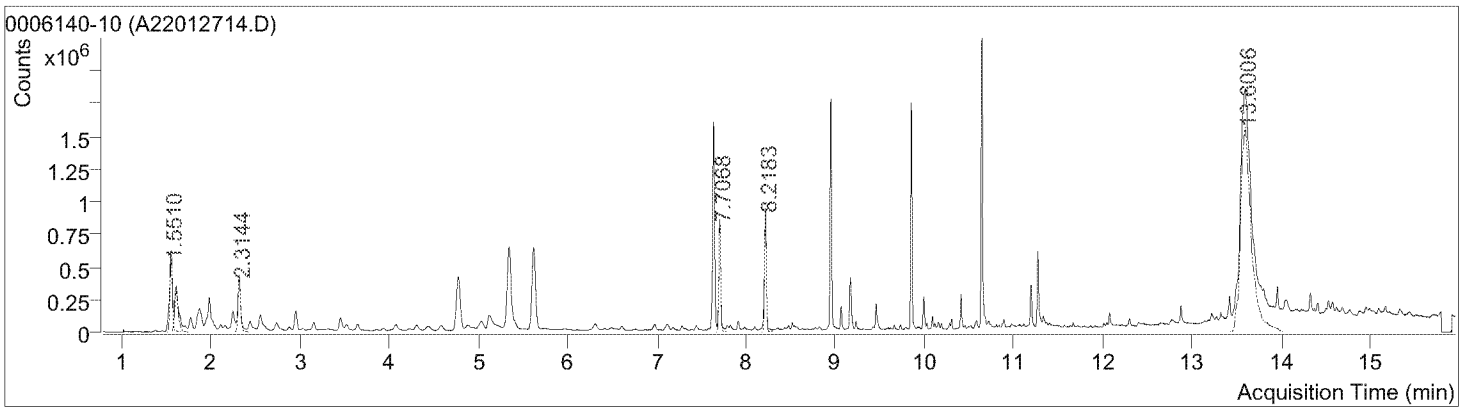
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012713.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-09	**Client Sample**	1, CX_19, 9
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 1:40:42 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5517	Methane, chloro-	74-87-3	CH3Cl	1205800	99.1	16
7.7069	Toluene	108-88-3	C7H8	804986	98.4	11
8.2187	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	2162713	99.0	28
13.6131	Benzene, 1,1'-sulfonylbis[4-chloro-	80-07-9	C12H8Cl2O2S	1059819	89.7	14

BEACON TICs Analysis Report

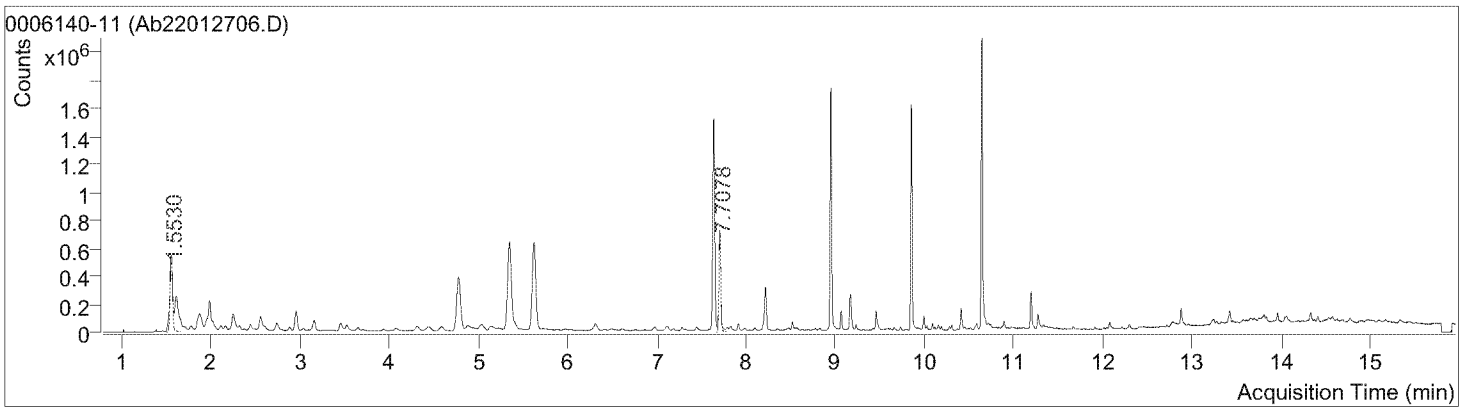
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	A22012714.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-10	**Client Sample**	1, CX_20, 10
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 2:07:48 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5510	Methane, chloro-	74-87-3	CH3Cl	1067387	99.2	15
1.6081	Butane	106-97-8	C4H10	881626	88.2	12
2.3144	Methane, iodo-	74-88-4	CH3I	821629	99.5	11
7.7068	Toluene	108-88-3	C7H8	1235937	98.6	17
8.2183	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	1350932	98.7	18
13.6006	Benzene, 1,1'-sulfonylbis[4-chloro-	80-07-9	C12H8Cl2O2S	13333343	93.6	181

BEACON TICs Analysis Report

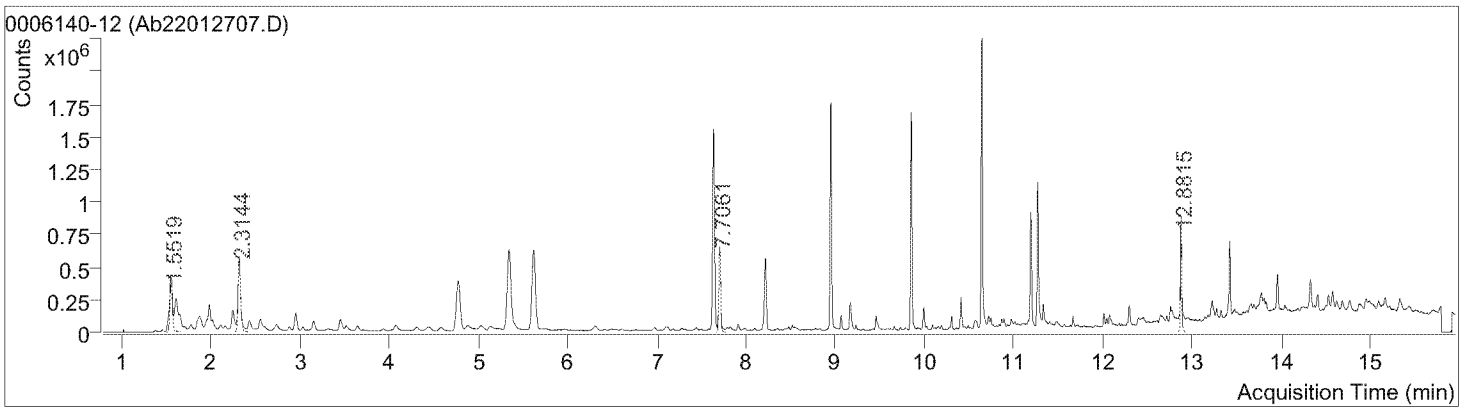
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012706.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-11	**Client Sample**	1, CX_52, 11
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 5:33:11 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5530	Methane, chloro-	74-87-3	CH3Cl	1003967	98.4	14
7.7078	Toluene	108-88-3	C7H8	1016823	98.5	14

BEACON TICs Analysis Report

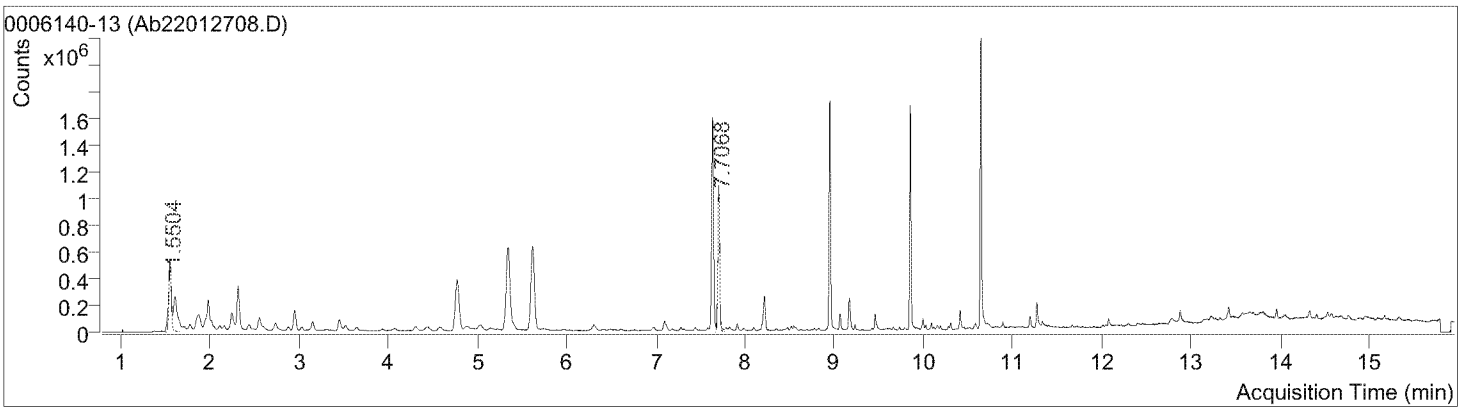
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012707.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-12	**Client Sample**	1, CX_53, 12
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 6:00:21 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5519	Methane, chloro-	74-87-3	CH3Cl	752324	99.6	10
2.3144	Methane, iodo-	74-88-4	CH3I	1111762	99.6	15
7.7061	Toluene	108-88-3	C7H8	922197	98.5	13
12.8815	Tetradecane	629-59-4	C14H30	776931	97.0	11

BEACON TICs Analysis Report

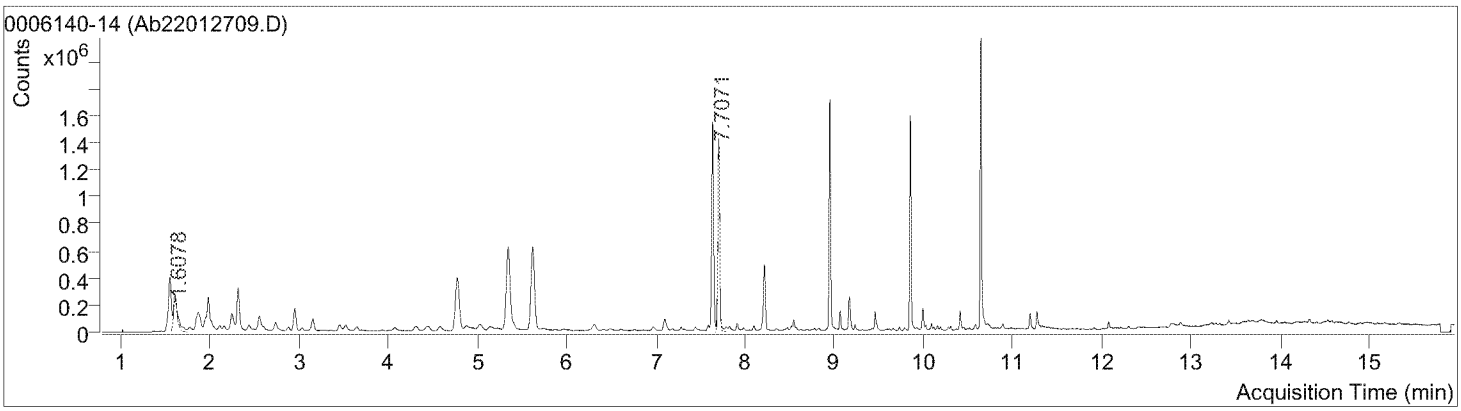
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012708.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-13	**Client Sample**	1, CX_54, 13
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 6:27:30 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5504	Methane, chloro-	74-87-3	CH3Cl	946228	98.7	13
7.7068	Toluene	108-88-3	C7H8	1557353	98.7	21

BEACON TICs Analysis Report

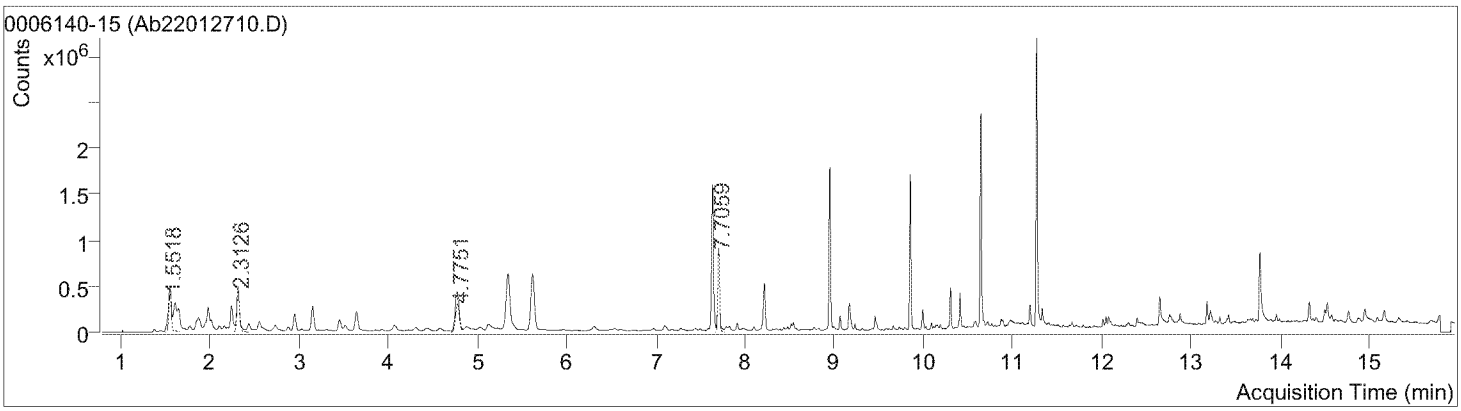
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012709.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-14	**Client Sample**	1, CX_55, 14
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 6:54:41 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.6078	Butane	106-97-8	C4H10	735844	88.3	10
7.7071	Toluene	108-88-3	C7H8	2082433	98.7	29

BEACON TICs Analysis Report

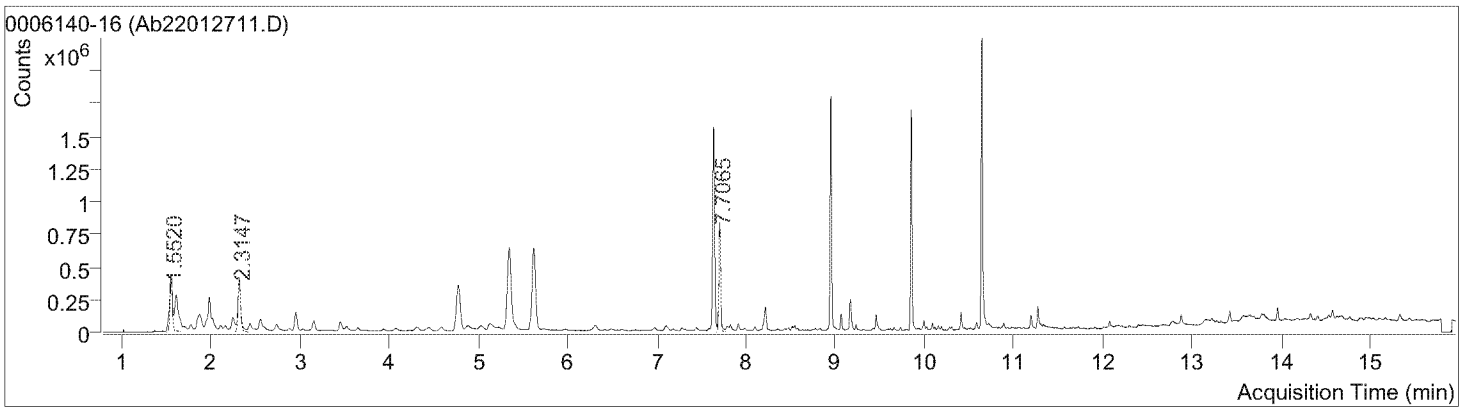
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012710.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-15	**Client Sample**	1, CX_56, 15
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 7:21:43 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5518	Methane, chloro-	74-87-3	CH3Cl	852317	98.0	12
2.3126	Methane, iodo-	74-88-4	CH3I	952642	99.0	13
4.7751	Benzene	71-43-2	C6H6	929012	94.8	13
7.7059	Toluene	108-88-3	C7H8	1307959	98.4	18

BEACON TICs Analysis Report

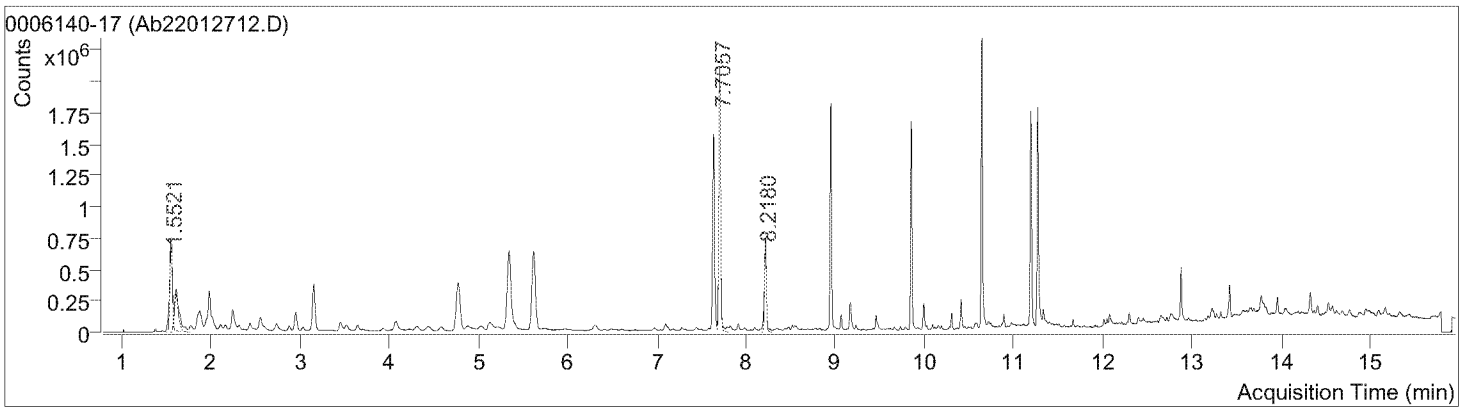
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012711.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-16	**Client Sample**	1, CX_57, 16
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 7:48:46 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5520	Methane, chloro-	74-87-3	CH3Cl	758450	98.6	10
2.3147	Methane, iodo-	74-88-4	CH3I	800251	99.5	11
7.7065	Toluene	108-88-3	C7H8	1169205	98.6	16

BEACON TICs Analysis Report

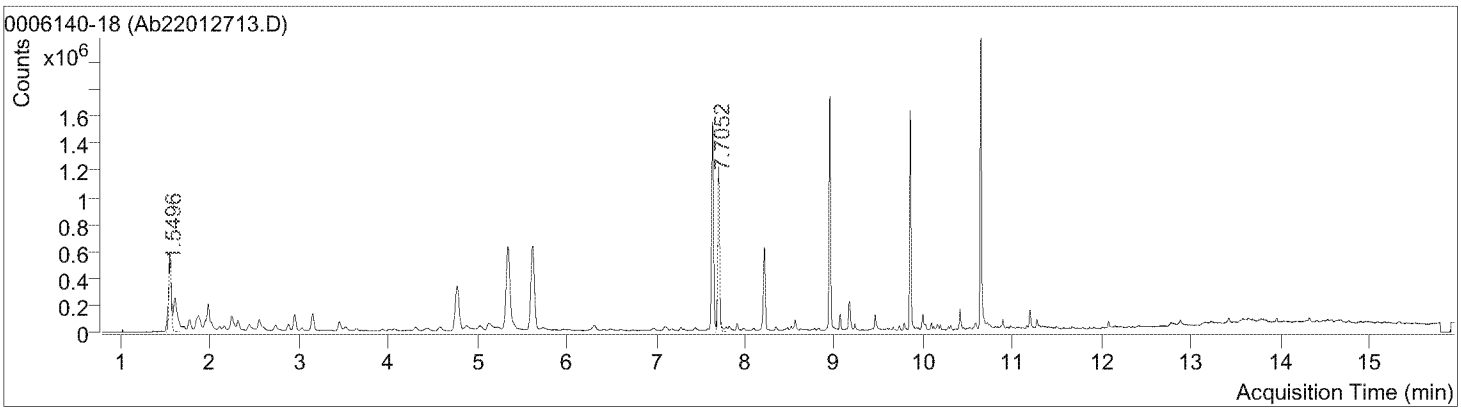
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012712.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-17	**Client Sample**	1, CX_58, 17
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 8:15:53 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5521	Methane, chloro-	74-87-3	CH3Cl	1361862	99.2	19
1.6061	Butane	106-97-8	C4H10	948595	88.6	13
7.7057	Toluene	108-88-3	C7H8	3015193	98.8	41
8.2180	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	1063047	98.6	15

BEACON TICs Analysis Report

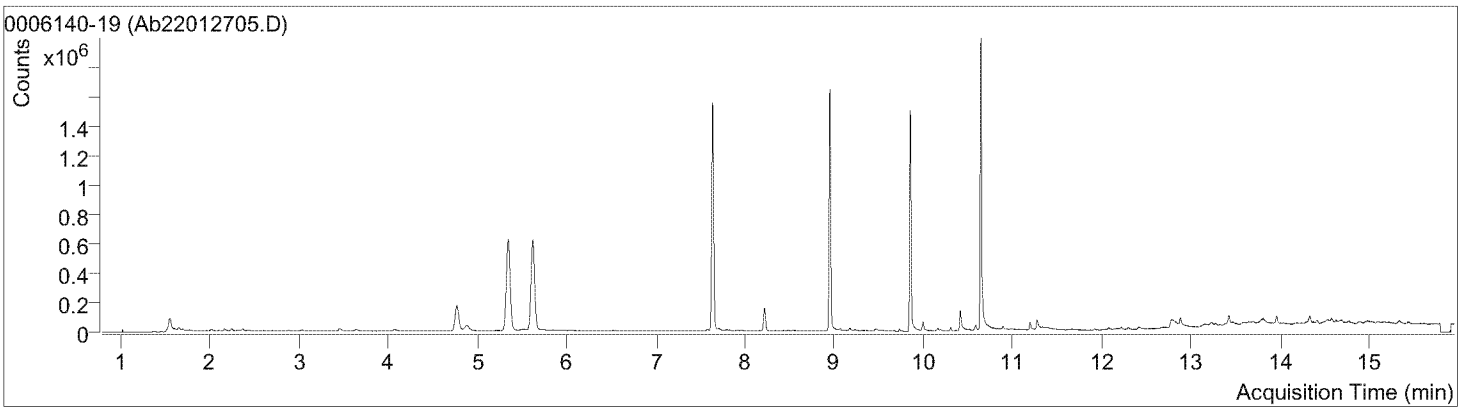
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012713.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-18	**Client Sample**	1, CX_59, 18
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 8:42:56 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5496	Methane, chloro-	74-87-3	CH3Cl	1036924	99.0	14
7.7052	Toluene	108-88-3	C7H8	1757856	98.6	24

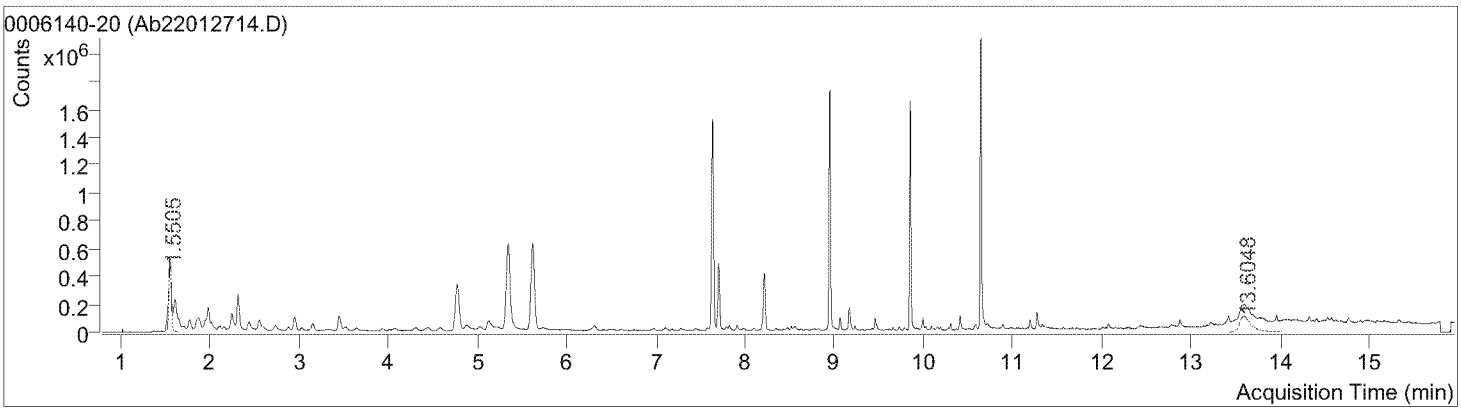
BEACON TICs Analysis Report

Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012705.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-19	**Client Sample**	1, CX_51, 2 Blank
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 5:05:57 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



BEACON TICs Analysis Report

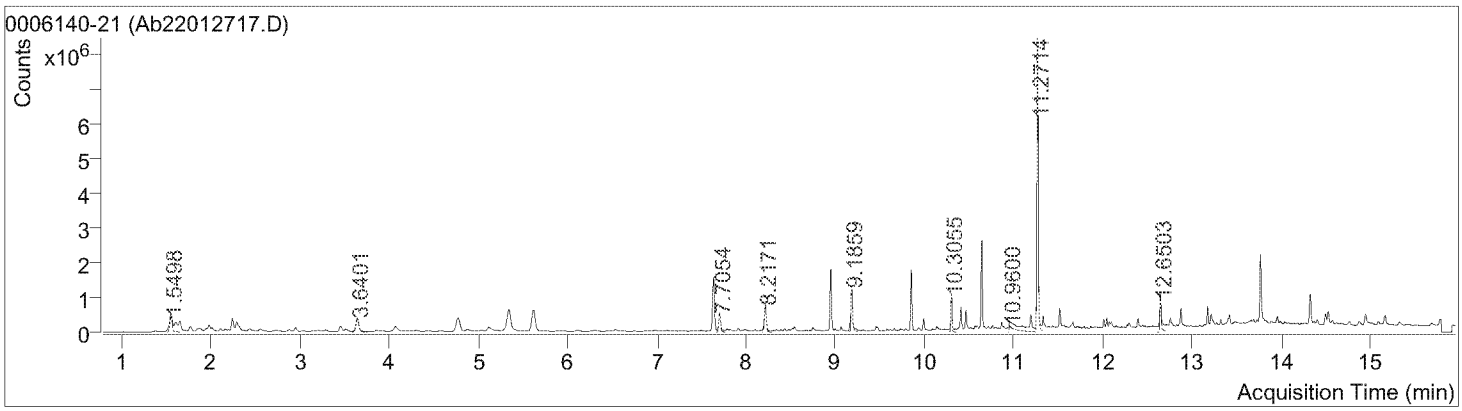
Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012714.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-20	**Client Sample**	1, CX_60, 3 Duplicate
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 9:10:03 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5505	Methane, chloro-	74-87-3	CH3Cl	952118	98.7	13
13.6048	Benzene, 1,1'-sulfonylbis[4-chloro-	80-07-9	C12H8Cl2O2S	1046503	86.5	14

BEACON TICs Analysis Report

Batch Path	Z:\GCMS\data\22\01\A220127a		
Analysis File Name	a220127a & b abov3 10ng fixed.uaf		
Analyst Name	Admin		
Analysis Time	01/28/2022 9:16:13 AM		
Data File Name	Ab22012717.D	**Data Path Name**	Z:\GCMS\data\22\01\A220127a
Sample Name	0006140-21	**Client Sample**	1, CX_63, 8 Duplicate
Acq Method File	etuneVOA	**Acq Method Path**	C:\Users\Chemstation1\Desktop\methods\
Acq Time	01/27/2022 10:25:47 PM	**Operator**	PBK
Instrument Name	A_system_5977b	**Dilution**	1



Component RT	Compound Name	CAS#	Formula	Area	Match Score	ng
1.5498	Methane, chloro-	74-87-3	CH3Cl	855772	98.4	12
3.6401	Benzene, 1,3,5-trifluoro-	372-38-3	C6H3F3	880764	93.7	12
7.7054	Toluene	108-88-3	C7H8	742580	96.1	10
8.2171	Cyclotrisiloxane, hexamethyl-	541-05-9	C6H18O3Si3	1107332	98.3	15
9.1859	3-Furaldehyde	498-60-2	C5H4O2	1524182	95.9	21
10.3055	.alpha.-Methylstyrene	98-83-9	C9H10	982429	97.4	14
10.9600	Phenol	108-95-2	C6H6O	830044	92.1	11
11.2714	Acetophenone	98-86-2	C8H8O	8740365	98.0	121
12.6503	2-Thio-2,4-oxazolidinedione	2346-24-9	C3H3NO2S	1086594	83.6	15

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

QC Information/Summary

BEACON ENVIRONMENTAL

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LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A052 - Instrument: A System - File ID: A22011814.D

B22A052-ICV1 (LCSD/Second Source Verification/CALV)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	22.6	2	1	ng	25.0		90.6	70-130			
Chloroprene	23.2	2	1	ng	25.0		93.0	70-130			
Surrogate: 1,2-DCA-d4	*22.9*			*ng*	25.0		*91.6*	*70-130*			

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A052 - Instrument: A System - File ID: A22011817.D

B22A052-ICB1 (Lab Blank/Initial Calibration Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<1	2	1	ng							U
Chloroprene	<1	2	1	ng							U
Surrogate: 1,2-DCA-d4	*23.1*			*ng*	25.0		*92.4*	*70-130*			

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A075 - Batch: 22A0064 - Instrument: A System - File ID: A22012702.D

22A0064-BS1 (LCS, Calibration Source Verification)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	25.4	2	1	ng	25.0		102	70-130			
Chloroprene	25.8	2	1	ng	25.0		103	70-130			
Surrogate: 1,2-DCA-d4	*27.3*			*ng*	25.0		*109*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A075 - Batch: 22A0064 - Instrument: A System - File ID: A22012703.D

22A0064-BLK1 (Lab Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<0.082	0.164	0.082	µg/m³							U
Chloroprene	<0.091	0.182	0.091	µg/m³							U
Surrogate: 1,2-DCA-d4	*26.4*			*ng*	25.0		*106*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A075 - Instrument: A System - File ID: A22012704.D

B22A075-ICV1 (LCSD/Second Source Verification/CALV)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	21.4	2	1	ng	25.0		85.6	70-130			
Chloroprene	23.6	2	1	ng	25.0		94.5	70-130			
Surrogate: 1,2-DCA-d4	*26.3*			*ng*	25.0		*105*	*70-130*			

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A075 - Instrument: A System - File ID: A22012715.D

B22A075-CCV1 (Continuing Calibration Verification)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	24.3	2	1	ng	25.0		97.3	70-130			
Chloroprene	24.4	2	1	ng	25.0		97.5	70-130			
Surrogate: 1,2-DCA-d4	*25.2*			*ng*	25.0		*101*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A075 - Instrument: A System - File ID: A22012716.D

B22A075-CCB1 (Lab Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<1	2	1	ng							U
Chloroprene	<1	2	1	ng							U
Surrogate: 1,2-DCA-d4	*24.7*			*ng*	25.0		*98.8*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Batch: 22A0066 - Instrument: A System - File ID: Ab22012702.D

22A0066-BS1 (LCS, Calibration Source Verification)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	25.6	2	1	ng	25.0		102	70-130			
Chloroprene	25.9	2	1	ng	25.0		104	70-130			
Surrogate: 1,2-DCA-d4	*25.7*			*ng*	25.0		*103*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Batch: 22A0066 - Instrument: A System - File ID: Ab22012703.D

22A0066-BLK1 (Lab Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<0.082	0.164	0.082	µg/m³							U
Chloroprene	<0.091	0.182	0.091	µg/m³							U
Surrogate: 1,2-DCA-d4	*25.2*			*ng*	25.0		*101*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Instrument: A System - File ID: Ab22012704.D

B22A077-ICV1 (LCSD/Second Source Verification/CALV)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	22.0	2	1	ng	25.0		88.0	70-130			
Chloroprene	24.4	2	1	ng	25.0		97.6	70-130			
Surrogate: 1,2-DCA-d4	*25.0*			*ng*	25.0		*99.9*	*70-130*			

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Instrument: A System - File ID: Ab22012715.D

B22A077-CCV1 (Continuing Calibration Verification)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	23.9	2	1	ng	25.0		95.6	70-130			
Chloroprene	25.0	2	1	ng	25.0		100	70-130			
Surrogate: 1,2-DCA-d4	*25.0*			*ng*	25.0		*100*	*70-130*			

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Instrument: A System - File ID: Ab22012716.D

B22A077-CCB1 (Lab Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<1	2	1	ng							U
Chloroprene	<1	2	1	ng							U
Surrogate: 1,2-DCA-d4	*23.6*			*ng*	25.0		*94.4*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Instrument: A System - File ID: Ab22012718.D

B22A077-CCV2 (Continuing Calibration Verification)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	24.8	2	1	ng	25.0		99.3	70-130			
Chloroprene	24.9	2	1	ng	25.0		99.5	70-130			
Surrogate: 1,2-DCA-d4	*21.6*			*ng*	25.0		*86.4*	*70-130*			

BEACON ENVIRONMENTAL

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS - Quality Control Summary

Sequence: B22A077 - Instrument: A System - File ID: Ab22012719.D

B22A077-CCB2 (Lab Blank)

Analyte	Result	LOQ	LOD	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
1,3-Butadiene	<1	2	1	ng							U
Chloroprene	<1	2	1	ng							U
Surrogate: 1,2-DCA-d4	*23.7*			*ng*	25.0		*95.0*	*70-130*			

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

EPA 325B - LCS/LCSD Quality Control Summary

LCS: 22A0064-BS1 File ID: A22012702.D Analyzed: 1/27/22 9:24

LCSD: B22A075-ICV1 File ID: A22012704.D Analyzed: 1/27/22 8:36

Analyte	CAS#	LCS Result (ng)	%REC	Q	Spike Level (ng)	LCSD Result (ng)	%REC	%REC Limits	RPD	RPD Limit	Q
1,3-Butadiene	106-99-0	25.44	101.76		25	21.39	85.60	70-130	17.30	30	
Chloroprene	126-99-8	25.82	103.28		25	23.63	94.50	70-130	8.86	30	

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LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

EPA 325B - LCS/LCSD Quality Control Summary

LCS: 22A0066-BS1 File ID: Ab22012702.D Analyzed: 1/27/22 16:38

LCSD: B22A077-ICV1 File ID: Ab22012704.D Analyzed: 1/27/22 15:50

Analyte	CAS#	LCS Result (ng)	%REC	Q	Spike Level (ng)	LCSD Result (ng)	%REC	%REC Limits	RPD	RPD Limit	Q
1,3-Butadiene	106-99-0	25.56	102.24		25	21.99	88.00	70-130	15.02	30	
Chloroprene	126-99-8	25.94	103.76		25	24.4	97.60	70-130	6.12	30	

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Duplicate RPD Summary

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS

Duplicate Sample: 3 Duplicate (0006140-20) ***Sample: 3 (0006140-03)*** ***Average RPD:*** 22.0%

Analyte	CAS#	Duplicate Result (µg/m³)	LOD (µg/m³)	Q	Sample Result (µg/m³)	RPD (%)		RPD Limit	Q
1,3-Butadiene	106-99-0	<0.0824	0.0824	U	<0.0824	0.0		30	U
Chloroprene	126-99-8	0.405	0.0919		0.633	43.9	+	30	

Notes: + Field Duplicate RPD out of laboratory acceptance limits.

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Duplicate RPD Summary

Organics in Air/Fugitive and Area Sources by EPA 325B Using GC/MS

Duplicate Sample: 8 Duplicate (0006140-21) ***Sample: 8 (0006140-08)*** ***Average RPD:*** 16.8%

Analyte	CAS#	Duplicate Result (µg/m³)	LOD (µg/m³)	Q	Sample Result (µg/m³)	RPD (%)	RPD Limit	Q
1,3-Butadiene	106-99-0	<0.0823	0.0823	U	<0.0823	0.0	30	U
Chloroprene	126-99-8	0.160	0.0918	J	0.114	33.6 +	30	J

Notes: + Field Duplicate RPD out of laboratory acceptance limits.

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Additional QC Information

BEACON ENVIRONMENTAL

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560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Result Calculation Summary (Concentration)

EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial Result ng	C Calculated Result µg/m³	File ID
Lab ID: 0006140-01 **Sample Name:** 1					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	U	U	A22012705.D
Chloroprene	20,253	1.00	0.537	14.41	1.32	A22012705.D
Lab ID: 0006140-02 **Sample Name:** 2					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	U	U	A22012706.D
Chloroprene	20,252	1.00	0.537	13.94	1.28	A22012706.D
Lab ID: 0006140-03 **Sample Name:** 3					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	U	U	A22012707.D
Chloroprene	20,253	1.00	0.537	6.89	0.633	A22012707.D
Lab ID: 0006140-04 **Sample Name:** 4					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,187	1.00	0.600	U	U	A22012708.D
Chloroprene	20,187	1.00	0.537	5.22	0.481	A22012708.D
Lab ID: 0006140-05 **Sample Name:** 5					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,180	1.00	0.600	U	U	A22012709.D
Chloroprene	20,180	1.00	0.537	2.02	0.186	A22012709.D
Lab ID: 0006140-06 **Sample Name:** 6					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,172	1.00	0.600	U	U	A22012710.D
Chloroprene	20,172	1.00	0.537	1.70	0.157	A22012710.D
Lab ID: 0006140-07 **Sample Name:** 7					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,333	1.00	0.600	U	U	A22012711.D
Chloroprene	20,333	1.00	0.537	U	U	A22012711.D
Lab ID: 0006140-08 **Sample Name:** 8					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,274	1.00	0.600	U	U	A22012712.D
Chloroprene	20,274	1.00	0.537	1.24	0.114	A22012712.D
Lab ID: 0006140-09 **Sample Name:** 9					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,271	1.00	0.600	U	U	A22012713.D
Chloroprene	20,271	1.00	0.537	2.29	0.210	A22012713.D
Lab ID: 0006140-10 **Sample Name:** 10					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,266	1.00	0.600	U	U	A22012714.D
Chloroprene	20,266	1.00	0.537	5.05	0.464	A22012714.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

2203A Commerce Road, Suite 1
Forest Hill, MD 21050 USA
1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Result Calculation Summary (Concentration)

EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial Result ng	C Calculated Result µg/m³	File ID
Lab ID: 0006140-11 **Sample Name:** 11					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,268	1.00	0.600	U	U	Ab22012706.D
Chloroprene	20,268	1.00	0.537	6.17	0.566	Ab22012706.D
Lab ID: 0006140-12 **Sample Name:** 12					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	U	U	Ab22012707.D
Chloroprene	20,261	1.00	0.537	6.26	0.575	Ab22012707.D
Lab ID: 0006140-13 **Sample Name:** 13					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	U	U	Ab22012708.D
Chloroprene	20,261	1.00	0.537	5.56	0.511	Ab22012708.D
Lab ID: 0006140-14 **Sample Name:** 14					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,260	1.00	0.600	U	U	Ab22012709.D
Chloroprene	20,260	1.00	0.537	7.78	0.715	Ab22012709.D
Lab ID: 0006140-15 **Sample Name:** 15					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,256	1.00	0.600	U	U	Ab22012710.D
Chloroprene	20,256	1.00	0.537	23.13	2.12	Ab22012710.D
Lab ID: 0006140-16 **Sample Name:** 16					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	U	U	Ab22012711.D
Chloroprene	20,261	1.00	0.537	6.47	0.594	Ab22012711.D
Lab ID: 0006140-17 **Sample Name:** 17					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,249	1.00	0.600	U	U	Ab22012712.D
Chloroprene	20,249	1.00	0.537	31.65	2.91	Ab22012712.D
Lab ID: 0006140-18 **Sample Name:** 18					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	U	U	Ab22012713.D
Chloroprene	20,252	1.00	0.537	11.06	1.02	Ab22012713.D
Lab ID: 0006140-19 **Sample Name:** 2 Blank					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	U	U	Ab22012705.D
Chloroprene	20,252	1.00	0.537	U	U	Ab22012705.D
Lab ID: 0006140-20 **Sample Name:** 3 Duplicate					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	U	U	Ab22012714.D
Chloroprene	20,253	1.00	0.537	4.41	0.405	Ab22012714.D

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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1.410.838.8780

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Result Calculation Summary (Concentration)

EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial Result ng	C Calculated Result µg/m³	File ID
Lab ID: 0006140-21 **Sample Name:** 8 Duplicate					**X̄ Temp (°C):** 12.00	
1,3-Butadiene	20,274	1.00	0.600	U	U	Ab22012717.D
Chloroprene	20,274	1.00	0.537	1.74	0.160	Ab22012717.D

Calculations:

$$C = \frac{1000 \times M \times DF}{Uc \times t}$$

$$Uc = U * \left(\left(\frac{Ts + 273.15}{Tu + 273.15}\right)^{1/2}\right)$$

where:
- C = concentration (µg/m³)
- M = mass (ng)
- DF = dilution factor
- Uc = uptake rate (ml/min), corrected
- t = sampling time (minutes)
- U = compound specific uptake rate
- Tu = uptake rate study temperature
- Ts = sample average temperature

Note: Tu is 22°C for 1,3-Butadiene and 25.5° for Chloroprene

Reference: Federal Register/Vol. 79, No. 125/June 30, 2014

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Method Detection and Reporting Limit Calculations (Concentration)
EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial (ng) LOQ	M Initial (ng) LOD	C Calculated (µg/m³) LOQ	C Calculated (µg/m³) LOD
Lab ID: 0006140-01	**Sample Name:** 1					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,253	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-02	**Sample Name:** 2					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,252	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-03	**Sample Name:** 3					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,253	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-04	**Sample Name:** 4					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,187	1.00	0.600	2.0	1.00	0.165	0.0826
Chloroprene	20,187	1.00	0.537	2.0	1.00	0.184	0.0922
Lab ID: 0006140-05	**Sample Name:** 5					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,180	1.00	0.600	2.0	1.00	0.165	0.0826
Chloroprene	20,180	1.00	0.537	2.0	1.00	0.184	0.0922
Lab ID: 0006140-06	**Sample Name:** 6					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,172	1.00	0.600	2.0	1.00	0.165	0.0827
Chloroprene	20,172	1.00	0.537	2.0	1.00	0.184	0.0922
Lab ID: 0006140-07	**Sample Name:** 7					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,333	1.00	0.600	2.0	1.00	0.164	0.0820
Chloroprene	20,333	1.00	0.537	2.0	1.00	0.183	0.0915
Lab ID: 0006140-08	**Sample Name:** 8					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,274	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,274	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-09	**Sample Name:** 9					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,271	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,271	1.00	0.537	2.0	1.00	0.184	0.0918

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Method Detection and Reporting Limit Calculations (Concentration)
EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial (ng) LOQ	M Initial (ng) LOD	C Calculated (µg/m³) LOQ	C Calculated (µg/m³) LOD
Lab ID: 0006140-10	**Sample Name:** 10					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,266	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,266	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-11	**Sample Name:** 11					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,268	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,268	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-12	**Sample Name:** 12					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,261	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-13	**Sample Name:** 13					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,261	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-14	**Sample Name:** 14					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,260	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,260	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-15	**Sample Name:** 15					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,256	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,256	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-16	**Sample Name:** 16					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,261	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,261	1.00	0.537	2.0	1.00	0.184	0.0918
Lab ID: 0006140-17	**Sample Name:** 17					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,249	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,249	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-18	**Sample Name:** 18					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,252	1.00	0.537	2.0	1.00	0.184	0.0919

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CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Method Detection and Reporting Limit Calculations (Concentration)

EPA 325B

Analyte	t Sampling Time minutes	DF Dilution Factor	Uc Uptake Rate	M Initial (ng) LOQ	M Initial (ng) LOD	C Calculated (µg/m³) LOQ	C Calculated (µg/m³) LOD
Lab ID: 0006140-19	**Sample Name:** 2 Blank					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,252	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,252	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-20	**Sample Name:** 3 Duplicate					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,253	1.00	0.600	2.0	1.00	0.165	0.0824
Chloroprene	20,253	1.00	0.537	2.0	1.00	0.184	0.0919
Lab ID: 0006140-21	**Sample Name:** 8 Duplicate					**x̄ Temp (°C):** 12.00	
1,3-Butadiene	20,274	1.00	0.600	2.0	1.00	0.165	0.0823
Chloroprene	20,274	1.00	0.537	2.0	1.00	0.184	0.0918

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CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Laboratory Certification List

Certification ID	Certification No.	Description	Expires	Project Required
Alaska CS-LAP	19-002	Alaska Department of Environmental Conservation	01/31/2023	
DoD-ELAP	L20-532-R1	United States Department of Defense Environmental Laboratory Accreditation	12/31/2022	
ISO/IEC 17025:2017	L20-532	General Requirements for the competence of Testing and Calibration Laboratories	12/31/2022	
NEFAP	72690/L20-533	TNI National Environmental Field Activities Program (NEFAP)	12/31/2022	
NY-NELAC	12097	New York Department of Health	04/01/2022	
Utah-NELAC	MD010912021-9	Utah Department of Health	12/31/2022	

BEACON ENVIRONMENTAL

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Forest Hill, MD 21050 USA
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CERTIFICATE OF ANALYSIS

Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Qualifiers/Notes and Definitions

General Definitions:

DF	Dilution Factor
DL	Detection Limit
LOD	Limit of Detection
LOQ	Limit of Quantitation
NA	Not Applicable
Q	Qualifier
RPD	Relative Percent Difference
RT	Retention Times in Minutes
RRT	Evaluation of Relative Retention Times in RRT Units (qualified if outside $\pm$0.06 control limits)
3σ	Uncertainty
$\notin$	Compound not on scope of accreditation
+	values are outside method/contract required QC limits
$\varnothing$	Compound not on scope of accreditation and analyzed with a one-point calibration

Sample/Sample Receipt Qualifiers and Notes:

J	Value reported below limit of quantitation (LOQ).
U	Analyte was not detected and is reported as less than the limit of detection (LOD). The LOD has been adjusted for any dilution or concentration of the sample.

BEACON ENVIRONMENTAL

CERTIFICATE OF ANALYSIS

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Denka Performance Elastomer LLC	**Site Name:** Fenceline Monitoring	**Beacon Proposal:** 210923H01
560 Highway 44	**Site Location:** LaPlace, LA	**Lab Work Order:** 0006140
LaPlace, LA 70068	**Project Manager:** Patrick Walsh	**Reported:** 02/04/2022

Sample Management Records

BEACON ENVIRONMENTAL
2203A Commerce Rd, Suite 1
Forest Hill, MD 21050, USA
1-410-838-8780
800-878-5510 Toll Free

PASSIVE AIR SAMPLING – SORBENT TUBE CHAIN-OF-CUSTODY

Client Information		
Company: Denka Performance Elastomer LLC	Project Manager: Patrick Walsh	Client PO:
Address: 560 Highway 44	Project Name: 325 Monitoring	Turn around time (check one): ☑ Normal ☐ Rush (specify) ____ days
City / State / Zip: Laplace, LA 70068	Location: Plant Perimeter	Analysis: ☐ Method TO-17 ☑ Method 325
Phone: 1-985-536-7575	Submitted by: Mitchell Costanza	
	Email: patrick-walsh@denka-pe.com	

Location ID	Tube ID	Start Date	Start Time	Stop Date	Stop Time	Avg Temp (C)	Target Compounds	INDOOR AIR	AMBIENT AIR	CRAWL SPACE	SEWER GAS
1	1178020	1/7/22	9:23	1/21/22	10:56	Provided by Denka 12°C	1,3 Butadiene; Chloroprene; TICs		✓		
2	1178017		9:29		11:01	Pass 1/25/22 12°C			✓		
3	1178138		9:34		11:07	12°C			✓		
4	1178320		12:38		13:05	12°C			✓		
5	1178274		12:57		13:17	12°C			✓		
6	1178212		13:16		13:29	12°C			✓		
7	1178339		10:53		13:46	12°C			✓		
8	1178143		10:29		12:23	12°C			✓		
9	1178147		10:13		12:04	12°C			✓		
10	1178149		10:09		11:55	12°C			✓		
11	1178162		10:00		11:48	12°C			✓		
12	1178209		9:57		11:38	12°C			✓		
13	1178071		9:52		11:33	12°C			✓		
14	1178073		9:49		11:29	12°C			✓		
15	1178079		9:45		11:21	12°C			✓		

Special Notes / Instructions:

Relinquished by (signature): Mitchell Costanza	Date / Time: 1/24/22 13:00	Received by (signature): Peter Kelly	Date / Time: 1/25/2022 1215
Relinquished by (signature):	Date / Time:	Received by (signature):	Date / Time:
For Lab Use Only	Beacon Job No: 6140	Beacon Proposal: 210923H01	
Courier Name: Fedex	Shipment Condition: Good	Custody Seal Intact: ☑ Yes ☐ No ☐ n/a	Custody Seal No: 401 2201

BEACON ENVIRONMENTAL
2203A Commerce Rd, Suite 1
Forest Hill, MD 21050, USA
1-410-838-8780
800-878-5510 Toll Free

PASSIVE AIR SAMPLING - SORBENT TUBE CHAIN-OF-CUSTODY

Client Information		
Company: Denka Performance Elastomer LLC	Project Manager: Patrick Walsh	Client PO:
Address: 560 Highway 44	Project Name: 325 Monitoring	Turn around time (check one): ☑ Normal ☐ Rush (specify) ____ days
City / State / Zip: Laplace, LA 70068	Location: Plant Perimeter	
Phone: 1-985-536-7525	Submitted by: Mitchell Castanza	Analysis: ☐ Method TO-17 ☑ Method 325
	Email: patrick-walsh@denka-pe.com	

Location ID	Tube ID	Start Date	Start Time	Stop Date	Stop Time	Avg. Temp (C)	Target Compounds	INDOOR AIR	AMBIENT AIR	CRAWL SPACE	SEWER GAS
16	1178048	1/7/22	8:37	1/21/22	10:18	Provided by Denka 12°C	1,3 Butadiene; Chloroprene; TICs		✓		
17	1178043		9:15		10:44	12°C			✓		
18	1178024		9:19		10:51	12°C			✓		
2 Blank	1178314		9:29		11:01	—			✓		
3 Duplicate	1178100		9:34		11:07	12°C			✓		
8 Duplicate	1178397		10:29		12:23	12°C			✓		

Special Notes / Instructions:

Relinquished by (signature): Mitchell Castanza	Date / Time: 1/24/22 1300	Received by (signature): Peter Kelly	Date / Time: 1/25/2022 1015
Relinquished by (signature):	Date / Time:	Received by (signature):	Date / Time:
For Lab Use Only	Beacon Job No: 6140	Beacon Proposal: 210923H01	
Courier Name: Fedex	Shipment Condition: Good	Custody Seal Intact: ☑ Yes ☐ No ☐ n/a	Custody Seal No: 4012201

Pg 2 of 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 11 2017

J. Derek Reese
GHG and Air Quality Advisor
Safety, Security, Health & Environment
22777 Springwoods Village Parkway
Spring, TX 77389

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Reese:

I am writing in response to your letter dated August 7, 2017, requesting approval for use of alternative testing procedures to Methods 325A and 325B (40 CFR 63, Appendix A) for fenceline monitoring at certain ExxonMobil facilities. Your letter indicates that fenceline monitoring is required under 40 CFR 63, Subpart CC, National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (Subpart CC), for the following refineries:

ExxonMobil Baton Rouge Refinery 4999 Scenic Hwy Baton Rouge, LA 70805	ExxonMobil Beaumont Refinery 1795 Burt St Beaumont, TX 77701
ExxonMobil Baton Rouge Chemical Plant 4999 Scenic Hwy Baton Rouge, LA 70805	ExxonMobil Beaumont Chemical Plant 11440 Highway 90 Beaumont, TX 77713
ExxonMobil Baytown Refinery 2800 Decker Dr. Baytown, Texas 77520	ExxonMobil Billings Refinery 700 ExxonMobil Rd. Billings, MT 59101
ExxonMobil Baytown Chemical Plant 5000 Bayway Dr Baytown, Texas 77522	ExxonMobil Joliet Refinery 25915 SE Frontage Road Joliet, IL 60410
ExxonMobil Baytown Olefins Plant 5000 Bayway Dr Baytown, Texas 77522	

Your letter included several specific alternative testing and method clarification requests, including:

1) **Temperature and pressure corrections.** As an alternative to section 12.2 of Method 325B, equations 12.5 and 12.6, you requested use of a simplified equation to correct for temperature and pressure in the calculation of fenceline concentrations of target compounds.

2) **Sample Collection Timing**. You requested an alternative to the requirements of section 8.4.1 in Method 325A and section 63.658(e)(1) of Subpart CC that specify 14-day sampling periods as routine with provision for a minimum of 13 and a maximum of 15 days to allow for extenuating circumstances. You point out that it may not always be possible to comply with

the 13- to 15-day requirement and request that there be further provision for modifying the sampling period under extreme conditions such as a hurricane, blizzard, flooding, power failure, or other emergency which would not permit safe access to the samplers.

3) **Duplicate and Field Blank Samples.** As an alternative to Method 325A, section 8.5.5, you requested that facilities be allowed to collect one co-located duplicate sample and one field blank per sampling period for facilities with 19 or fewer monitoring locations. If there are 20 or more monitoring locations, you requested an alternative to collect two co-located duplicate samples per sampling period and one field blank per sampling period. You also requested comporting clarification of the number and use of duplicate samples in sections 9.4 and 9.9 of Method 325B.

4) **Duplicate Sample Calculations.** Clarification for how co-located duplicate samples are used to calculate rule specified difference in concentration between the highest and the lowest measured concentration during a sampling period (ΔC) values.

The EPA plans to make several revisions to the fenceline monitoring requirements in Methods 325A and 325B as well as the related requirements in Subpart CC for petroleum refineries to facilitate implementation of the monitoring requirements. To expedite the availability of these planned revisions and facilitate implementation of the fenceline monitoring now being conducted, we are approving the following alternatives.

- **Temperature and Pressure Corrections**

Replacement of equations 12.5 and 12.6 in section 12.2 of Method 325B, with a single equation for temperature and pressure correction:

$$C_c = \frac{(m_{meas}) * 10^6}{U_{NTP} * \left[\frac{T_{SS}}{298}\right]^{\frac{1}{2}} * t}$$

Where:
C_c = The concentration of target compound at normal ambient temperature and pressure (μg/m^3),
m_{meas} = Mass of compound as measured on the sorbent tube (μg),
U_{NTP}= Diffusive uptake rate at normal ambient temperature and pressure (ml/min),
t = Sampling duration (minutes), and
T_{SS} = Average temperature during the collection period at the sampling site (K).

- **Sample Collection Timing**

When extenuating circumstances do not permit safe deployment or retrieval of passive samplers (i.e., extreme weather, power failure), sampler placement or retrieval earlier or later than the prescribed schedule is allowed, but must occur as soon as safe access to sampling sites is possible. When the sampling period is adjusted outside the 13- to 15-calendar day range, the reason must be recorded and reported in the next routine reporting cycle. Otherwise, except as provided in paragraph 63.658(e)(3) of 40 CFR 63, Subpart CC, the frequency of sample

collection shall be once each contiguous 14-day sampling period, such that the beginning of the each 14-day sampling period begins immediately upon the completion of the previous 14-day sampling period.

- **Duplicate and Field Blank Samples**

In sections 8.5.5 and 9.3.1 of Method 325A, an allowance for field blank and field duplicate sample collection as follows:

- If there are 19 or fewer monitoring locations, collect at least one co-located duplicate sample per sampling period and at least one field blank per sampling period.
- If there are 20 or more monitoring locations, collect at least two co-located duplicate samples per sampling period and at least one field blank per sampling period.

To comport with the allowance above, in regard to sections 8.3.2 and 9.4 of Method 325B, we are clarifying that the following samples will be required:

- Laboratory blanks as specified in section 9.1.2 (one per analytical sequence minimum), and
- Continuing calibration verification sample (CCV) tubes as specified in section 10.9.4. (at least one per analysis sequence or every 24 hours).
- Duplicate samples must be analyzed and reported as part of method quality control. They are used to evaluate sampling and analysis precision. The concentrations for co-located duplicates will be averaged for the purpose of determining results required in 40 CFR 63, Subpart CC.

A copy of this approval letter must be included in the report for each testing program where these alternative testing procedures are applied. Should the alternative approvals authorized in this letter be superseded by formal actions to revise Method 325A, Method 325B, and/or 40 CFR 63, Subpart CC, this approval may be rescinded. Since these alternative procedures are applicable to all of the facilities subject to 40 CFR 63, Subpart CC, we will announce on EPA's Web site (*https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods*) that our approval of this alternative is broadly applicable to fenceline monitoring under this subpart.

If you have any questions regarding this approval or need further assistance, please contact Ray Merrill at (919) 541-5225 or *merrill.raymond@epa.gov* or Robin Segall at (919) 541-0893 or *segall.robin@epa.gov*.

Sincerely,

Steffan M. Johnson, Group Leader
Measurement Technology Group

cc.

Jennifer Caparoso EPA/OAQPS/SPPD
Gerri Garwood EPA/OAQPS/SPPD
Brenda Shine EPA/OAQPS/SPPD
Maria Malave EPA/OECA
EPA Regional Testing Contacts

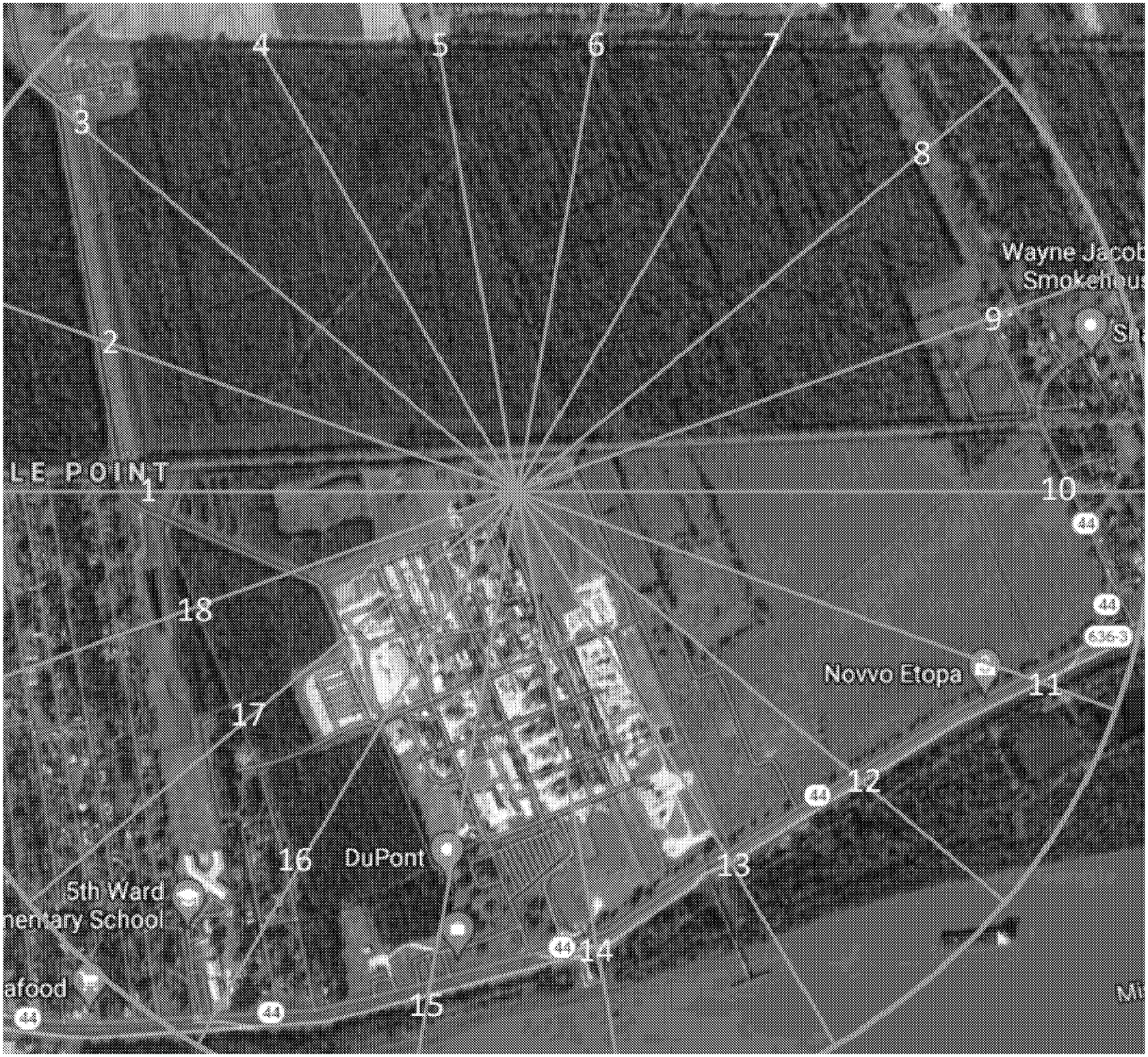
From: "Spina, Providence"
Date: January 23, 2022 at 9:27:52 AM EST

Subject: Denka - CAA 114 Information Request - Fenceline Monitoring - Uptake Rate

Section III, Requirement 1.e requires DPE to "use an estimated uptake rate of 0.5 ml/min for chloroprene, regardless of sampling period until otherwise informed by EPA." In my December 13, 2021 e-mail, EPA expressly stated that DPE should instead use an uptake rate of 0.55 mL/min developed by Enthalpy (we realize that the December 13 e-mail used the incorrect units for the uptake rate; the correct units are expressed here). Accordingly, Denka's selected lab, Beacon Environmental, must use the 0.55 mL/min uptake rate developed by Enthalpy in analyzing Denka's Method 325 samples required under the Information Request. The uptake rate developed by Enthalpy is publicly available and EPA has no proprietary concerns with Beacon's use of that uptake rate.

Please let me know if you have any questions.

Providence Spina, Attorney-Advisor
U.S. Environmental Protection Agency
Office of Civil Enforcement, Air Enforcement Division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Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 8/16/2022 1:42:29 PM
To: Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Denka inspection reports

I just heard that the administrator's office has asked that we delay posting the inspection reports until after a meeting scheduled with the Administrator this Thursday. So, we won't be posting today after all. It would still be good to pull them down and do the review.

Thanks,
Margaret

From: Osbourne, Margaret
Sent: Monday, August 15, 2022 8:37 PM
To: Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Denka inspection reports

Can you please pull down the newly redacted inspection reports from Denka and review them? We are slated to post them to the R6 website tomorrow (August 16). If there's anything we need to discuss prior to posting, please let me know.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Venn, Brett [bvenn@joneswalker.com]
Sent: 8/12/2022 4:39:50 PM
To: Holden, Bob [bholden@joneswalker.com]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Craig Easley [craig.easley@la.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Christopher Meyers (christopher-meyers@denka-pe.com) [christopher-meyers@denka-pe.com]; Jason B. Hutt (jason.hutt@bracewell.com) [jason.hutt@bracewell.com]; Kevin M. Voelkel (kevin.voelkel@bracewell.com) [kevin.voelkel@bracewell.com]; Bartholomew, Trey [tbartholomew@joneswalker.com]
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI
Attachments: Attachment 1_Redacted.pdf; Attachment 7 proposed redaction.pdf

Please see attached CBI-redacted Attachment 1 and Attachment 7 to the May 5 inspection report.

Brett S. Venn | Partner
Jones Walker LLP
D: 504.582.8116 | M: 504.451.1170
bvenn@joneswalker.com

From: Holden, Bob <bholden@joneswalker.com>
Sent: Thursday, August 11, 2022 8:49 PM
To: 'Penland, John' <Penland.John@epa.gov>; 'Yurk, Jeffrey' <yurk.jeffrey@epa.gov>; 'Osbourne, Margaret' <osbourne.margaret@epa.gov>; 'Craig Easley' <craig.easley@la.gov>; 'Deppe.Fred@epa.gov' <Deppe.Fred@epa.gov>
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>; Venn, Brett <bvenn@joneswalker.com>
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI

Hi John,

As we discussed yesterday and today, we have further reviewed for CBI the attachments to the May inspection report, and have made further CBI redactions to the table of the samples in Attachment 1, and to Attachment 7, specifically noted on pages i–ii; 1-2; and in Attachment E to Attachment 7, page 5. We have not identified CBI in Attachment 8.

You can find redacted copies of Attachments 1 and 7 on the Sharefile (line below) in the 8-11-22 folder.

https://joneswalker.sharefile.com/f/foa26bbb-df0a-4ba1-a3d8-d1cb5e043034

I believe that you already have instructions on the use of the Sharefile account.

We look forward to talking at 11:30 AM CDT tomorrow.

Bob

Robert E. Holden | Partner
Jones Walker LLP
D: 504.582.8139
BHolden@joneswalker.com

From: Holden, Bob
Sent: Monday, August 8, 2022 6:39 PM
To: Penland, John <Penland.John@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret

<osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>; Deppe.Fred@epa.gov
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>
Subject: RE: DPE April Inspection Report Attachments and May Inspection Report, Redactions for CBI

Dear Mr. Penland and all:

On behalf of Denka Performance Elastomer LLC (DPE), we appreciate the opportunity to assert Confidential Business Information (CBI) protection from public disclosure of confidential process, trade secret, and business information contained in the appendices to the Resource Conservation and Recovery Act (RCRA) Inspection Report for the inspection of the DPE facility on April 18 – 21, 2022 and in the report and attachments to the RCRA Inspection Report for the inspection of the DPE facility on May 5, 2022.

Per the discussions between DPE counsel and EPA, we are submitting DPE's CBI-redactions of the following via this Sharefile: https://joneswalker.sharefile.com/f/fo374615-9d76-4725-9221-4393e9c641a0

1. Appendices to April Inspection Report
2. May Inspection Report
3. Attachments to May Inspection Report

We will separately each of you an email with Sharefile instructions and login information.

We are also submitting in the Sharefile CBI-redacted and unredacted copies of DPE's proposed Attachment 5.1 to the May report. We request that you replace Attachment 5 with DPE's proposed Attachment 5.1. Attachment 5 to the report is an out-of-date version of the Raw Materials Characteristics and Hazards document that EPA reviewed during the inspection and quotes in the May report. Attachment 5.1 is the updated version of the document. EPA's reliance on Attachment 5 resulted in an error in the May report. In the "Respiratory Protection of Facility Personnel" part of Section IV (page 7), it states that the AEL for chloroprene in air is .2 ppm (parts per million). This is incorrect. The proper calculation is actually 2 ppm. Attachment 5 states .2 ppm. Proposed Attachment 5.1 correctly states 2 ppm – see page 4 under "CD Chloroprene – CAS #126-99-8."

We will provide a written response to the Areas of Concern in the May report within 30 days of today (September 7).

Please let us know if you have any questions or comments about this.

Robert E. Holden | Partner
Jones Walker LLP
D: 504.582.8139
BHolden@joneswalker.com

From: Holden, Bob
Sent: Friday, August 5, 2022 4:58 PM
To: 'Penland, John' <Penland.John@epa.gov>; 'Yurk, Jeffrey' <yurk.jeffrey@epa.gov>; 'Osbourne, Margaret' <osbourne.margaret@epa.gov>; 'Craig Easley' <craig.easley@la.gov>; 'Deppe.Fred@epa.gov' <Deppe.Fred@epa.gov>
Cc: Christopher Meyers (christopher-meyers@denka-pe.com) <christopher-meyers@denka-pe.com>; Jason B. Hutt (jason.hutt@bracewell.com) <jason.hutt@bracewell.com>; Kevin M. Voelkel (kevin.voelkel@bracewell.com) <kevin.voelkel@bracewell.com>; Bartholomew, Trey <tbartholomew@joneswalker.com>
Subject: DPE April Inspection Report, Redactions for CBI

Dear Mr. Penland and all:

On behalf of Denka Performance Elastomer LLC (DPE), we appreciate the opportunity to assert Confidential Business Information (CBI) protection from public disclosure of confidential process, trade secret, and business information

contained in the Resource Conservation and Recovery Act (RCRA) Inspection Report for the inspection of the DPE facility on April 18 – 21, 2022.

Per the discussions between DPE counsel and EPA, attached is a CBI-redacted of the April Inspection Report. We will provide CBI-redactions of the report appendices on Monday, August 8.

We are also working on the May Inspection Report, and plan to have our CBI –redactions to you by Monday, August 8.

We are reviewing the Areas of Concern in the April and May reports. We will provide a written response to the Areas of Concern for the April Report within 30 days from today (by September 6 in view of the Labor Day holiday), and we will provide a written response to the Areas of Concern in the May report within 30 days of our submittal of the CBI-redacted version.

Please let us know if you have any questions or comments about this.

Bob Holden

Robert E. Holden
Partner
D: 504.582.8139
BHolden@joneswalker.com

JONES WALKER

Jones Walker LLP
201 St. Charles Ave, Ste 5100
New Orleans, LA 70170
joneswalker.com

Attachment 1

Photo and Video Log (CBI)

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
1	DSCN0619.JPG	5/5/2022	1539	Jose Ojeda	West	[redacted]
2	DSCN0620.JPG	5/5/2022	1539	Jose Ojeda	West	[redacted]
3	DSCN0621.JPG	5/5/2022	1539	Jose Ojeda	West	[redacted]
4	DSCN0622.MOV	5/5/2022	1539	Jose Ojeda	N/A	[redacted]
5	DSCN0623.MOV	5/5/2022	1541	Jose Ojeda	NA	[redacted]
6	DSCN0624.JPG	5/5/2022	1553	Jose Ojeda	North-Northwest	[redacted]
7	DSCN0625.JPG	5/5/2022	1554	Jose Ojeda	North-Northwest	[redacted]
8	DSCN0626.JPG	5/5/2022	1604	Jose Ojeda	West	[redacted]
9	DSCN0627.JPG	5/5/2022	1604	Jose Ojeda	West	[redacted]
10	DSCN0628.JPG	5/5/2022	1605	Jose Ojeda	West	[redacted]

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
11	DSCN0629.JPG	5/5/2022	1605	Jose Ojeda	South	[redacted]
12	DSCN0630.JPG	5/5/2022	1606	Jose Ojeda	South	[redacted]
13	DSCN0631.JPG	5/5/2022	1606	Jose Ojeda	South	[redacted]
14	DSCN0632.JPG	5/5/2022	1611	Jose Ojeda	North	[redacted]
15	DSCN0633.JPG	5/5/2022	1612	Jose Ojeda	North	[redacted]
16	DSCN0634.JPG	5/5/2022	1613	Jose Ojeda	North	[redacted]
17	DSCN0635.JPG	5/5/2022	1613	Jose Ojeda	North	[redacted]
18	DSCN0636.JPG	5/5/2022	1614	Jose Ojeda	North	[redacted]
19	DSCN0637.JPG	5/5/2022	1614	Jose Ojeda	North	[redacted]
20	DSCN0638.MOV	5/5/2022	1616	Jose Ojeda	N/A	[redacted]
21	DSCN0639.MOV	5/5/2022	1616	Jose Ojeda	N/A	[redacted]

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
22	DSCN0640.JPG	5/5/2022	1637	Jose Ojeda	South	[redacted]
23	DSCN0641.JPG	5/5/2022	1637	Jose Ojeda	South	[redacted]
24	DSCN0642.JPG	5/5/2022	1637	Jose Ojeda	South	[redacted]
25	DSCN0643.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
26	DSCN0644.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
27	DSCN0645.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
28	DSCN0646.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
29	DSCN0647.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
30	DSCN0648.JPG	5/5/2022	1638	Jose Ojeda	West	[redacted]
31	DSCN0649.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
32	DSCN0650.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]
33	DSCN0651.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]
34	DSCN0652.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]
35	DSCN0653.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]
36	DSCN0654.JPG	5/5/2022	1639	Jose Ojeda	West	[redacted]
37	DSCN0655.MOV	5/5/2022	1641	Jose Ojeda	N/A	[redacted]
38	DSCN0656.JPG	5/5/2022	1703	Jose Ojeda	Northwest	[redacted]
39	DSCN0657.JPG	5/5/2022	1703	Jose Ojeda	Northwest	[redacted]

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
40	DSCN0658.JPG	5/5/2022	1703	Jose Ojeda	Northwest	[redacted]
41	DSCN0659.MOV	5/5/2022	1704	Jose Ojeda	N/A	[redacted]
42	DSCN0660.JPG	5/5/2022	1706	Jose Ojeda	South	[redacted]
43	DSCN0661.MOV	5/5/2022	1707	Jose Ojeda	N/A	[redacted]
44						
45						
46						
47						

Message

From: Holden, Bob [bholden@joneswalker.com]
Sent: 9/7/2022 11:34:46 PM
To: Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Craig Easley [craig.easley@la.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
CC: Christopher Meyers (christopher-meyers@denka-pe.com) [christopher-meyers@denka-pe.com]; Jason B. Hutt (jason.hutt@bracewell.com) [jason.hutt@bracewell.com]; Kevin M. Voelkel (kevin.voelkel@bracewell.com) [kevin.voelkel@bracewell.com]; Bartholomew, Trey [tbartholomew@joneswalker.com]; Venn, Brett [bvenn@joneswalker.com]
Subject: \DPE Response to April Inspection Report
Attachments: DPE Response to April EPA RCRA Report.pdf

Dear Mr. Penland and all:

On behalf of Denka Performance Elastomer LLC (DPE), we are submitting herewith DPE's response to the April 18 – 21, 2022 ,inspection of the DPE facility. We will provide in a follow-up Sharefile email for downloading two versions of the Attachments, one un-redacted set containing Confidential Business Information (CBI) and the other set of Attachments redacted for CBI. The CBI is entitled to protection from public disclosure of confidential process, trade secret, and business information.

Please let us know if you have any questions or comments about this.

Robert E. Holden | Partner
D: 504.582.8139
BHolden@joneswalker.com

JONES WALKER

Jones Walker LLP
201 St. Charles Ave, Ste 5100
New Orleans, LA 70170
joneswalker.com

DISCLAIMER: The following message constitutes a confidential attorney-client communication. If you have received this communication in error, do not read it. It is not intended for transmission to, or receipt by, any unauthorized persons. Please delete it from your system without copying it, and notify the sender by reply email or by notifying the sender, so that our address record can be corrected. Thank you.

DPE'S RESPONSE TO EPA REGION 6 INSPECTION REPORT, RCRA INSPECTION CONDUCTED ON APRIL 18-21, 2022

Below please find DPE's responses to the Areas of Concern identified in EPA Region 6's Inspection Report documenting the inspection conducted on April 18 – 21, 2022. This response is timely submitted on September 7, 2022 in accordance with the schedule communicated to EPA. DPE reserves the right to supplement its response at any time in the future if it discovers additional, inconsistent, or conflicting information.

1. The inspection team noted that components subject to regulation under Subpart BB were not marked or identified in a way that would distinguish them from other pieces of equipment. Components are assigned an individual identification number for the purposes of LDAR monitoring and had tags, but physical labeling of each component specific to RCRA was not observed during the walkthrough (Photos 1 through 3, 6, 9, and 16; Appendix 1).

Response: Pursuant to the Louisiana Fugitive Emissions Program Consolidation Guidelines, beginning on January 1, 2014, DuPont elected to consolidate the facility LDAR programs under the HON LDAR program. LDEQ approved the consolidation on December 20, 2013, identifying LDAR programs under the facility LDAR programs under the HON as the "most stringent and guiding fugitive rule." DPE has continued that practice. Attachment 1. Under the consolidation, the facility complies with the HON LDAR program (40 CFR 63 Subpart H), and the Subpart BB requirements are expressly made subject to the HON requirements by the LDEQ approval. This consolidation is consistent with Subpart BB. 40 CFR 265, Section 265.1061(a) ("An owner or operator subject to the requirements of § 265.1057 may elect to have all valves within a hazardous waste management unit comply with an alternative standard which allows no greater than 2 percent of the valves to leak").

We are not aware of any RCRA requirement under which LDAR components subject to RCRA's LDAR requirements need to be tagged distinctly from LDAR components subject to HON LDAR or other LDAR requirements. Similarly, the HON (40 CFR 63 Subpart H) does not require tagging of LDAR components so as to identify the regulatory program under which the component is subject to LDAR. DPE has physically tagged every component under its LDAR program, including the RCRA 40 CFR 264 & 265 Subpart BB components. The RCRA LDAR components are identified in DPE's LDAR process stream workbook. See Attachment 2.

2. A generator must mark its satellite accumulation area containers with the words "hazardous waste" as well as an indication of the hazards of the contents.

(a) The inspection team observed two improperly or unlabeled satellite containers in the Neoprene Lab that were used to accumulate hazardous waste (Photos 49 and 50, Appendix 1).

(b) The inspection team observed containers that were used to accumulate hazardous waste near the point of generation as satellite accumulation containers, but they were not labeled as "hazardous waste". The containers were located at the base of the Recovery

Column, nearby the Catalyst Sludge Receiver, and nearby the HCl Feed tanks (Photos 5, 10, and 15; Appendix 1).

Response: (a) DPE addressed labeling issues identified during the EPA inspection either during the inspection in April or shortly thereafter. Each satellite hazardous waste container has been properly labeled with the words "hazardous waste". See Attachment 3.

(b) Each satellite hazardous waste container has been properly labeled with the words "hazardous waste". See Attachment 4.

3. The inspection team observed open-ended lines that did not have a cap, blind flange, or second valve during the walkthrough.

(a) One open-ended line was observed along the piping run leading to the permitted Catalyst Sludge Receiver Tank from a primary decanter (Photo 9, Appendix 1).

(b) An open-ended line for a strainer removed for servicing was observed at the secondary containment area for the permitted HCl Feed Tanks. The open-ended line had a bag containing sawdust over the opening (Photo 14, Appendix 1).

Response: (a) For lines in chloroprene (also referred to as "CD") service, safety concerns for the possible auto-catalytic polymerization of CD preclude the capping of open-ended lines, as allowed by the HON regulations and other LDAR regulations. The HON LDAR rules at 40 CFR 63.167(e) provide:

> (e) Open-ended valves or lines containing materials which would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in paragraphs (a) through (c) of this section are exempt from the requirements of paragraph (a) through (c) of this section.

Going above applicable regulatory requirements, prior to EPA's inspection in April, 2022, DPE had instituted a policy to install a rubber plug on its Open-ended Lines ("OELs") to ensure this component is double blocked. See Attachment 5.

(b) DPE was performing maintenance activities on the in-line strainer at the time of the inspection. The bag was placed on the end of the line to catch any hazardous material that might leak from the line during the maintenance. Following EPA's inspection, DPE replaced the in-line strainer and there is no OEL present at that location. See Attachment 6.

4. A vacuum box that was being prepared to accumulate hazardous wastes generated during cleanout of the Isomerization Unit process vessels was not completely closed at the time of the inspection (Photo 12, Appendix 1). Inspector Wieber monitored the opening of the vacuum box and did not detect emissions using the TVA 2020. The vacuum box had not yet received wastes, but the flanged opening of the container should be completely bolted prior to receipt of wastes.

Response: At the time of the inspection, a 4-inch camlock fitting was being installed on the vacuum box and no waste had been placed inside the container. The flange was completely bolted prior to any waste being placed inside the vacuum box. See Attachment 7.

5. Waste neoprene, also referred to as popcorn neoprene, coagulated polymer, or Poly Kettle strainer waste, is generated at several points in the process at the DPE Pontchartrain site and appears to be mischaracterized as a nonhazardous waste stream. Identified waste generation points include in-line filters in the CD Synthesis Unit, strainers in the Polymerization Process Unit following polymerization in the Poly Kettles, and from deep well cleanout. Associated waste profiles that were identified for waste neoprene include FIN-018, AW-036, and CDS-102 (note that CDS-102 is only referenced in a SOP, and no waste profile was received from DPE). Waste profile FIN-018 (included in Appendix 10) defines waste chloroprene as 100 percent neoprene rubber, but a waste re-certification form from DPE (Appendix 24) and analytical data of waste neoprene (Appendices 22 and 23) show that the waste neoprene contains other compounds such as chloroprene. Additionally, while exact composition varies for the waste generation points, the waste neoprene waste streams appear to exhibit hazardous characteristics of reactivity. Evidence suggesting the reactivity of the Poly Kettle strainer waste (FIN-018) at the point of generation includes the following:

- **Flyers posted on the wall of a building in the Polymerization Process Area addressing hazards and management of Poly Kettle strainer waste (Appendixs 15 through 17)**
- **Statement from Mr. Roussell that the Poly Kettle strainer waste is at risk of self-ignition due to exothermic reaction if left to dry after being removed from the Poly Kettle strainers.**
- **Statement from Mr. Walsh suggesting it would not be feasible to place the Poly Kettle strainer waste into a container for sampling since the material is still "curing" (reacting).**

Additionally, the waste neoprene generated from cleaning out in-line strainers in the CD Synthesis Unit (waste profile CDS-102) also appears to exhibit hazardous characteristics of reactivity based on the description provided in a SOP for the removal and steaming of waste neoprene ("popcorn polymer") from the strainer (Appendix 21). The SOP states that, "Popcorn polymer can be stored safely after it has been steamed for at least 2 hours. Steaming removes all CD liquid and vapor from the polymer and is the most acceptable method of preparing popcorn polymer for disposal," and, "[s]team the polymer for at least 2 hours to deactivate it".

Response: DPE respectfully disagrees with the AOC assertion that the coagulated polymer ("polymer/popcorn" or "coag") generated at various points in the Pontchartrain Works Neoprene Plant has been mischaracterized as a nonhazardous waste. DPE's position is supported by its knowledge of the process and its calculations of the polymer/popcorn removed from the poly kettle strainers.

The April Inspection Report states that "waste neoprene waste streams" and "waste neoprene generated from cleaning out in-line strainers" appear to exhibit hazardous characteristics of reactivity. The report cites language in safety flyers and DPE's SOPs, as well as statements from DPE personnel addressing safety considerations, purportedly to support the finding. The report

does not cite, however, any chemical composition data, calculations, or other information probative of the regulatory criteria.

Please note that waste polymer/popcorn has different compositions at different points in the process. As will be discussed below, however, on a worst case basis the polymer/popcorn is not hazardous. Accordingly, while waste profile information may vary, no waste profile for polymer/popcorn will indicate that the material is hazardous.

The Inspection Report questions Waste profile FIN-018 (included in Appendix 10). This Waste Profile defines waste from the finishing area, and that waste is essentially pure Neoprene rubber, and therefore it is described as 100 percent Neoprene rubber. On the other hand, AW-036, also mentioned in the Inspection Report, describes aqueous waste from the wastewater treatment area, and CDS-102, describes CD synthesis unit wastes. These wastes have different compositions, reflecting their process origins.

At no point in the process does the waste polymer/popcorn exhibit hazardous waste characteristics of reactivity or ignitability. In order for this material to be classified as a reactive hazardous waste, D003, it must meet the criteria in 40 CFR 261.23(a), particularly 261.23(a)(1) or (7). (The other criteria in 261.23(a) are clearly inapplicable.)

40 CFR 261.23 (a)(1) and (7) state the following:

> (1) It is normally unstable and readily undergoes violent change without detonating….
>
> **(7)** It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

The waste polymer/popcorn is not "reactive" at any time that it is removed from process equipment such as strainers (a worst case point of generation for reactivity consideration). Although the polymer/popcorn contains small amounts of unreacted CD ("residual CD"), the residual CD in the polymer/popcorn is not sufficient to "undergo violent change without detonating." Only an uncontrolled, runaway reaction from the **decomposition** of CD would meet this criterion. The amounts of residual CD in the waste polymer/popcorn, even at the stage where it is removed directly from the process equipment, is not sufficient to allow this type of runaway reaction. Calculations attached as Attachment 8 demonstrate that the maximum temperature of the residual CD polymerizing in, for example, unstripped emulsion in a **worst-case scenario will only increase the temperature of the polymer/popcorn to a maximum 84 °C, well below the onset of CD decomposition at 150 °C**. This calculation assumes a limiting adiabatic reaction (that is, a closed system in which no heat is added to or lost from the reaction). The temperature calculations assume an initial limiting temperature of the poly kettle reaction temperature of 40 °C (the temperature to which the Poly Kettle contents are cooled prior to completion of the process), with no loss of temperature in removing the polymer/popcorn to a buggy for transport to the Outside Brine Pit ("OBP")(under the manufacturing process unit provision of the RCRA regulations, the material is not a "waste" until removal from the process unit in which it is generated). The calculations then assume a complete polymerization reaction of all residual CD, showing a maximum possible rise in temperature of **44 °C, for a total final maximum temperature of 84 °C**, well below the onset of CD **decomposition at 150 °C.** When process steps, including a water

flush, are incorporated into the calculation assumptions, the maximum potential temperature rise is even lower than the "In Situ Worst Case Scenario."

In summary, the worst case calculations assume (referred to in the calculations as "*in situ* worst case"):

- Once goal monomer conversion is reached in LPK, polymerization reaction is stopped.
- Brine cooling is stopped.
- Contents remain in LPK and all unreacted CD is polymerized.
- FINAL MAXIMUM TEMPERATURE OF **84 °C.**

Unlike the production process where polymer/popcorn is in the presence of relatively large amounts of CD to drive chemical reactions, the waste polymer/popcorn during and after removal from the process equipment has limited amounts of residual CD that will be consumed during any further polymerization reactions. The temperature of the waste polymer/popcorn will rise to a maximum of 84 °C, and after such polymerization has occurred, the polymer/popcorn will cool.

The maximum reaction temperature is well below the boiling point of water, and well below the decomposition temperature of CD. In handling waste polymer/popcorn immediately upon removal from process equipment, it is important to have procedures for safe handling of the polymer/popcorn. DPE uses the OBP and in some cases steaming to ensure that the polymer/popcorn is safe for handling, not because it is at risk of causing a violent or explosive reaction. Because the polymer/popcorn does not meet the reactivity test immediately upon removal from process equipment, it clearly does not meet the reactivity criterion when removed from the OBP later in the process.

The cited and informal statements of employees appear misplaced or to be out of context. DPE's understanding of the employees' statements is that they were provided from a safety perspective and in the context of addressing the handling procedures related to sampling the coag in a closed container and not in relation to the RCRA status of the material. Any statements that suggest a greater reactive potential than the heat rise shown above were incorrect. Moreover, the statements in flyers or SOPs concerning the safety hazards of polymer/popcorn concern process operations, not waste handling of polymer/popcorn with relatively small amounts of residual CD.

As to the feasibly of taking samples for offsite analysis of fresh polymer/popcorn, there are no applicable dispositive test methods required by RCRA. As stated in EPA guidance:

> 40 CFR §261.23 includes 8 different properties of a waste that is hazardous because of the characteristic of reactivity. A waste is a reactive hazardous waste if it exhibits one or more of those properties. The regulations do not require specific test methods for any of these properties. Therefore, generators must use waste knowledge to determine whether their waste exhibits the characteristic of reactivity.

https://www.epa.gov/hw-sw846/hazardous-waste-characteristics#question16

Similarly, in a guidance letter, EPA explained:

> For the characteristics of ignitability of solids and reactivity, there is no test method specified as to the operational definition of the characteristic, and **we have therefore given responsible deference to the operational experience of the waste generator or facility.** [Emphasis added.]

Letter to Paul G. Wallach, from David Bussard, Director, EPA Hazardous Waste Identification Division (RO 14176).

As noted above, the waste polymer/popcorn is not a hazardous waste for "ignitability" under 40 C.F.R. 261.21. The waste polymer/popcorn is a "solid" per the "paint filter" test (that is, it is "not a liquid"), and therefore to be ignitable hazardous waste D001 it would have to meet the following criterion in 40 C.F.R. 261.21(a)(2):

> It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

DPE has determined that none of the waste polymer/popcorn generated at the Pontchartrain Works is a hazardous waste. DPE has also relied on DuPont's waste determination set out in a "DuPont Interoffice Memorandum" dated Dec 21, 1995. This document expressly determined that waste polymer/popcorn was not a RCRA hazardous waste, specifically concluding that it was not an ignitable hazardous waste. Attachment 9.

6 CFR 260.10 defines "treatment" as: "any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to [...] render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume". DPE places Poly Kettle strainer waste into the OBP for stabilization before the material is dredged and transferred to an open roll-off container (as seen in Photo 25, Appendix 1). Placing the Poly Kettle strainer waste into the OBP for stabilization is a form of waste treatment in accordance with the definition of "treatment". Therefore, the OBP may be operating as an unpermitted hazardous waste treatment unit.

Response: In order for polymer/popcorn to be classified as a hazardous waste, it must meet the definition of an ignitable hazardous waste D001 as defined in 40 CFR 261.21(a), or it must meet the definition of reactive hazardous waste D003 as defined in 40 CFR 261.23(a). See Response to AOC 5. Because the polymer/popcorn is not "hazardous waste" when it is removed from process units, it is not a hazardous waste when it is placed in the OBP or into roll-off boxes, and the hazardous waste "treatment" definition does not apply. On June 14, 2018, DPE notified LDEQ the Title V permitting status of the OBP concerning emissions from the OBP. At the same time. DPE submitted to LDEQ Addendum No. 2 to its December 6, 2017, Title V Minor Modification and Reconciliation Application to incorporate the OBP as an existing emission point and requesting authorization to emit chloroprene (1.06 tons per year). At no point during the discussions with LDEQ concerning the notification, during the permitting process, or during inspections of DPE's Facility, did any governmental authority raise concerns with the polymer/popcorn when removed from the manufacturing process, placed in the OBP, or placed in the roll-off containers.

7. Hazardous waste containers must be labeled with the words "hazardous waste", an indication of the hazards of the contents, and an accumulation start date.
(a) The inspection team observed six separate 55-gallon drums and several totes labeled as hazardous in the South/North CSA that were not labeled with a start accumulation date. (Photos 26 through 33 and Photo 40, Appendix 1)
(b) The inspection team observed approximately 17 totes labeled as "low pH Water" with no hazardous waste indication in the CAA near the Emergency Aqueous Tank. The inspection team requested analytical data or a waste profile for the waste in the totes, which was provided in follow-up documentation as waste profile PLY-213 (Appendix 20). The material is identified as characteristic hazardous waste in the waste profile, and the totes were not labeled as hazardous waste in the CAA (Photos 55 through 61, Appendix 1).

Additionally, it is uncertain whether the material is completely stabilized following dredging from the OBP into the roll-off container. Therefore, the roll-off container may be accumulating hazardous waste as an open hazardous waste container and potentially also an unpermitted treatment unit.

Response: (a) DPE addressed labeling issues identified by the EPA inspection either during the inspection in April or shortly thereafter. See Attachment 10. Because the handling of waste materials associated with the vacuum box was outside of the scope of normal operations, the date accumulation began was not recorded on the hazardous waste labels. DPE is committed to enhancing personnel and contractor training to avoid a reoccurrence.

(b) These are the low pH bottoms from the production of ACR. These totes are to be placed down DPE's permitted hazardous injection wells on a more frequent basis and not stacked up in the containment area adjacent to the 2MM lb. tank. DPE procedures specify that totes must be properly labeled prior to placing any material inside a tote. See Attachment 11.

As shown in response to AOCs 5 and 6, the stabilized polymer/popcorn is not a hazardous waste and the roll-off boxes containing this material do not require hazardous waste labeling.

8. Based on labeling of the accumulation area in the South/North CSA, DPE manages used lamps and used batteries as hazardous waste instead of under the regulations set forth in 40 CFR 273. DPE also labeled the areas for accumulation of these wastes as satellite accumulation areas within the South/North CSA. The area in the South/North CSA accumulating the used lamp and used battery wastes is not at or near the point of generation of the wastes, and the collective capacity of containers in the area is greater than 55 gallons. The signage in the area indicates that the containers are not labeled with the start accumulation date until full. (Photos 35 through 39, Appendix 1)

Response: AOC 8 confuses Hazardous Waste and Universal Waste requirements. In all material respects the hazardous waste regulations are more stringent than the universal waste regulations of 40 C.F.R. part 273. As stated in *McCoy's RCRA Unraveled* (2022) at 463:

> First of all, managing hazardous batteries, burned out lamps, aerosol cans, etc. under the less-stringent universal waste program is a choice. If desired, generators may alternatively

mange such materials under the full hazardous waste regulatory program.... [§273.1(b), RO 14088]

Under 40 C.F.R. 273.35, there is no legal requirement to label the Universal Waste ("UW") with the initial accumulation date. For example, LQGs for UW may store UW onsite for up to one-year, and no specific date marking is required. The LQG for UW may establish the initial date of accumulation by various methods and demonstrate that it is in compliance with the one-year holding period. *See* 40 C.F.R. 273.35(c)(5)("Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received"). DPE disposes of all UW in this satellite accumulation area at least annually, and therefore no UW is accumulated for more than one year.

9. The inspection team did not observe spill control equipment at the CAA in the underground injection well area (Photo 48, Appendix 1).

Response: The spill containment for the CAA at the time of the inspection was managed through a pump system which is pumped back to DPE's aqueous waste. Major spill containment for this area is provided by the emergency pit (lined with geotextile liner) located across the street (connected by a trench) and the DuPont ditch system. DPE maintains spill containment equipment and cleanup materials onsite in accordance with its government-approved contingency plan.

10. Waste neoprene from the in-line filters in the CD Synthesis Unit is steamed for at least two hours in a bucket to "deactivate it", and the steaming process "removes all CD liquid and vapor" according to a SOP (Appendix 21). The steaming process would be considered "treatment" based on the regulatory definition (as included in AOC 6), and the bucket, or vessel used to steam the polymer, may be considered an unpermitted treatment unit.

Response: DPE incorporates by reference its reply to AOCs 5 and 6.. Because the polymer/popcorn is not a hazardous waste, no hazardous waste "treatment" is involved.

11. Waste streams generated from the Monomer Synthesis Process may be F024 or F025 listed wastes, including CD Brine generated from the flasher tank in the CD Synthesis Unit and waste that is sent to the HCl Recovery Unit. This determination is supported by documentation provided by DPE (Appendix 28). Listed hazardous waste would retain its listing throughout the HCl Recovery Unit process and in mixing for disposal via underground injection wells.

Response: AOC 11 fails to distinguish and account for the different RCRA standards applicable to co-products and by-products. The CD Brine and the product HCl (discussed in Appendix 28) are co-products produced in the plant operations and not "by-products" subject to possible "solid waste" characterization under 40 C.F.R. 261.2. As noted in DPE's waste determination for the HCl acid generated from the HCl Recovery Unit (EPA's Appendix 28, "Hazardous Waste Determination, HCl Recovery Unit, HCl Acid,"), "the EPA Hazardous Waste Codes of the feed material [do not] carry over to the HCl product." Similarly, DPE's waste determination for CD Brine and Aqueous Hydrochloric Acid used as onsite treatment chemicals (EPA's Appendix 19, "CD Brine and Aqueous Hydrochloric Acid used as Treatment Chemicals, Hazardous Waste

Determination", March 18, 1998), includes a waste determination that concludes that CD Brine (used to adjust the specific gravity of the injected waste) and aqueous hydrochloric acid (used to neutralized the pH of the waste to be injected), are used as products in managing hazardous waste injected into the permitted hazardous waste injection wells. These determinations are correct.

As explained in *McCoy's RCRA Unraveled* (2022) at 17:

> A by-product is not the same thing as a co-product. Co-products are products that are intentionally produced, can be used as commodities in trade by the general public, and can be used "as is" without additional processing (or require minimal processing to become usable). … Another feature of a co-product is that it appears to have a legitimate or guaranteed market.

The hydrochloric acid is produced in a hydrochloric acid **production** furnace ("HAPF") as defined in 40 CFR 260.10 and 63.1201. The regulations make it clear that EPA considers the use of such furnaces (HAPFs) for the production of products. EPA and the courts have consistently found that hydrochloric acid produced in similar industrial situations should be classified as co-products. *See* Ltr. From Michael Shapiro, Director of EPA Office of Solid Waste, to Charles P. Lettow, May 19, 1994 (RO13671) (hydrochloric acid produced in air pollution control system) (Attachment 12); Ltr. From Matthew Straus, Chief, EPA Waste Characterization Branch, June 25, 1987 (RO 11260) (hydrochloric acid produced in pentachlorophenol manufacture) (Attachment 13); and *Tex. Tin Corp. v. U.S.*, 2006 WL 293 (S.D. Tex. 2006), at *6 (HCl recovered from hydrogen chloride gas, then stripped and sold, is not a waste).

The same principles apply to CD Brine. The CD brine is "intentionally produced, can be used as commodities in trade by the general public, and can be used 'as is' without additional processing (or require minimal processing to become usable)." And it has "a legitimate or guaranteed market." Quoting *McCoy's, supra.*

12. CD Brine generated from the flash tank in the CD Synthesis Unit and HCl material generated from the HCl Recovery Unit are both sent to the underground injection well system and mixed with aqueous waste for pH or specific gravity adjustment. DPE provided documentation stating that the CD Brine and HCl material streams are not considered wastes since they are used to replace commercial product for achieving permit requirements for underground injection of waste (Appendix 19). Underground injection of the mixed aqueous material may be considered "land disposal" of the CD Brine and HCl material, so the CD Brine and HCl streams would be considered wastes and retain associated characteristic and listed waste codes.

Response: As shown in response to AOC 11, the CD Brine and the aqueous hydrochloric acid are co-products, and not by-products subject to 40 C.F.R. 261.2 characterization. In any event, even if the waste codes F024 and F025 were to carry over to the injection of CD Brine and aqueous hydrochloric acid into the injection wells, the injection wells are permitted for F024 and F025 wastes.[1]

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[1] Specifically, on November 17, 2016. LDEQ re-issued the "Determination of No Alternatives to Land Disposal of Prohibited Waste by Deep Well Injection," which was expressly based on permit authorization for deep well injection

List of Attachments
DPE's Response to EPA Region 6 Inspection Report,
RCRA Inspection of April 18 – 21, 2022

1. Attachment 1 – LDEQ Approval of the Louisiana Fugitive Emissions Program Consolidation Guidelines, December 13, 2013;
2. Attachment 2 – LDAR Process Stream Determination Data (contains CBI);
3. Attachment 3 – Photos of labeled satellite containers in the Neoprene Lab (contains CBI);
4. Attachment 4 – Photos of labeled satellite containers located at the base of the Recovery Column, nearby the Catalyst Sludge Receiver, and nearby the HCl Feed tanks (contains CBI);
5. Attachment 5 – Photos of rubber plug on primary decanter leading to the permitted Catalyst Sludge Receiver Tank (contains CBI);
6. Attachment 6 – Photos of replaced in-line strainer at the secondary containment area for the permitted HCl Feed Tanks (contains CBI);
7. Attachment 7 – Photos of the completely bolted vacuum box (contains CBI);
8. Attachment 8 – Temperature calculations of the residual CD (contains CBI);
9. Attachment 9 – DuPont's waste determination set out in a "DuPont Interoffice Memorandum" dated Dec 21, 1995 (contains CBI);
10. Attachment 10- Photos of totes in South/North CSA labeled with start accumulation date (contains CBI);
11. Attachment 11 – Photos of totes properly labeled "hazardous waste" in the CAA (contains CBI);
12. Attachment 12 – May 19, 1994 Letter From Michael Shapiro, Director of EPA Office of Solid Waste, to Charles P. Lettow;
13. Attachment 13 – June 25, 1987 Letter From Matthew Straus, Chief, EPA Waste Characterization Branch;
14. Attachment 14 – LDEQ's "Determination of No Alternatives to Land Disposal of Prohibited Waste by Deep Well Injection," (in globo, includes the LDEQ determination and the referenced documents as attachments thereto).

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from the Louisiana Department of Natural Resources (LDNR) Office of Conservation, and on EPA's October 22, 2015 No Migration Re-Issuance for the DPE injection wells (Attachment 14, in globo, includes the LDEQ determination and the referenced documents as attachments thereto). Waste codes F024 and F025 are expressly included in the Office of Conservation Orders of December 18, 2001, and November 15, 2016, and in the EPA determination (page 3). DPE's "Petition for Determination of No Alternatives to Deep-Well Injection," dated October 2016, describes the waste streams injected into the injection wells as requiring pH neutralization and the use of "CD Brine, produced from the manufacture of chloroprene monomer, … added to the aqueous waste for the control of specific gravity."

Message

From: Greene, Mary [Greene.Mary.E@epa.gov]
Sent: 2/11/2022 10:32:26 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
CC: Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Denka - 2017 state inspection report

Thank you

Mary E. Greene
Director, Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
WJC Building South, Rm 1119B
Office: 202 564 0254
Cell: 202 430 2876

This message is CONFIDENTIAL, and may contain legally privileged information. If you are not the intended recipient, or believe you received this communication in error, please delete it immediately, do not copy, and notify the sender. Thank you.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, February 11, 2022 12:23 AM
To: Davies, Lynne <Davies.Lynne@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Greene, Mary <Greene.Mary.E@epa.gov>
Cc: Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Here is the link to the Louisiana 2017 RCRA inspection report: https://edms.deq.louisiana.gov/app/doc/view?doc=10860843

John Penland is the inspector assigned to Denka. Should we wait to draft the TD until a decision is made to either proceed now with RCRA or to wait until after the CAA settlement is final? I defer to you.

Thanks,
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, February 10, 2022 8:12 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka - 2017 state inspection report

Hi all – Mary Greene (AED Director) contacted Greg and requested a copy of the state RCRA 2017 inspection report. Do we have a copy and if so, would you mind sending it to her?

She also asked for the RCRA permit, which I found on LDEQ's website, so I forwarded her the link (it's a large file).

Also, Kim Chavez in my group can start drafting a TD for a potential Denka inspection in April. We have funds we could devote to ERG sampling, etc. If you'd like to start that process, I'm happy to schedule a meeting to get that TD rolling.

Many thanks!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Seager, Cheryl [Seager.Cheryl@epa.gov]
Sent: 2/15/2022 1:01:39 AM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: A couple of questions
Attachments: Denka RCRA 3007 Information RequestFeb4.cs.docx

Flag: Follow up

Hi everyone,

Great job on this – I had a couple of minor edits and comments. I thought it might be easier to send directly rather than go back through e-routing.

Thanks,
Cheryl

Cheryl Seager | Director | Enforcement and Compliance Assurance Division | EPA Region 6| Mail Code 6ECAD| 1201 Elm Street| Suite 500 | Dallas, TX 75270 | Phone 214-665-3114 | Cell 972-971-9175

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that the solid waste in question is a known listed hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Commented [SC1]: This is the first time we've talked about solid waste – shouldn't we identify what the solid waste in question is?

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Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term "Facility" or "Facilities" shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

4. For question number three above, please provide copies of hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) ~~of~~ from each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where ~~is~~ the waste generated? is taken to be stored, managed, treated, and ultimately disposed.
   viii. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.

Commented [SC2]: Should this be if waste generated from clean out is stored . . .

6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

Commented [SC3]: Do we really mean ever or do we want a time frame?

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.

Commented [SC4]: Any time frame?

8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from ~~its~~ Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
   i. What emission control devices are on each unit?
   ii. What type of emission could potentially leak and/or escape for each unit?
   iii. What is the inspection maintenance protocol for each unit?
   iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.

14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/16/2022 10:49:25 PM
To: Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: A couple of questions
Attachments: Denka RCRA 3007 Information RequestFeb16.docx

Good evening, Cheryl,

I have responded to your comments, after discussion with Fred, and have uploaded the revised RCRA 3007 Information request to E-routing.

Specifically, for the "Solid Waste" comment, I removed 'solid waste' and included 'Chloroprene', and for the comments on time (five years or less), I kept as is since there could be continuing disposal that started more than five years ago and such information would be useful in building the evidence for our RCRA 7003 case or a 3008(a) order.

For your other comments and/or suggestions we accepted and have attached the document here as well.

Thanks,
Marcia

From: Moncrieffe, Marcia
Sent: Wednesday, February 16, 2022 6:49 AM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: A couple of questions

You are welcome.
MM

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Tuesday, February 15, 2022 8:34 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Re: A couple of questions

Thanks Marcia!

Sent from my iPhone

> On Feb 15, 2022, at 7:53 PM, Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov> wrote:
>
> Good evening, Cheryl,
>
> I have looked at all your comments and just need to ask Fred few questions; after which, I will return a revised and updated version in e-routing tomorrow (2/16). Thanks, MM

Marcia

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Monday, February 14, 2022 7:02 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>
Subject: A couple of questions

Hi everyone,

Great job on this – I had a couple of minor edits and comments. I thought it might be easier to send directly rather than go back through e-routing.

Thanks,
Cheryl

Cheryl Seager | Director | Enforcement and Compliance Assurance Division | EPA Region 6| Mail Code 6ECAD| 1201 Elm Street| Suite 500 | Dallas, TX 75270 | Phone 214-665-3114 | Cell 972-971-9175

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a known listed hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

ED_013532_00002104-00001

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

cc:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ED_013532_00002104-00002

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term “Facility” or “Facilities” shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

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II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
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[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

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   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
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   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
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   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
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   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
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   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
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9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.

14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 2/17/2022 6:54:56 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RCRA 3007 edits
Attachments: Denka RCRA 3007 Information RequestFeb16.docx

Hi all:

Steve Gilrein reviewed the 3007 and had some comments. Our goal is to make this as expansive as possible, so instead of language limiting it to hazardous waste, lets add solid waste. I've made some suggested changes to the cover letter. Can you please review those and the questions and expand the language when possible?

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for solid and hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and solid and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a known listed hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA solid and hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Commented [OM1]: I'm not sure chloroprene is a listed hazardous waste (I don't see it on the P list). Chloroprene waste is an F-listed waste. Should we rephrase this or delete it?

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term "Facility" or "Facilities" shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[1]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.

[1] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

4. For question number three above, please provide copies of hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.

14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
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    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/23/2022 5:14:38 AM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: We have the green light to send out the Denka 3007 this week - need to finalize asap
Attachments: Denka RCRA 3007 Information RequestFeb22.docx

All,

I came to the computer to check my schedule for the morning, as I may need to take off, and saw Margaret's message and so I decided to address. Please see the attached, which I thought better to share here and if the program is satisfied then Fred please replace in e-routing. I am not sure why the footnote appears in some sort of blue/gray background.

I hope this helps.

Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, February 22, 2022 8:09 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: We have the green light to send out the Denka 3007 this week - need to finalize asap

Late-breaking news on this Tuesday evening – we have the green light to send out the Denka 3007 this week. I know Cheryl will want it sent out asap so please prioritize its review.

Thanks!
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for solid and hazardous waste[1] it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and solid and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA solid and hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately

[1] For purposes of this Section 3007 of RCRA, 42 U.S.C. § 6927, Information Request, the terms "hazardous waste" and "solid waste" shall have the meanings set for at Sections 1004(5) and (27) of RCRA, 42 U.S.C. § 6903, respectively.

justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

cc:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ED_013532_00002110-00002

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

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4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term “Facility” or “Facilities” shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you’ve specified.

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II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[2]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.

---

[2] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

4. For question number three above, please provide copies of hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNI, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?
13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.

14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 2/23/2022 1:41:35 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: We have the green light to send out the Denka 3007 this week - need to finalize asap
Attachments: Denka RCRA 3007 Information RequestFeb16 DT.docx

Hi Marcia:

Thank you so much, Marcia. Dale Thrush reviewed the previous version of the letter and his (few) comments are in the attached. I'll give you a call around 8:00 to discuss.

Thanks,
Margaret

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, February 23, 2022 6:59 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: We have the green light to send out the Denka 3007 this week - need to finalize asap
Importance: High

Good morning, Margaret,

I am at my computer and if you need to talk I can be available anytime before 9:00 am so that I can be assured that the revisions I made last evening are acceptable; and if not, I can take this time to make the Request acceptable so that it may be issued.

Therefore, if needed, please send me an invite during this period that works for you.

Thanks,
Marcia

From: Moncrieffe, Marcia
Sent: Tuesday, February 22, 2022 11:15 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: We have the green light to send out the Denka 3007 this week - need to finalize asap

All,

I came to the computer to check my schedule for the morning, as I may need to take off, and saw Margaret's message and so I decided to address. Please see the attached, which I thought better to share here and if the program is satisfied then Fred please replace in e-routing. I am not sure why the footnote appears in some sort of blue/gray background.

I hope this helps.

Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, February 22, 2022 8:09 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: We have the green light to send out the Denka 3007 this week - need to finalize asap

Late-breaking news on this Tuesday evening – we have the green light to send out the Denka 3007 this week. I know Cheryl will want it sent out asap so please prioritize its review.

Thanks!
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for solid and hazardous waste it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and solid and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a known listed hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA solid and hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Commented [OM1]: I'm not sure chloroprene is a listed hazardous waste (I don't see it on the P list). Chloroprene waste is an F-listed waste. Should we rephrase this or delete it?

Commented [TD2R1]: I would suggest deleting this sentence. I checked all four listings for chloroprene and 2-chlorobuta-1,3-diene and didn't find it under the F, K, P or U lists. I also checked under the CAS number of 126-99-8 for the P and U listing and no luck.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

ec:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

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Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
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Phone: 214-665-7591

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   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event, to include both the vapor and liquid amounts?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNID, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard

space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?

13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/23/2022 2:37:29 PM
To: Khan, Zahra [Khan.Zahra@epa.gov]
CC: Hoang, Anhthu [Hoang.Anhthu@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: RE: Denka

You are welcome.
MM

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Wednesday, February 23, 2022 8:32 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

Thank you, Marcia! And all. I also sent a message to Providence in OECA (I copied you Marcia and Justin). Thank you so much for your time! I appreciate it.

Zahra

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, February 23, 2022 9:30 AM
To: Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

Good morning, Zahra,

I am not sure I can say yes at this moment, but will copy a few folks on the email and ask pretty please that they respond ASAP. Marcia

Good morning Fred, James, Jeff, and Justin,

We need your help on the questions below ASAP (Say like now) for each or all as you are able to provide a response or forward to the person(s) who would be able to respond. Please confirm your receipt and you ability to respond in the time period that we are requesting.
I know this is short notice and so I thank you in advance and with a 😉
Marcia

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Wednesday, February 23, 2022 8:21 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Subject: FW: Denka

Good morning! My office has set a briefing with Melissa Hoffer on Thursday. I was not the sender, so I am not sure who was invited to this. Melissa had a few questions for our office to answer and some appear to be more appropriate for the

technical folks. Do you think you can help me find some answers to share tomorrow? Here are all the questions, but I highlighted the R6 questions in blue.

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

Whether we have data on the HAP and criteria pollutant emissions of all other sources in the parishes where Denka and Formosa are located;

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

When will we have the new air monitoring results for Denka.

Thank you!

Zahra

From: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Sent: Wednesday, February 23, 2022 4:57 AM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>; O'Lone, Mary <OLone.Mary@epa.gov>
Subject: RE: Denka

Thank you, Melissa.

We will be prepared to answer the questions you pose. We appreciate your focusing the issues for us.

From: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Sent: Tuesday, February 22, 2022 8:48 PM
To: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: RE: Denka

Excellent, thank you.

When we meet on Thursday, I would like to gain a better understanding of:

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

Whether we have data on the HAP and criteria pollutant emissions of all other sources in the parishes where Denka and Formosa are located;

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

When will we have the new air monitoring results for Denka.

Thanks,
Melissa

From: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Sent: Tuesday, February 22, 2022 4:30 PM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: RE: Denka

Hi Melissa.

Please see the attached for the material you requested. Note that some documents are still in draft form. Please let me know if I can be of further assistance.

From: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Sent: Tuesday, February 22, 2022 3:33 PM
To: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>
Subject: FW: Denka
Importance: High

Hi Anhthu, please see below. Would you kindly please provide these materials to me today or tomorrow so that I may review them before our meeting on Thursday. I would also like to see any Title VI complaints or requests for investigations we have received re Denka and Formosa. Thank you.

Melissa

From: Hoffer, Melissa
Sent: Tuesday, February 15, 2022 2:06 PM
To: Dorka, Lilian <Dorka.Lilian@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Russell, Maishia <Russell.Maishia@epa.gov>
Subject: Denka

Hi Lillian,

I am not sure if you and Elise have spoken, but I connected with Elise and Marianne last week (on non-recused aspects) and I am going to be helping out a bit on this matter. I know Elise was going to schedule a meeting for us this week but I thought I'd get the ball rolling. **I have copied Maishia to schedule a 30-minute meeting this week for us.**

As I understand, we are in discussions with DOJ about it potentially taking on a Title VI investigation of this facility, and other possible options. Would you please send me any already prepared summaries of (1) facility operations; (2) compliance history (fine to get from OECA); (3) bases for potential Title VI investigation; and (4) any chronologies and/or summaries of our engagement with LA, the facility, the community.

I have a pretty good understanding of EPA's efforts, at least as summarized in our response to the IACHR this past summer.

Thanks and I look forward to hearing more about this important work.

Melissa A. Hoffer
Principal Deputy General Counsel
U.S. Environmental Protection Agency
Office of General Counsel
1200 Pennsylvania Avenue, NW
Washington, DC 20460
T: 202.440.1671
E: hoffer.melissa@epa.gov

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/23/2022 3:14:37 PM
To: Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Khan, Zahra [Khan.Zahra@epa.gov]
CC: Hoang, Anhthu [Hoang.Anhthu@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: RE: Denka

Good morning, Jeff,

Thanks a million!!

Zahra,

Please see Jeff's responses below.

MM

From: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Sent: Wednesday, February 23, 2022 9:11 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

See some high level response in orange.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, February 23, 2022 8:30 AM
To: Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

Good morning, Zahra,

I am not sure I can say yes at this moment, but will copy a few folks on the email and ask pretty please that they respond ASAP. Marcia

Good morning Fred, James, Jeff, and Justin,

We need your help on the questions below ASAP (Say like now) for each or all as you are able to provide a response or forward to the person(s) who would be able to respond. Please confirm your receipt and you ability to respond in the time period that we are requesting.
I know this is short notice and so I thank you in advance and with a 😉
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Sent: Wednesday, February 23, 2022 8:21 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>

Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
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Good morning! My office has set a briefing with Melissa Hoffer on Thursday. I was not the sender, so I am not sure who was invited to this. Melissa had a few questions for our office to answer and some appear to be more appropriate for the technical folks. Do you think you can help me find some answers to share tomorrow? Here are all the questions, but I highlighted the R6 questions in blue.

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

Whether we have data on the HAP and criteria pollutant emissions of all other sources in the parishes where Denka and Formosa are located; This information is typically housed in National Emissions Inventory (NEI) data for major sources. I can't promise "all other sources" have to report into NEI or report all pollutants. Keep in mind Formosa is not constructed. This information is available but would require significant time to pull the information together.....also, someone would need to draw the boundary for what one would want considered (ex. 50 km or 30 miles). This could get very time consuming. Might also be able to use TRI to identify top toxic air pollutant emitters in some order in a given area (possibly Parish level).

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here? Title V operating permits for air emission major sources have to be renewed every 5 years. New source review construction permits have to be issued in accordance with LDEQ's EPA approved State Implementation Plan (SIP) requirements whether it is a new major source or a new minor source (this includes existing facility expansion projects). Formosa's prevention of significant deterioration (PSD) permit which is a type of new source review construction permit was proposed for public comment and an opportunity for public hearing was provided. The PSD permit (including the title V operating permits) are currently subject to litigation in State court (State's permitting process has to have a process where public commenters can appeal permit issuance). In addition, Formosa's title V operating permits have been petitioned to EPA regarding their adequacy (which is a process public commenters can use to challenge the adequacy of those permits).

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue; EPA Region 6's air permit program has not placed LDEQ "on notice" that it should undertake a cumulative impacts analysis. LDEQ would have completed an air quality impacts analysis for NAAQS pollutants in issuing the Formosa permit which should have considered emissions from other existing sources and LDEQ would have also done a screening against their State air toxics standards during the permitting process. Keep in mind EPA does not have any ambient air quality standards for air toxic pollutants. LDEQ also did an environmental justice analysis during the permitting process and received comments during the public comment period on the analysis (this is part of the subject litigation in State court). Under CAA regulatory provisions.....State permitting authorities are not required to evaluate air quality impacts as part of the title V operating permit renewal process. Air quality impact analysis is typically required as a function of adding new emission sources to the airshed in a given area. EPA's air toxics regulatory program is more of a technology based program broken down into industrial sector control regulations or specific equipment sectors.....it's not regulated like national ambient air pollutants.

When will we have the new air monitoring results for Denka. (James Leathers can provide this response).

Thank you!

Zahra

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Sent: Wednesday, February 23, 2022 4:57 AM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>; O'Lone, Mary <OLone.Mary@epa.gov>
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Importance: High

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Melissa

From: Hoffer, Melissa
Sent: Tuesday, February 15, 2022 2:06 PM
To: Dorka, Lilian <Dorka.Lilian@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Russell, Maishia <Russell.Maishia@epa.gov>
Subject: Denka

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I have a pretty good understanding of EPA's efforts, at least as summarized in our response to the IACHR this past summer.

Thanks and I look forward to hearing more about this important work.

Melissa A. Hoffer
Principal Deputy General Counsel
U.S. Environmental Protection Agency
Office of General Counsel
1200 Pennsylvania Avenue, NW
Washington, DC 20460
T: 202.440.1671
E: hoffer.melissa@epa.gov

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/23/2022 4:02:36 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka

Thank you Fred.
MM

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Wednesday, February 23, 2022 9:22 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: RE: Denka

Marcia,

I am staying out of this conversation and have the 3007 ready to go in e-routing when ever we decide to send to Cheryl. I have answered Margarets question of earlier by telling her chloroprene should always have a D001 waste code for ignitability but beyond that RCRA knows very little about this facilities process, its products, and its treatment process's. This facility claims a F026 waste code on its RCRA permit, F026 is the code applied to: Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-,penta-, or hexachlorobenzene under alkaline conditions.

I do not know if this F026 material claimed by Denka is the same chloroprene material that escapes the brine pit.

Until RCRA has data all we have is Air's data for products and Title VI.

Fred

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, February 23, 2022 9:14 AM
To: Leathers, James <Leathers.James@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>
Subject: RE: Denka

Good morning, James,

Thanks a million.

Zahra,
Please see James response. MM

From: Leathers, James <Leathers.James@epa.gov>
Sent: Wednesday, February 23, 2022 9:00 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>
Subject: RE: Denka

Hi Marcia,

Let me get some quick responses now, and I will be available to revisit after 11:00 AM (if needed).

Good morning! My office has set a briefing with Melissa Hoffer on Thursday. I was not the sender, so I am not sure who was invited to this. Melissa had a few questions for our office to answer and some appear to be more appropriate for the technical folks. Do you think you can help me find some answers to share tomorrow? Here are all the questions, but I highlighted the R6 questions in blue.

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

Whether we have data on the HAP and criteria pollutant emissions of all other sources in the parishes where Denka and Formosa are located; Yes, Enforcement can pull the Emissions Inventory data from the state for St. James and St. John the Baptist. Let me know if you want the spreadsheet emailed or added to a share site (about 5.5 MB file).

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

When will we have the new air monitoring results for Denka. EPA has Continuous Air Monitoring Data (SPods) through January 6, 2022 (update to the website last week). Denka's next submittal of Fenceline Monitoring (FLM) data related to EPA's 114 is due to EPA on March 4, 2022. After submittal, OAR will need some amount of time (estimated to be a couple of weeks but less than 30 days) for their QA/QC review.

Continuous Air Monitoring Data Link
https://www.epa.gov/la/denka-air-monitoring-data-summaries

EPA R6/OECA/OAR are working to post the FLM data to EPAs LaPlace website. No firm date yet, when this will occur. I think we all have a goal to get the initial submittal posted before the next submittal is due (March 4, 2022), however Senior leadership will need to review all materials before anything gets posted.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Wednesday, February 23, 2022 8:30 AM

To: Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

Good morning, Zahra,

I am not sure I can say yes at this moment, but will copy a few folks on the email and ask pretty please that they respond ASAP. Marcia

Good morning Fred, James, Jeff, and Justin,

We need your help on the questions below ASAP (Say like now) for each or all as you are able to provide a response or forward to the person(s) who would be able to respond. Please confirm your receipt and you ability to respond in the time period that we are requesting.
I know this is short notice and so I thank you in advance and with a ☺
Marcia

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Wednesday, February 23, 2022 8:21 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Subject: FW: Denka

Good morning! My office has set a briefing with Melissa Hoffer on Thursday. I was not the sender, so I am not sure who was invited to this. Melissa had a few questions for our office to answer and some appear to be more appropriate for the technical folks. Do you think you can help me find some answers to share tomorrow? Here are all the questions, but I highlighted the R6 questions in blue.

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

Whether we have data on the HAP and criteria pollutant emissions of all other sources in the parishes where Denka and Formosa are located;

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

When will we have the new air monitoring results for Denka.

Thank you!

Zahra

From: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Sent: Wednesday, February 23, 2022 4:57 AM

To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>; O'Lone, Mary <OLone.Mary@epa.gov>
Subject: RE: Denka

Thank you, Melissa.

We will be prepared to answer the questions you pose. We appreciate your focusing the issues for us.

From: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Sent: Tuesday, February 22, 2022 8:48 PM
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Cc: Packard, Elise <Packard.Elise@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>
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Subject: RE: Denka

Hi Melissa.

Please see the attached for the material you requested. Note that some documents are still in draft form. Please let me know if I can be of further assistance.

From: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Sent: Tuesday, February 22, 2022 3:33 PM
To: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>
Subject: FW: Denka
Importance: High

Hi Anhthu, please see below. Would you kindly please provide these materials to me today or tomorrow so that I may review them before our meeting on Thursday. I would also like to see any Title VI complaints or requests for investigations we have received re Denka and Formosa. Thank you.

Melissa

From: Hoffer, Melissa
Sent: Tuesday, February 15, 2022 2:06 PM
To: Dorka, Lilian <Dorka.Lilian@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>; Russell, Maishia <Russell.Maishia@epa.gov>
Subject: Denka

Hi Lillian,

I am not sure if you and Elise have spoken, but I connected with Elise and Marianne last week (on non-recused aspects) and I am going to be helping out a bit on this matter. I know Elise was going to schedule a meeting for us this week but I thought I'd get the ball rolling. **I have copied Maishia to schedule a 30-minute meeting this week for us.**

As I understand, we are in discussions with DOJ about it potentially taking on a Title VI investigation of this facility, and other possible options. Would you please send me any already prepared summaries of (1) facility operations; (2) compliance history (fine to get from OECA); (3) bases for potential Title VI investigation; and (4) any chronologies and/or summaries of our engagement with LA, the facility, the community.

I have a pretty good understanding of EPA's efforts, at least as summarized in our response to the IACHR this past summer.

Thanks and I look forward to hearing more about this important work.

Melissa A. Hoffer
Principal Deputy General Counsel
U.S. Environmental Protection Agency
Office of General Counsel
1200 Pennsylvania Avenue, NW
Washington, DC 20460
T: 202.440.1671
E: hoffer.melissa@epa.gov

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/23/2022 9:19:07 PM
To: Khan, Zahra [Khan.Zahra@epa.gov]; Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]
CC: Hoang, Anhthu [Hoang.Anhthu@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: RE: Denka

We are glad we could help, and you are welcome.
MM

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Wednesday, February 23, 2022 3:18 PM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

As always, Jeffrey, James, Marcia, and team, thank you so much for your time and help on this. I sincerely appreciate the timely responses and guidance.

From: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Sent: Wednesday, February 23, 2022 10:11 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
Subject: RE: Denka

See some high level response in orange.

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What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here? Title V operating permits for air emission major sources have to be renewed every 5 years. New source review construction permits have to be issued in accordance with LDEQ's EPA approved State Implementation Plan (SIP) requirements whether it is a new major source or a new minor source (this includes existing facility expansion projects). Formosa's prevention of significant deterioration (PSD) permit which is a type of new source review construction permit was proposed for public comment and an opportunity for public hearing was provided. The PSD permit (including the title V operating permits) are currently subject to litigation in State court (State's permitting process has to have a process where public commenters can appeal permit issuance). In addition, Formosa's title V operating permits have been petitioned to EPA regarding their adequacy (which is a process public commenters can use to challenge the adequacy of those permits).

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

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When will we have the new air monitoring results for Denka. (James Leathers can provide this response).

Thank you!

Zahra

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Thanks and I look forward to hearing more about this important work.

Melissa A. Hoffer
Principal Deputy General Counsel
U.S. Environmental Protection Agency
Office of General Counsel
1200 Pennsylvania Avenue, NW
Washington, DC 20460
T: 202.440.1671
E: hoffer.melissa@epa.gov

Message

From: Khan, Zahra [Khan.Zahra@epa.gov]
Sent: 2/24/2022 3:26:52 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: FW: re: LDEQ Briefing for Melissa Hoffer

Khan, Zahra has shared a OneDrive for Business file with you. To view it, click the link below.

2022.02.17 Draft LDEQ and LDH Briefing Paper.docx

See below.

From: Khan, Zahra
Sent: Thursday, February 24, 2022 10:12 AM
To: O'Lone, Mary <olone.mary@epa.gov>
Cc: Hoang, Anhthu <Hoang.Anhthu@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: RE: re: LDEQ Briefing for Melissa Hoffer

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LILIAN opens the briefing

The pros and cons of investigations versus compliance reviews, and specifically, which remedies might be afforded under each approach;

LILIAN

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Yes, EPA can pull the Emissions Inventory data from the state for St. James and St. John the Baptist. The spreadsheet is about 5.5 MB file; we are working with Region 6 to establish a file on a shared drive. This information is typically housed in National Emissions Inventory (NEI) data for major sources. It's possible that not "all other sources" have to report into NEI or report all pollutants. However, the Emissions Inventory from Louisiana will feed into the (National Emissions Inventory) NEI, so it would be the same info found in the NEI (just screened for only Louisiana and the 2 parishes of interest). Also attached are the Emissions Inventory reporting requirements that will define what universe of facilities are required to report to Louisiana's Emissions Inventory.

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what one would want considered (ex. 50 km or 30 miles) as the impact zone. This exercise could get very time consuming.

As for other sources of pollution, we might also be able to use TRI (Toxics Release Inventory) to identify top toxic air pollutant emitters in some order in a given area (possibly Parish level).

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

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Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Causation question is more complicated.....you have to keep in mind one source may have a more significant impact on NAAQS (National Ambient Air Quality Standards) emissions potentially causing an area to trend towards non-attainment (ex. RAIN CII in St. Bernard Parish) and another may have a more significant causation issue based on its air toxic emissions from a risk perspective (ex. Denka). A good example is that a facility with high ethylene oxide or chloroprene emissions may drive cancer risk in an area due to its IRIS (Integrated Risk Information System) values more so than a facility with significant NAAQS emissions contributing to SO2 pollution or ozone pollution. Also, keep in mind certain pollutants travel or disperse differently than others and depending upon the types of pollutants, stack heights, fugitive emissions, and/or malfunction emission the impacts on communities or geographical areas can vary.

The only thing to add is that the only major emitter of chloroprene in the Nation is Denka. Further, the only emitter of EtO in St James and St John is Evonik (St John Parish, city of Reserve). This simplifies the source attribution for those high risk driver chemicals.

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

EPA Region 6's air permit program has not placed LDEQ "on notice" that it should undertake a cumulative impacts analysis. LDEQ would have completed an air quality impacts analysis for NAAQS pollutants in issuing the Formosa permit which should have considered emissions from other existing sources and LDEQ would have also done a screening against their State air toxics standards during the permitting process. Keep in mind EPA does not have any ambient air quality standards for air toxic pollutants. LDEQ also did an environmental justice analysis during the permitting process and received comments during the public comment period on the analysis (this is part of the subject litigation in State

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When will we have the new air monitoring results for Denka.

EPA has Continuous Air Monitoring Data (SPods) through January 6, 2022 (update to the website last week). Denka's next submittal of Fenceline Monitoring (FLM) data related to EPA's 114 is due to EPA on March 4, 2022. After submittal, OAR will need some amount of time (estimated to be a couple of weeks but less than 30 days) for their QA/QC review.

Continuous Air Monitoring Data Link
https://www.epa.gov/la/denka-air-monitoring-data-summaries

EPA R6/OECA/OAR are working to post the FLM data to EPAs LaPlace website. No firm date yet, when this will occur. I think we all have a goal to get the initial submittal posted before the next submittal is due (March 4, 2022), however Senior leadership will need to review all materials before anything gets posted.

There are a lot of different monitoring networks around Denka right now. EPA receiving fenceline monitoring data from the passive samplers that began operation on Jan. 7. We received a first set of monitoring data on Feb. 4; OAR has been working on making that data more easily consumable. OECA can make the raw data available for internal EPA discussions if necessary.

Other monitoring: result updates from a set of SPod monitors and periodic monitors that Denka keeps in the community. That data comes in about monthly; I can try and run down the most recent results and get them to you.

We have a map prepared by OAR with the monitoring locations and the most recent fenceline monitoring data. Brenda Shine is the contact for this work product.

Matt Woody in OAR also has emissions data and modeled concentrations for facilities in the area for emissions year 2017.

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Thursday, February 24, 2022 8:20 AM
To: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Cc: Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: RE: re: LDEQ Briefing for Melissa Hoffer

Good morning,

I have a bunch of technical information sent from the Region. I can do my best to explain it to Melissa, but it will probably be a reading of the responses. Mary has not responded at all. Much of the information that Melissa is asking for is discovered during the investigation phase and it would be good to let her know that ahead of time. Otherwise I will do the best I can.

Zahra

From: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Sent: Thursday, February 24, 2022 8:05 AM
To: Khan, Zahra <Khan.Zahra@epa.gov>
Cc: Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: re: LDEQ Briefing for Melissa Hoffer

Hi Zahra.

I'm checking in to see if you have all the information you need for the briefing with Melissa Hoffer today and whether you need anything from me or Lilian. Have you been able to coordinate with Mary on this at all? Looks like she accepted the meeting.

I saw the email traffic from Region 6 on your call for information yesterday. I didn't see any incoming from OECA, ORD or OAR, though I think you said you were contacting those folks separately.

Please let me know if you'd like to discuss. Thanks.

Anhthu Hoang
Acting Deputy Director
External Civil Rights Compliance Office
212-637-5033

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/24/2022 3:57:55 PM
To: Khan, Zahra [Khan.Zahra@epa.gov]
CC: Leathers, James [Leathers.James@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]
Subject: RE: re: LDEQ Briefing for Melissa Hoffer

Zahra,

Justin on our team would be the person to send the LA Air Regulations to you. MM

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From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Thursday, February 24, 2022 9:27 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Leathers, James <Leathers.James@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>
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Keep in mind Formosa is not yet constructed. Attribution information may be available but would require significant time to pull together. Additionally, EPA would need to determine the boundary for what one would want considered (ex. 50 km or 30 miles) as the impact zone. This exercise could get very time consuming.

As for other sources of pollution, we might also be able to use TRI (Toxics Release Inventory) to identify top toxic air pollutant emitters in some order in a given area (possibly Parish level).

What the specific LA air permitting regs/statutes require for purposes of the permit renewals and new permits at issue here?

Title V operating permits for air emission major sources have to be renewed every 5 years. Formosa would need to go through new source review for construction permits, which is issued by LDEQ in accordance with LDEQ's EPA approved State Implementation Plan (SIP) requirements whether it is a new major source or a new minor source (this includes existing facility expansion projects). Formosa's prevention of significant deterioration (PSD) permit which is a type of new source review construction permit was proposed for public comment and an opportunity for public hearing was provided. The PSD permit (including the title V operating permits) are currently subject to litigation in State court (State's permitting process has to have a process where public commenters can appeal permit issuance). In addition, Formosa's title V operating permits have been petitioned to EPA regarding adequacy (which is a process public commenters can use to challenge the adequacy of those permits).

Where there are numerous polluting facilities co-located in a community, how do we attribute causation for purposes of establishing a Title VI violation?

Causation question is more complicated.....you have to keep in mind one source may have a more significant impact on NAAQS (National Ambient Air Quality Standards) emissions potentially causing an area to trend towards non-attainment (ex. RAIN CII in St. Bernard Parish) and another may have a more significant causation issue based on its air toxic emissions from a risk perspective (ex. Denka). A good example is that a facility with high ethylene oxide or chloroprene emissions may drive cancer risk in an area due to its IRIS (Integrated Risk Information System) values more so than a facility with significant NAAQS emissions contributing to SO2 pollution or ozone pollution. Also, keep in mind certain pollutants travel or disperse differently than others and depending upon the types of pollutants, stack heights, fugitive emissions, and/or malfunction emission the impacts on communities or geographical areas can vary.

The only thing to add is that the only major emitter of chloroprene in the Nation is Denka. Further, the only emitter of EtO in St James and St John is Evonik (St John Parish, city of Reserve). This simplifies the source attribution for those high risk driver chemicals.

Whether EPA policy or guidance has placed LA on notice that it should undertake an analysis of cumulative impacts for purposes of issuing the relevant air permits at issue;

EPA Region 6's air permit program has not placed LDEQ "on notice" that it should undertake a cumulative impacts analysis. LDEQ would have completed an air quality impacts analysis for NAAQS pollutants in issuing the Formosa permit which should have considered emissions from other existing sources and LDEQ would have also done a screening against their State air toxics standards during the permitting process. Keep in mind EPA does not have any ambient air quality standards for air toxic pollutants. LDEQ also did an environmental justice analysis during the permitting process and received comments during the public comment period on the analysis (this is part of the subject litigation in State court). Under CAA regulatory provisions.....State permitting authorities are not required to evaluate air quality impacts as part of the title V operating permit renewal process. Air quality impact analysis is typically required as a function of

adding new emission sources to the airshed in a given area. EPA's air toxics regulatory program is more of a technology based program broken down into industrial sector control regulations or specific equipment sectors.....it's not regulated like national ambient air pollutants.

When will we have the new air monitoring results for Denka.

EPA has Continuous Air Monitoring Data (SPods) through January 6, 2022 (update to the website last week). Denka's next submittal of Fenceline Monitoring (FLM) data related to EPA's 114 is due to EPA on March 4, 2022. After submittal, OAR will need some amount of time (estimated to be a couple of weeks but less than 30 days) for their QA/QC review.

Continuous Air Monitoring Data Link
https://www.epa.gov/la/denka-air-monitoring-data-summaries

EPA R6/OECA/OAR are working to post the FLM data to EPAs LaPlace website. No firm date yet, when this will occur. I think we all have a goal to get the initial submittal posted before the next submittal is due (March 4, 2022), however Senior leadership will need to review all materials before anything gets posted.

There are a lot of different monitoring networks around Denka right now. EPA receiving fenceline monitoring data from the passive samplers that began operation on Jan. 7. We received a first set of monitoring data on Feb. 4; OAR has been working on making that data more easily consumable. OECA can make the raw data available for internal EPA discussions if necessary.

Other monitoring: result updates from a set of SPod monitors and periodic monitors that Denka keeps in the community. That data comes in about monthly; I can try and run down the most recent results and get them to you.

We have a map prepared by OAR with the monitoring locations and the most recent fenceline monitoring data. Brenda Shine is the contact for this work product.

Matt Woody in OAR also has emissions data and modeled concentrations for facilities in the area for emissions year 2017.

From: Khan, Zahra <Khan.Zahra@epa.gov>
Sent: Thursday, February 24, 2022 8:20 AM
To: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Cc: Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: RE: re: LDEQ Briefing for Melissa Hoffer

Good morning,

I have a bunch of technical information sent from the Region. I can do my best to explain it to Melissa, but it will probably be a reading of the responses. Mary has not responded at all. Much of the information that Melissa is asking for is discovered during the investigation phase and it would be good to let her know that ahead of time. Otherwise I will do the best I can.

Zahra

From: Hoang, Anhthu <Hoang.Anhthu@epa.gov>
Sent: Thursday, February 24, 2022 8:05 AM
To: Khan, Zahra <Khan.Zahra@epa.gov>

Cc: Dorka, Lilian <Dorka.Lilian@epa.gov>
Subject: re: LDEQ Briefing for Melissa Hoffer

Hi Zahra.

I'm checking in to see if you have all the information you need for the briefing with Melissa Hoffer today and whether you need anything from me or Lilian. Have you been able to coordinate with Mary on this at all? Looks like she accepted the meeting.

I saw the email traffic from Region 6 on your call for information yesterday. I didn't see any incoming from OECA, ORD or OAR, though I think you said you were contacting those folks separately.

Please let me know if you'd like to discuss. Thanks.

Anhthu Hoang
Acting Deputy Director
External Civil Rights Compliance Office
212-637-5033

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 2/24/2022 5:42:09 PM
To: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Thrush, Dale [Thrush.Dale@epa.gov]
CC: Murdock, Russell [Murdock.Russell@epa.gov]
Subject: RE: wastewater treatment plant at Denka
Attachments: Denka RCRA 3007 Information RequestFeb22.docx

I'm so sorry – I thought I sent it to you all. Here is the latest.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, February 24, 2022 11:38 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: wastewater treatment plant at Denka

Margaret,

When we spoke yesterday morning, we agreed that in order to be consistent and make sure the latest version has all accepted comments you would revise to include the comments we discussed. I have not seen an updated version since and that is the version I would like to work from. Thanks, MM

From: Moncrieffe, Marcia
Sent: Thursday, February 24, 2022 9:21 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Subject: RE: wastewater treatment plant at Denka

Thanks, MM

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, February 24, 2022 9:19 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Subject: RE: wastewater treatment plant at Denka

I haven't received any additions from Water Enforcement yet so the current draft is the one I shared yesterday. I'll be speaking with Bryant this morning and will share anything I receive.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, February 24, 2022 8:34 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Subject: RE: wastewater treatment plant at Denka

PS:

Could you please share with me the last version of the RCRA 3007 Information Request so that I may review with these new facts (Bryant was able to find the Denka LPDES permit and they have an onsite wastewater treatment system with activated sludge).

Marcia

From: Moncrieffe, Marcia
Sent: Thursday, February 24, 2022 8:30 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Subject: RE: wastewater treatment plant at Denka

Good morning, Margaret,

Would the sludge and all filters be considered solid/hazardous waste? They would at a minimum be solid and hazardous waste under the statute.

Wouldn't they carry the waste codes? As regulatory solid and/or hazardous waste, I would need to know the facts about them, including Denka's knowledge of the process and/or testing to make its hazardous waste determination.

I think it is important that whomever is coming-up with questions coordinate with me because when I construct the questions I have in mind a legal rationale for each question and the element(s) of a legal claim. Also, I would suggest that they also review the entire set of questions to make sure their new questions are not covered already.

Thanks,
Marcia

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, February 23, 2022 5:04 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Subject: wastewater treatment plant at Denka

Bryant was able to find the Denka LPDES permit and they have an onsite wastewater treatment system with activated sludge. Would the sludge and all filters be considered solid/hazardous waste? Wouldn't they carry the waste codes? Bryant and Steve are coming up with some questions to add to the 3007 about hazardous and solid waste streams going to the treatment system but if you have some ideas, please provide them.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for solid and hazardous waste[1] it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and solid and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA solid and hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately

[1] For purposes of this Section 3007 of RCRA, 42 U.S.C. § 6927, Information Request, the terms "hazardous waste" and "solid waste" shall have the meanings set for at Sections 1004(5) and (27) of RCRA, 42 U.S.C. § 6903, respectively.

justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

cc:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

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ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term “Facility” or “Facilities” shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you’ve specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of solid waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[2]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.

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[2] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

4. For question number three above, please provide copies of hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event, to include both the vapor and liquid amounts?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNID, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard

space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
    i. What emission control devices are on each unit?
    ii. What type of emission could potentially leak and/or escape for each unit?
    iii. What is the inspection maintenance protocol for each unit?
    iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.
11. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
12. What knowledge does Denka have of operational drinking water wells at or near its Facility?

13. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
14. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
15. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
16. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
17. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
18. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
19. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
20. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
21. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
22. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.
    i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).
23. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 2/24/2022 9:14:07 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]
Subject: FW: DENKA 3007
Attachments: Denka RCRA 3007 Information RequestFeb22_Winput.docx

Importance: High

Margaret,

I am now on another call- FIOA for the Crossett/ADEQ Title VI and Enforcement case.

Therefore, I think it is best if you could please use Bryant's version attached hereto and replace the current Question 22 with this New Question 22:

22. For purposes of the LPDES 2017 Permit, please respond to the following:

i. As listed in Denka's 2017 LPDES permit, are Denka's external and internal outfalls currently as stated in the 2017 version of Denka's LPDES Permit?

ii. In addition to the Mississippi River, are there other bodies of water that these outfalls (internal and external) discharge to? If yes, please list and correlate with the respective outfall(s).

iii. Please provide PNID or engineered diagrams that identifies the tanks, surface impoundments, and other related features of the units covered by the LPDES permit.

I will be available to talk later and have sent you an invitation.

Thanks,
MM

From: Smalley, Bryant <smalley.bryant@epa.gov>
Sent: Thursday, February 24, 2022 12:55 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: DENKA 3007

My apologies, I forgot to attach earlier.

Let me know if you have questions.

B

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, February 24, 2022 12:50 PM
To: Smalley, Bryant <smalley.bryant@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: DENKA 3007

Good afternoon, Bryant,

I can be available today at 3:30 pm for us to talk or early tomorrow morning.

I am awaiting your recommended questions for the referenced matter and may have questions before I update the information request. Thanks, Marcia

[EMBED MSPhotoEd.3]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: XXXX

Cory Green
SR. SHE CONSULTANT
Denka Performance Elastomer LLC
560 HIGHWAY 44
La Place, LA 70068

Re: Request for Information pursuant to Section 3007 of Resource Conservation and Recovery Act regarding operations of Denka Performance Elastomer ("Denka") La Place, Louisiana.

Dear Mr. Green,

Enclosed is an Information Request ("Request") issued to Denka for its facilities defined and identified in the enclosed Request. This Request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the Environmental Protection Agency, Region 6 ("EPA") may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA, 42 U.S.C. §§ 6921 – 6992k at its locations in Region 6.

EPA is conducting an investigation and records review of Denka's management practices for solid and hazardous waste[1] it generates and/or receives from sources including but not limited to wastes generated on site from maintenance and/or other activities. The predicate for this investigation and records review is supported by information EPA has that confirms Denka's processes and solid and hazardous waste generation, storage, and/or disposal have resulted in the release of hazardous air pollutants into the ambient air. Further, EPA has evidence that supports a likelihood that Chloroprene is a hazardous waste and a carcinogen. EPA has community monitoring data confirming the release of chloroprene into the ambient air. While these facts, taken together may or may not represent violation(s) of RCRA solid and hazardous waste management requirements, they provide EPA with sufficient information to issue this Request.

Please respond to this Request within twenty-one (21) calendar days of receipt. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the Resource Conservation and Recovery Act. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately

[1] For purposes of this Section 3007 of RCRA, 42 U.S.C. § 6927, Information Request, the terms "hazardous waste" and "solid waste" shall have the meanings set for at Sections 1004(5) and (27) of RCRA, 42 U.S.C. § 6903, respectively.

justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, *et. seq*. Your response to this Request should be sent to Fred Deppe (6ECDSR) at the above address and/or by email at [HYPERLINK "mailto:Deppe.Fred@epa.gov"].

Please direct technical questions to Mr. Fred Deppe of the Waste Enforcement Branch at (214) 665-7591, and legal questions to Ms. Marcia Moncrieffe of the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and Compliance
Assurance Division

Enclosures
cc:

CORY-GREEN2@DENKA-PE.COM

cc:

Craig Easley: [HYPERLINK "mailto:Craig.easley@"]la.gov

Phyllis Luke: [HYPERLINK "mailto:Phyllis.luke@"]la.gov

ED_013532_00002142-00002

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency, Region 6 ("EPA") is investigating Denka Performance Elastomers LLC's (Denka or Denka's) compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA for the the facility identified in question 4 below, within twenty-one (21) days from the date you receive this Request.

If you anticipate that you will be unable to fully respond to this Request for your facility, you must submit a sworn affidavit or declaration by a responsible corporate official within fourteen (14) calendar days of receipt of this Request specifying what information will be provided within the specified 21 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA may extend the time in which Denka must provide the responsive information. Please note, as well, that EPA retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Denka. A Statement of Certification making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject Denka to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Fred Deppe
Waste Enforcement Branch (6ECDSR)
Enforcement and Compliance Assurance Division
U.S. EPA - Region 6
1201 Elm St, Suite 500
Dallas, TX 75270
Email: [HYPERLINK "mailto:Deppe.Fred@epa.gov"]
Phone: 214-665-7591

I. INSTRUCTIONS

1. The enclosed Statement of Certification (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy). The terms "document" and "documents" shall mean any object that presents information, both electronic and tangible.

4. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized States hazardous waste program. The term “Facility” or “Facilities” shall mean Denka locations owned and/or operated by Denka in La Place, Louisiana that generate, treat, store, or dispose of hazardous waste.

5. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the questions below.

   a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

   b. For what period of time do you request the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you’ve specified.

   c. What measure(s) have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?

d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. INFORMATION REQUESTED

1. Providing a process diagram as support, please identify and list all **Denka's points of solid waste generation**. For this question, please include a description of Denka's management of all unused and/or outdated ingredients/products that would have been used in Denka's process(es) and the manner of destruction and disposal.[2]
2. For question number one above, please provide copies of all hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
3. Please identify all **actual and potential points of generation** for the Waste Coagulate, and the Waste Polymer (commonly referred to as "popcorn"). Also, include any closed vent piping or header systems that accumulate Waste Coagulate and Waste Polymer.

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[2] As a note, the response to question one should include a response for all the units that are specifically identified in this information request, but not limited to the specified units and/or areas of concern listed herein. Further, please ensure that all hazardous waste reported on the Facility's RCRA permit, waste analysis plan, and the RCRA 8700-12 notification are cross-referenced to their respective point of waste generation and can be identified easily on Piping and Instrumentation Diagram(s) ("PNID") or other similar form(s) of engineered process flow diagrams that Denka submits.

4. For question number three above, please provide copies of hazardous waste determinations (including documentation to support the conclusion) whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
5. For the **Poly-Building**, please respond to the following questions:
   i. Provide a process flow diagram of all processes that take place in the Poly-Building. Identify inputs, outputs, and points of waste generation.
   ii. How often does Denka perform a clean-out of the five (5) or more Poly Kettles in the Poly-Building?
   iii. Since Denka reported achieving at least a 50% reduction in emissions from the Poly Building Wall Fans, have there been any operational or equipment changes that impacted the Poly Building Wall Fans' emissions?
   iv. Please provide a copy of the document that supports the 50% reduction in emissions.
   v. What is the amount of solid and/or hazardous waste generated by weight (in kilogram/pounds) from each clean-out event, to include both the vapor and liquid amounts?
   vi. List any cleaning agents used in the clean-out of the Poly Kettles, i.e., solvents.
   vii. Describe where the waste generated is taken to be stored, managed, treated, and ultimately disposed.
   viii. If the waste generated from the clean out is stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and/or ultimate disposal site? If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the Treatment, Storage, and Disposal ("TSD") facility.
6. For the **Open Brine Pit**, please respond to the following questions:
   i. List the number and origination of all waste streams that feed into and/or placed into the Open Brine Pit.
   ii. What is the amount of solid and/or hazardous waste by weight (in kilogram/pound) removed from the Open Brine Pit on a monthly basis and/or by cleaning event?
   iii. Has there been any overflow of the Open Brine Pit? If yes, when and how was the overflow managed by Denka?
   iv. Where is the solid and/or hazardous waste in the Open Brine Pit taken to be stored, managed, treated, and/or ultimately disposed?
   v. If stored, managed, treated, and/or disposed on site, state how long the waste was stored, where on site it was stored, the treatment method, and the ultimate disposal site. If stored, managed, treated, and/or disposed off-site, provide the name, identification number, and the location of the TSD facility.
   vi. Is the Open Brine Pit a Tank or a Surface Impoundment in accordance with RCRA requirements? Provide construction drawing and details such as a PNID, or other engineering documents, that demonstrate the open brine pit is a tank or surface impoundment. Also, include in your answer information on freeboard

space, if any, and photographs of the Open Brine Pit that show all visible perspectives.

7. For your **Underground Injection Wells**, please answer the following questions:
   i. Provide in one spreadsheet the dates, failures of any kind (like gasket breaks) that contributed to emission releases, the types and duration of emissions, and the time each failure took to repair.
   ii. What is the origination, generation of waste streams, and/or sources of the waste streams that are placed in Denka's UIC Wells?
   iii. Please provide a description of waste generated from the storage, clarification, neutralization and filtration of waste streams sent to the Aqueous Wate Area, prior to underground injection, as well as maintenance activities and how this waste is handled.
   iv. Provide copies of waste determinations (including documentation to support the conclusion) for each separate waste stream that is placed in the UIC Wells, whether by testing or by knowledge of process, which were made contemporaneous to the time of waste generation and before any dilution, mixing, or other alteration of the waste.
8. Please provide information regarding all emergency and non-emergency response events associated with RCRA releases at or from the Denka Facility over the last three years.
   i. Provide all waste determinations (including documentation to support the conclusion) made in response to clean up of all releases.
   ii. Provide a brief narrative of each event and identify the type of release, clean up and/or remediation method(s), related unit(s) and/or process(es).
9. How many **Roll-off Boxes and other Containers** are managed at the Facility? Please answer the following questions as they relate to Denka's Roll-Off Box(es) and other containers:
   i. Provide photographs of each Roll-off Box and other containers.
   ii. What waste is stored and/or managed in the Roll-off Box(es) and other containers. Also, state the origination and final disposition of each waste stream that is managed in these units.
   iii. How are emissions from Roll-off Box(es) and other containers controlled?
   vii. What is the ultimate disposal site of the waste in these Roll-Off Boxes and other containers? If on-site, describe the location. If off-site, please provide the name, identification number, and the location of the TSD facility.
10. For all management, storage, and/or treatment units including but not limited to, containers, tanks for treatment and/or storage, that are not listed in questions five through nine above, please list and answer the following questions:
   i. What emission control devices are on each unit?
   ii. What type of emission could potentially leak and/or escape for each unit?
   iii. What is the inspection maintenance protocol for each unit?
   iv. Provide a copy of the Standard Operating Procedure that addresses emission controls, maintenance, repairs, and delays in repairs for all units (included the units listed in questions five through nine) at the Facility.

11. Provide an description of specific waste streams that could contain Chloroprene, that are sent to the wastewater treatment plant and identify if any of the streams are hazardous.
12. Provide a description of the sludge removal and handling procedures form the WWTP, whether the sludge is sampled to determine if it is hazardous and where and how it is disposed.
13. Have there been any runoffs of any kind into the Mississippi River or any Bayous? If yes, describe and state how often, the amount, and contaminants.
14. What knowledge does Denka have of operational drinking water wells at or near its Facility?
15. Please provide copies of reported exceedances from all your monitoring wells, to include types of exceedances, dates, and amounts.
16. From Denka's knowledge, which of its solid waste and/or hazardous units have the propensity for the largest amount of Air emissions, Water discharges, and/or RCRA disposals? Please describe events (if any), dates, types of emissions, and amounts.
17. Provide a log showing inspection compliance for the last three years of all waste management units covered under 40 CFR 264 Subparts I, J, and K as they pertain to air emission standards and other RCRA management requirements.
18. Please submit all records for the last three years for all Hazardous Waste Management units and associated piping works demonstrating compliance with RCRA subparts AA, BB, and CC. For this response, submit detailed drawings and identify all inspection points.
19. For each unit at the Facility which potentially or actually produces air emissions, please explain if the unit is covered by either Title V of the CAA or RCRA subparts AA, BB, and/or CC and the rationale for Denka's decisions as to which subpart is applicable to the respective unit. If Denka elected to operate any of these units under an applicable CAA permit, please cite to the permit and provide a certification of compliance with the CAA permit prepared contemporaneously at the time the election was made for the unit(s) to operate under the CAA permit instead of RCRA.
20. For all waste (solid or hazardous waste) that Denka generates, please prepare a chart listing the final disposal site, whether on-site or off-site, by generation unit, contaminant, and associated levels in mg/L. And please provide the required Land Disposal Restrictions notice that was prepared contemporaneously and with the respective dates accordingly.
21. What connection(s) if any is there from the Denka Facility and to any municipal drinking water supply, well water, recreational water, or waters that have fish or birds, including migratory birds?
22. Does Denka hold a LPDES Permit? If yes, what are the outfalls and to what body of water do they discharge? If yes, please provide PNID or engineered diagrams that identifies the tanks and surface impoundments and other related features.
23. How much water does Denka draw from the Mississippi River annually? In what process(es), is this water used? Does Denka return, discharge, and/or dispose of any solid, liquid, and or semi-solids into the Mississippi River, Bayous, and/or other waterways?
24. Describe the systems in place for the washing and cleaning of equipment and vessels and the ultimate collection and disposal of these wash waters.

i. Please provide PNID or engineered process flow diagrams which show points of waste generation and travel/distance between units to terminal storage and disposal location(s).

25. Are there stormwater run-offs from the Facility that are contaminated with Chloroprene? How does Denka determine whether there are stormwater run-offs? How does Denka manage and contain its stormwater run-offs from its Facility?

ENCLOSURE B

STATEMENT OF CERTIFICATION

Denka Performance Elastomeres LLC

I certify that I am authorized to respond to this information request on behalf of Denka and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2022.

_____
(Signature)

_____
(Name)

_____
(Title)

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 3/8/2022 11:05:22 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: Denka - documents

Thanks Fred!

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Tuesday, March 8, 2022 3:18 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka - documents

Margaret,

I put in everything I have.

Fred

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, March 08, 2022 2:50 PM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: Denka - documents
Importance: High

Hi Fred and John:

I've created a SharePoint document library for Denka documents. Can you please save any permits, etc. into that so we can share it with the rest of the inspection team?

I will put the NEIC inspection report in there.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]
Sent: 3/10/2022 4:28:33 PM
To: Welton, Patricia [Welton.Patricia@epa.gov]; McGuire, James [McGuire.James@epa.gov]
CC: Murdock, Russell [Murdock.Russell@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; McDonald, Ashley [McDonald.Ashley@epa.gov]
Subject: RE: Denka Performance Elastomer | RCRA Information Request

Tricia,

Thanks for your response and you are welcome.

We have a call scheduled with Margaret for this afternoon.

Best for your today,
Marcia

From: Welton, Patricia <Welton.Patricia@epa.gov>
Sent: Thursday, March 10, 2022 10:26 AM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; McGuire, James <McGuire.James@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>; Barnett, Cheryl <Barnett.Cheryl@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request

Yes. Thanks so much and great job. Thank you for including newer attorneys in the call also.
We discussed with Margaret in her management meeting this morning for the team to be considering what items – if not included on Denka's first response list – would they need as priority items for inspection etc. to help you prioritize any rolling response items.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Thursday, March 10, 2022 10:05 AM
To: McGuire, James <McGuire.James@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>; Barnett, Cheryl <Barnett.Cheryl@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request
Importance: High

Good morning, James and Tricia,

Cannot be sure you saw my email of yesterday. Please see below a read-out from the call I had with Denka. I remain available. Marcia

The call with counsel for Denka went well. Basically, counsel raised the topics of:

1) Timing to respond; 2) Other EPA matters; 3) What triggered the request; and 4) The existence of a December 2021 Compliance Evaluation Report, which he will share with me this evening.

Regarding the timing- Denka is seeking an extension. I told him that before they request the extension Denka should determine what it can respond to within the 21 day so that both EPA and Denka are working in parallel to an effective and efficient outcome.

Other EPA Matters- Admittedly, I am aware of them but my purview is RCRA.

What Triggered the Request- As Denka is a RCRA permitted facility, EPA has a duty to ensure its compliance with RCRA. My roll is to assist the program in its determination of Denka's compliance with RCRA.

The 2021 LDEQ Compliance Evaluation Report- He will send me a copy this evening, which I will review with Fred to see if it answers to EPA satisfaction any of the RCRA 3007 questions.

We have another call scheduled for next Tuesday and maybe before (to be held on Monday 3/14)) if Denka is ready to say what it can respond to by the 21st.

From: Moncrieffe, Marcia
Sent: Wednesday, March 09, 2022 11:32 AM
To: McGuire, James <McGuire.James@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>; Barnett, Cheryl <Barnett.Cheryl@epa.gov>; George, Elizabeth A <George.Elizabeth.A@epa.gov>; McDonald, Ashley <McDonald.Ashley@epa.gov>
Subject: FW: Denka Performance Elastomer | RCRA Information Request

Good morning, Tricia and James,

As you will see from the emails below, I am scheduled today(3/9) to speak with Kevin Voelkel and Jason Hutt (counsel for Denka) regarding the RCRA information request.

In the normal course of our RCRA enforcement and the issuance of an information request, these calls are routine to discuss timing of the response, mode of the response, etc. However, given the CAA case and the global interest directed on Denka, I wanted you to be aware of my call of this afternoon so that you may share any limitations (in addition to the obvious CAA discussions) for purposes of this call that you want me to mark.

Also, for your information, I have invited Elizabeth and Ashley to the call to provide them with an opportunity to gain insight about our RCRA 3007 Information process.

Thanks in advance,
Marcia

From: Moncrieffe, Marcia
Sent: Wednesday, March 09, 2022 6:54 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request

You are welcome.
Marcia

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, March 08, 2022 6:00 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request

Thank you, Marcia.

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Tuesday, March 8, 2022 3:13 PM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request

Kevin,

Thanks for the follow-up.

Then I will send the invitation for just us attorneys.

Marcia

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, March 08, 2022 2:07 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request

Thanks very much, Marcia. 3:30 CT tomorrow works well for me.

I was hoping to schedule this brief update call among counsel to coordinate timing of the response. I anticipate we may schedule a subsequent call to address technical issues. I would welcome Margaret, Fred, and James to join, but want to clarify that I do not intend to cover technical issues on this call (and DPE's technical team will not be joining).

Regards,
Kevin

From: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Sent: Tuesday, March 8, 2022 2:35 PM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Cc: Hutt, Jason <jason.hutt@bracewell.com>; Deppe, Fred <Deppe.Fred@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Performance Elastomer | RCRA Information Request
Importance: High

Good afternoon, Kevin,

Thanks for your response and your earlier call. I have copied my technical team to this email.

I can have time tomorrow afternoon at 3:30 PM (CST) and would be happy to send an invitation. I cannot be sure if Margaret, Fred and/or James will be available, but if they are not available, I will facilitate the call with you.

Please let me know if the time I have suggested works for you and your team.

Thanks in advance and with kind regards,
Marcia

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Tuesday, March 08, 2022 1:18 PM
To: Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Cc: Hutt, Jason <jason.hutt@bracewell.com>
Subject: Denka Performance Elastomer | RCRA Information Request

Marcia,

I am writing to follow-up on the voicemail message I left earlier this afternoon. Jason Hutt and I represent Denka Performance Elastomer. I was calling earlier to provide an update on the company's response effort and timing in connection with EPA's February 24 information request. Would you have time today or tomorrow to connect by phone to discuss?

Thanks,
Kevin

KEVIN M. VOELKEL
Associate
kevin.voelkel@bracewell.com | download v-card
T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

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Appointment

From: Penland, John [Penland.John@epa.gov]
Sent: 8/12/2022 3:09:52 PM
To: Penland, John [Penland.John@epa.gov]; george.weiber@erg.com; bholden@joneswalker.com; christopher-meyers@denka-pe.com; Davies, Lynne [Davies.Lynne@epa.gov]; tbartholomew@joneswalker.com; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; bvenn@joneswalker.com; Young, Justin [Young.Justin@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George Wieber [george.wieber@erg.com]

Subject: Denka CBI Redactions Review - with Denka

Start: 8/12/2022 4:30:00 PM
End: 8/12/2022 5:30:00 PM
Show Time As: Busy

Required Attendees: george.weiber@erg.com; bholden@joneswalker.com; christopher-meyers@denka-pe.com; Davies, Lynne; tbartholomew@joneswalker.com; Osbourne, Margaret; Yurk, Jeffrey; bvenn@joneswalker.com; Young, Justin
Optional Attendees: Deppe, Fred; Murdock, Russell; George Wieber

-----Original Appointment-----
From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, August 11, 2022 2:39 PM
To: Penland, John; george.weiber@erg.com; bholden@joneswalker.com; christopher-meyers@denka-pe.com; Davies, Lynne; tbartholomew@joneswalker.com; Osbourne, Margaret; Yurk, Jeffrey; bvenn@joneswalker.com; Young, Justin
Subject: Denka CBI Redactions Review - with Denka
When: Friday, August 12, 2022 11:30 AM-12:30 PM (UTC-06:00) Central Time (US & Canada).
Where:

This meeting is to review the CBI redactions made by Denka for the two inspection reports prior to publication.

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Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 4/13/2022 12:29:36 PM
To: Young, Justin [Young.Justin@epa.gov]

good morning Justin, Just wanted to let you know that inspectors plan to make entry at DuPont today, in support of the PAT project. The inspection will not touch the Denka portion of the complex, and no Denka staff will be needed or requested. No mention of the upcoming RCRA inspection will be made or the planned GMAP monitoring that will occur late next week.

Weather conditions in the area influenced this recent change of plans. It has been approved by RCRA and Air (Enforcement) Management in the Region and our Air DOJ lead. Let me know if you have questions.

Message

From: Young, Justin [Young.Justin@epa.gov]
Sent: 4/13/2022 12:48:47 PM
To: Leathers, James [Leathers.James@epa.gov]

So with this change, Denka will not be notified about any future plans through the inspection team or DOJ?

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 4/19/2022 8:08:19 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]

the GMAP is planned to make entry on Thursday or Friday. If the inspection team wants the GMAP to lock in a specific date that works best for them, we can accommodate the request (we just need to know which day). We agreed we would not make entry sooner that Thursday, but if the RCRA inspection team needs monitoring support (not able to speciate for Chloroprene) we can make entry tomorrow.

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 4/28/2022 3:54:02 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

Do you know if the State participated in the RCRA inspection at DPE?

Message

From: Burke, Shaun [Burke.Shaun@epa.gov]
Sent: 6/8/2022 12:59:13 PM
To: Penland, John [Penland.John@epa.gov]; Leathers, James [Leathers.James@epa.gov]
CC: Bobbs, Nicholas [bobbs.nicholas@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]
Subject: RE: TD12 - Denka Summa Canister Results

John feel free to send the report/results to whoever needs them, Weston or anyone at EPA.

ERG sends their files to me as a matter of procedure bc I am the COR< but after that it can go wherever needed.

From: Penland, John <Penland.John@epa.gov>
Sent: Tuesday, June 7, 2022 8:20 PM
To: Leathers, James <Leathers.James@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Helmich, Richard <Helmich.Richard@epa.gov>
Subject: RE: TD12 - Denka Summa Canister Results

Yes those are the sample results and I've got a draft trip report from Weston. I'll write up the Sampling Inspection Report tomorrow

---

From: Leathers, James <Leathers.James@epa.gov>
Sent: Tuesday, June 7, 2022 3:08 PM
To: Penland, John <Penland.John@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Helmich, Richard <Helmich.Richard@epa.gov>
Subject: FW: TD12 - Denka Summa Canister Results

John,

Can you please confirm that the attached Sample Results received today are from RCRA's follow-up inspection/site visit, where Weston assisted with the collection of samples. I think these are additional air canister samples that supplement the liquid and solid samples summarized by you below.

Please find attached the analytical report for the liquid and solid phase samples collected during the May 5, 2022, sampling inspection at Denka, LLC in LaPlace, LA.

Background:

The Brine Pit at Denka is an inground tank used for the accumulation and stabilization of neoprene "popcorn" from the Polymer Building. On May 5, 2022, EPA observed the "popcorn" management process and collected samples from the Brine Pit and of gases emitted from the handling of the "popcorn." Air sample results are still pending.

Sample Summary:

Sample DR-S-BP-05052022-02

This grab sample is of neoprene "popcorn" which was being removed from the Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized "popcorn" normally shipped offsite for disposal. Residual chloroprene is present in the solids at 1080ppm.

Samples DR-L-LB-05052022-01 and DR-L-LB05052022-02

These grab samples are of liquids collected from the Brine Pit as found prior to the addition of the neoprene "popcorn" observed during the inspection. Chloroprene is present in the liquids at an average of 63.5ppm (stdev 0.9) before the addition of the neoprene "popcorn".

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Brine Pit approximately 10 minutes after the addition of the neoprene "popcorn" observed during the inspection. The Chloroprene concentration has increased 437% to 341ppm.

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

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From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Tuesday, June 07, 2022 1:03 PM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>; Leathers, James <Leathers.James@epa.gov>; Helmich, Richard <Helmich.Richard@epa.gov>
Cc: Fried, Gregory <Fried.Gregory@epa.gov>
Subject: FW: TD12 - Denka Summa Canister Results

From: Jason Sese <Jason.Sese@erg.com>
Sent: Tuesday, June 7, 2022 1:56 PM
To: Burke, Shaun <Burke.Shaun@epa.gov>
Cc: Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Subject: TD12 - Denka Summa Canister Results

Shaun,

I've attached the canister analysis results. Let us know if you have any questions.

Thanks,
Jason

~~~~~~

Jason Sese
Senior Chemical Engineer
Eastern Research Group, Inc. (ERG)
14555 Avion Parkway, Ste 200
Chantilly, VA 20151
~~~~~~

Message

From: Bobbs, Nicholas [bobbs.nicholas@epa.gov]
Sent: 7/25/2022 8:54:34 PM
To: Leathers, James [Leathers.James@epa.gov]
Subject: Bobbs, Nicholas shared the folder "Denka Response to 7-7-22 114 Request" with you.

Bobbs, Nicholas shared a folder with you

Hi James,

I realized that you might not have access to the Bracewell share file, so here are Denka's response documents to our 114 following up on the June inspection. Note that some of the documents are CBI.

-Nick

Denka Response to 7-7-22 114 Request

This link only works for the direct recipients of this message.

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Microsoft

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Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 7/27/2022 6:43:57 PM
To: Leathers, James [Leathers.James@epa.gov]
Subject: RE: Interim Report For ECAD Denka Enforcement Multimedia Sampling
Attachments: Redacted - FY2022 RCRA Sampling Inspection Report-Denka.pdf

---

From: Leathers, James <Leathers.James@epa.gov>
Sent: Wednesday, July 27, 2022 11:53 AM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Interim Report For ECAD Denka Enforcement Multimedia Sampling

Hey Jeff,

Can you provide me with a final sampling report (referenced below) that I can share with LDEQ?

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

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From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, June 29, 2022 7:07 AM
To: Leathers, James <Leathers.James@epa.gov>
Subject: FW: Interim Report For ECAD Denka Enforcement Multimedia Sampling

FYI

From: Penland, John <Penland.John@epa.gov>
Sent: Tuesday, June 28, 2022 5:48 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: Interim Report For ECAD Denka Enforcement Multimedia Sampling

This report is still in draft but this is the last one before it goes final

---

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Tuesday, June 28, 2022 3:37 PM
To: Penland, John <Penland.John@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>
Subject: Interim Report For ECAD Denka Enforcement Multimedia Sampling

John and Eric,

Please see attached report and attachments. I rolled all documents up into a single pdf and also included the word document for the report in case you need to extract anything.

Please let me know if you have any questions or edits you'd like for me to complete.

Thanks
David

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 2/24/2022 7:38:14 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Au, Doreen [Au.Doreen@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Craig Lutz [Lutz.Craig@epamail.epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]; Au, Doreen [Au.Doreen@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]
CC: Fried, Gregory [Fried.Gregory@epa.gov]; Caballero, Kathryn [caballero.kathryn@epa.gov]; Greene, Mary [Greene.Mary.E@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]; Parrish, Robert [Parrish.Robert@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hamre, Martha [Hamre.Martha@epa.gov]; Bobbs, Nicholas [bobbs.nicholas@epa.gov]; Diana Saenz (Saenz.Diana@epa.gov) [Saenz.Diana@epa.gov]

Subject: Denka inspection planning
Location: Microsoft Teams Meeting

Start: 2/28/2022 5:00:00 PM
End: 2/28/2022 6:00:00 PM
Show Time As: Busy

Required Attendees: Au, Doreen; Leathers, James; Deppe, Fred; Penland, John; Craig Lutz; Hoyt, Daniel; Foley, Patrick; Yurk, Jeffrey; Davies, Lynne; Young, Justin; Bellot, Michael; Chavez, Kimberly; Connell, Rebecca; Buenning, Hans; Sullivan, Greg; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Fried, Gregory; Caballero, Kathryn; Greene, Mary; Moncrieffe, Marcia; Helmich, Richard; Parrish, Robert; Spina, Providence; Hamre, Martha; Bobbs, Nicholas

This is to plan for an NEIC RCRA inspection at the Denka facility in (hopefully) the April timeframe. It will be a process-based inspection with sampling.

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Appointment

From: Young, Justin [Young.Justin@epa.gov]
Sent: 3/10/2022 5:12:39 PM
To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]
CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]; Leathers, James [Leathers.James@epa.gov]

Subject: Denka Inspection Planning
Attachments: Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment
Location: Microsoft Teams Meeting

Start: 3/14/2022 4:30:00 PM
End: 3/14/2022 5:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 12:30 PM to 1:00 PM
Required Attendees: Young, Justin; Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh
Optional Attendees: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Keteles, Kristen; Paul Buellesbach; Leathers, James

Agenda for 3/21/22

1. Documents with John Penland
2. Safety/PPE
3. NEIC/R6 pollution accountability
4. Other items

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Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]

CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]

Start: 3/21/2022 4:30:00 PM
End: 3/21/2022 5:30:00 PM

Recurrence: (none)

Optional Attendees: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Helmich, Richard

Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]; Leathers, James [Leathers.James@epa.gov]
CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]

Start: 3/28/2022 4:30:00 PM
End: 3/28/2022 5:30:00 PM
Show Time As: Busy

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh; Leathers, James

All,

I have updated the agenda for 3/28/22. I left a spot for general questions at the end, but if there is a specific topic anyone would like to discuss please let me know.

1. Roles/Responsibilities of Team
2. Safety/PPE
3. Sampling
4. GMAP

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Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]

CC: George Wieber [george.wieber@erg.com]; Janosh Wolters [Janosh.Wolters@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]

Start: 4/4/2022 4:30:00 PM
End: 4/4/2022 5:00:00 PM

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh

Agenda for 4/4/22

1. Safety/PPE
2. Pre inspection documents
3. Other items

Microsoft Teams meeting

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To: Wolters, Janosh [Wolters.Janosh@epa.gov]; Joe Watson [joe.watson@erg.com]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]

CC: Keteles, Kristen [Keteles.Kristen@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]; George Wieber [george.wieber@erg.com]

Start: 4/11/2022 4:30:00 PM
End: 4/11/2022 5:00:00 PM

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh
Optional Attendees: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Keteles, Kristen; Paul Buellesbach

Agenda for 4/11/22

1. Pre inspection meeting location
2. H&S/PPE review
3. Any other questions/comments

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Appointment

From: Carroll, Craig [Carroll.Craig@epa.gov]
Sent: 4/21/2022 11:00:45 PM
To: Carroll, Craig [Carroll.Craig@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Petersen, Chris [petersen.chris@epa.gov]; LaBombard, Will [LaBombard.Will@epa.gov]
CC: Penland, John [Penland.John@epa.gov]

Subject: Denka Sampling Request

Start: 4/22/2022 1:00:00 PM
End: 4/22/2022 1:25:00 PM
Show Time As: Busy

Recurrence: (none)

Required Attendees: Osbourne, Margaret; Yurk, Jeffrey; Petersen, Chris; LaBombard, Will
Optional Attendees: Penland, John

Meeting to discuss request for START sampling assistance at Denka facility.

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/25/2022 2:14:23 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Delgado, Eric [Delgado.Eric@epa.gov]
CC: Bordelon, David [David.Bordelon@WestonSolutions.com]; Wright, Jeff [Jeff.Wright@WestonSolutions.com]

Subject: Denka sampling brainstorm session
Location: Microsoft Teams Meeting

Start: 4/25/2022 6:30:00 PM
End: 4/25/2022 7:00:00 PM
Show Time As: Busy

Required Attendees: Penland, John; Moncrieffe, Marcia; Murdock, Russell; Deppe, Fred; Delgado, Eric

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/25/2022 7:47:38 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]; Bordelon, David [David.Bordelon@WestonSolutions.com]

Subject: Denka sampling followup
Location: Microsoft Teams Meeting

Start: 4/26/2022 3:00:00 PM
End: 4/26/2022 3:30:00 PM
Show Time As: Busy

Required Attendees: Delgado, Eric; Penland, John; Bordelon, David

David Borderline

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From: Davies, Lynne [Davies.Lynne@epa.gov]
Sent: 5/19/2022 5:33:24 PM
To: Davies, Lynne [Davies.Lynne@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Greenblum, Max [greenblum.max@epa.gov]; Schanilec, Kevin [Schanilec.Kevin@epa.gov]; Housman, Van [Housman.Van@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Lambert, Jason [Lambert.Jason@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]

Subject: Denka Coordination
Attachments: Outline for 4 29 2022 mtg.docx; FW: Denka Coordination; Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment
Location: Microsoft Teams Meeting

Start: 5/19/2022 5:30:00 PM
End: 5/19/2022 6:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
Occurs on Thursday every other week from 1:30 PM to 2:00 PM effective 5/19/2022 until 11/3/2022.
Required Attendees: Sullivan, Greg; Bellot, Michael; Young, Justin; Penland, John; Moncrieffe, Marcia; Mostaghim, Negin; Yurk, Jeffrey; Murdock, Russell; Deppe, Fred; George, Elizabeth A; Greenblum, Max; Schanilec, Kevin; Housman, Van
Optional Attendees: Osbourne, Margaret; Welton, Patricia; Lambert, Jason; Oif, Leslie

Didn't realize you weren't on this.

-----Original Appointment-----
From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, April 28, 2022 1:18 PM
To: Davies, Lynne; Saenz, Diana; Sullivan, Greg; Bellot, Michael; Young, Justin; Penland, John; Moncrieffe, Marcia; Mostaghim, Negin; Yurk, Jeffrey; Murdock, Russell; Deppe, Fred; George, Elizabeth A
Subject: Denka Coordination
When: Occurs every 2 week(s) on Thursday effective 5/19/2022 until 11/3/2022 from 1:30 PM to 2:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Please see the outline we developed 4/28/22.

Microsoft Teams meeting

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Appointment

To: Davies, Lynne [Davies.Lynne@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]

Subject: FW: Denka Coordination
Attachments: Outline for 4 29 2022 mtg.docx

Start: 5/19/2022 5:30:00 PM
End: 5/19/2022 6:00:00 PM

Recurrence: (none)

-----Original Appointment-----
From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, April 28, 2022 1:18 PM
To: Davies, Lynne; Sullivan, Greg; Bellot, Michael; Young, Justin; Penland, John; Moncrieffe, Marcia; Mostaghim, Negin; Yurk, Jeffrey; Murdock, Russell; Deppe, Fred; George, Elizabeth A; Saenz, Diana; Davies, Lynne
Subject: Denka Coordination
When: Thursday, May 19, 2022 1:30 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Please see the outline we developed 4/28/22.

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Appointment

To: Davies, Lynne [Davies.Lynne@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Lambert, Jason [Lambert.Jason@epa.gov]

Start: 6/30/2022 5:30:00 PM
End: 6/30/2022 6:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Required Attendees: Saenz, Diana; Sullivan, Greg; Bellot, Michael; Young, Justin; Penland, John; Moncrieffe, Marcia; Mostaghim, Negin; Yurk, Jeffrey; Murdock, Russell; Deppe, Fred; George, Elizabeth A

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Appointment

To: Davies, Lynne [Davies.Lynne@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; George, Elizabeth A [George.Elizabeth.A@epa.gov]

CC: Osbourne, Margaret [osbourne.margaret@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]; Lambert, Jason [Lambert.Jason@epa.gov]

Attachments: Outline for 4 29 2022 mtg.docx

Start: 7/14/2022 5:30:00 PM
End: 7/14/2022 6:00:00 PM

Recurrence: (none)

Start: 8/11/2022 5:30:00 PM
End: 8/11/2022 6:00:00 PM
Show Time As: Busy

Recurrence: (none)

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-----Original Appointment-----
From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, April 28, 2022 1:18 PM
To: Davies, Lynne; Saenz, Diana; Sullivan, Greg; Bellot, Michael; Young, Justin; Penland, John; Moncrieffe, Marcia; Mostaghim, Negin; Yurk, Jeffrey; Murdock, Russell; Deppe, Fred; George, Elizabeth A
Subject: Denka Coordination
When: Occurs every 2 week(s) on Thursday effective 5/19/2022 until 11/3/2022 from 1:30 PM to 2:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Please see the outline we developed 4/28/22.

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Appointment

From: Nance, Earthea [Nance.Earthea@epa.gov]
Sent: 6/13/2022 8:36:02 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Gonzalez, Iris [Gonzalez.Iris@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]

Subject: Copy: R6 Denka Update
Attachments: DENKA update 06132022.docx
Location: Microsoft Teams Meeting

Start: 6/23/2022 2:30:00 PM
End: 6/23/2022 3:00:00 PM
Show Time As: Tentative

Required Attendees: Wooden-Aguilar, Helena; Iris Gonzalez; Dwyer, Stacey; McGuire, James; Welton, Patricia; Barnett, Cheryl; Lannen, Justin; Seager, Cheryl; Smalley, Bryant; Steve Thompson; Leathers, James

Action Item Coordinator: James Leathers

Please send meeting materials 48 hours in advance to Sue Davis and James Turk
We ask that you connect 5 min. in advance of the scheduled start time.
If additional staff need to attend, notify Sue Davis and James Turk via email.

Microsoft Teams meeting

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1/4/22

ORA Meeting Request Form

Earthea Nance, Regional Administrator ☒
Helena Wooden-Aguilar, Acting Deputy Regional Administrator ☒

- **Today's Date:** June 13, 2022
- **Title of meeting or event:** Denka Update
- **Is this an ORA requested meeting: Yes ☒ or No ☐**
- **Purpose:** Update on Denka inspections and enforcement case
- **Desired Outcome:** Provide RA with inspection results
- **For RA Signature items including Proposed and Final Actions, correspondence, or other decisions: What is the signature deadline?** N/A
- **Classification (Urgent, Time Sensitive, Decision Making, Informative): Time Sensitive**
- **Date desired for meeting or no later than:** RA requested week of June 20, 2022
- **Length of meeting/event:** 60 minutes
- **Location/Platform:** Teams/virtual
- **Participants:** James McGuire, Patricia Welton, Cheryl Barnett, Justin Lannen, Cheryl Seager, Bryant Smalley, Steve Thompson, James Leathers
- **Will there be outside attendees?** No
- **Advance materials are required 48 Hours in Advance of any Meeting. Materials should include a WeCare Briefing Sheet and PowerPoint presentation.**
  Briefing sheet should include Environmental Justice impact and Climate Change impact (if any). It also should include activity that EPA has done or indicate none.
- **Name of individual who will be providing materials:** Steve Thompson
- **POC for questions: (add Phone #)** Cheryl Seager 972-971-9175
- **Action Items Coordinator:** James Leathers
- (This is a designated person who, during the meeting, will capture and ensure follow-up on any action items coming from meeting). Please allow for the last 5 minutes of the meeting to be used for review of action items.

**** Please submit completed forms to: Sue Davis,** [HYPERLINK "mailto:Davis.Suea@epa.gov"], **and James Turk,** [HYPERLINK "mailto:Turk.James@epa.gov"].

***** Division Director must be aware of meeting request.**

Appointment

From: Parrish, Robert [Parrish.Robert@epa.gov]
Sent: 5/26/2022 6:19:27 PM
To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]; Greenblum, Max [greenblum.max@epa.gov]; dan.smith2@usdoj.gov

Subject: Denka Management Call
Attachments: Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment
Location: Microsoft Teams Meeting

Start: 5/31/2022 3:30:00 PM
End: 5/31/2022 4:30:00 PM
Show Time As: Busy

Recurrence: Weekly
Occurs on Tuesday every other week from 11:30 AM to 12:30 PM effective 5/31/2022 until 12/31/2022.
Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne
Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary E.; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana; Oif, Leslie; Greenblum, Max; dan.smith2@usdoj.gov

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Appointment

To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Caballero, Kathryn [Caballero.Kathryn@epa.gov]

Start: 5/31/2022 3:30:00 PM
End: 5/31/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Carroll, Thomas (ENRD); Davies, Lynne

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Caballero, Kathryn

Appointment

To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]

Start: 6/14/2022 3:30:00 PM
End: 6/14/2022 4:30:00 PM

Recurrence: (none)

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana

Appointment

To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]

Start: 6/28/2022 3:30:00 PM
End: 6/28/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana

Appointment

To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Gange, Heather (ENRD) [Heather.Gange@usdoj.gov]; Purdy, Angeline (ENRD) [Angeline.Purdy@usdoj.gov]; Oif, Leslie [Oif.Leslie@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Gange, Heather (ENRD) [Heather.Gange@usdoj.gov]; Purdy, Angeline (ENRD) [Angeline.Purdy@usdoj.gov]

Start: 7/26/2022 3:30:00 PM
End: 7/26/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne; Hoyt, Daniel

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary E.; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana; Gange, Heather (ENRD); Purdy, Angeline (ENRD); Oif, Leslie

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To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]

Start: 8/9/2022 3:30:00 PM
End: 8/9/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne

Optional Attendees: Murdock, Russell; Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary; Gubin, Brian; Frazier, Hannah (ENRD); Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana

Proposed Agenda for Today's Call

- Discuss plan for tomorrow's meeting with Denka.
- Draft agenda for tomorrow –
  - Review RCRA inspection report
  - Review RCRA relief
  - Review CAA relief
  - Get update from Denka on emission control efforts
  - New community monitors
  - Contacts with DuPont

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To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]

Start: 8/23/2022 3:30:00 PM
End: 8/23/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary E.; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana; Oif, Leslie

Appointment

To: Parrish, Robert [Parrish.Robert@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Spina, Providence [Spina.Providence@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne [Davies.Lynne@epa.gov]; steven.shermer@usdoj.gov [Steven.Shermer@usdoj.gov]; davis.forsythe@usdoj.gov

CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Greene, Mary E. [Greene.Mary.E@epa.gov]; Gubin, Brian [Gubin.Brian@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Penland, John [Penland.John@epa.gov]; Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]; Oif, Leslie [Oif.Leslie@epa.gov]; Greenblum, Max [greenblum.max@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Frazier, Hannah (ENRD) [Hannah.Frazier@usdoj.gov]

Start: 9/20/2022 3:30:00 PM
End: 9/20/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary E.; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana; Oif, Leslie; Greenblum, Max

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Appointment

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Start: 10/4/2022 3:30:00 PM
End: 10/4/2022 4:30:00 PM

Recurrence: (none)

Required Attendees: Parrish, Robert; Welton, Patricia; Thompson, Steve; Leathers, James; Barnett, Cheryl; Lannen, Justin; Fried, Gregory; Spina, Providence; Hoyt, Daniel; Foley, Patrick; steven.shermer@usdoj.gov; davis.forsythe@usdoj.gov; Thomas.Carroll@USDOJ.GOV; Davies, Lynne

Optional Attendees: Seager, Cheryl; McGuire, James; Osbourne, Margaret; Moncrieffe, Marcia; Kelley, Rosemarie; Greene, Mary E.; Gubin, Brian; Frazier, Hannah (ENRD); Murdock, Russell; Deppe, Fred; Mostaghim, Negin; Penland, John; Jeffrey Yurk (yurk.jeffrey@epa.gov); Sullivan, Greg; Bellot, Michael; Young, Justin; Saenz, Diana; Oif, Leslie; Greenblum, Max

Appointment

From: Young, Justin [Young.Justin@epa.gov]
Sent: 6/29/2022 5:03:41 PM
To: Young, Justin [Young.Justin@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]

Subject: Denka Inspection report call
Location: Microsoft Teams Meeting

Start: 6/30/2022 4:30:00 PM
End: 6/30/2022 5:30:00 PM
Show Time As: Busy

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Wednesday, June 29, 2022 12:04 PM
To: Young, Justin; Deppe, Fred; Penland, John; Osbourne, Margaret; Davies, Lynne; Mostaghim, Negin; Yurk, Jeffrey
Subject: Denka Inspection report call
When: Thursday, June 30, 2022 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

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From: Young, Justin [Young.Justin@epa.gov]
Sent: 6/29/2022 5:05:45 PM
To: Young, Justin [Young.Justin@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]

Subject: Continue Denka inspection call
Location: Microsoft Teams Meeting

Start: 6/30/2022 7:30:00 PM
End: 6/30/2022 8:30:00 PM
Show Time As: Busy

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Wednesday, June 29, 2022 12:06 PM
To: Young, Justin; Deppe, Fred; Penland, John; Davies, Lynne; Mostaghim, Negin; Osbourne, Margaret
Subject: Continue Denka inspection call
When: Thursday, June 30, 2022 3:30 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 7/27/2022 10:11:17 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]

Subject: Denka sampling report
Location: Microsoft Teams Meeting

Start: 7/28/2022 3:00:00 PM
End: 7/28/2022 3:30:00 PM
Show Time As: Busy

Required Attendees: Yurk, Jeffrey; Deppe, Fred; Penland, John; Murdock, Russell

---

Microsoft Teams meeting

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Meeting ID: 265 641 845 899
Passcode: bmpg2x
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Video Conference ID: 112 741 056 5
Alternate VTC instructions

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Phone Conference ID: 469 712 131#
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Appointment

From: Nance, Earthea [Nance.Earthea@epa.gov]
Sent: 8/11/2022 2:30:33 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]; Gonzalez, Iris [Gonzalez.Iris@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Durant, Jennah [Durant.Jennah@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Leathers, James [Leathers.James@epa.gov]

Subject: Denka RCRA Inspection Report
Location: Microsoft Teams Meeting

Start: 8/11/2022 8:00:00 PM
End: 8/11/2022 8:30:00 PM
Show Time As: Tentative

Required Attendees: Nance, Earthea; Wooden-Aguilar, Helena; Dwyer, Stacey; Gonzalez, Iris; McGuire, James; Welton, Patricia; Murdock, Russell; Barnett, Cheryl; Osbourne, Margaret; Seager, Cheryl; Durant, Jennah
Optional Attendees: Yurk, Jeffrey; Leathers, James

Microsoft Teams meeting

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Meeting ID: 235 433 046 886
Passcode: mpaUdQ
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Video Conference ID: 112 285 776 3
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Phone Conference ID: 831 223 742#
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Appointment

From: Penland, John [Penland.John@epa.gov]
Sent: 8/11/2022 7:39:03 PM
To: Penland, John [Penland.John@epa.gov]; george.weiber@erg.com; bholden@joneswalker.com; christopher-meyers@denka-pe.com; Davies, Lynne [Davies.Lynne@epa.gov]; tbartholomew@joneswalker.com; Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; bvenn@joneswalker.com; Young, Justin [Young.Justin@epa.gov]
CC: Deppe, Fred [Deppe.Fred@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; George Wieber [george.wieber@erg.com]

Subject: Denka CBI Redactions Review - with Denka

Start: 8/12/2022 4:30:00 PM
End: 8/12/2022 5:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Required Attendees: george.weiber@erg.com; bholden@joneswalker.com; christopher-meyers@denka-pe.com; Davies, Lynne; tbartholomew@joneswalker.com; Osbourne, Margaret; Yurk, Jeffrey; bvenn@joneswalker.com; Young, Justin
Optional Attendees: Deppe, Fred; Murdock, Russell; George Wieber

This meeting is to review the CBI redactions made by Denka for the two inspection reports prior to publication.

Microsoft Teams meeting

Join on your computer or mobile app
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Meeting ID: 259 479 843 221
Passcode: RYQSf6
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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 2/24/2022 7:38:17 PM
To: Au, Doreen [Au.Doreen@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Craig Lutz [Lutz.Craig@epamail.epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Foley, Patrick [Foley.Patrick@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]
CC: Fried, Gregory [Fried.Gregory@epa.gov]; Caballero, Kathryn [caballero.kathryn@epa.gov]; Greene, Mary [Greene.Mary.E@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]

Subject: Denka inspection planning
Location: Microsoft Teams Meeting

Start: 2/28/2022 5:00:00 PM
End: 2/28/2022 6:00:00 PM
Show Time As: Tentative

Required Attendees: Au, Doreen; Leathers, James; Deppe, Fred; Penland, John; Craig Lutz; Hoyt, Daniel; Foley, Patrick; Yurk, Jeffrey; Davies, Lynne; Young, Justin; Bellot, Michael; Chavez, Kimberly; Connell, Rebecca; Buenning, Hans
Optional Attendees: Fried, Gregory; Caballero, Kathryn; Greene, Mary; Moncrieffe, Marcia

This is to plan for an NEIC RCRA inspection at the Denka facility in (hopefully) the April timeframe. It will be a process-based inspection with sampling.

Microsoft Teams meeting

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 2/28/2022 2:47:06 PM
To: Sullivan, Greg [Sullivan.Greg@epa.gov]

Subject: FW: Denka inspection planning
Location: Microsoft Teams Meeting

Start: 2/28/2022 5:00:00 PM
End: 2/28/2022 6:00:00 PM
Show Time As: Tentative

Hi Greg:

Any way you can attend this inspection planning meeting for Denka? NEIC is invited but Cheryl said that in discussions with Rosemarie, there is a thought that this would be a R6/OECA-led inspection without NEIC.

Thanks,
Margaret

-----Original Appointment-----
From: Osbourne, Margaret
Sent: Thursday, February 24, 2022 1:38 PM
To: Osbourne, Margaret; Au, Doreen; Leathers, James; Deppe, Fred; Penland, John; Craig Lutz; Hoyt, Daniel; Foley, Patrick; Yurk, Jeffrey; Davies, Lynne; Young, Justin; Bellot, Michael; Chavez, Kimberly; Connell, Rebecca; Buenning, Hans
Cc: Fried, Gregory; Caballero, Kathryn; Greene, Mary; Moncrieffe, Marcia; Helmich, Richard; Parrish, Robert; Spina, Providence; Hamre, Martha; Bobbs, Nicholas
Subject: Denka inspection planning
When: Monday, February 28, 2022 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

This is to plan for an NEIC RCRA inspection at the Denka facility in (hopefully) the April timeframe. It will be a process-based inspection with sampling.

Microsoft Teams meeting

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Phone Conference ID: 415 417 121#

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 2/28/2022 2:47:34 PM
To: Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]

Subject: Denka inspection planning
Location: Microsoft Teams Meeting

Start: 2/28/2022 5:00:00 PM
End: 2/28/2022 6:00:00 PM
Show Time As: Tentative

Required Attendees: Au, Doreen; Leathers, James; Deppe, Fred; Penland, John; Craig Lutz; Hoyt, Daniel; Foley, Patrick; Yurk, Jeffrey; Davies, Lynne; Young, Justin; Bellot, Michael; Chavez, Kimberly; Connell, Rebecca; Buenning, Hans; Sullivan, Greg; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Fried, Gregory; Caballero, Kathryn; Greene, Mary; Moncrieffe, Marcia; Helmich, Richard; Parrish, Robert; Spina, Providence; Hamre, Martha; Bobbs, Nicholas

This is to plan for an NEIC RCRA inspection at the Denka facility in (hopefully) the April timeframe. It will be a process-based inspection with sampling.

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 2/28/2022 7:29:21 PM
To: Craig Lutz [Lutz.Craig@epamail.epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Au, Doreen [Au.Doreen@epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]

Subject: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/1/2022 9:00:00 PM
End: 3/1/2022 10:00:00 PM
Show Time As: Tentative

Required Attendees: Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael

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Microsoft Teams meeting

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 3/1/2022 1:43:14 PM
To: Murdock, Russell [Murdock.Russell@epa.gov]

Subject: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/1/2022 9:00:00 PM
End: 3/1/2022 10:00:00 PM
Show Time As: Tentative

Required Attendees: Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael; Murdock, Russell
Optional Attendees: Hamre, Martha

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 3/1/2022 3:11:37 PM
To: Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]

Subject: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/1/2022 9:00:00 PM
End: 3/1/2022 10:00:00 PM
Show Time As: Tentative

Required Attendees: Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael; Murdock, Russell; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Hamre, Martha

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 3/8/2022 7:49:15 PM
To: Craig Lutz [Lutz.Craig@epamail.epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Au, Doreen [Au.Doreen@epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]
CC: Hamre, Martha [Hamre.Martha@epa.gov]; Schlachter, Zachary [schlachter.zachary@epa.gov]; Kanopkin, Laura [kanopkin.laura@epa.gov]

Subject: Canceled: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/1/2022 9:00:00 PM
End: 3/1/2022 10:00:00 PM
Show Time As: Free

Importance: High

Recurrence: Weekly
every Tuesday from 3:00 PM to 4:00 PM
Required Attendees: Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael; Murdock, Russell; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Hamre, Martha; Schlachter, Zachary; Kanopkin, Laura

Cancelling this meeting for today.

Microsoft Teams meeting

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 3/2/2022 7:49:38 PM
To: Craig Lutz [Lutz.Craig@epamail.epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Au, Doreen [Au.Doreen@epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]
CC: Hamre, Martha [Hamre.Martha@epa.gov]; Schlachter, Zachary [schlachter.zachary@epa.gov]

Subject: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/1/2022 9:00:00 PM
End: 3/1/2022 10:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Tuesday from 3:00 PM to 4:00 PM
Required Attendees: Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael; Murdock, Russell; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Hamre, Martha; Schlachter, Zachary

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From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 3/8/2022 7:49:16 PM
To: Au, Doreen [Au.Doreen@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Craig Lutz [Lutz.Craig@epamail.epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Hoyt, Daniel [hoyt.daniel@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]
CC: Hamre, Martha [Hamre.Martha@epa.gov]; Schlachter, Zachary [schlachter.zachary@epa.gov]; Kanopkin, Laura [kanopkin.laura@epa.gov]

Subject: Canceled: Denka Sampling Plan meeting
Location: Microsoft Teams Meeting

Start: 3/8/2022 9:00:00 PM
End: 3/8/2022 10:00:00 PM
Show Time As: Free

Importance: High

Recurrence: Weekly
every Tuesday from 3:00 PM to 4:00 PM
Required Attendees: Au, Doreen; Bellot, Michael; Connell, Rebecca; Craig Lutz; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Hoyt, Daniel; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Murdock, Russell; Aubuchon, Kenneth; Smalley, Bryant
Optional Attendees: Hamre, Martha; Schlachter, Zachary; Kanopkin, Laura

Cancelling this meeting for today.

Microsoft Teams meeting

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Appointment

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
on behalf of Young, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=351f8d3d77ff49a98d3d33cb2a1c8153-Justin Young]
Sent: 3/14/2022 2:02:55 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]

Subject: FW: Denka Inspection Planning
Location: Microsoft Teams Meeting

Start: 3/14/2022 4:30:00 PM
End: 3/14/2022 5:30:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Thursday, March 10, 2022 11:13 AM
To: Young, Justin; Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh
Cc: Janosh Wolters; George Wieber
Subject: Denka Inspection Planning
When: Monday, March 14, 2022 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

All,

This meeting is to continue our Denka inspection planning. Everyone's schedules are busy, but this time seemed to work best for most everyone.

Thanks,
Justin

Microsoft Teams meeting

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sip:teams@video.epa.gov
Video Conference ID: 111 668 706 4
Alternate VTC instructions

Or call in (audio only)
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Phone Conference ID: 784 885 08#
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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 2/2/2022 4:37:12 PM
To: Craig Easley [Craig.Easley@LA.GOV]
Subject: RE: any RCRA inspections at Denka LaPlace?

Thanks Craig!

From: Craig Easley <Craig.Easley@LA.GOV>
Sent: Wednesday, February 2, 2022 9:54 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: any RCRA inspections at Denka LaPlace?

Here are some of the latest from EDMS…

10/28/2021 & 12/2021 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=13073492

12/12&16/2019 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=11994174

09/28/2017 and 10/02/2017 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=10860843

The last 3 RCRA TSD Inspections did not reveal any violations.

Craig Easley

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, February 2, 2022 9:33 AM
To: Craig Easley <Craig.Easley@LA.GOV>
Cc: Roberts, Lou <Roberts.Lou@epa.gov>
Subject: any RCRA inspections at Denka LaPlace?

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Craig:

Our Headquarters office is asking if there have been any recent RCRA inspections at Denka in LaPlace, specifically looking at their BIFs. I know we haven't done any EPA RCRA inspections lately but want to check to see if the state has.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6

1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/4/2022 4:41:09 PM
To: Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]
Subject: Re: Denka inspection the week of April 18

John Penland from Region 6 and Justin Young from OECA.

Sent from my iPhone

On Apr 4, 2022, at 10:10 AM, Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov> wrote:

Margaret,

I was out on last week conducting inspections but I spoke with Bryant regarding this inspection. Who is a good contact with details regarding the inspection?

Thanks

Ken AuBuchon

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, March 28, 2022 12:05 PM
To: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Cc: Smalley, Bryant <smalley.bryant@epa.gov>
Subject: RE: Denka inspection the week of April 18

I'm re-sending this because I didn't hear back from you.

From: Osbourne, Margaret
Sent: Monday, March 14, 2022 12:42 PM
To: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Cc: Smalley, Bryant <smalley.bryant@epa.gov>
Subject: Denka inspection the week of April 18

Hi Ken:

I'm not sure how much you know about the upcoming Denka inspection but you have been volunteered to be the water inspector on what is primarily a RCRA-focused inspection. The inspection is now scheduled for the week of April 18. Are you available? We would like for you to participate and focus on the wastewater treatment plant and the UIC wells. We have weekly planning meetings on Monday at 11:30-12:30 that I hope you can participate in going forward.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch

Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Appointment

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
on behalf of Young, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=351f8d3d77ff49a98d3d33cb2a1c8153-Justin Young]
Sent: 4/11/2022 3:47:41 PM
To: Leathers, James [Leathers.James@epa.gov]

Subject: FW: Denka Inspection Planning
Location: Microsoft Teams Meeting

Start: 3/14/2022 4:30:00 PM
End: 3/14/2022 5:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 12:30 PM to 1:00 PM

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Thursday, March 10, 2022 11:13 AM
To: Young, Justin; Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh
Cc: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Keteles, Kristen; Paul Buellesbach
Subject: Denka Inspection Planning
When: Occurs every Monday effective 3/14/2022 until 4/11/2022 from 12:30 PM to 1:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Agenda for 3/21/22

1. Documents with John Penland
2. Safety/PPE
3. NEIC/R6 pollution accountability
4. Other items

Microsoft Teams meeting

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Phone Conference ID: 784 885 08#

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Appointment

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
on behalf of Young, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=351f8d3d77ff49a98d3d33cb2a1c8153-Justin Young]
Sent: 4/11/2022 3:47:42 PM
To: Leathers, James [Leathers.James@epa.gov]

Subject: FW: Denka Inspection Planning
Location: Microsoft Teams Meeting

Start: 4/11/2022 4:30:00 PM
End: 4/11/2022 5:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 12:30 PM to 1:00 PM

-----Original Appointment-----
From: Young, Justin <Young.Justin@epa.gov>
Sent: Thursday, March 10, 2022 11:13 AM
To: Young, Justin; Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh; Young, Justin
Cc: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Keteles, Kristen; Paul Buellesbach; George Wieber
Subject: Denka Inspection Planning
When: Monday, April 11, 2022 12:30 PM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Agenda for 4/11/22

1. Pre inspection meeting location
2. H&S/PPE review
3. Any other questions/comments

Microsoft Teams meeting

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/22/2022 1:09:45 AM
To: Cole, Howard [Cole.Howard@epa.gov]
CC: Tates, Samuel [Tates.Samuel@epa.gov]
Subject: RE: OSHA contact in Louisiana?

Thank you so much Howard!

From: Cole, Howard <Cole.Howard@epa.gov>
Sent: Thursday, April 21, 2022 11:14 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Tates, Samuel <Tates.Samuel@epa.gov>
Subject: RE: OSHA contact in Louisiana?

Hey Margret,

The OSHA Area Office is in Baton Rouge....Rod Chube is the Area Director 225-298-5458 and then reports can be made to the duty officer at that number.

If you get the duty officer, after you explain to him/her the nature of the issue request that Rod Chube call you back.

It would help to know the company the employees work for and the location where the safety issues are occurring and will they continue to occur over a period or is it this a one-time exposure.

Let me know if you have any problems 214-693-3109

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 21, 2022 8:27 AM
To: Tates, Samuel <Tates.Samuel@epa.gov>; Cole, Howard <Cole.Howard@epa.gov>
Subject: RE: OSHA contact in Louisiana?

Thank you Sam.

From: Tates, Samuel <Tates.Samuel@epa.gov>
Sent: Thursday, April 21, 2022 8:27 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Cole, Howard <Cole.Howard@epa.gov>
Subject: RE: OSHA contact in Louisiana?

Margaret
Howard is also conducting an inspection this week and my not have computer access until later today. I will try and reach him by phone.

Samuel Tates, Chief
Chemical Accident Enforcement Section (ECDAC)
Enforcement and Compliance Assurance Division
tates.samuel@epa.gov
(214) 665-2243 voice
(214) 665-7447 fax

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 21, 2022 8:24 AM
To: Cole, Howard <Cole.Howard@epa.gov>
Cc: Tates, Samuel <Tates.Samuel@epa.gov>
Subject: OSHA contact in Louisiana?
Importance: High

Hi Howard and Sam:

We have inspectors out in the field this week and they are extremely concerned about the worker safety at the facility in LaPlace, Louisiana. Who can they contact at OSHA to express this concern? Please let me know asap.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Appointment

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
on behalf of Carroll, Craig [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cf7900e73bfb429c9bf46dc3b22fc12c-Carroll, Craig]
Sent: 4/22/2022 1:12:44 AM
To: Penland, John [Penland.John@epa.gov]

Subject: FW: Denka Sampling Request

Start: 4/22/2022 1:00:00 PM
End: 4/22/2022 1:25:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Carroll, Craig <Carroll.Craig@epa.gov>
Sent: Thursday, April 21, 2022 6:01 PM
To: Carroll, Craig; Osbourne, Margaret; Yurk, Jeffrey; Petersen, Chris; LaBombard, Will
Subject: Denka Sampling Request
When: Friday, April 22, 2022 8:00 AM-8:25 AM (UTC-06:00) Central Time (US & Canada).
Where:

Meeting to discuss request for START sampling assistance at Denka facility.

Microsoft Teams meeting

Join on your computer or mobile app
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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/22/2022 1:12:49 AM
To: Carroll, Craig [Carroll.Craig@epa.gov]

Subject: Accepted: Denka Sampling Request

Start: 4/22/2022 1:00:00 PM
End: 4/22/2022 1:25:00 PM
Show Time As: Busy

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/22/2022 2:49:51 PM
To: Kudla, Courtney [kudla.courtney@epa.gov]; Penland, John [Penland.John@epa.gov]
Subject: FW: Denka Sampling Assignment and Information Needs

Importance: High

Any idea how to write a cost estimate for this?

From: Carroll, Craig <Carroll.Craig@epa.gov>
Sent: Friday, April 22, 2022 9:49 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Petersen, Chris <petersen.chris@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>
Subject: Denka Sampling Assignment and Information Needs

Hi Margaret,

Eric Delegado will be the OSC assigned to coordinate the sampling under the START contract. As soon as we receive a general scope of work, cost estimate, and timeline from ECAD, Eric work with Will to generate a TDD and with START to develop the QASP, HASP, and any other necessary documents.

Craig Carroll

Chief, Emergency Management Branch

U.S. EPA, Region 6

Ph. (214)665-2220

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/22/2022 6:28:20 PM
To: Seager, Cheryl [Seager.Cheryl@epa.gov]
CC: Gilrein, Stephen [gilrein.stephen@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]
Subject: Re: Denka Inspections This Week

We'll have to add something about the delayed/denied entry

Sent from my iPhone

On Apr 22, 2022, at 12:42 PM, Seager, Cheryl <Seager.Cheryl@epa.gov> wrote:

Sorry for delayed response – this looks great.

From: Gilrein, Stephen <gilrein.stephen@epa.gov>
Sent: Friday, April 22, 2022 12:41 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Seager, Cheryl <Seager.Cheryl@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: Re: Denka Inspections This Week

Looks good

Sent from my iPhone

On Apr 22, 2022, at 9:51 AM, Osbourne, Margaret <osbourne.margaret@epa.gov> wrote:

Here's a write-up – any suggested changes?

Inspectors from OECA, ERG, and Region 6 conducted a RCRA and CWA inspection at Denka Performance Elastomers in LaPlace, LA during on April 18-21, 2022. The inspection team observed solid and hazardous waste management practices, particularly in the poly kettle building and the open brine pit, that are most likely contributing to elevated chloroprene concentrations in the surrounding community. Unfortunately, due to the measured total VOCs in these two locations, the inspectors' health & safety plans did not allow for them to take solid or liquid samples. The Pollution Accountability Team will be onsite at Denka on Friday, April 22 and intend to drive the GMAP around the facility and take air canister samples in the poly building and near the open brine pit. Region 6 is investigating options for deploying personnel to the facility in enhanced PPE with supplied air to take the samples that could not be taken during the RCRA inspection.

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Thursday, April 21, 2022 4:28 PM
To: Shiffman, Cari <Shiffman.Cari@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Hi Cari – we should be able to get you something tomorrow, at least with respect to PAT. May be later for RCRA.

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Thursday, April 21, 2022 4:11 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Denka Inspections This Week

Cheryl,

Would you be able to send me a short note on how the inspections went this week and next steps?

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/25/2022 2:14:26 PM
To: Penland, John [Penland.John@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]

Subject: Denka sampling brainstorm session
Location: Microsoft Teams Meeting

Start: 4/25/2022 6:30:00 PM
End: 4/25/2022 7:00:00 PM
Show Time As: Tentative

Required Attendees: Penland, John; Moncrieffe, Marcia; Murdock, Russell; Deppe, Fred

---

Microsoft Teams meeting

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/25/2022 3:24:18 PM
To: Delgado, Eric [Delgado.Eric@epa.gov]

Subject: Denka sampling brainstorm session
Location: Microsoft Teams Meeting

Start: 4/25/2022 6:30:00 PM
End: 4/25/2022 7:00:00 PM
Show Time As: Tentative

Required Attendees: Penland, John; Moncrieffe, Marcia; Murdock, Russell; Deppe, Fred; Delgado, Eric

---

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Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 4/25/2022 7:47:40 PM
To: Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]; Bordelon, David [David.Bordelon@WestonSolutions.com]

Subject: Denka sampling followup
Location: Microsoft Teams Meeting

Start: 4/26/2022 3:00:00 PM
End: 4/26/2022 3:30:00 PM
Show Time As: Tentative

Required Attendees: Delgado, Eric; Penland, John; Bordelon, David

David Borderline

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From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/27/2022 2:15:42 PM
To: Burke, Shaun [Burke.Shaun@epa.gov]
CC: Penland, John [Penland.John@epa.gov]; Young, Justin [Young.Justin@epa.gov]
Subject: FW: Denka Sampling Assignment and Information Needs

From: Kudla, Courtney <kudla.courtney@epa.gov>
Sent: Friday, April 22, 2022 9:28 PM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Thanks again!

Sorry! I saw we had enough in contracts and didn't look at the details on the PRCs.

Hope everyone has a good weekend!

Courtney

From: Gilrein, Stephen <gilrein.stephen@epa.gov>
Sent: Friday, April 22, 2022 7:53 PM
To: LaBombard, Will <LaBombard.Will@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

yes

From: LaBombard, Will <LaBombard.Will@epa.gov>
Sent: Friday, April 22, 2022 7:34 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>
Cc: Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

There was only $22,950 in the E44 account, so we changed the PR to be $22k from E44 and $18k from E50. Is that okay with everyone?

Will LaBombard
972-514-7799

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 22, 2022 5:53 PM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>
Cc: Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John

<Penland.John@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>
Subject: Re: Denka Sampling Assignment and Information Needs

Yes Courtney confirmed that earlier today we have $138K

Sent from my iPhone

On Apr 22, 2022, at 5:39 PM, Gilrein, Stephen <gilrein.stephen@epa.gov> wrote:

Do we have $40,000 to put on this?

From: LaBombard, Will <LaBombard.Will@epa.gov>
Sent: Friday, April 22, 2022 4:34 PM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Hi Steve,

I just routed a PR to you for this sampling effort. Please let me know if you have any questions. Thanks!

Will LaBombard
972-514-7799

From: Kudla, Courtney <kudla.courtney@epa.gov>
Sent: Friday, April 22, 2022 2:02 PM
To: LaBombard, Will <LaBombard.Will@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Looks accurate to me. Margaret/John-Can you confirm there isn't anything else you need?

From: LaBombard, Will <LaBombard.Will@epa.gov>
Sent: Friday, April 22, 2022 1:43 PM
To: Kudla, Courtney <kudla.courtney@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Okay, this is what I came up with based on your email. Will this work for you?
Note that I left out the 3-4 people language. Do we care how many people they bring for the sampling? Or was that just what was used to estimate the cost?

The initial expense limit for this TDD is set at $40,000. When available, all TDD costs shall be invoiced against the oldest 000E44 task order funding.

This TDD's cost category is ECAD.

Eric Delgado will be the primary COR for this TDD.

The contractor shall:
-Develop a HASP, QAPP, and final report for sampling at the Denka/DuPont LaPlace, LA facility.
-Attend phone and in-person meetings with the COR and other stakeholders.
-Conduct air, solid, and liquid sampling as directed by the COR. Initial estimates are for 10 liquid/solid samples and 10 air samples, but additional sampling may be required. Level B PPE is needed for entry to the location.
-As directed by the COR, provide analytical services for samples taken or ship/deliver samples to a lab designated by the COR.
-If directed by the COR, provide expert advice regarding alternative solutions.
-Provide other technical support as directed by the COR.
-Contact the COR immediately upon receipt of this TDD to coordinate mobilization and sampling schedule. Anticipated need is during the week of 4/25 through 4/29.

Will LaBombard
972-514-7799

From: Kudla, Courtney <kudla.courtney@epa.gov>
Sent: Friday, April 22, 2022 12:58 PM
To: LaBombard, Will <LaBombard.Will@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: FW: Denka Sampling Assignment and Information Needs

Will,

Do you have an example of what this narrative should be?

Would something such as this work:

Requesting development of a HASP, QAPP, and final report for sampling at the Denka/DuPont LaPlace, LA facility. Needing 3-4individuals to take 10 liquid/solid samples and 10 air samples. Level B PPE is needed for entry. Estimating costs of $40,000 for travel, labor, and lab analysis.

Thanks,
Courtney

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 22, 2022 12:22 PM
To: Kudla, Courtney <kudla.courtney@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: Fwd: Denka Sampling Assignment and Information Needs

Sent from my iPhone

Begin forwarded message:

> **From:** "LaBombard, Will" <LaBombard.Will@epa.gov>
> **Date:** April 22, 2022 at 11:35:00 AM CDT
> **To:** "Osbourne, Margaret" <osbourne.margaret@epa.gov>
> **Cc:** "Petersen, Chris" <petersen.chris@epa.gov>, "Nguyen, Lyndsey" <Nguyen.Lyndsey@epa.gov>, "Carroll, Craig" <Carroll.Craig@epa.gov>
> **Subject: RE: Denka Sampling Assignment and Information Needs**

Hi Margaret,

Adding to what Craig said, we don't need an IGCE, just a narrative estimate of cost for the PR amount and TDD expenditure limit. Your folks can do an IGCE if that helps come up with the number, but I don't need it since this work will go under an existing TO that already has an IGCE for all EPM work.

Will LaBombard
972-514-7799

From: Carroll, Craig <Carroll.Craig@epa.gov>
Sent: Friday, April 22, 2022 9:49 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Petersen, Chris <petersen.chris@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>
Subject: Denka Sampling Assignment and Information Needs

Hi Margaret,

Eric Delegado will be the OSC assigned to coordinate the sampling under the START contract. As soon as we receive a general scope of work, cost estimate, and timeline from ECAD, Eric work with Will to generate a TDD and with START to develop the QASP, HASP, and any other necessary documents.

Craig Carroll

Chief, Emergency Management Branch

U.S. EPA, Region 6

Ph. (214)665-2220

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/27/2022 8:42:29 PM
To: Bordelon, David [David.Bordelon@WestonSolutions.com]; Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: Wright, Jeff [jeff.wright@westonsolutions.com]
Subject: RE: Denka Sampling

Would Denka just supply the canisters but not take the samples nor send them to the lab? I think this needs more discussion.

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, April 27, 2022 12:38 PM
To: Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: Denka Sampling

Jeff and I were talking this morning and he brought up a couple of good points. For the air samples, Denka will need to provide their own summa canisters (10) and flow controllers (200ml/minute). Summa canisters shouldn't be procured from one lab and sent to another. They all have their own certifications for the cannisters. For the solid sample within the brine pit we need to think through the sample container. Normally we'd use a TerraCore or encore, but with the material being neoprene I don't know if we can use those. We can talk with the lab a little more to see what they think.

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/28/2022 2:03:30 PM
To: Young, Justin [Young.Justin@epa.gov]
Subject: FW: Denka follow-up
Attachments: Denka officical document request information - OECA letterhead.docx

FYI.

From: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Sent: Thursday, April 28, 2022 8:28 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: RE: Denka follow-up

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, April 27, 2022 3:34 PM
To: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Cc: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: Denka follow-up
Importance: High

Hi Ken:

Justin Young is needing your response asap on the post-inspection document request list for Denka. Can you please respond to him and cc me?

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Chris,

Below are documents that we are requesting as part of our inspection authority under RCRA (3007(a)) and CWA § 308, 33 U.S.C. § 1318. Please let us know in writing which requests you cannot provide and the reason. Items in blue needed ASAP otherwise an agreed upon date of May 6th to provide all remaining documents.

RCRA Documents

- Process flow diagrams, including WWT facility
- Waste management unit inspection records from the past 3 years
- SOPs for hazardous waste management
- Contingency Plan proof of delivery to local emergency agencies
- Monomer process diagram, to include WWT process (11inX20ft)
- Any analytical data for heads make column and recovery tails column
- Profiles/determinations on each of the waste streams leading to the Aqueous Clarifier Tank headers to WWT
- Records regarding CC determination under 265.1084 for all waste generated onsite
- Heads Make profile (from monomer synthesis unit)
- Recovery Tails profile (from monomer synthesis unit)
- DCB Coke profile (from Isom unit)
- Profiles/determination for waste brine coming from the flasher in CD Synthesis unit and conveyed to the Brine Tanks
- Profiles/determination for strainer cleanout neoprene "popcorn" in the poly unit; analytical data if available
- LDAR backup file (.bak file from LeakDAS)
- List of raw materials used
- Municipal landfill receiving roll-off of popcorn neoprene dredged from the open Brine Pit and the landfill's waste profile.
- SOPs/methods for separating incompatible wastes (may include excerpt from training materials given to operators)
- Flyers posted in the Poly area (identifications INMSC #04, NMSC #39, and NMSC #40)
- SOPs associated with LDAR monitoring program, including calibration process document.
- Container inventory for hazardous waste containers present onsite during inspection (excerpt from facility's Access database used for waste container inventory management)
- Profiles/determination for Cleaning pad sludge (identified as AW-015 while on the walkthrough)
- Profiles/determination for COD vials (FIN-159) in the neoprene lab
- Profiles/determination for inhibited brine container present in the lab

- Profiles/determination for material in "Low pH water" totes (seen in 90-day area next to 2MM lb Storage Tank)
- Award letter for HCl unit waste management
- As-built diagram of brine pit
- A list of known material/inputs into the brine pit. Includes the evaluation of contributing waste streams developed in response to the 2016 NEIC inspection.
- Analytical, if available of liquid leaving the brine pit
- Analytical, if available of popcorn neoprene sent to landfill
- Analytical, if available, indicating residual chloroprene content of neoprene "popcorn" removed from the poly strainers

CWA Documents

- Box emissions study for the WWTP
- Sump gate procedures for the Monomer unit
- Analytical of feed streams to the WWTP

Thanks,
Justin

X

Justin Young
Physical Scientist/Inspector

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/28/2022 2:03:35 PM
To: Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Penland, John [Penland.John@epa.gov]
CC: Bernier, Roberto [bernier.roberto@epa.gov]
Subject: RE: Denka follow-up

Thanks!

From: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Sent: Thursday, April 28, 2022 8:28 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: RE: Denka follow-up

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, April 27, 2022 3:34 PM
To: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Cc: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: Denka follow-up
Importance: High

Hi Ken:

Justin Young is needing your response asap on the post-inspection document request list for Denka. Can you please respond to him and cc me?

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 4/28/2022 2:44:59 PM
To: Penland, John [Penland.John@epa.gov]
Subject: RE: Denka Sampling

Oh! Okay, great. Thanks for clarifying.

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, April 28, 2022 9:34 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Sampling

These are splits required by 3007. They are not going to be analyzing our samples only those splits.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, April 27, 2022 9:35 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: FW: Denka Sampling

Is there any way around this? The community is going to be suspicious of these samples if we hand them over to Denka.

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, April 27, 2022 6:49 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: Re: Denka Sampling

I would think denka would provide canisters. We would collect samples and turn them over to denka so they could submit to their lab.

Sent from my iPhone

On Apr 27, 2022, at 3:42 PM, Osbourne, Margaret <osbourne.margaret@epa.gov> wrote:

CAUTION: ***External Message***

Would Denka just supply the canisters but not take the samples nor send them to the lab? I think this needs more discussion.

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, April 27, 2022 12:38 PM
To: Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: Denka Sampling

Jeff and I were talking this morning and he brought up a couple of good points. For the air samples, Denka will need to provide their own summa canisters (10) and flow controllers (200ml/minute). Summa canisters shouldn't be procured from one lab and sent to another. They all have their own certifications for the cannisters. For the solid sample within the brine pit we need to think through the sample container. Normally we'd use a TerraCore or encore, but with the material being neoprene I don't know if we can use those. We can talk with the lab a little more to see what they think.

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/2/2022 3:10:54 PM
To: Burke, Shaun [Burke.Shaun@epa.gov]
CC: Hoyt, Daniel [hoyt.daniel@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]
Subject: FW: Denka lab analysis help

Hi Shaun:

We are okay with reallocating ARP funding from the flyovers to the Denka air canister analyses.

Thanks,
Margaret

From: Thompson, Steve <thompson.steve@epa.gov>
Sent: Monday, May 2, 2022 10:07 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>
Subject: RE: Denka lab analysis help

I don't recall any ARP funding discussions for flyovers so I don't have any concerns.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 2, 2022 10:05 AM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: FW: Denka lab analysis help

Can I put this in writing? That we can reallocate ARP funding from flyovers to Denka analysis? See below.

From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Monday, May 2, 2022 9:54 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Subject: RE: Denka lab analysis help

Margaret, in order to pay for the sampling and analysis using ERG we will have to tap into ARP money that was earmarked for flyovers in R6. Darrin Larson said a few weeks ago that Region 6 didn't need more funding for the flyovers.

I was asked to confirm that in writing by Loren Denton.

Would you please check on that for me and get me an email stating that Region 6 is ok with this re-allocation of the ARP funding?

Thanks

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 2, 2022 9:01 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Hi Dan:

It will be 8-12 6L Summa canisters that will be delivered later this week (May 6). We want TO-15 method run on them and would like the results expedited but understand the situation with the PAT samples.

Thanks for your help!
Margaret

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Monday, May 2, 2022 7:51 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Margaret,

It looks like we can accommodate the air samples under the ERG contract, to support follow-up from the RCRA inspection. We'll confirm and let you know. Do you know how many samples, when they will be delivered and when you need the results? The analysis and reporting may take a little longer than normal (~8+ weeks) because the lab is already backed up somewhat with the J2J/PAT stuff.

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 28, 2022 2:34 PM
To: Fried, Gregory <Fried.Gregory@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: Denka lab analysis help
Importance: High

Hi Dan and Greg:

We are sending START contractors out to Denka to take liquid/solid and air samples as a follow-up from last week's RCRA inspection. Weston (the contractors) are wanting to use the ERG contracted lab for the air samples since they already have a chloroprene standard. Is that possible?

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch

Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/4/2022 5:02:29 PM
To: Tates, Samuel [tates.samuel@epa.gov]
CC: Penland, John [Penland.John@epa.gov]
Subject: John Penland's info

Hi Sam:

As discussed, we are interested in Kayla Buchanan attending the RCRA sampling event at Denka with her CAA credentials. We would also like her to ask some process hazard questions related to GDC while she's out there. She should coordinate with John Penland who is flying out to LA today. John's number is 214-755-8795.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/4/2022 5:10:37 PM
To: Bordelon, David [David.Bordelon@WestonSolutions.com]; Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]; Wright, Jeff [jeff.wright@westonsolutions.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: [EXT]:Sampling

Hi David:

Are you talking about for splits? I assume they will provide their own containers since we provided them with a list of the planned samples. I have a call with them today so I can ask them if you'd like me to.

A site visit tomorrow sounds good. You may also get to do sampling depending on when the canisters arrive – John will be there so I recommend you coordinate with him. Do you have his phone number?

Thanks,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 11:12 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will Denka provide their own sample containers for the liquids and solids? Our lab is providing voa vials and the TerraCores.

We were talking through the process and it would be a good idea for us to have a site visit on Thursday and plan to sample on Friday.

Please let me know what you think.

David

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Bordelon, David
Sent: Tuesday, May 3, 2022 4:05 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will our people need any of the Denka specific safety requirements prior to the event?

David Bordelon
Weston Solutions, Inc.
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Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

-----Original Appointment-----
From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, May 3, 2022 11:43 AM
To: Osbourne, Margaret; Eric Delgado; Penland, John; Bordelon, David; Wright, Jeff; Yurk, Jeffrey
Subject: [EXT]:Sampling
When: Tuesday, May 3, 2022 12:30 PM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

CAUTION: ***External Message***

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 113 734 862 0
Alternate VTC instructions

Or call in (audio only)
+1 202-991-0477,,954317904# United States, Washington DC
Phone Conference ID: 954 317 904#
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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/4/2022 7:08:17 PM
To: Bordelon, David [David.Bordelon@WestonSolutions.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]; Wright, Jeff [jeff.wright@westonsolutions.com]
Subject: RE: [EXT]:Sampling

The attorneys said that Denka had ordered the sample containers so we should be good there.

I told them you'd arrive tomorrow.

There is a <30 min video for you to watch.

They requested a closing conference.

They indicated that they aren't fully staffed on Saturday so if the inspection will need to extend into Saturday, to let them know as soon as possible.

I told them that John would be taking photos and videos and aside from claiming it CBI, they didn't think that would be a problem.

I requested that you be provided hard copy versions of the SOPs and as-built drawing and they said they would pass that along.

They said that they would confirm that "normal operations" are continuing until Saturday and would let us know if they aren't.

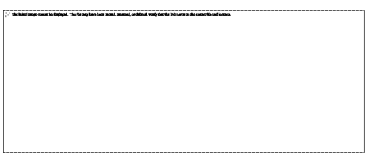
And I asked for a schedule of brine pit cleanout over the Thursday-Saturday timeframe.

Let me know if you have any questions.

Thanks,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 12:53 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: RE: [EXT]:Sampling

Thank you. We'll have a PID.



David Bordelon
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13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, May 4, 2022 12:41 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

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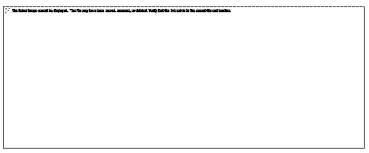

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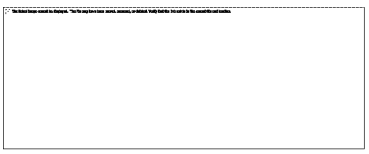

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It should be much earlier than that. Liquid and Solid results should be back before the end of next week depending on how many dilutions they'll have to do. I'll check with ERG to see what their turnaround time will be. Air samples usually take a little longer.

David

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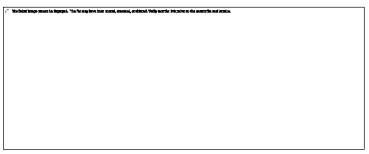

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/9/2022 3:27:52 PM
To: Bordelon, David [David.Bordelon@WestonSolutions.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Delgado, Eric [Delgado.Eric@epa.gov]; Penland, John [Penland.John@epa.gov]; Wright, Jeff [jeff.wright@westonsolutions.com]
Subject: RE: Denka Sampling - Summary of samples

Thanks so much, David!

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Monday, May 9, 2022 10:22 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: Denka Sampling - Summary of samples

Wanted to pass along that all samples were shipped on Friday. Pace samples were shipped via courier, received Friday. Summa canisters were shipped Friday for receipt today. I have asked both labs for a quick turnaround.

Sample IDs are as follows:
Air

- DR-A-BK-05052022-01 – background sample at kettle, prior to initiation of event.
- DR-A-KP-05052022-01 – Sample at kettle during popcorn poly removal
- DR-A-KD-05052022-01 – Inside of process building, 20' east of kettle
- DR-A-KD-05052022-02 – duplicate of above
- DR-A-KT-05052022-01 – travel sample from kettle to pit, then downwind of pit
- DR-A-PU-05052022-01 – Upwind of brine pit
- DR-A-BU-05052022-01 – Upwind sample during brine pit solid removal
- DR-A-BD-05052022-01 – Brine pit downwind during solids removal

Liquid

- DR-L-LB-05052022-01 – Liquid from brine pit before addition of "new" popcorn
- DR-L-LA-05052022-01- Liquid from brine pit after addition of "new" popcorn

Solid

- DR-S-BP-05052022-01 – Solid from brine pit during cleanout operation

David

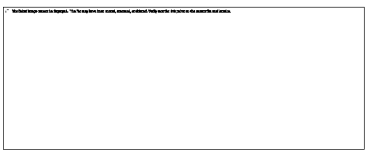
David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817

(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Bordelon, David
Sent: Friday, May 6, 2022 8:23 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

It should be much earlier than that. Liquid and Solid results should be back before the end of next week depending on how many dilutions they'll have to do. I'll check with ERG to see what their turnaround time will be. Air samples usually take a little longer.

David



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David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, May 6, 2022 8:21 AM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

Hi David:

Thanks to you and your team for getting the sampling done yesterday! We would like the results as soon as possible – 30 days or less if we can. Is that reasonable?

Thanks again,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Friday, May 6, 2022 7:58 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Delgado, Eric

<Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: RE: [EXT]:Sampling

What turnaround time would you all like to request for the analytical? Submitting the samples today.

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(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, May 4, 2022 2:08 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

The attorneys said that Denka had ordered the sample containers so we should be good there.

I told them you'd arrive tomorrow.

There is a <30 min video for you to watch.

They requested a closing conference.

They indicated that they aren't fully staffed on Saturday so if the inspection will need to extend into Saturday, to let them know as soon as possible.

I told them that John would be taking photos and videos and aside from claiming it CBI, they didn't think that would be a problem.

I requested that you be provided hard copy versions of the SOPs and as-built drawing and they said they would pass that along.

They said that they would confirm that "normal operations" are continuing until Saturday and would let us know if they aren't.

And I asked for a schedule of brine pit cleanout over the Thursday-Saturday timeframe.

Let me know if you have any questions.

Thanks,

Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 12:53 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>
Subject: RE: [EXT]:Sampling

Thank you. We'll have a PID.

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Baton Rouge, LA 70817
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(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, May 4, 2022 12:41 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

John is on the way to the airport, but he texted me that you will probably have to watch a 15 minute video when you get there and will be provided with and escape respirator by Denka. You'll need a phot ID to get access badges for the facilities gates, but your START credentials should work. You don't need to provide PII.

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 12:21 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Need to confirm that we do not need the Denka site specific health and safety training courses for our people.

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Weston Solutions, Inc.
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Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, May 4, 2022 12:11 PM
To: Bordelon, David <David.Bordelon@WestonSolutions.com>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

CAUTION: ***External Message***

Hi David:

Are you talking about for splits? I assume they will provide their own containers since we provided them with a list of the planned samples. I have a call with them today so I can ask them if you'd like me to.

A site visit tomorrow sounds good. You may also get to do sampling depending on when the canisters arrive – John will be there so I recommend you coordinate with him. Do you have his phone number?

Thanks,
Margaret

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Wednesday, May 4, 2022 11:12 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <jeff.wright@westonsolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will Denka provide their own sample containers for the liquids and solids? Our lab is providing voa vials and the TerraCores.

We were talking through the process and it would be a good idea for us to have a site visit on Thursday and plan to sample on Friday.

Please let me know what you think.

David

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

From: Bordelon, David
Sent: Tuesday, May 3, 2022 4:05 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Eric Delgado <delgado.eric@epa.gov>; Penland, John <Penland.John@epa.gov>; Wright, Jeff <Jeff.Wright@WestonSolutions.com>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: [EXT]:Sampling

Will our people need any of the Denka specific safety requirements prior to the event?

David Bordelon
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Baton Rouge, LA 70817
(225) 297-5403 Direct
(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

-----Original Appointment-----
From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, May 3, 2022 11:43 AM
To: Osbourne, Margaret; Eric Delgado; Penland, John; Bordelon, David; Wright, Jeff; Yurk, Jeffrey
Subject: [EXT]:Sampling
When: Tuesday, May 3, 2022 12:30 PM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

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Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 113 734 862 0
Alternate VTC instructions

Or call in (audio only)
+1 202-991-0477,,954317904# United States, Washington DC
Phone Conference ID: 954 317 904#
Find a local number | Reset PIN

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/9/2022 7:38:35 PM
To: Penland, John [Penland.John@epa.gov]
Subject: FW: Denka

Hey John,

Can you please share the video with Lynne Davies at OECA?

Thanks,
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Monday, May 9, 2022 2:32 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka

That's awesome! So glad it went well. I am CBI cleared!
Lynne

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 9, 2022 3:05 PM
To: Davies, Lynne <Davies.Lynne@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka

Yes! The sampling event took place on Thursday, May 5. John got a great video of the popcorn strainer cleanout, wheelbarrow transport, and dumping it into the brine pit. If you're CBI cleared, I'll have him share it with you. It is incredible to actually see the process. The company also brought over the backhoe and took one scoop out of the solids in the brine pit. We got a solid sample of that and also took air canister samples. All in all, it was a successful event. Now we just await the sampling results. I'll email you separately a summary that John wrote up of his interactions with the facility personnel that you'll find interesting.

They took the following samples:

Air

- DR-A-BK-05052022-01 – background sample at kettle, prior to initiation of event.
- DR-A-KP-05052022-01 – Sample at kettle during popcorn poly removal
- DR-A-KD-05052022-01 – Inside of process building, 20' east of kettle
- DR-A-KD-05052022-02 – duplicate of above
- DR-A-KT-05052022-01 – travel sample from kettle to pit, then downwind of pit
- DR-A-PU-05052022-01 – Upwind of brine pit
- DR-A-BU-05052022-01 – Upwind sample during brine pit solid removal
- DR-A-BD-05052022-01 – Brine pit downwind during solids removal

Liquid

- DR-L-LB-05052022-01 – Liquid from brine pit before addition of "new" popcorn
- DR-L-LA-05052022-01- Liquid from brine pit after addition of "new" popcorn

Solid

- DR-S-BP-05052022-01 – Solid from brine pit during cleanout operation

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Monday, May 9, 2022 1:59 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka

Hi! We're all at the edge of our seats – any interesting updates?

Thanks to you both for your support on PCS – we did send a lot of documents back to PCS on Friday. We're in a good position at the start of this week.
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 5/24/2022 6:59:38 PM
To: Seager, Cheryl [seager.cheryl@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Patricia Welton [Welton.Patricia@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Barnett, Cheryl [barnett.cheryl@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]
Subject: FW: Draft Sampling and Results summary for May 5, 2022 at Denka
Attachments: 20243028_frc.pdf; OECA Denka preliminary results.pdf

FYI. Air, liquid, and solid sample results summary and preliminary conclusions below.

From: Penland, John <Penland.John@epa.gov>
Sent: Tuesday, May 24, 2022 12:44 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Young, Justin <Young.Justin@epa.gov>; Mostaghim, Negin <Mostaghim.Negin@epa.gov>; Bellot, Michael <Bellot.Michael@epa.gov>; Davies, Lynne <Davies.Lynne@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>
Subject: Draft Sampling and Results summary for May 5, 2022 at Denka

Background:

Neoprene "popcorn" is partially reacted neoprene generated from the auto-polymerization of chloroprene. According to Denka internal Standard Operating Procedures, the neoprene "popcorn" consists of: neoprene; chloroprene; toluene; 2,3-dichloro-1,3-butadiene; and stabilizers. Denka's written hazard descriptions of these materials indicate that the neoprene "popcorn" may meet the definitions for the hazardous waste characteristics of reactivity and ignitability. It is created in the neoprene reactors in the Polymer Unit at Denka and separated from the neoprene emulsion product by a canister filter, referred to as a "screen." Denka personnel transfer the neoprene "popcorn" to the Brine pit following its removal from the screens. The Brine Pit at Denka is an inground tank used for the accumulation and stabilization of the neoprene "popcorn" from the Polymer Building. On May 5, 2022, EPA observed the "popcorn" management process and collected samples from the Brine Pit and of gases emitted from the handling of the "popcorn." While a final laboratory report has been received for the solid and liquid samples collected, air sample results are still preliminary and a final laboratory report is pending.

Final Report Summary:

Sample DR-S-BP-05052022-02

This grab sample is of neoprene "popcorn" which was being removed from the Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized "popcorn" normally shipped offsite for disposal. Residual chloroprene is present in the solids at 1,080ppm.

Samples DR-L-LB-05052022-01 and DR-L-LB05052022-02

These grab samples are of liquids collected from the Brine Pit as found prior to the addition of the neoprene "popcorn" observed during the inspection. Chloroprene is present in the liquids at an average of 63.5ppm before the addition of the neoprene "popcorn".

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Brine Pit approximately 10 minutes after the addition of the neoprene "popcorn" observed during the inspection. The Chloroprene concentration has increased 437% to 341ppm.

Preliminary Results Summary

Sample DR-A-BK

This approximately 30 minute, 6 liter air sample was collected at the polymer kettle screen approximately 30 minutes before the neoprene "popcorn" generating procedure. This sample serves as the background reading for the process. The reported Chloroprene concentration is 0.28988ppm.

Sample DR-A-KP

This approximately 30 minute, 6 liter air sample was collected at the polymer kettle screen during the neoprene "popcorn" generating procedure. The concentration of chloroprene in this sample is anticipated to be dependent on the concentration of chloroprene released during the opening of the screen and the volatilization of the chloroprene from the "popcorn." Since this sample remained at the screen following the removal of the "popcorn," a difference between the measurement for this sample and the KT sample would illustrate the impact of direct volatilization of chloroprene from the "popcorn." The reported Chloroprene concentration is 50.728ppm.

Sample DR-A-KT

This approximately 30 minute, 6 liter air sample collection was started at the neoprene "popcorn" screen during the neoprene "popcorn" generation and traveled with the "popcorn" to the brine pit. The concentration of chloroprene in this sample is anticipated to be dependent on the concentration of chloroprene released during the opening of the screen and the volatilization of the chloroprene from the "popcorn." Since this sample remained near the popcorn throughout the process, the concentration of chloroprene in this sample is significantly more dependent on the volatilization of chloroprene from the popcorn. The reported Chloroprene concentration is 71.494ppm.

Sample DR-A-KD-01 and 02

This approximately 30 minute, 6 liter air sample was collected approximately 20 feet from the neoprene "popcorn" screen during the neoprene "popcorn" generation. This sample indicates the presence of chloroprene in the air at a downflow location from the "popcorn" generating activity. The concentration would be dependent on the concentration of chloroprene released during the opening of the screen, the volatilization of the chloroprene from the "popcorn", and the rate of dispersion of chloroprene vapor. The average reported Chloroprene concentration is 5.1591ppm.

Sample DR-A-PU

This approximately 30 minute, 6 liter air sample was collected between the poly-building wall fans and the brine pit during the neoprene "popcorn" generation and brine pit addition. In the absence of an additional downwind sample this sample's significance is inconclusive. The reported Chloroprene concentration is 1.2072ppm.

Sample DR-A-BU

This approximately 30 minute, 6 liter air sample was collected from a location immediately adjacent to the brine pit, on the upwind edge, during the removal of stabilized neoprene "popcorn" from the Brine Pit. The concentration of chloroprene in this sample would be dependent on the volatilization of chloroprene from the brine pit during the removal activity and any upwind sources of chloroprene. The reported Chloroprene concentration is 2.8188ppm.

Sample DR-A-BD

This approximately 30 minute 6 liter sample was collected from a location 20 feet from the brine pit, on the downwind side, during the removal of stabilized neoprene "popcorn". The concentration of chloroprene in this sample would be dependent on the volatilization of chloroprene from the brine pit during the removal activity, any upwind sources of chloroprene, and the rate of dispersion of chloroprene vapors in the air. The reported Chloroprene concentration is 0.26718ppm.

<u>Preliminary Conclusions</u>

1)Based on its management and the written hazard descriptions provided by Denka, the neoprene popcorn may be a hazardous waste demonstrating the characteristics of ignitability and reactivity.

2)Based on the results for air samples taken during the "popcorn" generating process, this process is a significant source of chloroprene emissions.

3)Based on the difference between air samples DR-A-KP and DR-A-KT, volatilization of the chloroprene component of the popcorn is a significant source of these emissions.

4)Based on the difference between liquid samples DR-L-LB-05052022-01 and DR-L-LA-05052022-01, volatilization of the chloroprene component of the popcorn is a significant source of these emissions.

5)Based on the results for residual chloroprene in solid sample DR-S-BP-05052022-02, the popcorn remains a potential source of chloroprene emissions even after stabilization.

6)Based on the results for air samples DR-A-BD and DR-A-BU, the removal of stabilized popcorn from the brine pit is a source of chloroprene emissions.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Pace Analytical Services, LLC
1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
(504)469-0333

May 19, 2022

Jeff Wright
Weston Solutions, Inc.
13702 Coursey Blvd.
Bldg #7, STE A
Baton Rouge, LA 70817

RE: Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Dear Jeff Wright:

Enclosed are the analytical results for sample(s) received by the laboratory on May 06, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Clay Ledet
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(504)469-0333
Project Manager

Enclosures

cc: David Bordelon, Weston Solutions, Inc.

REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 0025721
Kansas Department of Health and Environment (NELAC): E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP): 02006
Texas Commission on Env. Quality (NELAC): T104704405-09-TX
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119

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SAMPLE SUMMARY

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20243028001	**DR-L-LB-05052022-01**	Water	05/05/22 15:45	05/06/22 17:50
20243028002	**DR-L-LB-05052022-02**	Water	05/05/22 15:45	05/06/22 17:50
20243028003	**DR-L-LA-05052022-01**	Water	05/05/22 17:10	05/06/22 17:50
20243028004	**DR-S-BP-05052022-02**	Solid	05/05/22 16:10	05/06/22 17:50

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SAMPLE ANALYTE COUNT

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20243028001	**DR-L-LB-05052022-01**	EPA 8260	SLK	46
20243028002	**DR-L-LB-05052022-02**	EPA 8260	SLK	46
20243028003	**DR-L-LA-05052022-01**	EPA 8260	SLK	46
20243028004	**DR-S-BP-05052022-02**	EPA 8260	JRP	46

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
3 samples were analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255081

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20243028001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 1213307)
  - Chloroprene
- MSD (Lab ID: 1213308)
  - Chloroprene

R1: RPD value was outside control limits.

- MSD (Lab ID: 1213308)
  - 1,2-Dibromo-3-chloropropane
  - Methyl acetate

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255081

D4: Sample was diluted due to the presence of high levels of target analytes.

- DR-L-LA-05052022-01 (Lab ID: 20243028003)
  - Chloroprene
  - Toluene
- DR-L-LB-05052022-01 (Lab ID: 20243028001)
  - Toluene
- DR-L-LB-05052022-02 (Lab ID: 20243028002)
  - Chloroprene
  - Toluene
- MS (Lab ID: 1213307)
  - Toluene
- MSD (Lab ID: 1213308)
  - Toluene

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
1 sample was analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 5035/5030B with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255724

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20242755001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MSD (Lab ID: 1217691)
  - Chloroethane

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255724

D4: Sample was diluted due to the presence of high levels of target analytes.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Vinyl chloride

E: Analyte concentration exceeded the calibration range. The reported result is estimated.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Chloroprene

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:01	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:01	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:01	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:01	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:01	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:01	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:01	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:01	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:01	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:01	74-87-3	
Chloroprene	**62.8**	mg/L	5.0	1000		05/12/22 13:08	126-99-8	M1
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:01	96-12-8	R1
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:01	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:01	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:01	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:01	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:01	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:01	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:01	79-20-9	R1
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:01	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:01	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:01	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:01	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:01	127-18-4	
Toluene	**8.4**	mg/L	0.50	100		05/11/22 23:01	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:01	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:01	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:01	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:08	2037-26-5	
Toluene-d8 (S)	104	%.	76-124	100		05/11/22 23:01	2037-26-5	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Surrogates								
4-Bromofluorobenzene (S)	101	%.	78-121	100		05/11/22 23:01	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	1000		05/12/22 13:08	460-00-4	
Dibromofluoromethane (S)	102	%.	74-128	1000		05/12/22 13:08	1868-53-7	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:01	1868-53-7	

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:19	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:19	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:19	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:19	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:19	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:19	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:19	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:19	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:19	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:19	74-87-3	
Chloroprene	**64.1**	mg/L	5.0	1000		05/12/22 13:26	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:19	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:19	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:19	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:19	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:19	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:19	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:19	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:19	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:19	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:19	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:19	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:19	100-42-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:19	127-18-4	
Toluene	**8.0**	mg/L	0.50	100		05/11/22 23:19	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:19	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:19	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:19	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:26	2037-26-5	
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:19	2037-26-5	
4-Bromofluorobenzene (S)	100	%.	78-121	100		05/11/22 23:19	460-00-4	
4-Bromofluorobenzene (S)	100	%.	78-121	1000		05/12/22 13:26	460-00-4	
Dibromofluoromethane (S)	103	%.	74-128	1000		05/12/22 13:26	1868-53-7	
Dibromofluoromethane (S)	100	%.	74-128	100		05/11/22 23:19	1868-53-7	

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:36	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:36	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:36	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:36	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:36	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:36	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:36	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:36	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:36	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:36	74-87-3	
Chloroprene	**341**	mg/L	50.0	10000		05/12/22 20:04	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:36	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:36	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:36	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-59-2	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:36	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:36	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:36	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:36	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:36	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:36	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:36	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:36	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:36	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:36	127-18-4	
Toluene	**7.6**	mg/L	0.50	100		05/11/22 23:36	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:36	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:36	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:36	95-47-6	
Surrogates								
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:36	2037-26-5	
Toluene-d8 (S)	101	%.	76-124	10000		05/12/22 20:04	2037-26-5	
4-Bromofluorobenzene (S)	98	%.	78-121	100		05/11/22 23:36	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	10000		05/12/22 20:04	460-00-4	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:36	1868-53-7	
Dibromofluoromethane (S)	103	%.	74-128	10000		05/12/22 20:04	1868-53-7	

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	67-64-1	
Benzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-43-2	
Bromodichloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-27-4	
Bromoform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-25-2	
Bromomethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-83-9	
2-Butanone (MEK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	78-93-3	
Carbon disulfide	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-15-0	
Carbon tetrachloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	56-23-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Chlorobenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-90-7	
Chloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-00-3	
Chloroform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	67-66-3	
Chloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-87-3	
Chloroprene	**1080**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	126-99-8	E
1,2-Dibromo-3-chloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	96-12-8	
Dibromochloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	106-93-4	
Dichlorodifluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-71-8	
1,1-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-34-3	
1,2-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	107-06-2	
1,1-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-35-4	
cis-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-59-2	
trans-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-60-5	
1,2-Dichloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	78-87-5	
cis-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-02-6	
Ethylbenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-41-4	
2-Hexanone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	98-82-8	
Methyl acetate	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	79-20-9	
Methylene Chloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	1634-04-4	
Styrene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-34-5	
Tetrachloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	127-18-4	
Toluene	**240**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-88-3	
1,1,1-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-00-5	
Trichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-01-6	
Trichlorofluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-69-4	
Vinyl chloride	ND	mg/kg	5.6	50	05/19/22 09:30	05/19/22 14:09	75-01-4	D4
m&p-Xylene	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	179601-23-1	
o-Xylene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	95-47-6	
Surrogates								
Toluene-d8 (S)	100	%.	75-125	50	05/19/22 09:30	05/19/22 14:09	2037-26-5	
4-Bromofluorobenzene (S)	103	%.	64-139	50	05/19/22 09:30	05/19/22 14:09	460-00-4	
Dibromofluoromethane (S)	97	%.	66-143	50	05/19/22 09:30	05/19/22 14:09	1868-53-7	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255081
QC Batch Method: EPA 8260
Analysis Method: EPA 8260
Analysis Description: 8260 MSV
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028001, 20243028002, 20243028003

METHOD BLANK: 1213305
Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloropropane	mg/L	ND	0.0050	05/11/22 19:49	
2-Butanone (MEK)	mg/L	ND	0.010	05/11/22 19:49	
2-Hexanone	mg/L	ND	0.010	05/11/22 19:49	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/11/22 19:49	
Acetone	mg/L	ND	0.010	05/11/22 19:49	
Benzene	mg/L	ND	0.0050	05/11/22 19:49	
Bromodichloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Bromoform	mg/L	ND	0.0050	05/11/22 19:49	
Bromomethane	mg/L	ND	0.0050	05/11/22 19:49	
Carbon disulfide	mg/L	ND	0.0050	05/11/22 19:49	
Carbon tetrachloride	mg/L	ND	0.0050	05/11/22 19:49	
Chlorobenzene	mg/L	ND	0.0050	05/11/22 19:49	
Chloroethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroform	mg/L	ND	0.0050	05/11/22 19:49	
Chloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroprene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	
Dibromochloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Ethylbenzene	mg/L	ND	0.0050	05/11/22 19:49	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/11/22 19:49	
m&p-Xylene	mg/L	ND	0.010	05/11/22 19:49	
Methyl acetate	mg/L	ND	0.010	05/11/22 19:49	
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/11/22 19:49	
Methylene Chloride	mg/L	ND	0.0050	05/11/22 19:49	
o-Xylene	mg/L	ND	0.0050	05/11/22 19:49	
Styrene	mg/L	ND	0.0050	05/11/22 19:49	
Tetrachloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Toluene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213305 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Trichlorofluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Vinyl chloride	mg/L	ND	0.0020	05/11/22 19:49	
4-Bromofluorobenzene (S)	%.	99	78-121	05/11/22 19:49	
Dibromofluoromethane (S)	%.	102	74-128	05/11/22 19:49	
Toluene-d8 (S)	%.	104	76-124	05/11/22 19:49	

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloropropane	mg/L	ND	0.0050	05/12/22 11:06	
2-Butanone (MEK)	mg/L	ND	0.010	05/12/22 11:06	
2-Hexanone	mg/L	ND	0.010	05/12/22 11:06	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/12/22 11:06	
Acetone	mg/L	ND	0.010	05/12/22 11:06	
Benzene	mg/L	ND	0.0050	05/12/22 11:06	
Bromodichloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Bromoform	mg/L	ND	0.0050	05/12/22 11:06	
Bromomethane	mg/L	ND	0.0050	05/12/22 11:06	
Carbon disulfide	mg/L	ND	0.0050	05/12/22 11:06	
Carbon tetrachloride	mg/L	ND	0.0050	05/12/22 11:06	
Chlorobenzene	mg/L	ND	0.0050	05/12/22 11:06	
Chloroethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroform	mg/L	ND	0.0050	05/12/22 11:06	
Chloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroprene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Dibromochloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Ethylbenzene	mg/L	ND	0.0050	05/12/22 11:06	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/12/22 11:06	
m&p-Xylene	mg/L	ND	0.010	05/12/22 11:06	
Methyl acetate	mg/L	ND	0.010	05/12/22 11:06	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/12/22 11:06	
Methylene Chloride	mg/L	ND	0.0050	05/12/22 11:06	
o-Xylene	mg/L	ND	0.0050	05/12/22 11:06	
Styrene	mg/L	ND	0.0050	05/12/22 11:06	
Tetrachloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Toluene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Trichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Trichlorofluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Vinyl chloride	mg/L	ND	0.0020	05/12/22 11:06	
4-Bromofluorobenzene (S)	%.	98	78-121	05/12/22 11:06	
Dibromofluoromethane (S)	%.	103	74-128	05/12/22 11:06	
Toluene-d8 (S)	%.	102	76-124	05/12/22 11:06	

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.048	96	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.062	123	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.056	112	75-121	
1,1-Dichloroethane	mg/L	0.05	0.051	101	71-127	
1,1-Dichloroethene	mg/L	0.05	0.046	92	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.050	100	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.055	109	75-125	
1,2-Dichloroethane	mg/L	0.05	0.052	103	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	105	72-125	
2-Butanone (MEK)	mg/L	0.05	0.059	117	34-170	
2-Hexanone	mg/L	0.05	0.061	122	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.057	115	58-141	
Acetone	mg/L	0.05	0.068	135	16-192	
Benzene	mg/L	0.05	0.051	101	74-132	
Bromodichloromethane	mg/L	0.05	0.054	108	73-117	
Bromoform	mg/L	0.05	0.056	112	58-132	
Bromomethane	mg/L	0.05	0.037	74	47-157	
Carbon disulfide	mg/L	0.05	0.043	87	52-145	
Carbon tetrachloride	mg/L	0.05	0.049	98	68-129	
Chlorobenzene	mg/L	0.05	0.052	103	79-121	
Chloroethane	mg/L	0.05	0.043	86	34-160	
Chloroform	mg/L	0.05	0.050	100	70-120	
Chloromethane	mg/L	0.05	0.038	76	44-142	
Chloroprene	mg/L	0.05	0.047	94	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.048	95	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.052	105	77-121	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Dibromochloromethane	mg/L	0.05	0.053	106	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.031	62	28-148	
Ethylbenzene	mg/L	0.05	0.052	104	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.050	100	77-126	
m&p-Xylene	mg/L	0.1	0.10	103	78-119	
Methyl acetate	mg/L	0.05	0.053	106	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.053	106	58-135	
Methylene Chloride	mg/L	0.05	0.048	95	49-145	
o-Xylene	mg/L	0.05	0.051	103	77-121	
Styrene	mg/L	0.05	0.050	101	81-123	
Tetrachloroethene	mg/L	0.05	0.059	117	62-138	
Toluene	mg/L	0.05	0.051	102	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.048	95	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.050	99	77-117	
Trichlorofluoromethane	mg/L	0.05	0.040	79	45-164	
Vinyl chloride	mg/L	0.05	0.035	70	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			102	74-128	
Toluene-d8 (S)	%.			104	76-124	

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.050	100	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.057	115	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.054	108	75-121	
1,1-Dichloroethane	mg/L	0.05	0.054	108	71-127	
1,1-Dichloroethene	mg/L	0.05	0.051	102	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.047	95	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.051	103	75-125	
1,2-Dichloroethane	mg/L	0.05	0.054	107	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	106	72-125	
2-Butanone (MEK)	mg/L	0.05	0.055	110	34-170	
2-Hexanone	mg/L	0.05	0.053	106	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.052	104	58-141	
Acetone	mg/L	0.05	0.065	129	16-192	
Benzene	mg/L	0.05	0.053	106	74-132	
Bromodichloromethane	mg/L	0.05	0.053	106	73-117	
Bromoform	mg/L	0.05	0.050	99	58-132	
Bromomethane	mg/L	0.05	0.057	113	47-157	
Carbon disulfide	mg/L	0.05	0.049	97	52-145	
Carbon tetrachloride	mg/L	0.05	0.051	101	68-129	
Chlorobenzene	mg/L	0.05	0.053	107	79-121	
Chloroethane	mg/L	0.05	0.071	143	34-160	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloroform	mg/L	0.05	0.052	105	70-120	
Chloromethane	mg/L	0.05	0.063	127	44-142	
Chloroprene	mg/L	0.05	0.049	98	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.050	101	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.053	106	77-121	
Dibromochloromethane	mg/L	0.05	0.050	100	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.052	104	28-148	
Ethylbenzene	mg/L	0.05	0.053	106	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.051	102	77-126	
m&p-Xylene	mg/L	0.1	0.11	107	78-119	
Methyl acetate	mg/L	0.05	0.046	92	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.052	104	58-135	
Methylene Chloride	mg/L	0.05	0.054	107	49-145	
o-Xylene	mg/L	0.05	0.052	103	77-121	
Styrene	mg/L	0.05	0.051	101	81-123	
Tetrachloroethene	mg/L	0.05	0.051	102	62-138	
Toluene	mg/L	0.05	0.051	103	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.052	104	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.051	102	77-117	
Trichlorofluoromethane	mg/L	0.05	0.053	106	45-164	
Vinyl chloride	mg/L	0.05	0.053	106	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			104	74-128	
Toluene-d8 (S)	%.			102	76-124	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/L	ND	5	5	4.8	5.6	96	112	73-141	15	20	
1,1,2,2-Tetrachloroethane	mg/L	ND	5	5	5.5	6.8	110	135	48-148	20	20	
1,1,2-Trichloroethane	mg/L	ND	5	5	5.1	6.1	101	121	46-154	18	20	
1,1-Dichloroethane	mg/L	ND	5	5	5.8	6.7	116	134	63-145	15	20	
1,1-Dichloroethene	mg/L	ND	5	5	4.9	5.5	98	109	28-176	11	20	
1,2-Dibromo-3-chloropropane	mg/L	ND	5	5	4.4	5.5	89	110	40-152	21	20	R1
1,2-Dibromoethane (EDB)	mg/L	ND	5	5	4.9	5.8	98	116	69-134	17	20	
1,2-Dichloroethane	mg/L	ND	5	5	4.7	5.7	95	114	51-147	18	20	
1,2-Dichloropropane	mg/L	ND	5	5	4.9	5.7	98	113	64-140	15	20	
2-Butanone (MEK)	mg/L	ND	5	5	5.1	6.0	101	120	10-200	17	20	
2-Hexanone	mg/L	ND	5	5	5.2	6.3	105	125	40-157	18	20	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	5	5	5.0	6.1	99	121	36-165	20	20	
Acetone	mg/L	ND	5	5	6.1	7.2	122	143	10-200	16	20	
Benzene	mg/L	ND	5	5	5.0	5.8	100	117	29-186	16	20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Bromodichloromethane	mg/L	ND	5	5	4.9	5.8	99	116	58-139	16	20	
Bromoform	mg/L	ND	5	5	5.0	6.0	101	121	57-135	18	20	
Bromomethane	mg/L	ND	5	5	4.0	4.1	80	81	42-168	1	20	
Carbon disulfide	mg/L	ND	5	5	4.9	5.1	97	102	44-170	4	20	
Carbon tetrachloride	mg/L	ND	5	5	5.1	5.9	101	119	45-162	16	20	
Chlorobenzene	mg/L	ND	5	5	4.9	5.8	99	116	71-135	17	20	
Chloroethane	mg/L	ND	5	5	4.7	4.8	95	96	32-175	1	20	
Chloroform	mg/L	ND	5	5	4.8	5.7	96	114	61-136	17	20	
Chloromethane	mg/L	ND	5	5	4.1	4.1	80	79	38-154	1	20	
Chloroprene	mg/L	62.8	5	5	64.6	62.7	37	-2	59-153	3	20	M1
cis-1,2-Dichloroethene	mg/L	ND	5	5	4.7	5.5	93	109	44-160	16	20	
cis-1,3-Dichloropropene	mg/L	ND	5	5	4.8	5.6	96	112	47-153	15	20	
Dibromochloromethane	mg/L	ND	5	5	4.8	5.8	97	116	64-130	18	20	
Dichlorodifluoromethane	mg/L	ND	5	5	3.6	3.6	72	72	22-160	0	20	
Ethylbenzene	mg/L	ND	5	5	5.0	6.0	100	119	51-153	17	20	
Isopropylbenzene (Cumene)	mg/L	ND	5	5	5.0	6.1	101	123	68-145	20	20	
m&p-Xylene	mg/L	ND	10	10	10.1	11.9	101	119	30-173	16	20	
Methyl acetate	mg/L	ND	5	5	4.5	5.7	90	114	20-173	23	20	R1
Methyl-tert-butyl ether	mg/L	ND	5	5	4.8	5.8	96	117	36-160	19	20	
Methylene Chloride	mg/L	ND	5	5	4.8	5.5	95	110	56-140	14	20	
o-Xylene	mg/L	ND	5	5	4.9	5.9	98	118	10-197	18	20	
Styrene	mg/L	ND	5	5	4.8	5.6	95	111	37-163	16	20	
Tetrachloroethene	mg/L	ND	5	5	5.1	5.9	102	117	18-193	14	20	
Toluene	mg/L	8.4	5	5	13.0	13.2	93	97	33-175	2	20	D4
trans-1,2-Dichloroethene	mg/L	ND	5	5	4.9	5.6	99	112	63-140	13	20	
trans-1,3-Dichloropropene	mg/L	ND	5	5	4.9	5.8	98	116	47-153	17	20	
Trichloroethene	mg/L	ND	5	5	4.9	5.6	97	112	24-181	14	20	
Trichlorofluoromethane	mg/L	ND	5	5	4.5	4.7	91	94	37-182	3	20	
Vinyl chloride	mg/L	ND	5	5	4.0	4.1	81	81	19-169	0	20	
4-Bromofluorobenzene (S)	%.						101	104	78-121			
Dibromofluoromethane (S)	%.						102	102	74-128			
Toluene-d8 (S)	%.						103	101	76-124			

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255724
QC Batch Method: EPA 5035/5030B
Analysis Method: EPA 8260
Analysis Description: 8260 MSV 5030 Med Level
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028004

METHOD BLANK: 1217688
Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromo-3-chloropropane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromoethane (EDB)	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloropropane	mg/kg	ND	0.25	05/19/22 10:03	
2-Butanone (MEK)	mg/kg	ND	0.50	05/19/22 10:03	
2-Hexanone	mg/kg	ND	0.50	05/19/22 10:03	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.50	05/19/22 10:03	
Acetone	mg/kg	ND	0.50	05/19/22 10:03	
Benzene	mg/kg	ND	0.25	05/19/22 10:03	
Bromodichloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Bromoform	mg/kg	ND	0.25	05/19/22 10:03	
Bromomethane	mg/kg	ND	0.25	05/19/22 10:03	
Carbon disulfide	mg/kg	ND	0.25	05/19/22 10:03	
Carbon tetrachloride	mg/kg	ND	0.25	05/19/22 10:03	
Chlorobenzene	mg/kg	ND	0.25	05/19/22 10:03	
Chloroethane	mg/kg	ND	0.25	05/19/22 10:03	
Chloroform	mg/kg	ND	0.25	05/19/22 10:03	
Chloromethane	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Dibromochloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Dichlorodifluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Ethylbenzene	mg/kg	ND	0.25	05/19/22 10:03	
Isopropylbenzene (Cumene)	mg/kg	ND	0.25	05/19/22 10:03	
m&p-Xylene	mg/kg	ND	0.50	05/19/22 10:03	
Methyl acetate	mg/kg	ND	0.50	05/19/22 10:03	
Methyl-tert-butyl ether	mg/kg	ND	0.25	05/19/22 10:03	
Methylene Chloride	mg/kg	ND	0.25	05/19/22 10:03	
o-Xylene	mg/kg	ND	0.25	05/19/22 10:03	
Styrene	mg/kg	ND	0.25	05/19/22 10:03	
Tetrachloroethene	mg/kg	ND	0.25	05/19/22 10:03	
Toluene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Trichloroethene	mg/kg	ND	0.25	05/19/22 10:03	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1217688 Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichlorofluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Vinyl chloride	mg/kg	ND	0.10	05/19/22 10:03	
4-Bromofluorobenzene (S)	%.	101	64-139	05/19/22 10:03	
Dibromofluoromethane (S)	%.	102	66-143	05/19/22 10:03	
Toluene-d8 (S)	%.	101	75-125	05/19/22 10:03	

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	2.5	2.4	97	76-126	
1,1,2,2-Tetrachloroethane	mg/kg	2.5	2.7	107	65-129	
1,1,2-Trichloroethane	mg/kg	2.5	2.5	101	75-121	
1,1-Dichloroethane	mg/kg	2.5	2.5	99	71-127	
1,1-Dichloroethene	mg/kg	2.5	2.1	82	63-130	
1,2-Dibromo-3-chloropropane	mg/kg	2.5	2.4	98	59-131	
1,2-Dibromoethane (EDB)	mg/kg	2.5	2.6	102	75-125	
1,2-Dichloroethane	mg/kg	2.5	2.4	94	65-131	
1,2-Dichloropropane	mg/kg	2.5	2.6	104	72-125	
2-Butanone (MEK)	mg/kg	2.5	2.9	116	34-170	
2-Hexanone	mg/kg	2.5	2.8	112	52-147	
4-Methyl-2-pentanone (MIBK)	mg/kg	2.5	2.7	110	58-141	
Acetone	mg/kg	2.5	2.9	117	16-192	
Benzene	mg/kg	2.5	2.6	106	74-132	
Bromodichloromethane	mg/kg	2.5	2.4	96	73-117	
Bromoform	mg/kg	2.5	2.6	102	58-132	
Bromomethane	mg/kg	2.5	2.0	81	47-157	
Carbon disulfide	mg/kg	2.5	2.0	80	52-145	
Carbon tetrachloride	mg/kg	2.5	2.5	101	68-129	
Chlorobenzene	mg/kg	2.5	2.5	101	79-121	
Chloroethane	mg/kg	2.5	1.9	77	34-160	
Chloroform	mg/kg	2.5	2.5	98	70-120	
Chloromethane	mg/kg	2.5	3.1	122	44-142	
cis-1,2-Dichloroethene	mg/kg	2.5	2.5	100	71-124	
cis-1,3-Dichloropropene	mg/kg	2.5	2.5	102	77-121	
Dibromochloromethane	mg/kg	2.5	2.5	100	67-122	
Dichlorodifluoromethane	mg/kg	2.5	2.5	99	28-148	
Ethylbenzene	mg/kg	2.5	2.5	101	79-116	
Isopropylbenzene (Cumene)	mg/kg	2.5	2.6	103	77-126	
m&p-Xylene	mg/kg	5	5.0	100	78-119	
Methyl acetate	mg/kg	2.5	2.6	103	47-155	
Methyl-tert-butyl ether	mg/kg	2.5	2.4	97	58-135	
Methylene Chloride	mg/kg	2.5	2.4	97	49-145	
o-Xylene	mg/kg	2.5	2.5	101	77-121	
Styrene	mg/kg	2.5	2.5	99	81-123	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Tetrachloroethene	mg/kg	2.5	2.6	105	62-138	
Toluene	mg/kg	2.5	2.5	99	79-120	
trans-1,2-Dichloroethene	mg/kg	2.5	2.6	102	68-125	
trans-1,3-Dichloropropene	mg/kg	2.5	2.4	98	77-121	
Trichloroethene	mg/kg	2.5	2.6	104	77-117	
Trichlorofluoromethane	mg/kg	2.5	2.1	82	45-164	
Vinyl chloride	mg/kg	2.5	1.9	77	48-130	
4-Bromofluorobenzene (S)	%.			101	64-139	
Dibromofluoromethane (S)	%.			98	66-143	
Toluene-d8 (S)	%.			100	75-125	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	106	73-141	3	20	
1,1,2,2-Tetrachloroethane	mg/kg	ND	2.6	2.6	2.9	2.9	110	110	48-148	0	20	
1,1,2-Trichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	105	106	46-154	1	20	
1,1-Dichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	106	108	63-145	1	20	
1,1-Dichloroethene	mg/kg	ND	2.6	2.6	2.1	2.1	80	81	28-176	1	20	
1,2-Dibromo-3-chloropropane	mg/kg	ND	2.6	2.6	2.5	2.7	96	101	40-152	5	20	
1,2-Dibromoethane (EDB)	mg/kg	ND	2.6	2.6	2.8	2.9	105	109	69-134	3	20	
1,2-Dichloroethane	mg/kg	ND	2.6	2.6	2.6	2.6	97	99	51-147	2	20	
1,2-Dichloropropane	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	64-140	2	20	
2-Butanone (MEK)	mg/kg	ND	2.6	2.6	2.8	2.9	94	100	10-200	5	20	
2-Hexanone	mg/kg	ND	2.6	2.6	2.9	3.1	108	116	40-157	7	20	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	2.6	2.6	2.8	2.9	107	110	36-165	2	20	
Acetone	mg/kg	ND	2.6	2.6	2.8	3.1	94	105	10-200	10	20	
Benzene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	29-186	2	20	
Bromodichloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	104	58-139	1	20	
Bromoform	mg/kg	ND	2.6	2.6	2.7	2.8	102	107	57-135	4	20	
Bromomethane	mg/kg	ND	2.6	2.6	2.0	2.0	75	75	42-168	0	20	
Carbon disulfide	mg/kg	ND	2.6	2.6	2.0	2.0	75	76	44-170	2	20	
Carbon tetrachloride	mg/kg	ND	2.6	2.6	2.8	2.9	107	109	45-162	2	20	
Chlorobenzene	mg/kg	ND	2.6	2.6	2.9	2.9	109	111	71-135	2	20	
Chloroethane	mg/kg	ND	2.6	2.6	0.90	0.74	34	28	32-175	19	20	M1
Chloroform	mg/kg	ND	2.6	2.6	2.7	2.8	104	106	61-136	2	20	
Chloromethane	mg/kg	ND	2.6	2.6	3.4	3.4	128	127	38-154	1	20	
Chloroprene	mg/kg				2.8	2.8				2	20	
cis-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	44-160	1	20	
cis-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	47-153	1	20	
Dibromochloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	102	104	64-130	2	20	
Dichlorodifluoromethane	mg/kg	ND	2.6	2.6	2.8	2.7	105	103	22-160	2	20	
Ethylbenzene	mg/kg	ND	2.6	2.6	2.9	2.9	110	111	51-153	1	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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Pace Analytical Services, LLC
1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
(504)469-0333

QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Isopropylbenzene (Cumene)	mg/kg	ND	2.6	2.6	3.0	3.0	114	114	68-145	0	20	
m&p-Xylene	mg/kg	ND	5.3	5.3	5.7	5.8	108	110	30-173	1	20	
Methyl acetate	mg/kg	ND	2.6	2.6	2.6	2.7	99	103	20-173	4	20	
Methyl-tert-butyl ether	mg/kg	ND	2.6	2.6	2.7	2.7	100	102	36-160	2	20	
Methylene Chloride	mg/kg	ND	2.6	2.6	2.9	2.9	108	109	56-140	1	20	
o-Xylene	mg/kg	ND	2.6	2.6	3.0	3.0	113	113	10-197	1	20	
Styrene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	37-163	1	20	
Tetrachloroethene	mg/kg	ND	2.6	2.6	3.2	3.4	120	127	18-193	6	20	
Toluene	mg/kg	ND	2.6	2.6	2.8	2.8	107	108	33-175	0	20	
trans-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.9	2.9	108	108	63-140	0	20	
trans-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.7	2.7	101	102	47-153	1	20	
Trichloroethene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	24-181	1	20	
Trichlorofluoromethane	mg/kg	ND	2.6	2.6	1.9	2.0	73	74	37-182	1	20	
Vinyl chloride	mg/kg	ND	2.6	2.6	2.1	2.1	78	81	19-169	3	20	
4-Bromofluorobenzene (S)	%.						104	103	64-139			
Dibromofluoromethane (S)	%.						95	96	66-143			
Toluene-d8 (S)	%.						101	100	75-125			

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QUALIFIERS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The Nelac Institute

ANALYTE QUALIFIERS

D4	Sample was diluted due to the presence of high levels of target analytes.
E	Analyte concentration exceeded the calibration range. The reported result is estimated.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
R1	RPD value was outside control limits.

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1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20243028001	**DR-L-LB-05052022-01**	EPA 8260	255081		
20243028002	**DR-L-LB-05052022-02**	EPA 8260	255081		
20243028003	**DR-L-LA-05052022-01**	EPA 8260	255081		
20243028004	**DR-S-BP-05052022-02**	EPA 5035/5030B	255724	EPA 8260	255848

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Pace

CHAIN-OF-CUSTODY / Analytical Request Docum

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be com

Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at https://info.pacelabs.com/

WO# : 20243028

20243028

tion A	Section B	Section C
uired Client Information:	Required Project Information:	Invoice Information:
ıpany: weston solution inc.	Report To: Jeff Wright	Attention:
ress: 4324 S. Sherwood Forest Blvd #100	Copy To:	Company Name:
n Rouge , LA 70816		Address:
il: jeff.wright@westonsolutions.com	Purchase Order #:	Pace Quote:
ne: 225-772-7921 Fax:	Project Name:	Pace Project Manager: clay.ledet@pacelabs.com,
uested Due Date: 48 hr	Project #:	Pace Profile #: 17402/1&2

Regulatory Agency

State / Location

Requested Analysis Filtered (Y/N)

#	SAMPLE ID (One Character per box. (A-Z, 0-9 / , -) Sample Ids must be unique)	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED START DATE	COLLECTED START TIME	COLLECTED END DATE	COLLECTED END TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Other	Analyses Test Y/N	8260 Full List	8260 Full List	8260 Full List	Residual Chlorine (Y/N)
1	DR-L-LB-05052022-01	WW	G	5/5/22	1545				3				X						X			
2	DR-L-LB-05052022-02	WW	G	5/5/22	1545				3				X						X			
3	DR-L-LA-05052022-01	WW	G	5/5/22	~~1715~~ 1710				3				X						X			
4	DR-S-BP-05052022-01	S	G	5/5/22	1610				2	X									X			
5																						
6																						
7																						
8																						
9																						
10																						
11																						
12																						

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
	[signature] Weston	5/6/22	14:15	[signature]	5/6/22	14:15				
	[signature]	5/6/22	14:15	[signature]	5/6/22	15:15				
	[signature]	5/6/22	1750	[signature]	5/6/2022	1750	1.8 TT	Y	Y	Y

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE of SAMPLER: DATE Signed:

TEMP in C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

E34 3.0

WO#: 20243028

Pace

1000 Riverbend. Blvd., Suite F
St. Rose, LA 70087

Project : PM: CAL Due Date: 05/12/22
CLIENT: 20-WestonSol

Courier: ☑ Pace Courier ☐ Hired Courier ☐ Fed X ☐ UPS ☐ DHL ☐ USPS ☐ Customer ☐ Other

Custody Seal on Cooler/Box Present: ☐ YES ☑ NO **Custody Seals intact:** ☐ YES ☐ NO

Samples on ice: ☑ YES ☐ NO **Type of Ice:** (Wet) Blue None

Date and Initials of person examining contents: 5/9/22 CAL

Temp should be ≤6°C *Temp must be measured from Temperature blank when present

Cooler #1 Thermometer Used: 10 Cooler Temp °C: (Observed) 1.8 (CF) 0 (Actual) 1.8
Cooler #2 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #3 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #4 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____

Tracking #: ____

Temperature Blank Present*?	☐Yes ☐No ☑N/A	
Chain of Custody Present:	☑Yes ☐No ☐N/A	
Chain of Custody Complete:	☑Yes ☐No ☐N/A	
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	
Sampler Name & Signature on COC:	☐Yes ☑No ☐N/A	
Samples Arrived within Hold Time:	☑Yes ☐No ☐N/A	
Sufficient Volume:	☑Yes ☐No ☐N/A	
Correct Containers Used:	☑Yes ☐No ☐N/A	
Filtered vol. Rec. for Diss. tests	☐Yes ☐No ☑N/A	
Sample Labels match COC:	☑Yes ☐No ☐N/A	
All containers received within manafacture's precautionary and/or expiration dates.	☑Yes ☐No ☐N/A	
All containers needing chemical preservation have been checked (except VOA, coliform, & O&G).	☐Yes ☐No ☑N/A	If No, was preserative added? ☐Yes ☐No If added record lot #.: HNO3 ____ H2SO4 ____ Date: ____ Time: ____
All containers preservation checked found to be in compliance with EPA recommendation.	☐Yes ☐No ☑N/A	
~~Headspace in VOA Vials (>6mm):~~	~~☐Yes ☑No ☐N/A~~	
Trip Blank Present:	☐Yes ☑No	

Client Notification/ Resolution:

Person Contacted: ____ Date/Time: ____

Comments/ Resolution: ____

Data File Name	W22EM004.D	W22EM005.D	W22EM006.D	W22EM007.D	W22EM008.D	W22EM009.D	W22EM010.D	W22EM011.D	W22EM012.D	W22EM013.D
Operator	RJM	RJM	RJM	RJM	RJM	RJM	RJM	RJM	RJM	RJM
Acq. Method File	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M	2040009.M
Sample Name	2050917-03	2050917-06	2050917-07	2050917-08	2050917-04	2050917-05	B2E1302-DUP2	2050917-02	B2E1302-DUP3	2050917-01
Misc Info	DR-A-BK	DR-A-BU	DR-A-PU	DR-A-BD	DR-A-KP	DR-A-KD	DR-A-KD REP	DR-A-KD	DR-A-KD REP	DR-A-KT
Multiplier:	1103	1267	1230	1317	1205	1305	1305	1251	1251	1256
Reported	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)
Chloroprene	289.88	2818.79	1207.20	267.18	50727.65	5070.34	5060.95	5236.23	5268.89	71494.63
Toluene	1247.12	241.83	204.85	57.49	2783.73	2622.94	2593.11	2720.70	2738.07	1539.33
On Column	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)	Amount (ppbV)
Chloroprene	0.263	2.225	0.981	0.203	42.098	3.885	3.878	4.186	4.212	56.922
Toluene	1.131	0.191	0.167	0.044	2.310	2.010	1.987	2.175	2.189	1.226

Appointment

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
on behalf of Nance, Earthea [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5a54d6f295db49bf9b334b7d971d789f-Nance, Eart]
Sent: 6/23/2022 1:13:03 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]

Subject: FW: R6 Denka Update
Attachments: DENKA update 06132022.docx
Location: Microsoft Teams Meeting

Start: 6/23/2022 2:30:00 PM
End: 6/23/2022 3:00:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Nance, Earthea <Nance.Earthea@epa.gov>
Sent: Monday, June 13, 2022 3:36 PM
To: Nance, Earthea; Wooden-Aguilar, Helena; Gonzalez, Iris; Dwyer, Stacey; McGuire, James; Welton, Patricia; Barnett, Cheryl; Lannen, Justin; Seager, Cheryl; Smalley, Bryant; Thompson, Steve; Leathers, James
Subject: Copy: R6 Denka Update
When: Thursday, June 23, 2022 9:30 AM-10:00 AM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

Action Item Coordinator: James Leathers

Please send meeting materials 48 hours in advance to Sue Davis and James Turk
We ask that you connect 5 min. in advance of the scheduled start time.
If additional staff need to attend, notify Sue Davis and James Turk via email.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 113 676 406 6
Alternate VTC instructions

Or call in (audio only)
+1 210-469-3886,,297465036# United States, San Antonio
Phone Conference ID: 297 465 036#
Find a local number | Reset PIN

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

Learn More | Meeting options

1/4/22

ORA Meeting Request Form

Earthea Nance, Regional Administrator ☒
Helena Wooden-Aguilar, Acting Deputy Regional Administrator ☒

- **Today's Date:** June 13, 2022
- **Title of meeting or event:** Denka Update
- **Is this an ORA requested meeting: Yes ☒ or No ☐**
- **Purpose:** Update on Denka inspections and enforcement case
- **Desired Outcome:** Provide RA with inspection results
- **For RA Signature items including Proposed and Final Actions, correspondence, or other decisions: What is the signature deadline?** N/A
- **Classification (Urgent, Time Sensitive, Decision Making, Informative): Time Sensitive**
- **Date desired for meeting or no later than:** RA requested week of June 20, 2022
- **Length of meeting/event:** 60 minutes
- **Location/Platform:** Teams/virtual
- **Participants:** James McGuire, Patricia Welton, Cheryl Barnett, Justin Lannen, Cheryl Seager, Bryant Smalley, Steve Thompson, James Leathers
- **Will there be outside attendees?** No
- **Advance materials are required 48 Hours in Advance of any Meeting. Materials should include a WeCare Briefing Sheet and PowerPoint presentation.**
  Briefing sheet should include Environmental Justice impact and Climate Change impact (if any). It also should include activity that EPA has done or indicate none.
- **Name of individual who will be providing materials:** Steve Thompson
- **POC for questions: (add Phone #)** Cheryl Seager 972-971-9175
- **Action Items Coordinator:** James Leathers
- (This is a designated person who, during the meeting, will capture and ensure follow-up on any action items coming from meeting). Please allow for the last 5 minutes of the meeting to be used for review of action items.

**** Please submit completed forms to: Sue Davis,** [HYPERLINK "mailto:Davis.Suea@epa.gov"], **and James Turk,** [HYPERLINK "mailto:Turk.James@epa.gov"].

***** Division Director must be aware of meeting request.**

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 6/30/2022 12:54:51 AM
To: Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Interim Report For ECAD Denka Enforcement Multimedia Sampling

I've added my comments for your consideration.

From: Penland, John <Penland.John@epa.gov>
Sent: Tuesday, June 28, 2022 7:52 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Interim Report For ECAD Denka Enforcement Multimedia Sampling

Please use the following link for final comments: Denka Performance Elastomer RCRA Support v.5.docx
I would like to have these no later than COB Thursday so I can have the final approved report next week.

From: Penland, John
Sent: Tuesday, June 28, 2022 5:48 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: Interim Report For ECAD Denka Enforcement Multimedia Sampling

This report is still in draft but this is the last one before it goes final

---

From: Bordelon, David <David.Bordelon@WestonSolutions.com>
Sent: Tuesday, June 28, 2022 3:37 PM
To: Penland, John <Penland.John@epa.gov>; Delgado, Eric <Delgado.Eric@epa.gov>
Subject: Interim Report For ECAD Denka Enforcement Multimedia Sampling

John and Eric,

Please see attached report and attachments. I rolled all documents up into a single pdf and also included the word document for the report in case you need to extract anything.

Please let me know if you have any questions or edits you'd like for me to complete.

Thanks
David

David Bordelon
Weston Solutions, Inc.
13702 Coursey Blvd, Bldg 7
Baton Rouge, LA 70817
(225) 297-5403 Direct

(225) 772-7921 Cell
David.Bordelon@westonsolutions.com

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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 7/19/2022 6:32:54 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Denka Sampling Report

I think Cheryl is fine with it going out as long as no objections from OECA or DOJ. We just need to let WCED know at 3:00 and then I think we can send it.

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Tuesday, July 19, 2022 12:58 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: FW: Denka Sampling Report

Meant to copy you

From: Yurk, Jeffrey
Sent: Tuesday, July 19, 2022 12:57 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Denka Sampling Report

Cheryl: The redacted version of the final signed Denka sampling report is attached. Our normal procedure is to send it to the facility and then post it to the web 10 days after sending. Please let me know if there will be any change to this procedure.

Thanks,

Jeff

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 7/27/2022 7:45:48 PM
To: Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

---

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, July 27, 2022 2:26 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – thank you for forwarding the transmittal from John Penland to Chris Meyers, which attached the Final Inspection Report. Three quick items:

1. I have confirmed with Chris that he did not receive the transmittal. The email address is correct, so we don't yet have a good explanation for the confusion. It is possible that the file size (11 MB) caused the issue. DPE requests a short extension of time to respond before the report is posted to EPA's website. Our strong preference would be an extension until 10 days after receipt of the second RCRA inspection report (anticipated to be transmitted to us on Friday, July 29, 2022). This will allow concurrent responses to the two reports, if any.

2. Please provide an unredacted copy of the report.

3. When you or John transmits the upcoming RCRA inspection report, please copy Bob Holden, Kevin Voelkel and me. We will be requesting an unredacted copy of that report as well.

Thanks in advance, - Jason

JASON B. HUTT
Partner
jason.hutt@bracewell.com | download v-card
T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

BRACEWELL LLP
2001 M Street NW, Suite 900 | Washington, D.C. | 20036-3310
bracewell.com | profile | LinkedIn | Twitter

CONFIDENTIALITY STATEMENT
This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 1:00 PM
To: Hutt, Jason <jason.hutt@bracewell.com>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

---

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
Subject: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Mr. Meyers,

On May 5, 2022, the United States Environmental Protection Agency conducted a sampling inspection at your facility under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA) and your Denka's RCRA Permit. A copy of the final inspection report is attached to this email. Please review the report, note the areas of concern, and take any actions necessary to ensure compliance with RCRA. The attached inspection report will be posted to EPA's public website after July 29, 2022.

Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 7/27/2022 10:10:07 PM
To: Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Let's discuss tomorrow am.

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, July 27, 2022 5:09 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – by way of update, our attempts to forward the email (with attachment) to Chris did not work either. The electronic signatures may be causing the issue. Regardless, we posted the document to a secure site and Chris now has access to it. I wanted to make you aware for future communications. Thanks.

JASON B. HUTT
Partner
jason.hutt@bracewell.com | download v-card
T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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To: Osbourne, Margaret <osbourne.margaret@epa.gov>
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Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

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Thanks in advance, - Jason

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 1:00 PM
To: Hutt, Jason <jason.hutt@bracewell.com>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

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From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
Subject: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Mr. Meyers,

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Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)

Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Appointment

From: Osbourne, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fa81d13bb18f4249aab3e3b61275d58b-Osbourne, Margaret]
Sent: 7/27/2022 10:11:19 PM
To: Jeffrey Yurk (yurk.jeffrey@epa.gov) [yurk.jeffrey@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]

Subject: Denka sampling report
Location: Microsoft Teams Meeting

Start: 7/28/2022 3:00:00 PM
End: 7/28/2022 3:30:00 PM
Show Time As: Tentative

Required Attendees: Yurk, Jeffrey; Deppe, Fred; Penland, John; Murdock, Russell

---

Microsoft Teams meeting

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Passcode: bmpg2x
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sip:teams@video.epa.gov
Video Conference ID: 112 741 056 5
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Or call in (audio only)
+1 202-991-0477,,469712131# United States, Washington DC
Phone Conference ID: 469 712 131#
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Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 7/28/2022 1:14:43 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

I just quickly read through the areas of concern and I think it's fine to finalize. Do you want to take a quick look this morning?

From: Young, Justin <Young.Justin@epa.gov>
Sent: Thursday, July 28, 2022 8:08 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Davies, Lynne <Davies.Lynne@epa.gov>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret,

I just uploaded the final version of the report. The report is in at folder in the SharePoint site under Inspection Report 7-27-2022

There are two versions. A clean version and the version with our second round of comments.

Please let me know if R6 is comfortable with the report and we can finalize the report into a signable document.

Thanks,
Justin

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 10:42 PM
To: Davies, Lynne <Davies.Lynne@epa.gov>; Young, Justin <Young.Justin@epa.gov>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Hi Lynne and Justin:

Please see the two emails below from Jason Hutt (Denka's attorney) regarding the inspection report transmittal. Since it looks like Justin is out, who is going to transmit the report to Denka?

Thanks,
Margaret

From: Hutt, Jason <jason.hutt@bracewell.com>
Sent: Wednesday, July 27, 2022 5:09 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

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document to a secure site and Chris now has access to it. I wanted to make you aware for future communications. Thanks.

JASON B. HUTT
Partner
jason.hutt@bracewell.com | download v-card
T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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Cc: Mr. Kevin M. Voelkel <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Jorge Lavastida <jorge-lavastida@denka-pe.com>; Akihiko Kusaka <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – thank you for forwarding the transmittal from John Penland to Chris Meyers, which attached the Final Inspection Report. Three quick items:

1. I have confirmed with Chris that he did not receive the transmittal. The email address is correct, so we don't yet have a good explanation for the confusion. It is possible that the file size (11 MB) caused the issue. DPE requests a short extension of time to respond before the report is posted to EPA's website. Our strong preference would be an extension until 10 days after receipt of the second RCRA inspection report (anticipated to be transmitted to us on Friday, July 29, 2022). This will allow concurrent responses to the two reports, if any.

2. Please provide an unredacted copy of the report.

3. When you or John transmits the upcoming RCRA inspection report, please copy Bob Holden, Kevin Voelkel and me. We will be requesting an unredacted copy of that report as well.

Thanks in advance, - Jason

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 1:00 PM
To: Hutt, Jason <jason.hutt@bracewell.com>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

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Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
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Mr. Meyers,

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Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 7/28/2022 7:33:51 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Thanks Fred.

From: Deppe, Fred <Deppe.Fred@epa.gov>
Sent: Thursday, July 28, 2022 1:31 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret,

All files have been uploaded.

Fred

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 10:44 AM
To: Deppe, Fred <Deppe.Fred@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Hi Fred:

You'll be getting the FTP link shortly. Can you please upload the unredacted version of the sampling report to it?

We'll also probably have to do the same with the HQ report.

Thanks,
Margaret

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Thursday, July 28, 2022 10:41 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Yes. Fred has been added and should be receiving access instructions shortly.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, July 28, 2022 11:38 AM
To: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob

<bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Thanks. Can you add Fred Deppe to it since John's on inspection?

From: Voelkel, Kevin <kevin.voelkel@bracewell.com>
Sent: Thursday, July 28, 2022 10:32 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hutt, Jason <jason.hutt@bracewell.com>
Cc: Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret,

You and John have been added as users to a dedicated folder on the Bracewell ShareFile site. You both should be receiving an email with access instructions from the ShareFile service shortly. Please let me know if you encounter any issues.

Thanks,
Kevin

KEVIN M. VOELKEL
Associate
kevin.voelkel@bracewell.com | download v-card
T: +1.202.828.1713 | F: +1.800.404.3970 | M: +1.202.604.2069

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Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Hi Jason:

Can you please provide a link to your FTP site so we can upload the non-redacted inspection report?

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Cc: Voelkel, Kevin <kevin.voelkel@bracewell.com>; Meyers, Christopher <christopher-meyers@denka-pe.com>; Penland, John <Penland.John@epa.gov>; Lavastida, Jorge <jorge-lavastida@denka-pe.com>; Kusaka, Akihiko <Akihiko-Kusaka@denka-pe.com>; Holden, Bob <bholden@joneswalker.com>
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John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

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Sent: 2/16/2022 8:05:06 PM
To: Penland, John [Penland.John@epa.gov]
Subject: RE: Denka - 2017 state inspection report

Yup, something is going to get bumped since this is such a high priority. I'll keep you posted.

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, February 16, 2022 2:04 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Wow. I kinda thought it might go in this direction but NEIC is booked pretty solid

---

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, February 16, 2022 1:12 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: FW: Denka - 2017 state inspection report

FYI. Hopefully John will be able to attend the NEIC inspection.

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, February 16, 2022 1:09 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Hi Margaret – Rosemarie had a call with Mary Greene and Diana Saenz this morning (I couldn't attend, unfortunately) and the outcome was that Mary and Rosemarie would like to schedule an NEIC-led multi-media inspection as soon as feasible. That creates some logistical hurdles for us all to work through. The advantage of an NEIC-led inspection is that they have their own sampling capability and we wouldn't need a TD (and therefore would not need ERG). NEIC would also be responsible for the inspection report. The difficulty will be getting this on NEIC's calendar and potentially shifting other scheduled inspections.

I will schedule a time for all of us to meet, but wanted to convey this message ASAP to this core group.

Thank you!
Lynne

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, February 11, 2022 12:23 AM
To: Davies, Lynne <Davies.Lynne@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Greene, Mary <Greene.Mary.E@epa.gov>
Cc: Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Here is the link to the Louisiana 2017 RCRA inspection report: https://edms.deq.louisiana.gov/app/doc/view?doc=10860843

John Penland is the inspector assigned to Denka. Should we wait to draft the TD until a decision is made to either proceed now with RCRA or to wait until after the CAA settlement is final? I defer to you.

Thanks,
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, February 10, 2022 8:12 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka - 2017 state inspection report

Hi all – Mary Greene (AED Director) contacted Greg and requested a copy of the state RCRA 2017 inspection report. Do we have a copy and if so, would you mind sending it to her?

She also asked for the RCRA permit, which I found on LDEQ's website, so I forwarded her the link (it's a large file).

Also, Kim Chavez in my group can start drafting a TD for a potential Denka inspection in April. We have funds we could devote to ERG sampling, etc. If you'd like to start that process, I'm happy to schedule a meeting to get that TD rolling.

Many thanks!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 8/9/2022 12:26:59 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
CC: Penland, John [Penland.John@epa.gov]
Subject: RE: Wednesday Denka call

It's 1:30-3:00. I just sent you both the invitation. Thank you!

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Tuesday, August 9, 2022 6:25 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Wednesday Denka call

Margaret: I spoke with John and he will be available for the call. Do you have a scheduled time yet?

Thanks,

Jeff

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, August 8, 2022 3:49 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: Wednesday Denka call

There will be a Wednesday call with Denka and we'll need John to be on it. The RCRA piece will be a brief discussion of the inspection report status and areas of concern. Then we'll ask Denka what corrective actions they're planning on taking in response.

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 8/12/2022 4:23:55 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: EPA-Osha Communications RE: Denka

Thanks!

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Friday, August 12, 2022 11:22 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: FW: EPA-Osha Communications RE: Denka

From: Penland, John <Penland.John@epa.gov>
Sent: Friday, August 12, 2022 11:17 AM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: EPA-Osha Communications RE: Denka

During the April inspection I reached out to the OSHA office in Baton Rouge to notify them of a potentially unsafe work practice at Denka Performance Elastomers in LaPlace, Louisiana. During my inspections both in April and May of 2022, I observed facility personnel working in the Poly Unit without respiratory protection. This area of the facility has a chloroprene exposure risk. The NIOSH Recommended Exposure Limit for Chloroprene is 1ppm.

After notifying the OSHA office in April I was connected with a desk officer who began planning an OSHA inspection of Denka. I notified them of my anticipated sampling inspection in May and then of the planned facility shutdown that occurred between May and June. The officer stated that they would likely delay their inspection until after the facility returned to normal operations.

Following a request from my management, I contacted OSHA today to follow-up on my initial complaint.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Osbourne, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA81D13BB18F4249AAB3E3B61275D58B-OSBOURNE, MARGARET]
Sent: 8/16/2022 1:41:59 PM
To: Durant, Jennah [Durant.Jennah@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Denka inspection reports posting

Hi Jennah:

I just heard that the administrator's office has asked that we delay posting the inspection reports until after a meeting scheduled with the Administrator this Thursday. So, we won't be posting today after all.

Thanks,
Margaret

From: Osbourne, Margaret
Sent: Monday, August 15, 2022 8:38 PM
To: Durant, Jennah <Durant.Jennah@epa.gov>
Subject: Denka inspection reports posting

Hi Jennah:

We are scheduled to post the Denka inspection reports to the ECAD website tomorrow. We believe they should also be posted to the LaPlace website, but want to make sure that's included in the comms plan. I understand that there's a desk statement being drafted in case we get questions. Let me know if you'd like to discuss.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 3/8/2022 5:49:05 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Denka Inspection

That week would actually work better for John

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, March 8, 2022 9:50 AM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: FW: Denka Inspection
Importance: High

FYI. Once I hear the green light from Rosemarie, can you check with John on his schedule for the week of April 18?

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Monday, March 7, 2022 8:32 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Bellot, Michael <Bellot.Michael@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Miles, James <miles.james@epa.gov>
Subject: Denka Inspection
Importance: High

Hi Margaret – the WCED managers on this email chatted this afternoon about the scheduled Denka inspection and the consensus is that we should use ERG because they/we can conduct the inspection sooner than NEIC. Justin Young (WCED) is excited for this inspection. We can also ask other experienced RCRA inspectors in different regions if they are available to participate (there are a few in R4 and R9 that come to mind).

This new plan will allow NEIC to retain its PFAS inspection schedule as well. We'll check in with Rosemarie tomorrow at 11 am eastern about this change in direction. I believe once we have confirmation from ERG tomorrow, Greg will then reach out to NEIC to let them know.

Let us know if you have any concerns and thanks!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Connell, Rebecca [Connell.Rebecca@epa.gov]
Sent: 3/8/2022 9:03:49 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Hamre, Martha [Hamre.Martha@epa.gov]
Subject: RE: Denka Sampling Plan meeting

Did you mean to cancel the entire series or just this occurrence? We can meet next week to go over the information from our lab so we know how to proceed.

Thanks!

Rebecca Connell

Field Branch Chief
National Enforcement Investigations Center
US Environmental Protection Agency

303-462-9253
303-503-0583 (cell)
connell.rebecca@epa.gov

-----Original Appointment-----
From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Tuesday, March 8, 2022 12:49 PM
To: Lutz, Craig; Moncrieffe, Marcia; Deppe, Fred; Penland, John; Yurk, Jeffrey; Au, Doreen; Hoyt, Daniel; Connell, Rebecca; Young, Justin; Helmich, Richard; Davies, Lynne; Leathers, James; Bellot, Michael; Murdock, Russell; Aubuchon, Kenneth; Smalley, Bryant
Cc: Hamre, Martha; Schlachter, Zachary; Kanopkin, Laura
Subject: Canceled: Denka Sampling Plan meeting
When: Occurs every Tuesday effective 3/1/2022 until 4/29/2022 from 3:00 PM to 4:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting
Importance: High

Cancelling this meeting for today.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 111 508 944 5
Alternate VTC instructions

Or call in (audio only)

+1 202-991-0477,,889998461# United States, Washington DC

Phone Conference ID: 889 998 461#

Find a local number | Reset PIN

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

Learn More | Meeting options

Message

From: Wakeland, Morton [wakeland.morton@epa.gov]
Sent: 3/9/2022 8:57:39 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: FW: TRI Inspection

Request from HQ's regarding Denka in LaPlace – boots on ground inspection – reason?
call in a minute or so.
will let you know.
Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Franklyn, Valarie <Franklyn.Valarie@epa.gov>
Sent: Tuesday, March 8, 2022 3:21 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>
Subject: TRI Inspection

Good Afternoon Mort,

I hope you are well. I am reaching out to you to gauge your interest/capabilities in conducting a TRI inspection of Denka Performance Elastomers in LaPlace LA the week of April 18th. This is a fast developing and quickly changing target, as it will be a component of a multimedia inspection. I am happy to give you a call to discuss this further and share the limited info I have so far.

Kind regards,
Valarie

Valarie Franklyn
U.S. EPA | Office of Enforcement and Compliance Assurance | Office of Civil Enforcement | Waste and Chemical Enforcement Division | Chemical Risk and Reporting Enforcement Branch
William Jefferson Clinton Bldg., South, Rm. 4120A | 1200 Constitution Ave., NW | Washington, DC 20460| 202.564.1596

Message

From: Wakeland, Morton [wakeland.morton@epa.gov]
Sent: 3/9/2022 10:18:22 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: Just off phone with HQ's

Glad you all know about this.

Valarie implied an onsite inspection. But I told her I've only done off-site record reviews for past 5+ years

However, Valarie Franklyn (TRI Program) also said, is there any evidence to suggest an inspection.

After I'm done with your EJ (2 sites to go) I'll look into them.
When I send her my response I'll cc ya'll.
OK?
Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, March 9, 2022 3:27 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: RE: Just off phone with HQ's

Yes, I'm very much involved and so are Cheryl/Steve/Tricia. Interesting that they contacted you directly. So are they planning an ONSITE EPCRA inspection or are they asking if you'll do an offsite inspection?

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Wednesday, March 9, 2022 3:26 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: Just off phone with HQ's
Importance: High

From what was said the Administrator wants a multimedia inspection at Denka in LaPlace, LA ASAP.
The programs included, according to the TRI Program, are:
RCRA
EPCRA
CWA
CAA
TSCA
possible another?

HQs personnel + contractors will be doing the inspection, supposedly with Region 6 participation.
Slated for April 18.

I vaguely recall hearing Denka mentioned several weeks ago, cannot remember where or under
what circumstances.

Does Enforcement Management know about this?

The tone of the TRI Program is this is supposedly a BIG DEAL, but could not point out why.

FYI,
Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

Message

From: Wakeland, Morton [wakeland.morton@epa.gov]
Sent: 3/14/2022 6:51:13 PM
To: Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Riley, David [riley.david@epa.gov]
Subject: RE: TRI work - Denka Performance Elastomer
Attachments: Denka_5-YearPlot.xlsm

Importance: High

Happy Monday Valarie

Clarification – "this is off the table" means?

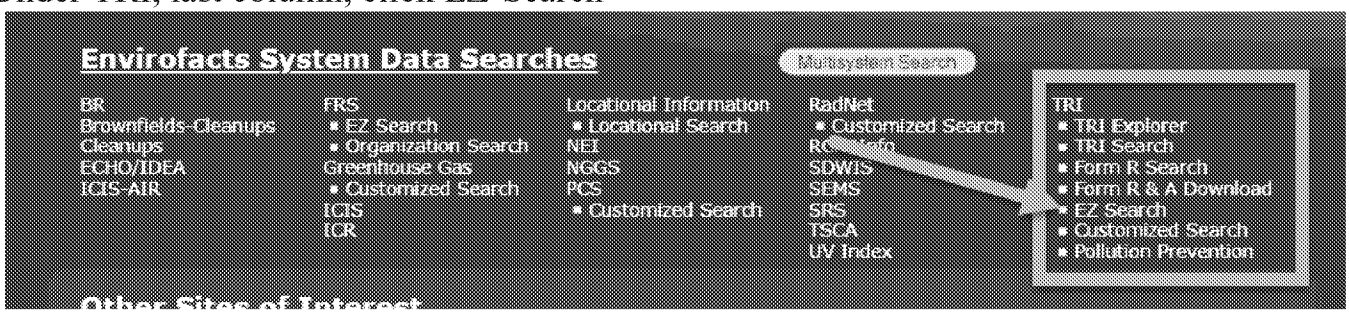
Are you talking about 313 inspection for Denka is "off the table?"

To help you out with determining a facility's latest 5-Year Reporting history (5-Year is the *Statute of Limitation for enforcement).*

How to find TRI reports in EZ-Search:
First get the TRIFID:
Denka = 7006WDNKPR56HIG

Then click EZ-Search in Public Envirofacts **https://enviro.epa.gov/**

Under TRI, last column, click EZ-Search



In EZ-Search you want to pick the **Submissions Report**

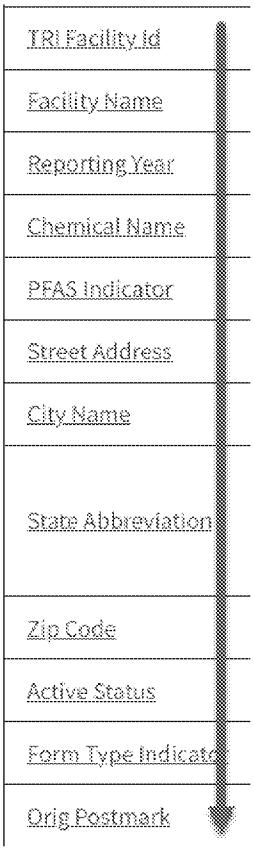
STEP 1: Select a Subject Area to Focus your Search

Facility Information		
Facility Information		Address and other location information about the facility.
Submissions		Toxic Chemical Release Inventory Reporting Form (EPA Form R) information and Facility Information
Toxic Chemical Releases to the Environment		

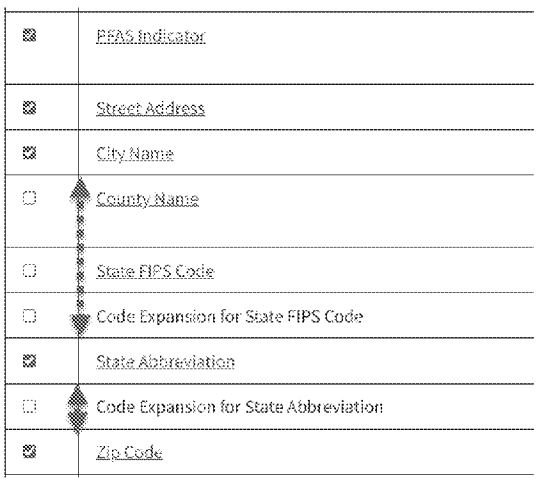
On next screen are all the **Data Elements** that are available under the **Submissions Report.** These are all the **Data Elements** under the **Submissions Report**.

Some of the **Data Elements** you want to extract by checking the box in the first column.
The **Data Elements** are arranged from Top to Bottom as you will find them as you scroll down the **Data Elements screen**. See below snapshot:

STEP 2: Select Columns (Data Elements or Fields)



There can be several unselected data elements between the ones you select.
So don't expect to see them one after the other. OK?



Once all elements are selected scroll to the bottom of the screen and select:

STEP 3: Enter Search Criteria | Reset

The next screen is where you enter you search criteria – **Column #3** (see below snapshot)
Note: You actually only input constant parameters, e.g. TRIFID, RY, Active Status always =1 for most active form
For RY, if you are going to cover a range of years, change the **Operator Definition**, Column #2, by selecting the
appropriate definition from the drop down arrow pop-up, here, **Greater than/Equal to.**

To keep the output neat and tidy, you may want to sort on the **RY**, then the **Chemical Name**.
NOTE: the output columns will be in the order shown below unless you change the **Column Display Order.**
I changed the **Display Order** (Column #4) to my preference. You can select how you like.

Column Name 1	Operator Definition 2	Search Value 3		Column Display Order 4	Sort Column 5	Sort Order 6	Where Only 7
TRI Facility Id	Equal to	7006WDNKPR56HIG		1		Ascending	
Facility Name	Equal to			2		Ascending	
Reporting Year	Greater than/Equal to	2016	If a range of years, change Operator Def. to Greater than/Equal to from drop down.	7	1	Ascending	
Chemical Name	Equal to			8	2	Ascending	
PFAS Indicator	Equal to			11		Ascending	
Street Address	Equal to			3		Ascending	
City Name	Equal to			4		Ascending	
State Abbreviation	Equal to	1. List All State Abbreviations		5		Ascending	
Zip Code	Equal to			6		Ascending	
Active Status	Equal to	1	Active Status will always = 1 for most recent	12		Ascending	
Form Type Indicator	Equal to			9		Ascending	
Orig Postmark	Equal to		The date must be entered completely in MON-DD-YYYY format (eg. JUN-23-1989)	10		Ascending	

Once all input and output values have been entered scroll to bottom of screen and click **Search Database**.

Search Database | Reset | Output to CSV File *

On the output screen pull scroll bar to bottom and click:
Output to CSV File

Total number of records returned from your search: 80
Number of Records shown on this page: 80 ***
Output to CSV File *
There is a 100000 row limit on the CSV output files. Ple

An inconspicuous file name appears identified by numbers only.

You selected the CSV Output Option. Click on the underlined filename: 1526340924.CSV to download the file

Click the link, name the file as you wish (Denka_2016-2020) and save where you want.

Open file, and save as .xlsx (.csv files may net play nice with Excel commands and functions).

Download is a formatting nightmare
See!

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	_TRI_SUB	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUE	V_TRI_SUBMISSIONS_EZ		ACTIVE_STATUS	
2	7006WDN	DENKA PE	560 HIGHV	LA PLACE	LA	70068	2016	1 2-Dichlo	L	########	0	1			
3	7006WDN	DENKA PE	560 HIGHV	LA PLACE	LA	70068	2016	1 3-Butadi	L	########	0	1			
4	7006WDN	DENKA PE	560 HIGHV	LA PLACE	LA	70068	2016	1 4-Dichlo	L	########	0	1			
5	7006WDN	DENKA PE	560 HIGHV	LA PLACE	LA	70068	2016	Ammonia	L	########	0	1			
6	7006WDN	DENKA PE	560 HIGHV	LA PLACE	LA	70068	2016	Benzyl chl	L	########	0	1			

AS I TELL EVERYONE, MAKE A COPY OF THE RAW DOWNLOAD AND WORK ON THE COPY.
THAT WAY IF SOMETHING GOES SOUTH, YOU ALWAYS HAVE THE ORIGINAL TO FALL BACK ON!

Attaching your spreadsheet so you can see if you can duplicate.

I wrote a VBA Program, with some assistance, to plot a single facility's 5-year reporting history.
See last workbook tab (red).

Denka_2016-2020 | Cols Expanded | DataForPlotting | VBA-Potting_Reports

Visually you can see at a glance what is going on.

Hope this helps you Valarie on determining a facility's 5 year reporting history.
Questions, let me know.
Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)

Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Franklyn, Valarie <Franklyn.Valarie@epa.gov>
Sent: Monday, March 14, 2022 12:28 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Riley, David <riley.david@epa.gov>
Subject: FW: TRI work - Denka Performance Elastomer
Importance: High

Hi Mort and Dave,

I somehow have missed this exchange last month, but it seems as though you (Mort) have already looked into Denka, and it seems they are mostly up to date with their TRI reports. Perhaps the Envirofacts data is not current, as it says they have not reported to TRI since 2011..However, Denka took over Duponts Chloroprene processing in 2015....

Looks like this is off the table...Thanks for looking into this!

-Valarie

From: Milton, Philip <Milton.Philip@epa.gov>
Sent: Monday, March 14, 2022 12:58 PM
To: Franklyn, Valarie <Franklyn.Valarie@epa.gov>
Cc: Miles, James <miles.james@epa.gov>
Subject: FW: TRI work - Denka Performance Elastomer
Importance: High

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3151-E I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Friday, February 18, 2022 11:23 AM
To: Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: TRI work - Denka Performance Elastomer
Importance: High

Thanks Phil – nice of RCRA to communicate with EPCRA.
Agree with your assessment on Denka.
If you want me to do anything with the "reds" am just an email/phone call away!

Best to you and family for long weekend. Had no clue Mon was a holiday.

Mort

	A	B	C	D	E	F	G	H
1	TRIFID EMAIL Show-Cause	Facility Name	TRI_Chemical	2016	2017	2018	2019	2020
382	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	1 2-DICHLOROBENZENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
383	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	1 3-BUTADIENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
384	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	1 4-DICHLORO-2-BUTENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
385	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	AMMONIA	6/30/2017	[redacted]	[redacted]	7/1/2020	[redacted]
386	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	BENZYL CHLORIDE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
387	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CERTAIN GLYCOL ETHERS	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
388	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHLORINE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
389	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHLOROPRENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
390	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHROMIUM	[redacted]	7/1/2018	[redacted]	[redacted]	[redacted]
391	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	DICHLOROMETHANE	6/30/2017	[redacted]	6/27/2019	[redacted]	[redacted]
392	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	DIOXIN AND DIOXIN-LIKE COMPOUNDS	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
393	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	HYDROCHLORIC ACID (ACID AEROSOLS INC	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
394	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	NICKEL	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
395	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	N-METHYL-2-PYRROLIDONE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
396	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	N-NITROSODIPHENYLAMINE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
397	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	TETRACHLOROETHYLENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
398	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	TOLUENE	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021
399	7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	XYLENE (MIXED ISOMERS)	6/30/2017	7/1/2018	6/27/2019	7/1/2020	6/29/2021

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Milton, Philip <Milton.Philip@epa.gov>
Sent: Friday, February 18, 2022 10:03 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: TRI work - Denka Performance Elastomer

Enforcement Confidential – Please do not release

Good Morning Mort –

Thanks for the additional information. I hope you saw in my email late yesterday to my BC. My recommendation was that there doesn't appear to be significant TRI concerns.

Our Office Director and Division management was asking about TRI (and TSCA) regulatory coverage because the facility is getting attention from R6 RCRA (issuing a 3007 (IRL?)) and they wanted an assessment about other programs. So I think we are good.

Hope you have a good Friday before our long weekend.

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3151-E I Washington, DC 20460

Milton.philip@epa.gov | phone: 202-564-5029 | fax: 202-564-0010

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Friday, February 18, 2022 10:53 AM
To: Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: TRI work - Denka Performance Elastomer

Back in 2012-2013 or so discovered 2 facilities became one.
See this email thread Phil.
Are you wanting these folks to be investigated?
Because of the number of chemicals reported and only a "few" yrs missing, I passed for bigger fish.

Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Milton, Philip <Milton.Philip@epa.gov>
Sent: Thursday, February 17, 2022 12:54 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Franklyn, Valarie <Franklyn.Valarie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>
Subject: RE: TRI work - Denka Performance Elastomer

Enforcement Confidential – Please do not release

Hi Mort –

I looked at your late/nonreporters list. Denka looks like they have been timely with a couple of chemicals falling below threshold (NH3, Cr, CH2Cl2). ECHO didn't indicated that they have made a voluntary disclosure.

TRIFID	Facility_Name	TRI_Chemical	2016	2017	
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	1 2-DICHLOROBENZENE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE	1 3-BUTADIENE	6/30/2017	7/1/2018	6/27

7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	1 4-DICHLORO-2-BUTENE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	AMMONIA	6/30/2017		
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	BENZYL CHLORIDE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CERTAIN GLYCOL ETHERS	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHLORINE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHLOROPRENE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	CHROMIUM		7/1/2018	
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	DICHLOROMETHANE	6/30/2017		6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	DIOXIN AND DIOXIN-LIKE COMPOUNDS	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	HYDROCHLORIC ACID (ACID AEROSOLS INCLUDING MISTS VAPORS GAS FOG AND OTHER AIRBORNE FORMS OF ANY PARTICLE SIZE)	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	NICKEL	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	N-METHYL-2-PYRROLIDONE	6/30/2017	7/1/2018	6/27

7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	N-NITROSODIPHENYLAMINE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	TETRACHLOROETHYLENE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	TOLUENE	6/30/2017	7/1/2018	6/27
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC	XYLENE (MIXED ISOMERS)	6/30/2017	7/1/2018	6/27

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3151-E I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, February 17, 2022 1:17 PM
To: Milton, Philip <Milton.Philip@epa.gov>
Cc: Franklyn, Valarie <Franklyn.Valarie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>
Subject: RE: TRI work - Denka Performance Elastomer

Name sounds vaguely familiar Phil – let me get a few things done for da boss and will check ole files.
Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Milton, Philip <Milton.Philip@epa.gov>
Sent: Thursday, February 17, 2022 12:06 PM

To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Franklyn, Valarie <Franklyn.Valarie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>
Subject: FW: TRI work - Denka Performance Elastomer

Enforcement Confidential – Please do not release

Good Afternoon Mort –

I wanted to reach out to you about an inquiry our senior management is making about a facility in Region 6. Denka Performance Elastomer's (Laplace, LA). I intend to look at QuEST and Envirofact, but wanted to check-in with you in case you have anything on-going. The company name sounds familiar.

I will keep you posted on what I find.

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3151-E I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Miles, James <miles.james@epa.gov>
Sent: Thursday, February 17, 2022 11:51 AM
To: Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>; Franklyn, Valarie <Franklyn.Valarie@epa.gov>
Subject: FW: TRI work - Denka Performance Elastomer

Is this something we, or the Region, could do easily?

From: Saenz, Diana <Saenz.Diana@epa.gov>
Sent: Thursday, February 17, 2022 11:47 AM
To: Miles, James <miles.james@epa.gov>
Cc: Davies, Lynne <Davies.Lynne@epa.gov>; Bellot, Michael <Bellot.Michael@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>
Subject: TRI work - Denka Performance Elastomer

James – One other CRREB request…

Is there someone who could review Denka Performance Elastomer's (Laplace, LA) TRI filings to flag any potential reporting anomalies?

WCED is becoming involved in the air case on RCRA, but there may be release information that we should track at the facility. R6 is planning to issue a RCRA 3007 and Rosemarie would like us to look at the facility holistically (including potentially 112r – last EPA inspection was in 2018). The review is to reach facility releases as completely as possible and the air enforcement action will not reach as far as if it is combined with RCRA.

Here is the ECHO history:
https://echo.epa.gov/detailed-facility-report?fid=110067396669

Let me know if CRREB has resources to do this check.

Thanks
Diana

Diana J. Saenz
Associate Director
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-4209
Fax: (202) 564-0022
Saenz.Diana@epa.gov

V_TRI_SUBMISSIONS_EZ.TRI_FACILITY_ID	V_TRI_SUBMISSIONS_EZ.FACILITY_NAME
7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC
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7006WDNKPR56HIG	DENKA PERFORMANCE ELASTOMER LLC

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V_TRI_SUBMISSIONS_EZ.CHEM_NAME

1 2-Dichlorobenzene

1 3-Butadiene

1 4-Dichloro-2-butene

Ammonia

Benzyl chloride

Certain glycol ethers

Chlorine

Chloroprene

Dichloromethane

Dioxin and dioxin-like compounds

Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)

N-Methyl-2-pyrrolidone

N-Nitrosodiphenylamine

Nickel

Tetrachloroethylene

Toluene

Xylene (mixed isomers)

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1 4-Dichloro-2-butene

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Chloroprene

V_TRI_SUBMISSIONS_EZ.ORIG_POSTMARK

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PULL DATA ONLY FROM SUBMISSIONS REPORT

CLICK HERE
to clear workbook
for new data

CLICK HERE
to plot 5-year
Reporting History

		V_TRI_SUBMISSIONS_EZ.TRI_FACILITY_ID
		72209MRNNM11605
72209MRNNM11605	72209MRNNM11605	PPG PROTECTIVE & MARINE COAT INGS
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Dichloromethane
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Nickel
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Ammonia
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
N-Methyl-2-pyrrolidone
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Nickel
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Toluene
Xylene (mixed isomers)

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Dichloromethane
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Nickel
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Ammonia
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
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Xylene (mixed isomers)

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ReportingYear	FormDueDate
2016	7/3/2017
2017	7/2/2018
2018	7/1/2019
2019	7/1/2020
2020	7/1/2021

TRI Chemical Was Reported on Time

TRI Chemical Was Reported, But Late

TRI Chemical Was Not Reported At All

TRIFID	TRIFID	TRIFID	STREET
		72209MRNNM11605	7006WDNKPR56HIG
72209MRNNM11605	72209MRNNM11605	PPG PROTECTIVE & MARINE COAT INGS	7006WDNKPR56HIG
		72209MRNNM11605	7006WDNKPR56HIG
		72209MRNNM11605	7006WDNKPR56HIG
		72209MRNNM11605	7006WDNKPR56HIG
		72209MRNNM11605	7006WDNKPR56HIG
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FACILITY	STREET	CITY	ST	RY
DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2016
DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2016
DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2016
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TRI_CHEMICAL
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Ammonia
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Dichloromethane
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Chromium
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
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Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Dichloromethane
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone

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Toluene
Xylene (mixed isomers)

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DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2018
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DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2020
DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2020
DENKA PERFORMANCE ELASTOMER LLC	560 HIGHWAY 44	LA PLACE	LA	2020

N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Ammonia
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)

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TRI_CHEMICAL
1 2-Dichlorobenzene
1 3-Butadiene
1 4-Dichloro-2-butene
Ammonia
Benzyl chloride
Certain glycol ethers
Chlorine
Chloroprene
Chromium
Dichloromethane
Dioxin and dioxin-like compounds
Hydrochloric acid (acid aerosols including mists vapors gas fog and other airborne forms of any particle size)
Nickel
N-Methyl-2-pyrrolidone
N-Nitrosodiphenylamine
Tetrachloroethylene
Toluene
Xylene (mixed isomers)

2016	2017	2018	2019	2020

TRI Chemical Was Reported on Time

TRI Chemical Was Reported, But Late

TRI Chemical Was Not Reported At All

V_TRI_SUBMISSIONS_EZ.TRI_FACILITY_ID V_TRI_SUBMISSIONS_EZ.FACILITY_NAME

V_TRI_SUBMISSIONS_EZ.STREET_ADDRESS V_TRI_SUBMISSIONS_EZ.CITY_NAME

V_TRI_SUBMISSIONS_EZ.STATE_ABBR V_TRI_SUBMISSIONS_EZ.REPORTING_YEAR

V_TRI_SUBMISSIONS_EZ.ORIG_POSTMARK V_TRI_SUBMISSIONS_EZ.CHEM_NAME

TRI_CHEMICAL	2016	2017	2018	2019	2020
Ammonia					
Chromium					
Dichloromethane					

TRI Chemical Was Reported on Time
TRI Chemical Was Not Reported At All

Message

From: Wakeland, Morton [wakeland.morton@epa.gov]
Sent: 3/23/2022 3:06:25 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: FW: TRI OfCM of Denka

Wakeland, Morton has shared a OneDrive for Business file with you. To view it, click the link below.

TRI Inspection Checklist for Other Media Inspectors.docx

Have to figure out what is going on here.

Wanted you to be aware of Margaret and Troy.

Mort

Morton E. Wakeland, Jr. ("Mort"), Ph.D.
EPCRA Section 313 Enforcement and TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance and Enforcement Division (ECD)
Waste Enforcement Branch (ECDS)
Toxics Section (ECDST)
Dallas, Texas 75270
(214) 665-8116

From: Franklyn, Valarie <Franklyn.Valarie@epa.gov>
Sent: Tuesday, March 22, 2022 11:40 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Riley, David <riley.david@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Yaras, Michelle <Yaras.Michelle@epa.gov>
Subject: TRI OfCM of Denka

Good Morning Mort and Dave,

As you know there have been numerous discussions considering conducting a TRI inspection component of the upcoming Denka inspection. While you have helped us rule out an on-site inspection, it seems management is still interested in collecting TRI data as part of the RCRA

inspection that will take place next month. To that end, it appears that there may be an opportunity for an OfCM activity whereby RCRA inspectors collect data useful for TRI compliance monitoring.

I have put together a rough questionnaire of information the TRI HQ Center would be interested in collecting as part of this activity. I am seeking your input and feedback into the suitability of the questions from both 1) a TRI usefulness standpoint and 2) ability for RCRA (or other media) to collect this info under their authorities. Please feel free to add/delete questions as you see fit. Dave, I know you are no longer doing TRI, but you have valuable inspector experience that we can benefit from. I hope you are able to find a few minutes to provide your feedback. Thanks so much and no worries if you are not able to.

Thanks!

Valarie

Valarie Franklyn
U.S. EPA | Office of Enforcement and Compliance Assurance | Office of Civil Enforcement | Waste and Chemical Enforcement Division | Chemical Risk and Reporting Enforcement Branch
William Jefferson Clinton Bldg., South, Rm. 4120A | 1200 Constitution Ave., NW | Washington, DC 20460| 202.564.1596

Message

From: Craig Easley [Craig.Easley@LA.GOV]
Sent: 2/2/2022 4:44:54 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: any RCRA inspections at Denka LaPlace?

You're welcome!

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, February 2, 2022 10:37 AM
To: Craig Easley <Craig.Easley@LA.GOV>
Subject: RE: any RCRA inspections at Denka LaPlace?

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Thanks Craig!

From: Craig Easley <Craig.Easley@LA.GOV>
Sent: Wednesday, February 2, 2022 9:54 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: any RCRA inspections at Denka LaPlace?

Here are some of the latest from EDMS...

10/28/2021 & 12/2021 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=13073492

12/12&16/2019 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=11994174

09/28/2017 and 10/02/2017 RCRA CEI Inspection
https://edms.deq.louisiana.gov/app/doc/view?doc=10860843

The last 3 RCRA TSD Inspections did not reveal any violations.

Craig Easley

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, February 2, 2022 9:33 AM
To: Craig Easley <Craig.Easley@LA.GOV>
Cc: Roberts, Lou <Roberts.Lou@epa.gov>
Subject: any RCRA inspections at Denka LaPlace?

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Craig:

Our Headquarters office is asking if there have been any recent RCRA inspections at Denka in LaPlace, specifically looking at their BIFs? I know we haven't done any EPA RCRA inspections lately but want to check to see if the state has.

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 4/13/2022 3:30:23 PM
To: Mask, Kendra [Mask.Kendra@epa.gov]
CC: Penland, John [Penland.John@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Bernier, Roberto [bernier.roberto@epa.gov]
Subject: Denka HASP for review and approval
Attachments: FY2022 April - Denka Multimedia CEI Hasp (003).pdf

Message

From: Mask, Kendra [Mask.Kendra@epa.gov]
Sent: 4/14/2022 4:52:14 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
CC: Penland, John [Penland.John@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Bernier, Roberto [bernier.roberto@epa.gov]
Subject: RE: Denka HASP for review and approval
Attachments: FY2022 April - Denka Multimedia CEI Hasp (003).pdf

Please see attached for your approved HASP.

Kendra C. Mask
R6 Health & Safety Manager
1201 Elm Street, Ste 500
Dallas, TX 75270
Work: 214.665.7225
Cell: 214.205.7643
R6 H&S SharePoint Site

From: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Sent: Wednesday, April 13, 2022 10:30 AM
To: Mask, Kendra <Mask.Kendra@epa.gov>
Cc: Penland, John <Penland.John@epa.gov>; Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Bernier, Roberto <bernier.roberto@epa.gov>
Subject: Denka HASP for review and approval

Appointment

From: Carroll, Craig [Carroll.Craig@epa.gov]
Sent: 4/21/2022 11:01:13 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Petersen, Chris [petersen.chris@epa.gov]; LaBombard, Will [LaBombard.Will@epa.gov]

Subject: Denka Sampling Request

Start: 4/22/2022 1:00:00 PM
End: 4/22/2022 1:25:00 PM
Show Time As: Tentative

Recurrence: (none)

Required Attendees: Osbourne, Margaret; Yurk, Jeffrey; Petersen, Chris; LaBombard, Will

Meeting to discuss request for START sampling assistance at Denka facility.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Join with a video conferencing device
sip:teams@video.epa.gov
Video Conference ID: 113 216 841 6
Alternate VTC instructions

Or call in (audio only)
+1 210-469-3886,,66251310# United States, San Antonio
Phone Conference ID: 662 513 10#
Find a local number | Reset PIN

For all EPA meetings, there is no expectation of privacy regarding any communications. Participation in a recorded meeting will be deemed as consent to be recorded. Information on EPA systems is the property of the Agency and may become official records.

Learn More | Meeting options

Message

From: Seager, Cheryl [Seager.Cheryl@epa.gov]
Sent: 4/22/2022 10:18:32 PM
To: Shiffman, Cari [Shiffman.Cari@epa.gov]
CC: Thompson, Steve [thompson.steve@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Re: Denka Inspections This Week

Thanks Cari! Have a good weekend.

Sent from my iPhone

On Apr 22, 2022, at 4:11 PM, Shiffman, Cari <Shiffman.Cari@epa.gov> wrote:

Cheryl,

I was able to touch base with Rosemarie and have everything that I need now. Thanks so much.

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Friday, April 22, 2022 4:04 PM
To: Shiffman, Cari <Shiffman.Cari@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Yes – there are some issues that came up today so this will probably be later in the day.

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Friday, April 22, 2022 3:03 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Cheryl,

Just wanted to follow-up on this. And could you include a sentence on the issue with the inspection on Thursday?

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Thursday, April 21, 2022 5:29 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Thanks Cheryl. I'm just looking for a few sentences.

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Thursday, April 21, 2022 5:28 PM
To: Shiffman, Cari <Shiffman.Cari@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Hi Cari – we should be able to get you something tomorrow, at least with respect to PAT. May be later for RCRA.

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Thursday, April 21, 2022 4:11 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Denka Inspections This Week

Cheryl,

Would you be able to send me a short note on how the inspections went this week and next steps?

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 4/22/2022 11:11:31 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Denka Inspections This Week

This looks good

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 21, 2022 8:24 PM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Denka Inspections This Week
Importance: High

Any changes to this write-up? It's for the Chief of Staff of OECA who is asking for a summary.

Inspectors from OECA, ERG, and Region 6 conducted a RCRA and CWA inspection at Denka Performance Elastomers in LaPlace, LA during on April 18-21, 2022. The inspection team observed solid and hazardous waste management practices, particularly in the poly kettle building and the open brine pit, that are most likely contributing to elevated chloroprene concentrations in the surrounding community. Unfortunately, due to the measured total VOCs in these two locations, the inspectors' health & safety plans did not allow for solid or liquid samples to be taken. The Pollution Accountability Team will be onsite at Denka on Friday, April 22 and intend to drive the GMAP around the facility and take air canister samples in the poly building and near the open brine pit. OECA and Region 6 are investigating options for deploying personnel to the facility in full protective gear with supplied air to take the solid and liquid samples that could not be taken during the RCRA inspection.

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Thursday, April 21, 2022 4:29 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Thanks Cheryl. I'm just looking for a few sentences.

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Thursday, April 21, 2022 5:28 PM
To: Shiffman, Cari <Shiffman.Cari@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Denka Inspections This Week

Hi Cari – we should be able to get you something tomorrow, at least with respect to PAT. May be later for RCRA.

From: Shiffman, Cari <Shiffman.Cari@epa.gov>
Sent: Thursday, April 21, 2022 4:11 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Denka Inspections This Week

Cheryl,

Would you be able to send me a short note on how the inspections went this week and next steps?

Thanks,

Cari Shiffman, Chief of Staff
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Office: (202) 564-2898 | Mobile: (202) 823-3277

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 4/29/2022 2:16:48 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Do you have anything to add/edit to this paragraph?

Ok I'll need to get a tentative start and end date so I can book a plane ticket. If I drive I'll have to add a day on both the front and back end of the trip.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 29, 2022 8:59 AM
To: Penland, John <Penland.John@epa.gov>
Subject: RE: Do you have anything to add/edit to this paragraph?

Thanks for the edits. I'm good with the cautionary language.

Hey – I talked to James L. about the May shutdown and he said that historically during shutdown, they continue the batch process until all the chloroprene is used up, so I think we should plan to go out next week. Of course, we're still waiting to hear back from the company.

From: Penland, John <Penland.John@epa.gov>
Sent: Friday, April 29, 2022 8:48 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: RE: Do you have anything to add/edit to this paragraph?

I think there's a risk that we might be overselling here. I get the impression that the ERG report will be more tentative. We have some editorial control but I don't want to be in a position where we over promise and under deliver.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 29, 2022 8:34 AM
To: Penland, John <Penland.John@epa.gov>
Subject: Do you have anything to add/edit to this paragraph?

It's for the Janet McCabe briefing next Wednesday.

On April 18-21, 2022, WCED, ERG and Region 6 conducted a RCRA inspection of the facility. An inspection report has not yet been issued, but preliminary findings at the facility may include: failure to make waste determinations at the point of generation; operation of an unpermitted waste treatment unit (the outside brine pit); failure to prevent releases of hazardous waste constituents to the air; and failure properly manage hazardous waste containers. Because of the high VOC concentrations measured by the inspectors in the poly building and near the outside brine pit, the inspectors were unable to safely take samples. Region 6 is planning a sampling event with START contractors in enhanced PPE at the facility for the week of May 2, 2022.

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270

214-665-6508 (office)
972-322-9381 (cell)

Message

From: Fanning, Cynthia [fanning.cynthia@epa.gov]
Sent: 4/29/2022 6:39:19 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Question re your Denka weekly

Margaret –

Not really a question … I'm going to assume you meant May 2 and roll on. LMK if I'm wrong.

RCRA Sampling Being Planned for Denka in LaPlace, LA[Confidential]: Inspectors from OECA, ERG, and Region 6 conducted a RCRA and CWA inspection at Denka Performance Elastomers in LaPlace, LA during on April 18-21, 2022. The inspection team observed solid and hazardous waste management practices, particularly in the poly kettle building and the open brine pit, that are most likely contributing to elevated chloroprene concentrations in the surrounding community. Unfortunately, due to the measured total VOCs in these two locations, the inspectors' health & safety plans did not allow for solid or liquid samples to be taken. Region 6 ECAD and Superfund are making plans for START contractors to deploy to the facility in full protective gear with supplied air to take the solid and liquid samples that could not be taken during the RCRA inspection. This sampling event will take place the week of March 2 at the earliest. - ***Margaret Osbourne (214-665-6508) (Cell-214-665-6508)***

****
Cynthia Fanning
Office of External Affairs (ORAXG)
U.S. Environmental Protection Agency, Region 6
214-665-2142
****

Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 5/2/2022 3:41:04 PM
To: Thompson, Steve [thompson.steve@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: Re: Denka lab analysis help

I don't know of any ARP funding either

Sent from my iPhone

On May 2, 2022, at 10:07 AM, Thompson, Steve <thompson.steve@epa.gov> wrote:

I don't recall any ARP funding discussions for flyovers so I don't have any concerns.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 2, 2022 10:05 AM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: FW: Denka lab analysis help

Can I put this in writing? That we can reallocate ARP funding from flyovers to Denka analysis? See below.

From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Monday, May 2, 2022 9:54 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Subject: RE: Denka lab analysis help

Margaret, in order to pay for the sampling and analysis using ERG we will have to tap into ARP money that was earmarked for flyovers in R6. Darrin Larson said a few weeks ago that Region 6 didn't need more funding for the flyovers.

I was asked to confirm that in writing by Loren Denton.

Would you please check on that for me and get me an email stating that Region 6 is ok with this re-allocation of the ARP funding?

Thanks

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 2, 2022 9:01 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Hi Dan:

It will be 8-12 6L Summa canisters that will be delivered later this week (May 6). We want TO-15 method run on them and would like the results expedited but understand the situation with the PAT samples.

Thanks for your help!
Margaret

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Monday, May 2, 2022 7:51 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Margaret,

It looks like we can accommodate the air samples under the ERG contract, to support follow-up from the RCRA inspection. We'll confirm and let you know. Do you know how many samples, when they will be delivered and when you need the results? The analysis and reporting may take a little longer than normal (~8+ weeks) because the lab is already backed up somewhat with the J2J/PAT stuff.

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 28, 2022 2:34 PM
To: Fried, Gregory <Fried.Gregory@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: Denka lab analysis help
Importance: High

Hi Dan and Greg:

We are sending START contractors out to Denka to take liquid/solid and air samples as a follow-up from last week's RCRA inspection. Weston (the contractors) are wanting to use the ERG contracted lab for the air samples since they already have a chloroprene standard. Is that possible?

Thanks,
Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS

Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Message

From: Young, Justin [Young.Justin@epa.gov]
Sent: 5/3/2022 11:00:39 AM
To: Burke, Shaun [Burke.Shaun@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Jason Sese [Jason.Sese@erg.com]; Penland, John [Penland.John@epa.gov]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Denka lab analysis help

Shaun,

I am not directly involved in the sampling coordination with Weston, so I will defer to John and or Margaret.

Justin

From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Monday, May 2, 2022 11:52 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Jason Sese <Jason.Sese@erg.com>; Young, Justin <Young.Justin@epa.gov>; Penland, John <Penland.John@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>
Subject: FW: Denka lab analysis help

Justin/John,

Has Weston already reached out to ERG about the chloroprene samples? See below.

If so, keep me in the loop as the COR for ERG just so I can properly direct the work. (I don't mind the efficiency, just safest to make sure I know about the contractor-contractor communications)

Thanks

Shaun

From: Jason Sese <Jason.Sese@erg.com>
Sent: Monday, May 2, 2022 11:22 AM
To: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

I asked Randy and he mentioned that they are already arranging with Weston to analyze some additional chloroprene samples. Do you have any idea whether these are the same?

From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Monday, May 2, 2022 10:51 AM
To: Jason Sese <Jason.Sese@erg.com>
Subject: FW: Denka lab analysis help

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Can we accommodate this in the lab?

This is a follow up project for J2J and will be funded using ARP funds

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Monday, May 2, 2022 9:01 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Hi Dan:

It will be 8-12 6L Summa canisters that will be delivered later this week (May 6). We want TO-15 method run on them and would like the results expedited but understand the situation with the PAT samples.

Thanks for your help!
Margaret

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Monday, May 2, 2022 7:51 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>
Subject: RE: Denka lab analysis help

Margaret,

It looks like we can accommodate the air samples under the ERG contract, to support follow-up from the RCRA inspection. We'll confirm and let you know. Do you know how many samples, when they will be delivered and when you need the results? The analysis and reporting may take a little longer than normal (~8+ weeks) because the lab is already backed up somewhat with the J2J/PAT stuff.

-Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
(202) 564-7898
1200 Pennsylvania Ave, NW
WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, April 28, 2022 2:34 PM
To: Fried, Gregory <Fried.Gregory@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: Denka lab analysis help
Importance: High

Hi Dan and Greg:

We are sending START contractors out to Denka to take liquid/solid and air samples as a follow-up from last week's RCRA inspection. Weston (the contractors) are wanting to use the ERG contracted lab for the air samples since they already have a chloroprene standard. Is that possible?

Thanks,

Margaret

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

Appointment

From: George, Elizabeth A [George.Elizabeth.A@epa.gov]
Sent: 5/6/2022 5:19:14 PM
To: Murdock, Russell [Murdock.Russell@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Penland, John [Penland.John@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]

Subject: Response to Denka Edits to Inspection Summary
Location: Microsoft Teams Meeting

Start: 5/9/2022 3:30:00 PM
End: 5/9/2022 4:00:00 PM
Show Time As: Tentative

Required Attendees: Murdock, Russell; Osbourne, Margaret; Penland, John; Yurk, Jeffrey

Hi All,

Setting a time to discuss how I should respond to Kevin's email.

Thank you,

Elizabeth

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Message

From: Bernier, Roberto [bernier.roberto@epa.gov]
Sent: 6/29/2022 4:43:06 PM
To: Penland, John [Penland.John@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]
Subject: FW: FINAL DRAFT
Attachments: Draft Report.pdf

John, we want to make sure that no language on the NPDES inspection report for Denka conflicts with their CBI/HSSI claim so I asked Margaret for assistance with a quick review for that and she mentioned you. Ken wrote it using only public available information mostly from their permit application, but again just to be sure. Can you please check it out and get back with us as soon as you get a chance. Thxs, Roberto.

Roberto L. Bernier, Chief
Municipal & Industrial Wastewater Section
Enforcement and Compliance Assurance Div.
U.S. EPA – Region 6 (ECDWM)
(214) 665-8376
bernier.roberto@epa.gov

From: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Sent: Wednesday, June 29, 2022 11:07 AM
To: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: FINAL DRAFT

Kenneth L. AuBuchon (ECD-WMH)
NPDES Inspector / Enforcement Officer
U.S. EPA Region 6 - Water Enforcement Branch
10625 Fallstone Road
Houston, TX 77099
ph. 281-983-2151
aubuchon.kenneth@epa.gov

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Message

From: Bernier, Roberto [bernier.roberto@epa.gov]
Sent: 6/29/2022 9:35:06 PM
To: Penland, John [Penland.John@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]
Subject: RE: FINAL DRAFT

Thanks John. Your quick review and support is much appreciated. Roberto

---

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, June 29, 2022 12:16 PM
To: Bernier, Roberto <bernier.roberto@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Subject: RE: FINAL DRAFT

I don't see anything that would conflict with the RCRA report. The facility might have a CBI claim on the picture of the gate for the chloroprene sump. I'd call the facility and just check.

From: Bernier, Roberto <bernier.roberto@epa.gov>
Sent: Wednesday, June 29, 2022 11:43 AM
To: Penland, John <Penland.John@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Subject: FW: FINAL DRAFT

John, we want to make sure that no language on the NPDES inspection report for Denka conflicts with their CBI/HSSI claim so I asked Margaret for assistance with a quick review for that and she mentioned you. Ken wrote it using only public available information mostly from their permit application, but again just to be sure. Can you please check it out and get back with us as soon as you get a chance. Thxs, Roberto.

Roberto L. Bernier, Chief
Municipal & Industrial Wastewater Section
Enforcement and Compliance Assurance Div.
U.S. EPA – Region 6 (ECDWM)
(214) 665-8376
bernier.roberto@epa.gov

From: Aubuchon, Kenneth <Aubuchon.Kenneth@epa.gov>
Sent: Wednesday, June 29, 2022 11:07 AM
To: Bernier, Roberto <bernier.roberto@epa.gov>
Subject: FINAL DRAFT

Kenneth L. AuBuchon (ECD-WMH)
NPDES Inspector / Enforcement Officer
U.S. EPA Region 6 - Water Enforcement Branch
10625 Fallstone Road
Houston, TX 77099
ph. 281-983-2151
aubuchon.kenneth@epa.gov

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Appointment

From: Young, Justin [Young.Justin@epa.gov]
Sent: 7/5/2022 3:47:33 PM
To: George Wieber [george.wieber@erg.com]; Janosh Wolters [Janosh.Wolters@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Penland, John [Penland.John@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]

Subject: Denka Inspection review cont.
Location: Microsoft Teams Meeting

Start: 7/6/2022 6:30:00 PM
End: 7/6/2022 8:00:00 PM
Show Time As: Tentative

Required Attendees: George Wieber; Janosh Wolters; Yurk, Jeffrey; Penland, John; Osbourne, Margaret; Deppe, Fred

All,

This meeting is to finalize our comments to ERG for the Denka inspection.

Justin

Microsoft Teams meeting

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Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 7/19/2022 5:58:07 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: FW: Denka Sampling Report
Attachments: Redacted - FY2022 RCRA Sampling Inspection Report-Denka.pdf

Meant to copy you

From: Yurk, Jeffrey
Sent: Tuesday, July 19, 2022 12:57 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Denka Sampling Report

Cheryl: The redacted version of the final signed Denka sampling report is attached. Our normal procedure is to send it to the facility and then post it to the web 10 days after sending. Please let me know if there will be any change to this procedure.

Thanks,

Jeff

EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	May 05, 2022	
Media Program:	Resource Conservation and Recovery Act	
Regulatory Program(s)	Large Quantity Generator, Treatment Storage and Disposal Facility	
Company Name:	**Denka Performance Elastomer, LLC.**	
Facility Name:	**Pontchartrain Site**	
Facility Physical Location:	560 Highway 44	
(city, state, zip code)	LaPlace, LA 70068	
Mailing address:		
(city, state, zip code)		
County/Parish:	St. John the Baptists Parish	
Facility Phone Number		
Facility Contact:	Christopher Meyers	Sr. Consultant
	Christopher-meyers@denka-pe.com	
FRS Number:	110067396669	
Identification/Permit Number:	LAR000009415	
Media Identifier Number:	See above	
NAICS:	325110, 325212, 325199	
SIC:	2822, 2869	

Personnel participating in inspection:		
John Penland	USEPA Region 6 - ECAD	Sr. RCRA Inspector
Christopher Meyers	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Cory Green	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Patrick Walsh	Denka Performance Elastomer, LLC.	SHE/PSM Manager
David Bordelon	USEPA START	
Derrick Cobb	USEPA START	
Jose Ojeda	USEPA START	
Jeff Wright	USEPA START	
Luke Murray	USEPA START	

EPA Lead Inspector Signature/Date	JOHN PENLAND Digitally signed by JOHN PENLAND DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JOHN PENLAND, 0.9.2342.19200300.100.1.1=68001003655750 Date: 2022.07.19 12:28:39 -05'00'	
	John Penland – Sr. RCRA Inspector	Date
Supervisor Signature/Date	JEFFREY YURK Digitally signed by JEFFREY YURK Date: 2022.07.19 12:48:26 -05'00'	
	Jeff Yurk – RCRA Enforcement Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On May 5, 2022, I, John Penland, conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). I was accompanied on this inspection by members of the Superfund Technical Assistance and Response Team (START) who were engaged to collect samples. This inspection is a follow-up to the April 18-21, 2022, Resource Conservation and Recovery Act (RCRA) inspection where initial concerns were raised about the generation and management of the waste generated from the strainers associated with the batch reactor vessels (kettles) located in the Polymer Unit (Poly-kettle Strainer Waste; also known as: waste neoprene; neoprene popcorn; or waste coag). This inspection focused on observation of the facility's standard operating procedures specific to the management of the Poly-kettle Strainer Waste and sample collection of air, liquid, and solid media associated with or impacted by the Poly-kettle Strainer Waste generation and management procedures.

This report serves as documentation of all onsite activities and observations during this inspection of the Denka facility. Photographs and video recordings taken during the inspection to document onsite observations are included as Attachment 1. A summary of all areas of concern identified during this inspection is provided in Section IV. Unless otherwise specified, the statements cited in this report reflect those claims made by facility personnel to me or documents reviewed by me during this inspection.

Facility Description

Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality.

Denka has been the focus of multiple inspections under the Clean Air Act, Resource Conservation and Recovery Act, and Clean Water Act. For a more complete description of the facility's units and operations refer to the report documenting the April 18-21, 2022, RCRA inspection. This inspection report is focused on the generation and management of the Poly-kettle Strainer Waste described below.

Poly-kettle Strainer Waste

Neoprene "popcorn" is partially reacted neoprene generated from the auto-polymerization of chloroprene. It is created in the neoprene reactors in the Polymer Unit at Denka and separated from the neoprene emulsion product by a canister filter, referred to as a "strainer." Denka personnel remove this material, now referred to in this report as Poly-kettle Strainer Waste, and transfer it to the Outside Brine Pit. The Outside Brine Pit at Denka is an inground tank used for the accumulation, stabilization, and storage of the Poly-kettle Strainer Waste from the Polymer Building. According to Denka internal

Standard Operating Procedures, the Poly-kettle Strainer Waste consists of neoprene, chloroprene, toluene, 2,3-dichloro-1,3-butadiene, and stabilizers. Denka's written hazard descriptions of these materials indicate that the Poly-kettle Strainer Waste may meet the definitions for the hazardous waste characteristics of reactivity and ignitability.

Section II - OBSERVATIONS

I conducted the onsite inspection during the normal business hours of May 5, 2022, beginning at 0930 hours Central Time. During this inspection, the facility was in the process of winding down operations in preparation for a facility-wide turnaround. However, Denka was still conducting normal operations in the Polymer Unit. Denka was notified of this inspection through their counsel Bracewell, LLP on April 29, 2022, and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.

I began this inspection with an initial briefing where I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility. I explained that the purpose of this inspection was to collect information and samples related to the generation and management of the Poly-kettle Strainer Waste. I also informed them that EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022, inspection.

In furtherance of this inquiry, I asked whether Denka considered the Poly-kettle Strainer Waste to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had previously sold the stabilized Poly-kettle Strainer Waste for its commercial value, though it does not currently do so. I explained the D001 flammable solids definition as discussed in 40 CFR 261.21(a)(2) and the associated Background Information Document and asked whether that characteristic could apply since the Poly-kettle Strainer Waste had been previously described by the Polymer Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated. I explained the D003 reactivity definition in 40 CFR 261.23(a)(1), the associated Background Information Document, and its link with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the Poly-kettle Strainer Waste.

During the opening meeting, I also requested and received the following documents marked as Confidential:

1) PK Pump Out and Strainer Cleaning Operation
2) Clearing Unstripped Emulsion Storage Tank for Cleaning
3) Engineering Drawings of the Outside Brine Pit
4) Raw Materials Characteristics and Hazards

5) Emergency Stabilizer Make-up.

These documents are included as Attachments 2 through 6. In addition, according to Chris Meyers, following the completion of the April 18-21, 2022, inspection, additional information concerning the amount of residual chloroprene present in the Poly-kettle Strainer Waste was located and provided as part of the response to the records request originating from EPA during the April 18-21, 2022, inspection. Those records are included in the report documenting that April 18-21, 2022, inspection.

David Bordelon, an employee of Weston Solutions, LLC. and the team lead for a sampling team activated under the START contract for EPA, arrived at approximately 1200hours Central Time. Following his introduction and at approximately 1230hours Central Time we conducted our initial reconnaissance of the planned sample collection area and equipment staging location. We departed the facility for lunch and a separate planning discussion at approximately 1300hours. When we returned to the facility at approximately 1415hours, we briefed the rest of START sampling team who had arrived in the interim. After staging our sampling equipment and donning personal protective equipment (PPE), the START team initiated sample collection at approximately 1530hours. A detailed sampling report describing the collection and analysis of the samples has been prepared by the START contractors and is included as Attachment 7. This report from the START contractors also includes the final analytical results for the collected samples which are discussed in the next section.

During the Poly-kettle Strainer Cleaning operation, the Denka employee removing the Poly-kettle Strainer Waste from the strainer was wearing an air-purifying respirator as required by Denka's SOP. However, the sampling team observed and documented multiple Denka personnel observing the operation without any respiratory protection.

Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel who attended via video call. This meeting and the inspection concluded at approximately 1830hours.

Section III - FOLLOW-UP

Sample Result Summary

Sample DR-S-BP-05052022-01

This grab sample is of Poly-kettle Strainer Waste which was being removed from the Outside Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized Poly-kettle Strainer Waste normally shipped offsite for disposal. Residual chloroprene is present in this sample at 1,080 mg/kg.

Sample DR-L-LB-05052022-01 and Field Duplicate DR-L-LB-05052022-02

This grab sample and its field duplicate are of liquid collected from the Outside Brine Pit as found prior to the addition of the Poly-kettle Strainer Waste observed during the inspection.

Chloroprene is present in the sample at 62.8 mg/L and the field duplicate at 64.1 mg/L before the addition of the Poly-kettle Strainer Waste.

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Outside Brine Pit approximately 10 minutes after the addition of the Poly-kettle Strainer Waste observed during the inspection. The chloroprene concentration in this sample is 341 mg/L. The increase in the chloroprene concentration of this sample over the concentration of Sample DR-L-LB-05052022-01 is interpreted to represent the release of chloroprene from the Poly-kettle Strainer Waste to the liquid in the Outside Brine Pit where it will continue to evaporate.

Sample DR-A-BK-0502022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer approximately 30 minutes before the Poly-kettle Strainer Waste generating procedure. This sample serves as the background reading for the waste generating process inside the Polymer building. The reported chloroprene concentration is 1,050 $\mu g/m^3$.

Sample DR-A-KP-05052022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer during the Poly-kettle Strainer Waste generating procedure. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer and the evaporation of the chloroprene from the Poly-kettle Strainer Waste. Since this sample remained at the strainer following the removal of the waste, a difference between the measurement for this sample and sample DR-A-KT-05052022-01 would illustrate the impact of direct volatilization of chloroprene from the Poly-kettle Strainer Waste. The reported chloroprene concentration in this sample is 193,000 $\mu g/m^3$.

Sample DR-A-KT-05052022-01

This approximately 30-minute, 6-liter air sample, was started at the Poly-kettle Strainer, alongside sample DR-A-KP-05052022-01 during waste generation and traveled with the Poly-kettle Strainer Waste to the Outside Brine Pit. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the screen, the evaporation of the chloroprene from the Poly-kettle Strainer Waste, and the transport and dumping of that waste into the Outside Brine Pit. Since this sample remained near the waste throughout the process, the concentration of chloroprene in this sample is expected to be dependent on the volatilization of chloroprene from the waste during the strainer cleaning and disposal process. The reported Chloroprene concentration in this sample is 243,000 $\mu g/m^3$.

Samples DR-A-KD-05052022-01 and DR-A-KD-05052022-02

These approximately 30-minute, 6-liter air samples were collected approximately 20 feet from the Poly-kettle Strainer during the waste generating procedure. These are collocated samples serving the same purpose of a field duplicate in this context. These samples indicate the presence of

chloroprene in the air at a downflow location from the strainer. The concentration in these samples is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer, the volatilization of the chloroprene from the Poly-kettle Strainer Waste, and the rate of dispersion of chloroprene vapor. The reported chloroprene concentration in sample DR-A-05052022-01 is 19,000 μg/m^3 and in sample DR-A005052022-02 is 18,400 μg/m^3.

Sample DR-A-PU

This approximately 30-minute, 6-liter air sample was collected between the Polymer building and the Outside Brine Pit during the Poly-kettle Strainer Waste generation and Outside Brine Pit addition. This sample location was originally intended to measure the release of chloroprene from the Poly-kettle Strainer Waste during its addition to the Outside Brine Pit. However, this sample was collected 15 feet away from the Outside Brine Pit. Due to this distance and chloroprene's rate of dispersion, this sample does not serve its intended purpose. The reported chloroprene concentration in this sample is 4,390 μg/m^3.

Sample DR-A-BU

This approximately 30-minute, 6-liter air sample was collected from a location immediately adjacent to the Outside Brine Pit, on the upwind edge, during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit by Denka's employees using an excavator. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal. The reported chloroprene concentration in this sample is 10,200 μg/m^3.

Sample DR-A-BD

This approximately 30-minute, 6-liter sample was collected from a location 20 feet from the Outside Brine Pit, on the downwind side, during the removal of stabilized Poly-kettle Strainer Waste. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal activity and the rate of dispersion of chloroprene vapors in the air. The reported chloroprene concentration in this sample is 969 μg/m^3.

Section IV – AREAS OF CONCERN

<u>Generation and Management of the Poly-kettle Strainer Waste</u>

Based on its management and the written hazard descriptions provided by Denka, the Poly-kettle Strainer Waste may be a hazardous waste demonstrating the characteristics of ignitability and reactivity. Chloroprene is a Volatile Organic Compound present in this waste at its point of generation and is capable of being released to this environment through evaporation if not properly contained.

Based on the results for air samples taken during the Poly-kettle Strainer Waste generating procedure, the waste is being released to the air during this procedure as evidenced by the increase in chloroprene concentrations.

Based on the results for liquid samples DR-L-LB-05052022-01 and DR-L-LA-05052022-01, Poly-kettle Strainer Waste is introducing chloroprene to the Outside Brine Pit which is not designed to

contain Volatile Organic Compounds. Therefore, the Poly-kettle Strainer Waste is being released to the air as it evaporates from the Outside Brine Pit.

Based on the results for air samples taken during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit, Poly-kettle Strainer Waste is being released to the air during this process.

Based on the results for solid sample DR-S-BP-05052022-02 the stabilized Poly-kettle Strainer Waste has concentrations of chloroprene that require additional containment measures to prevent release to the environment. The Roll-off container used for the accumulation of this waste is not designed to prevent releases of Volatile Organic Compounds. Since the chloroprene component of the Poly-kettle Strainer Waste is a volatile organic compound, it will evaporate and be released from the roll-off container during storage.

Respiratory Protection of Facility Personnel

The Raw Materials Chemicals and Hazards document presented to me by the facility describes Chloroprene (CD) as a "a toxic material with an AEL (Acceptable Exposure Limit) for CD in air of .2 ppm. Rubber gloves and coverall goggles are required for valving, and a full-face respirator is required when handling CD liquid or when the presence of CD vapor is possible." The SOP for the Poly-kettle Strainer Waste generating operation requires personnel to wear an air-purifying respirator during the process.

During this inspection, the sampling team observed and documented multiple Denka personnel without any respiratory protection during the Poly-kettle Strainer cleaning operation. Based on the results for the air samples collected during this inspection, the chloroprene concentration inside the Polymer Building was greater than the AEL described in the facility's documents during normal operations even prior to the Poly-kettle Strainer cleaning operation.

A full-face air-purifying respirator has an assigned protection factor of 50, which means that a chloroprene concentration above 25ppmv would exceed the AEL calculated for this type of respiratory protection. The concentration of chloroprene sampled during the strainer cleaning operation exceeded 50ppmv.

Section V – LIST OF ATTACHMENTS

Attachment 1 – Photo and Video Log (CBI)
Attachment 2 – PK Pump Out and Strainer Cleaning Operation (CBI)
Attachment 3 – Clearing Unstripped Emulsion Storage Tank for Cleaning (CBI)
Attachment 4 – Engineering Drawings of the Outside Brine Pit (CBI)
Attachment 5 – Raw Materials Characteristics and Hazards (CBI)
Attachment 6 – Emergency Stabilizer Make-up (CBI)
Attachment 7 – START Technical Support Report for ECAD - Denka Enforcement Multimedia Sampling
Attachment 8 – Daily Activity Summary for May 5, 2022 – FY2022 Denka Sampling Investigation

Attachment 1

Photo and Video Log (CBI)

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
1	DSCN0619.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2
2	DSCN0620.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2
3	DSCN0621.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2. Poor quality image
4	DSCN0622.MOV	5/5/2022	1539	Jose Ojeda	N/A	Accidental video recorded while exiting the Polymer building. Length- 1min 32sec
5	DSCN0623.MOV	5/5/2022	1541	Jose Ojeda	NA	Accidental video recorded while preparing sampling equipment in the staging area. Length- 4sec
6	DSCN0624.JPG	5/5/2022	1553	Jose Ojeda	North-Northwest	Sample collection for Sample DR-L-LB-05052022-01 and DR-L-LB05052022-02 from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
7	DSCN0625.JPG	5/5/2022	1554	Jose Ojeda	North-Northwest	Sample collection for Sample DR-L-LB-05052022-01 and DR-L-LB05052022-02 from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
8	DSCN0626.JPG	5/5/2022	1604	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
9	DSCN0627.JPG	5/5/2022	1604	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
10	DSCN0628.JPG	5/5/2022	1605	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
11	DSCN0629.JPG	5/5/2022	1605	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
12	DSCN0630.JPG	5/5/2022	1606	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
13	DSCN0631.JPG	5/5/2022	1606	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
14	DSCN0632.JPG	5/5/2022	1611	Jose Ojeda	North	Removal of stabilized Poly-kettle Strainer Waste from the stabilization cell of the Outside Brine Pit by Denka personnel using an excavator.
15	DSCN0633.JPG	5/5/2022	1612	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
16	DSCN0634.JPG	5/5/2022	1613	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
17	DSCN0635.JPG	5/5/2022	1613	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
18	DSCN0636.JPG	5/5/2022	1614	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
19	DSCN0637.JPG	5/5/2022	1614	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
20	DSCN0638.MOV	5/5/2022	1616	Jose Ojeda	N/A	Accidental video recorded while preparing sampling equipment in the staging area. Length- 4sec
21	DSCN0639.MOV	5/5/2022	1616	Jose Ojeda	N/A	Accidental video recorded while preparing sampling equipment in the staging area. Length- 7sec

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
22	DSCN0640.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
23	DSCN0641.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
24	DSCN0642.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
25	DSCN0643.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01, located near Poly-kettle Strainers 1 and 2
26	DSCN0644.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
27	DSCN0645.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
28	DSCN0646.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
29	DSCN0647.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
30	DSCN0648.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
31	DSCN0649.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
32	DSCN0650.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
33	DSCN0651.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
34	DSCN0652.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
35	DSCN0653.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
36	DSCN0654.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
37	DSCN0655.MOV	5/5/2022	1641	Jose Ojeda	N/A	Video recording of the Poly-kettle Strainer cleaning operation. Recording begins at the opening of the Poly-kettle Strainer and ends with the placement of the Poly-kettle Strainer Waste into the stablization cell of the Outside Brine Pit. Length- 11min 53sec
38	DSCN0656.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.
39	DSCN0657.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
40	DSCN0658.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.
41	DSCN0659.MOV	5/5/2022	1704	Jose Ojeda	N/A	Video recording of part of the collection of Sample DR-L-LA-05052022-01. Length- 11sec
42	DSCN0660.JPG	5/5/2022	1706	Jose Ojeda	South	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste.
43	DSCN0661.MOV	5/5/2022	1707	Jose Ojeda	N/A	Video recording of part of the collection of Sample DR-L-LA-05052022-01. Length- 15sec
44						
45						
46						
47						

Attachment 2

PK Pump Out and Strainer Cleaning Operation (CBI)

Attachment 3

Clearing Unstripped Emulsion Storage Tank for Cleaning (CBI)

Attachment 4

Engineering Drawings of the Outside Brine Pit (CBI)

Attachment 5

Raw Materials Characteristics and Hazards (CBI)

Attachment 6

Emergency Stabilizer Make-up (CBI)

Attachment 7

START Technical Support Report for ECAD - Denka Enforcement Multimedia Sampling

TECHNICAL SUPPORT REPORT

FOR

ECAD - DENKA ENFORCEMENT MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY-44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

Prepared for

U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

EPA Contract Number EP-S5-17-02
Technical Direction Document No. 0005/22-471
Weston Work Order No. 20600.012.005.5471
NRC Report No. N/A
FPN N/A
SSID 0600
EPA OSC Eric Delgado

Prepared by

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Frisco, Texas 75034

July 2022

PROJECT SUMMARY

This final report describes the U.S. Environmental Protection Agency (EPA) Region 6 Technical Support actions for the Enforcement and Compliance Assurance Division (ECAD) Denka Enforcement Multimedia Sampling event in LaPlace, St. John the Baptist Parish, Louisiana. A detailed report follows this project summary, and the attachments are provided as separate portable document format (PDF) files.

On April 22, 2022, the Superfund Technical Assessment and Response Team (START) was notified by EPA Region 6 On-Scene Coordinator (OSC) Eric Delgado of an EPA inspection conducted at the Denka Performance Elastomers, LLC (Denka) manufacturing facility. The OSC stated that a Resource Conservation and Recovery Act (RCRA) inspection at the facility was hindered due to inspectors encountering volatile organic compound (VOC) vapor readings that indicated additional respiratory protection would be necessary to continue the investigation. The OSC requested that START assist the ECAD in the inspection process by collecting solid, liquid and air samples, readings by a handheld VOC photoionization detector (PID), and documentation during a specific waste handling procedure conducted by Denka during the neoprene manufacturing process. Due to restrictions during the RCRA inspection that prevented the subcontractors from conducting Level B work, EPA tasked START to collect air, liquid, and solid samples to support RCRA inspection activities (Attachments F-J). Work performed by START during Denka's waste handling procedure was conducted in Level B personal protective equipment (PPE).

START coordinated with OSC Delgado and ECAD Lead Inspector John Penland to develop a Quality Assurance Project Plan (QAPP) documenting the project goals, sampling approach, quality assurance requirements, and analytical specifications. The goal of the event was to gather data to determine if waste material (referred to as "polymer kettle strainer waste") removed from the neoprene process lines was a source of chloroprene emissions, and to estimate the amount of chloroprene emitted from the material during its management. START was informed that the neoprene manufacturing process involves removing partially reacted neoprene solids from the process lines by forcing the liquids from each of the reactor kettles through strainers, each containing two baskets lined with disposable filter bags. The kettles are serviced between each

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product batch by Denka staff to remove the filter bag and solids from the strainer and replace the filter bag. The facility identified the polymer kettle strainer waste as a reactive material that would exothermically polymerize under normal conditions, presenting a physical and inhalation hazard due to the presence of chloroprene. The solids from the kettle are transferred by cart to a pit outside of the process building. Here, the materials are covered with brine water, allowing the waste to polymerize in a controlled environment. The stabilized polymer kettle strainer waste is removed from the brine pit using an excavator and placed into an open-topped roll-off container. The material is then sent to a non-hazardous waste landfill for final disposal.

START provided five personnel to execute the QAPP goals as approved by EPA. During the event, START collected eight air samples (seven locations and one co-located quality assurance/quality control [QA/QC] sample) using 6-liter summa canisters outfitted with a 200-milliliter-per-hour (ml/hr) flow controller. This canister setup enabled the collection of 6 liters of air over a 30-minute period. Sample locations and rationale were designed to collect representative air samples throughout the polymer kettle strainer waste removal process, along with background samples for comparison purposes. In addition to air samples, one solid and two liquid waste samples were collected from the brine pit to gather analytical information for these waste streams. Detailed information regarding sample collection is provided within Section 3 of this report. Analytical results for the air, solid and liquid samples are provided within Attachments F, G, H, and I of this report.

This Technical Support Report was prepared to describe the technical scope of work completed as part of Technical Direction Document (TDD) No. 0005/22-471.

[ ]	The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.
[X]	The EPA Task Monitor has provided final approval of this report. Therefore, Weston Solutions, Inc. has submitted this report with the Task Monitor's approval.

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1. INTRODUCTION

On April 22, 2022, the Superfund Technical Assessment and Response Team (START) contractor received a phone call from Eric Delgado, the EPA Region 6 On Scene Coordinator (OSC), regarding an EPA inspection conducted at the Denka Performance Elastomers, LLC (Denka) manufacturing facility (site). The OSC stated that a Resource Conservation and Recovery Act (RCRA) inspection at the facility was hindered due to the inspectors encountering volatile organic compound (VOC) vapor readings that indicated additional respiratory protection would be necessary to continue the investigation. The OSC requested that START assist the Enforcement and Compliance Assurance Division (ECAD) in the inspection process by collecting air, liquid, and solid waste samples; conducting air monitoring activities with a handheld VOC photoionization detector (PID) meter: and documenting specific waste handling procedures conducted by Denka during the neoprene manufacturing process. Due to the levels of VOCs documented by the RCRA inspectors, work conducted by START during Denka's waste handling process would be conducted in Level B personal protective equipment (PPE).

On April 22, 2022, the U.S. Environmental Protection Agency (EPA) activated Weston Solutions, Inc. (WESTON®), the EPA Region 6 START contractor, under Technical Direction Document (TDD) No. 0005/22-471, to provide support and to compile documentation of technical support activities at the Site.

2. BACKGROUND AND SITE DESCRIPTION

EPA RCRA personnel inspected the Denka Performance Elastomers facility from April 18 through April 21, 2022. During the inspection, concerns were raised regarding the handling and classification of polymer kettle strainer waste generated in Denka's polymer unit. Information provided by Denka regarding the generation of the polymer kettle strainer waste stated that the process stream of product neoprene emulsion in the polymer unit passes from the reactor kettles through strainers with metal baskets lined with fabric filter bags. The filters remove the solid, partially polymerized pieces of neoprene. The facility stated that the kettle strainers are serviced between production batches.

The procedure for removing the polymer kettle strainer waste begins when the kettle requiring service is taken offline and depressurized. A technician wearing a respirator positions a cart

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beneath the strainer and opens the horizontal vessel. Polymer kettle strainer waste is then removed from the baskets and placed into the cart along with the fabric filter bags. The facility stated that the polymer kettle strainer waste is reactive when exposed to the atmosphere and will exothermically polymerize generating chloroprene vapors and pose a potential ignition hazard. To safely allow the reaction of the waste material, the worker transports the waste to a concrete pit outside of the polymer building. Workers place the waste into the upstream cell of the pit and cover the material with brine. The brine prevents the potential combustion of the polymer kettle strainer waste due to the ongoing auto-polymerization reaction.

Once the waste material reaches a state at which the facility determines the waste material can be extracted, the material is removed from the pit and placed into an open-topped roll-off container using an excavator. Residual brine liquids drain from the roll-off container onto the ground surface and flow into drainage channels that direct the liquids to the middle cell of the pit. Wastewaters from the pit are pumped to the on-site wastewater treatment plant. Material within the roll-off box is sent to a non-hazardous disposal facility.

During the RCRA inspection, EPA representatives observed the waste generating units and utilized a VOC PID meter to monitor the atmosphere during operations. During the evaluation of the polymer unit, the inspectors documented VOC readings above the levels that the inspectors believed would allow them to collect samples safely. The EPA ECAD determined that Level B PPE would be required to conduct activities within the polymer unit during the waste generating and removal processes and contacted the EPA Region 6 Superfund and Emergency Management Division for assistance.

3. SUMMARY OF ACTIONS

3.1 OBJECTIVES AND PLANNING

START, in conjunction with OSC Delgado and ECAD inspector John Penland developed a site-specific Quality Assurance Project Plan (QAPP) to identify the project goals and means by which these objectives would be achieved (Attachment E). The goal of the project was to assess the facility's waste management processes conducted by Denka personnel cleaning the kettle strainers inside of the polymer unit and the potential impact to human health and the environment stemming from these practices. The evaluation of the processes and potential impacts to human health and

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the environment would be achieved by collecting air, liquid, and solid waste samples; conducting air monitoring using a VOC PID meter; as well as observing and documenting the waste management practices.

Air samples would include background locations, areas within the polymer unit building housing the kettles (both before and during Denka's servicing of the strainers), areas upwind and downwind of the brine pit, and near the material as it was transferred from the building to the brine pit. Liquid samples (2) would be collected from the brine pit before placement of the solids and 10 minutes after placement of the solids. One solid sample would be collected from solids removed from the brine pit, prior to placement into the waste neoprene roll-off box. A list of sample identification numbers and location descriptions is provided in Section 3.4.

The team reviewed the sampling approach with Denka personnel to ensure that coordination and safety requirements were met. Sampling efforts were coordinated with the Denka facility so that the sampling team was in place prior to and during the servicing of the kettle strainers and to enable collection of background air samples approximately 30 minutes prior to the servicing. The sampling team planned to collect split liquid and solid samples for the Denka facility and record the transfer of custody to the appropriate personnel.

Due to the high levels of VOCs measured with the handheld PID meter during the April RCRA inspection, all sampling efforts after the opening of the strainer would be conducted by personnel in Level B PPE. The sampling group was comprised of two teams of two people. One team served as the primary sampling team and the second as the backup/rescue team. The backup/rescue team was able to step into the sampling role if the sampling efforts exceeded the timeframe permitted by the Self-Contained Breathing Apparatus (SCBAs). The primary sampling team would don new tanks and serve as the backup team at that point.

3.2 SAMPLING ACTIVITIES

On May 5, 2022, START mobilized five people to the Denka facility to conduct sampling, monitoring, and documentation activities. The START Field Team Leader (FTL) met with ECAD inspector John Penland at the facility to conduct a site walk to orient the team prior to the sampling event. START and Mr. Penland observed the locations of the kettles, identified the strainer that would be serviced, the brine pit, and areas outside of the polymer unit that could be utilized as a

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support zone. The team was briefed as to the specific air sampling locations, liquid sampling location, solid waste sampling location, sequence of events, safety protocols, and documentation requirements. Winds at the site were documented to be from the south at 10-20 miles per hour.

Sampling activities were initiated at 1530 hours with the deployment and collection of the background air sampling canister (DR-A-BK-05052022-01). The background location was selected to provide a baseline level of VOCs within the polymer unit building prior to the servicing of the strainer. The canister was placed approximately 5 feet east of the strainer to be serviced.

To determine the impact of adding polymer kettle strainer waste to the brine pit liquids, liquid samples were collected before and after the addition of the waste. At 1545 hours, START collected a water sample (DR-L-LB-05052022-01) and duplicate (DR-L-LB-05052022-02) from the brine pit to determine the VOC levels within the liquid prior to the addition of polymer kettle strainer waste. After the addition of the waste material to the brine pit (1651 hours), a liquid sample (DR-L-LA-05052022-01) was collected from the brine pit at 1710 hours to determine the VOC levels. Split samples of the liquid material were provided to Denka.

To assess the potential impacts to the atmosphere caused by the removal of solid materials from the brine pit and placing the material into a dedicated roll-off box, the EPA team collected air and solid samples during Denka's removal of solids from the brine pit. Prior to the removal, START placed canisters approximately 2 feet upwind (DR-A-BU-05052022-01) and 20 feet downwind (DR-A-BD-05052022-01) of the brine pit. The canisters were activated at 1604 hours, and Denka personnel began removing solid material from the brine pit using an excavator at approximately 1610 hours, placing the material into an open-topped roll-off box. START collected and split with Denka a solid waste sample (DR-S-BP-05052022-01) from the excavator bucket at 1610 hours. Air sample collection was completed at 1631 hours.

Once the background air sample had been collected at approximately 1600 hours, START began deploying air sampling canisters at the following locations:

- Canister placed approximately 5 feet from strainer to be serviced – DR-A-KP-05052022-01
- Canister placed approximately 15 feet east of the strainer – DR-A-KD-05052022-01. This sample had a co-located canister (DR-A-KD-05052022-02) for QA purposes.

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- Canister that remained within approximately 5 feet of the cart as it was loaded with waste material and transported to the brine pit. Once material was placed in the brine pit, the canister was placed approximately 3 feet from the downwind (north) side of the pit. - DR-A-KT-05052022-01
- Canister placed approximately 15 feet upwind (south) of the brine pit. – DR-A-PU-05052022-01

Between 1637 and 1639 hours, START opened the canister valves at the locations described above in anticipation of the start of the strainer servicing process. At 1642 hours, the Denka technician, in level C PPE, began closing valves, venting the kettle, and opening the strainer. At 1645 hours, after a reading of 40 parts per million (ppm), the lamp on the START VOC PID meter malfunctioned (lamp error message) and would no longer read or record data. The Denka technician placed the cart beneath the strainer and began removing the waste material from the baskets using a metal hook. Once approximately one-half of the material was removed from the strainer, the technician removed the basket (two baskets per strainer) and dumped the contents into the cart, including the fabric filter bags. After completing the first basket, the same approach was taken with the second. A new filter bag was placed into the baskets and the baskets were returned into the strainer. The strainer lid was closed, and the screws were tightened. The technician completed removal of the polymer kettle strainer waste and filter bag by 1649 hours and began transporting the material from the polymer unit building to the brine pit. All material was placed into the pit by 1651 hours.

Sample Summary:

- DR-S-BP-05052022-01 – Solid sample from brine pit
- DR-A-BU-05052022-01 – Air sample upwind (south) of brine pit during removal.
- DR-A-BD-05052022-01 – Air sample downwind (north) of brine pit during removal.
- DR-L-LB-05052022-01 – Liquid sample from brine pit before addition of material from strainer.
- DR-L-LB-05052022-02– Duplicate: Liquid sample from brine pit before addition of material from strainer.
- DR-L-LA-05052022-01 – Liquid sample from brine pit after addition of material from strainer.

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- DR-A-BK-05052022-01 – Background air sample from strainer area prior to waste removal.
- DR-A-KP-05052022-01 – Air sample from strainer area during waste removal.
- DR-A-KD-05052022-01 – Air sample from 15 feet east of strainer during waste removal.
- DR-A-KD-05052022-02– Duplicate: Air sample from 15 feet east of strainer during waste removal.
- DR-A-KT-05052022-01 – Air sample collected in proximation with cart transportation waste material from strainer to brine pit.
- DR-A-PU-05052022-01 – Air sample collected approximately 15 feet upwind (south) of the brine pit during strainer servicing.

After collection of the final sample the START team completed documentation and preservation of all sample media and packaged all equipment. START participated in a post event debrief at the Denka offices where ECAD inspector John Penland reviewed activities conducted in the field.

Due to the time at which the field activities and debrief were completed, START was unable to ship or transport samples to the respective laboratories on May 5, 2022. All sample media was transported to the WESTON Baton Rouge, LA, office and secured within the locked building. The solid and liquid the samples were picked up by the Pace Analytical courier on May 6, 2022, and delivered to the laboratory on the same day for VOC analysis by SW-846 method 8260. Air samples were shipped to Eastern Research Group (ERG) laboratory on May 6, 2022, for VOC analysis by EPA Compendium TO-15.

4. LIST OF ATTACHMENTS

Attachment A	Site Location Map
Attachment B	Site Area Map
Attachment C	Site Layout Map
Attachment D	Sample Location Map
Attachment E	Site-Specific Quality Assurance Project Plan
Attachment F	Air Analytical Results Table
Attachment G	Air Analytical Results – Laboratory Deliverables
Attachment H	Liquid Analytical Results Table

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Attachment I Solid Analytical Results Table

Attachment J Solid and Liquid Analytical Results – Laboratory Deliverables

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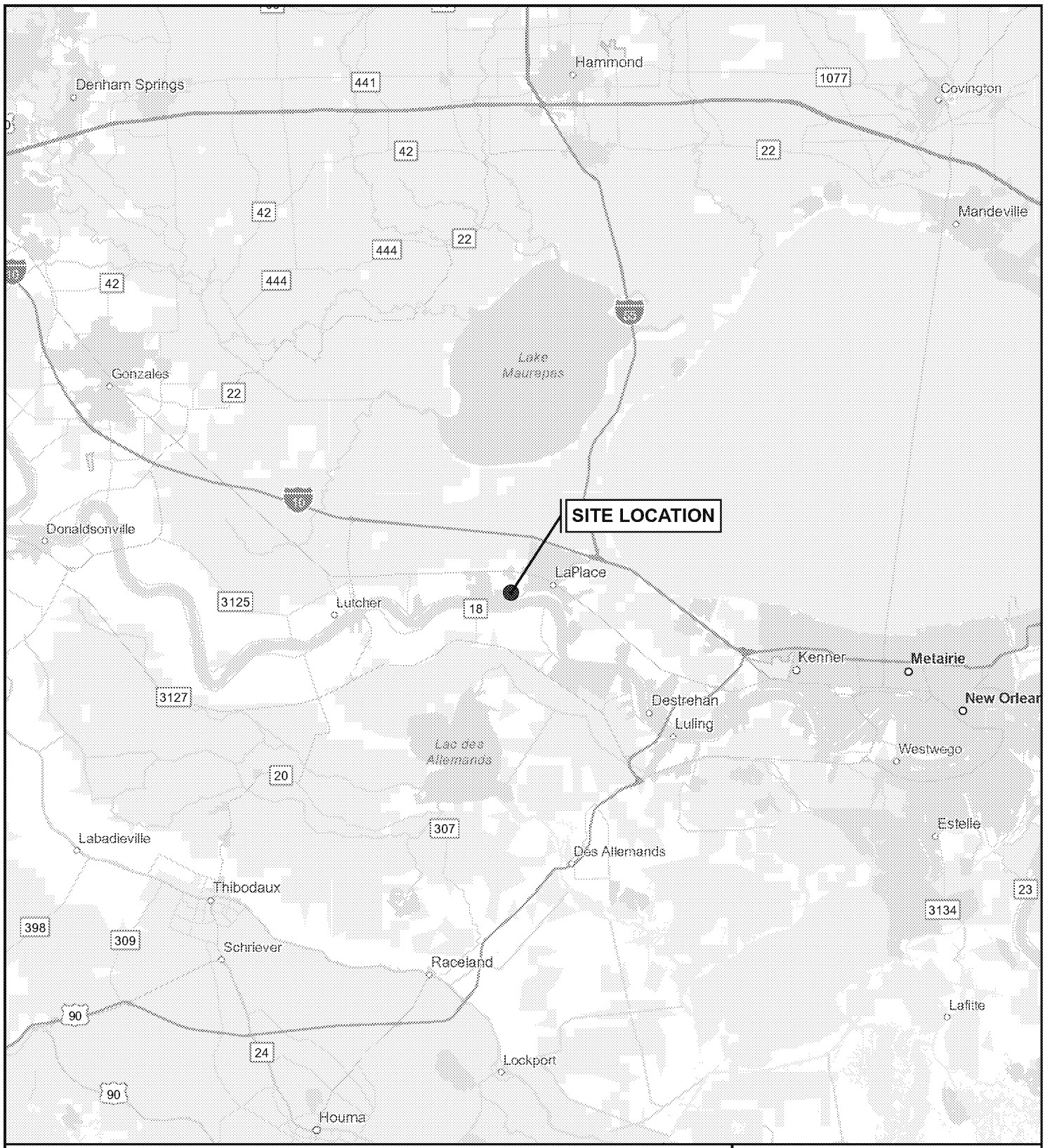
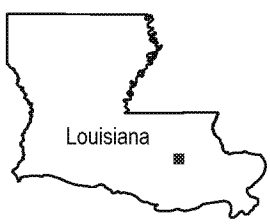
ATTACHMENT A

Site Location Map



LEGEND

- SITE LOCATION



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0 8 16

SCALE IN MILES

SOURCE: WORLD STREET MAPS; ESRI
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT A

SITE LOCATION MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

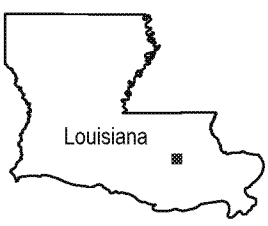
FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 11:47 AM 7/5/2022 covasj

ATTACHMENT B

Site Area Map

LEGEND

- SITE LOCATION



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SCALE IN FEET

SOURCE: NATIONAL GEOGRAPHIC TOPO; ESRI
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT B

SITE AREA MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 11:52 AM 7/5/2022 covasj

ATTACHMENT C

Site Layout Map

LEGEND

- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLYMER UNIT BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER

N

0 40 80

SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY; 2022
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT C

SITE LAYOUT MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 12:16 PM 7/5/2022 covasj

ATTACHMENT D

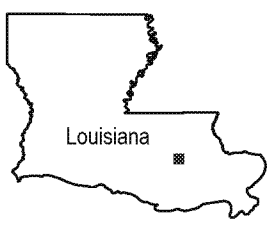
Sample Location Map

LEGEND

1. DR-S-BP-05052022-01 – Solid sample from brine pit.
2. DR-A-BU-05052022-01 – Air sample upwind of brine pit during removal.
3. DR-A-BD-05052022-01 – Air sample downwind of brine pit during removal.
4. DR-L-LB-05052022-01 – Liquid sample from brine pit before addition of material from kettle.
5. DR-L-LB-05052022-02– Duplicate: Liquid sample from brine pit before addition of material from kettle.
6. DR-L-LA-05052022-01 – Liquid sample from brine pit after addition of material from kettle.
7. DR-A-BK-05052022-01 – Background air sample from kettle area prior to waste removal.
8. DR-A-KP-05052022-01 – Air sample from kettle area during waste removal.
9. DR-A-KD-05052022-01 – Air sample from 15 feet east of kettle during waste removal.
10. DR-A-KD-05052022-02– Duplicate: Air sample from 15 feet east of kettle during waste removal.
11. DR-A-KT-05052022-01 – Air sample collected in proximation with cart transportation waste material from kettle to brine pit. Arrow indicates general travel path.
12. DR-A-PU-05052022-01 – Air sample collected approximately 15 feet upwind (south) of the brine pit during kettle servicing.

LEGEND

- TRAVEL PATH
- 1 SAMPLE LOCATION
- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLYMER UNIT BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER



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0 40 80

SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY; 2022
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT D

SAMPLE LOCATION MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 2:24 PM 7/5/2022 covasj

ATTACHMENT E

Site Specific QAPP

Region 6 - Enforcement & Compliance Assurance Division

QUALITY ASSURANCE PROJECT PLAN

DENKA PERFORMANCE ELASTOMERS

560 Louisiana Highway 44, LaPlace, LA 70068

Prepared by:

Weston Solutions– EPA Region 6 START Contractor

2600 Dallas Parkway, Suite 280
Frisco, Texas 75034

Prepared for:

U.S. Environmental Protection Agency, Region 6
Enforcement & Compliance Assurance Division
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

April 29, 2022

SECTION A – PROJECT MANAGEMENT

A.1 Denka Performance Elastomers QAPP

Denka Performance Elastomers
Quality Assurance Project Plan

Prepared by:

David Bordelon START Date: 4/29/2022

Approvals:

_____ Date: _____

_____ Date: _____

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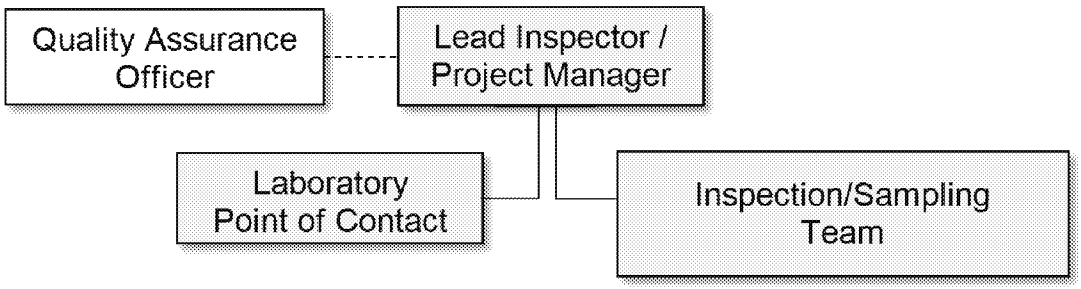
A.3 / A.4 Project Organization and Distribution List

The individuals participating in the project and their specific roles and responsibilities are shown below. These individuals will receive copies of the approved Quality Assurance Project Plan (QAPP) and subsequent revisions:

Table A.1: Roles & Responsibilities/Distribution List

Individual(s) Assigned:	Responsible for:	Authorized to:
John Penland 214-755-8795	Lead Inspector / Project Manager	Project Decisions, Lead and Assist Team Member(s), Collect and Assess Data
Jeff Wright START – R6 225-278-8406	Laboratory Point of Contact	Lab coordination for scheduling, analyses, validation, and deliverables.
David Bordelon START – R6 225-772-7921	Inspection/Sampling Team Member(s)	Inspect / Sample / Collect Data
Erik Hadwin START – R6 225-773-9104		

Figure A.1: Project Organization Chart



For current R6 Organization Chart, click on the following link:

https://usepa.sharepoint.com/sites/R6_Development/r6app/keypers/Lists/Organization%20List/AllItems.aspx?__utma=172919287.230895279.1551278682.1560952790.1560952937.338&__utmb=172919287.6.9.1560956460225&__utmc=172919287&__utmx=-&__utmz=172919287.1527106362.1.1.utmcsr=(direct)|utmccn=(direct)|utmcmd=(none)&__utmv=-&__utmk=55076843

A.5 Problem Definition and Background

Problem(s) to be resolved, decision(s) to be made and/or hypothesis to be tested:

This QAPP will address both the potential offsite migration of hazardous waste and potential hazardous was being processed, stored, and treated on site. Data gathered using handheld meters during the site inspection indicated that fugitive emissions of chloroprene were encountered during normal plant processes and further investigation was necessary to confirm the meter readings. See pre-inspection plan for further details.

Historical & background information:

EPA RCRA personnel conducted an inspection of the Denka Performance Elastomers facility on April 18-21 of 2022. During the inspection concerns were raised regarding the handling and classification of polymer kettle strainer waste generated in Denka's polymer unit. Information provided by Denka regarding the generation of the polymer kettle strainer waste stated that the process stream of product neoprene emulsion in the polymer unit passes from the reactor kettles through metal screens lined with a fabric filter sleeves. The filters remove the solid, partially polymerized pieces of neoprene. The facility stated that the kettle screens and filters are serviced between each production batch.

The procedure for removing the polymer kettle strainer waste begins when the kettle requiring service is taken offline and depressurized. Personnel wearing a respirator position a cart beneath the kettle and open the horizontal vessel. Polymer kettle strainer waste is then removed from the screens and placed into the cart along with the fabric sleeve. The facility stated that the polymer kettle strainer waste is reactive when exposed to the atmosphere and will exothermically polymerize generating chloroprene vapors. To inhibit the reaction of the waste material, the worker transports the waste to a concrete pit located outside of the polymer building. Workers place the waste into the upstream cell of the pit and cover the material with brine. The brine prevents the auto-polymerization of the polymer kettle strainer waste from combusting.

Once the waste material reaches a stable state, the material is removed from pit and placed into an open-topped roll-off container using an excavator. Residual brine liquids that drain from the roll-off container onto the ground surface flow into drainage channels which direct the liquids to the middle cell of the pit. Wastewaters from the pit are pumped to the onsite wastewater treatment plant. Material within the roll-off box is sent to a non-hazardous disposal facility.

During the RCRA inspection, EPA representatives were conducting observations of the waste generating units and utilizing a VOC meter to monitor the work atmosphere during operations. During the evaluation of the polymer unit the inspectors documented VOC readings above the levels which the inspectors believed would allow them to collect samples safely. The EPA ECAD determined that level B PPE would be required to conduct activities within the Polymer unit during the waste generating and removal processes and contacted the EPA Region 6 Superfund and Emergency Management Division for assistance.

A.6 Project/Task Description

The project goal will be to assess the impact to human health and the environment stemming from the waste management practices conducted by Denka personnel during the cleaning of screens within "kettles" inside of the Denka Polymer Unit. The screens remove solid waste materials from the process liquids and are periodically removed and solids placed within a brine pit. The solids are considered by Denka personnel to be reactive and if exposed to atmospheres outside of the process unit will exothermically polymerize, releasing chloroprene as a vapor and produce a significant amount of heat. Denka personnel have indicated that if left unchecked, the material will self-combust.

The placement within the brine pit reportedly enables the polymerization to occur beneath the liquid surface and reduce/restrict off gassing and self-combustion.

The sampling tasks will include collection of air, liquid, and solid samples. Air samples will include background locations, within the building housing the kettles both before and during Denka's servicing the screens, and in close proximity to the material during the transfer from the building to the brine pit. Liquid samples will be collected from the brine pit before placement of the solids, 10 minutes after placement of the solids, and 1 hour after placement of the solids. One solid sample will be collected from the brine pit or from the waste neoprene roll-off box depending upon accessibility and age of the material within the roll-off box.

Sampling efforts will be coordinated with the Denka facility to have the sampling team in place prior to and during the servicing of the screens. Background air samples will be collected approximately one hour prior to the servicing and the final liquid sample will be collected one hour after the placement of the last load of solid waste material into brine pit. The sampling team will collected split samples for the Denka facility and record the transfer of custody to the appropriate personnel.

Due to the high levels of VOCs measured with the handheld meters during the inspection, all sampling efforts (with the exception of background air samples) will be conducted by personnel in level B PPE. The sampling group will be comprised of two teams of two personnel. One team will serve as the primary sampling team and the second as the backup/rescue team. The backup/rescue team will step into the sampling roll if the sampling efforts exceed the timeframe permitted by the SCBAs. The primary team will don new tanks and serve as the backup team at that point.

The team will review the sampling approach with Denka personnel to ensure coordination and safety requirements are met.

All sampling activities will be documented within a site logbook and electronic devices. Sample media will be packaged appropriately with the proper preservatives and containers and shipped on the same day as collected. If the site activities exceed the timeframe needed to ship samples on the same day the samples will be properly preserved and placed within a locked facility overnight.

<u>This QAPP has been prepared to address:</u>

To determine 1) if hazardous waste is being improperly managed and 2) if hazardous waste is being released into the environment

<u>The work to be performed includes:</u>

1)Sampling of air before and during waste handling, 2) Sampling of liquids within the brine pit, 3) Sampling of solid waste with the brine pit and designated roll-off box, and 4) Observation and documentation of waste handling techniques.

<u>List samples/measurements to be collected/made and data to be obtained:</u>

1) Air – EPA TO-15 analysis (approximate 30 min sample period per canister)
    a. Background –

i. Upwind/downwind of Polymer building prior to screen change out.
ii. Two sample points within Polymer building prior to screen change out.

b. Polymer Building
i. One sample at kettle/screen during removal to determine immediate vicinity chloroprene.
ii. One sample 20-30 feet away to determine effectiveness of vent hose.

c. Travel corridor – one sample taken from the point at which the popcorn polymer placed within the wheelbarrow is transported from the kettle to the brine pit and continuing sampling at the brine pit until the summa canister has completed the collection

2) Brine Pit Liquid – EPA 8260B (chloroprene included in compound list)
a. Background – a liquid sample will be collected from the brine pit prior to the waste material being placed into the pit.
b. Initial sample – a sample will be collected approximately 10 minutes after the waste material has been placed into the brine pit. This will capture changes to the brine solution due to the polymer reaction.
c. Post sample - a sample will be collected approximately 1 hour after the waste material has been placed into the brine pit. This will capture changes to the brine solution after the majority of the polymer reaction has occurred.

3) Solid Brine Pit Sample – sample will be analyzed for EPA 8260B (chloroprene included in compound list). A sample of the solid material produced within the brine solution will be collected to determine the amount of free chloroprene within the solid.

Special personnel or equipment requirements:

Due levels of VOCs recorded during the site inspection using a PID meter, all work conducted during the kettle/screen servicing will be conducted in level B PPE. All personnel conducting the work will be HAZWOPER trained and experienced in level B work. Health monitoring will be conducted during operations.

Proposed work schedule (dates and time of sample collection):

All sampling efforts will be coordinated with Denka and the servicing of the kettle/screens. Times and dates are unknown at this time

Products to be produced:

At the conclusion of the inspection a XX report will be produced which will include a laboratory report along with a QA/QC review.

A.7 Quality Objectives & Criteria

This inspection will be conducted under the authority of EPA RCRA.

To support this requirement, EPA has developed a systematic planning process based on a graded approach for environmental decision making called the Data Quality Objectives (DQO) Process. The DQO Process is the Agency's preferred planning process and provides quality objectives and performance criteria based on the user's determination of tolerable error in the results. For details on the DQO Process and guidance on how and when it may be used, see the "*Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA QA/G-4) (EPA, February 2006).*" This process has limited applicability to most enforcement inspection activities, since generally only Special Projects lend themselves to development of formal DQOs and defining of error limits, hypothesis testing, etc.

All data collected shall be in accordance with the appropriate EPA methodologies and protocols found in the appropriate regulatory guidance. The data shall be used to determine the following:

1. Levels of hazardous materials entering the atmosphere as fugitive emissions due to waste handling procedures.
2. Levels of hazardous materials entering the facilities waste water stream as a result of the facility's waste handling procedures.
3. Reactivity of the polymer popcorn

The data must meet the approved method accuracy requirements such as those found in Industry-specific methods (40 CFR 136). All supporting QA/QC information shall be provided. The data may be used to support any future enforcement actions.

A.8 Special Training/Certification

At a minimum, field personnel have completed the required Health and Safety 24-hour initial and 8-hour annual training that is mandatory under OSHA 29 CFR 1910.120(e)(8) and EPA Order 3500.1 requirements. Under various programs, this training is mandatory to maintain inspector credentials. All non-credentialed personnel (e.g. inspectors in training) must meet the 29 CFR 1910.120(e)(8) requirements, and should be in accompanied by credentialed personnel while inspecting/sampling at the facility/site. Inspection personnel must be familiar with and follow bio-security procedures.

Additional Special Training:
No additional training is required at this time.

A.9 Documents and Records

The records for this project will include miscellaneous correspondence, field notes, laboratory analytical reports, photo logs, and inspection reports. All laboratory reports will be submitted to the EPA Lead Inspector/Project Manager. Field notes will include observations about facility conditions at the site(s) where samples are collected. Any noteworthy deviation from the procedures specified in the QAPP will be recorded in the field activity logs. Laboratory analytical reports will be generated for all of the samples received by the laboratory. Each set of samples will include a chain of custody form signed by the samplers and the laboratory recipient. All samples will be delivered by Weston Solutions personnel directly to the laboratory.

The EPA Project Manager will disseminate copies of the QAPP to the people listed in the distribution list once it is approved. Any revisions to the QAPP will be numbered sequentially. It will be the responsibility of the EPA Project Manager to ensure that each person on the distribution list receives copies of any revisions.
All EPA records and documents from this project will be handled according to the following EPA Region 6 Field Activities Quality System Procedures:

- Records Management - R6PROC-003
- Management of Sampling and Environmental Data - R6PROC-004
- Field Documentation - R6PROC-005
- Field Equipment Inventory and Management - R6PROC-006
- Field Inspections and Investigations - R6PROC-007
- Field Activities Report Preparation and Distribution- R6PROC-008

The designated and/or contracted laboratory/ies will manage the testing and original raw data from this project (both hard copy and electronic) in accordance with their established and accredited procedures. Any deviations from these procedures shall be approved by the EPA Project Manager before implementation.

SECTION B – DATA GENERATION & ACQUISITION

B.1 Sampling Process Design (Experimental Design)

The decision on whether or not to collect a sample will be contingent upon the following factors:

1. The facility representatives can conduct the service of removing the screens from the kettles and follow standard operating procedures regarding the collection and disposal of the waste stream.
2. EPA contractors can retrieve liquid samples from the brine pit utilizing tools available to the team.
3. EPA contractors can retrieve solid samples from the brine pit utilizing tools available to the team.

Because these samples are to be the result of an inspection and/or a one-time inspection/sampling event, a detail process design is not feasible or appropriate. However, the procedures to be followed from initiation to final report could be described as followed:

Step 1: The COR directs the START contractor to assemble sampling equipment, chain of custody forms, pre-inspection plan, QAPP, sampling equipment/containers, ice chests, etc. and notifies laboratory to expect samples of a particular matrix for a specific analysis (see Table B.1).

Step 2: The START contractor proceeds to field for observation, data gathering, and sample collection, if the situation warrants.

Step 3: START Contractor transports/ships sample(s) along with chain of custody forms to the laboratory for analytical testing.

Step 4: Analytical results are received from laboratory, EPA representatives evaluate data, attaches to report along with a QA/QC review, and takes any required action.

<u>Types and number of samples required</u>:
See Table B.1.

<u>Sampling network design & rationale for design</u>:
EPA representatives will collect samples to determine if hazardous wastes form the facility have been released into the environment.

Air samples will be collected and analyzed for VOCs via method TO-15 based upon previous field observations and records. Samples will be collected using 6-liter summa type air canisters with evacuated contents, creating a vacuum by which air in taken into the canister. A 200ml/minute flow controller will be attached to the orifice of the summa canister, allowing an approximate 30-minute sample to be collected. Air samples will be collected from the kettle area during servicing, along the pathway from the polymer building to the brine pit, and at the edge of the brine pit. Background samples will be

collected to provide a comparison value by which the release of materials into the atmosphere during the kettle servicing can be prepared.

Liquid samples will be collected from the brine pit and analyzed for VOCs via method 8260B. Samples will be collected from multiple depths within the brine pit using a container affixed to an extension pole. A background sample will be collected prior to the popcorn polymer waste product being introduced to the pit. After the waste material has been added to the pit the team will wait approximately 10 minutes prior to collecting the first sample. The facility has stated that the waste material will react and polymerize within this controlled environment to form neoprene. The EPA has surmised that this initial 10-minute time period will allow for the reaction of the material to begin. A second sample will be collected one hour after the waste material is added to the pit.

After the one-hour period the team will assess if the waste material has reacted to form neoprene. If solid material is noted within the brine pit the team will collect a solid sample and analyze the sample for VOCs via method 8260B. The solid sample will be collected using a screen attached to the extension pole. The solid material sample will be collected using a Terra Core or Encore sampling device. These devices collect the appropriate amount of sample material while limiting the loss of VOCS from the sample. Samples will be placed into the appropriate containers and preserved as the method instructs.

Table B.1 Samples by Matrix

Matrix	# of Matrix Samples	# of Field Blank**	# of Trip Blank*	# of Blind Duplicate	# of MS/MSD	Total # of Samples	Analysis *Example:* *TCLP RCRA 8 Metals SW846 6010C/7471*
Air	7			1		8	VOC by TO-15
Liquid	3		1	1		5	VOC by 8260B
Solid	1					1	VOC by 8260B

Note: *Trip blanks are for VOC analyses only. ** Field blanks column may also include rinsate blanks.

Typical Analytical Method No.

Volatile Organics by GC/MS
SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA – MC
CLP - VOA – LC
Std. Methods 6210B
Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC
SW-846 - 8021B
EPA500 - 502.2
EPA600 - 601

Semi-Volatile Organics by GC/MS
SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410

PAH
SW846 - 8310 (HPLC)

Inorganic Analytes
SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides
SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs
SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C
Std. Methods 6230D

Sampling locations & frequency of sampling:
Sampling is anticipated to be a single event from locations will include the following:

1. Air background locations
    a. Upwind of Polymer Building
    b. Downwind of Polymer Building
    c. Inside of polymer building near kettles
    d. Inside of polymer building 20-30 feet from kettles
2. Air Samples
    a. Inside of polymer building near kettle during screen servicing
    b. Inside of polymer building 20-30 feet away from kettle during screen servicing
    c. Collected alongside of the waste product as it is transported from the kettle to the brine pit.
3. Liquid Samples from Brine Pit
    a. Background sample collected prior to waste placement.
    b. After waste placement and after a 10-minute waiting period
    c. After waste placement and after a 1-hour waiting period
4. Solid Sample – to be collected from the brine pit after the 1-hour waiting period

Sample matrices:
See Table B.1.

Classification of measurement parameters:
Critical – For enforcement case development

Validation study information, for non-standard situations:
N/A: Standard laboratory validation is required.

B.2 Sampling Methods

Identify sample collection procedures:

AIR
Air samples will be analyzed for VOCs using EPA method TO-15 and collected following EPA SOP 1704 (Appendix B). START will utilize a 6-liter summa canister with particulate filters and inline pressure regulators and gauges to collect samples from 3-5 feet above ground surface. All air samples will be collected using flow controllers set to draw 200ml/minute of air into the summa canister. Batch certified summa canisters, particulate filters (as needed) and gauges will be provided by the contracted laboratory. Inline gauges will be set to collect a representative sample over the 30-minute period and retain at a minimum -2" Hg vacuum reading at the end of the sampling period. START will document that all normal vent systems will be operating normally at the time of the event. PID readings will be taken continuously during the sampling event.
Prior to the sampling event, each summa canister will be leak checked by START. With the inline regulator/gauge attached and shut in with a Swagelok nut the canisters

vacuum will be applied to the regulator by opening the summa canister valve until the gauge reading stabilizes. The summa canister valve will then be closed, and the gauge readings monitored for one minute. If the gauge loses more than 2" Hg of vacuum the fittings will be adjusted and the test repeated until a satisfactory result indicating no leakage around the flow controller is achieved.
START will document the time, temperature, ambient pressure, and canister pressure for each summa canister at the time of deployment and collection. Each summa canister will be equipped with a sample tagged affixed to the canister housing. The site-specific sample ID will be written onto each tag at deployment. At the time of collection, the inline regulator will be removed from the canister and a Swagelok nut installed at the inlet. Canisters will be placed within the designated container and prepared for shipment.

LIQUID
Upon initiation of sampling, the EPA team will place barriers around the sampling area to prevent any liquid from spilling onto the ground surface surrounding the brine pit. PID readings will be taken continuously during the sampling event. Readings will be recorded in the site logbook and electronically. An extension pole will be outfitted with a glass 8-ounce jar and secured with a pipe clamp and serve as the sample collection mechanism. New jars and clamps will be utilized for each sample event.
The samples will be placed directly into laboratory-supplied pre-preserved 40-ml VOA vial containers (3 per sample) and labelled according to the procedures described in this document. The sampling team will ensure that no air is captured within the vials during the collection process. Samples will be placed within a laboratory-provided "bubble wrap" bag and then placed inside of a zipper lock quart baggie. The sealed samples will be placed on ice immediately. All documentation of sample collection and chain of custody procedures will follow instructions provided in this QAPP.

SOLID
Samples will be collected from the brine pit using an extension pole and a screen. The solid material will be extracted from the pit and immediately placed into a dedicated aluminum pan. Sample cores will be collected according to VOC TerraCore sampling protocols. A Terra Core sampling kit will be utilized to extract 5-gram sample of the solid from the solid material. All debris will be removed from the outside of the sampling tool and the plug will be squared off to the lip of the sampler. The plunger will be rotated 90 degrees and the plug released into the 40 ml pre-labeled, pre-preserved (methanol) vial. A second sample using the same methods will be collected adjacent to the first to insure against breakage and provide additional sample volume should the analysis require a "re-run". Samples will be placed within a laboratory provided "bubble wrap" bag and then placed inside of a zipper lock quart baggie. The sealed samples will be placed on ice immediately. All documentation of sample collection and chain of custody procedures will follow instructions provided in this QAPP.

<u>Identify sampling methods and equipment:</u>

Sampling methods and regulatory citation: The analytical methods, sample containers, holding times, and sample preservation requirements are presented in Table B.4 and apply to EPA Sampling Methods:
8260B and TO-15

Sampling equipment available during the inspection/sampling event:
The team anticipates using summa canisters with 200ml/minute flow controllers to collect air samples.
The team anticipates using a container attached to an extension pole to collect liquid samples.
The team anticipates using a screen attached to an extension pole to collect a solid sample.

Implementation requirements: Will be based on based on the Lead Inspector's field observations, field conditions, facility operations and/or timing.

Sample preservation requirements: See Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Decontamination procedures: All equipment will be dedicated to the sample media collection. No decontamination will be conducted.

Any support facilities needed: No support facilities will be needed.

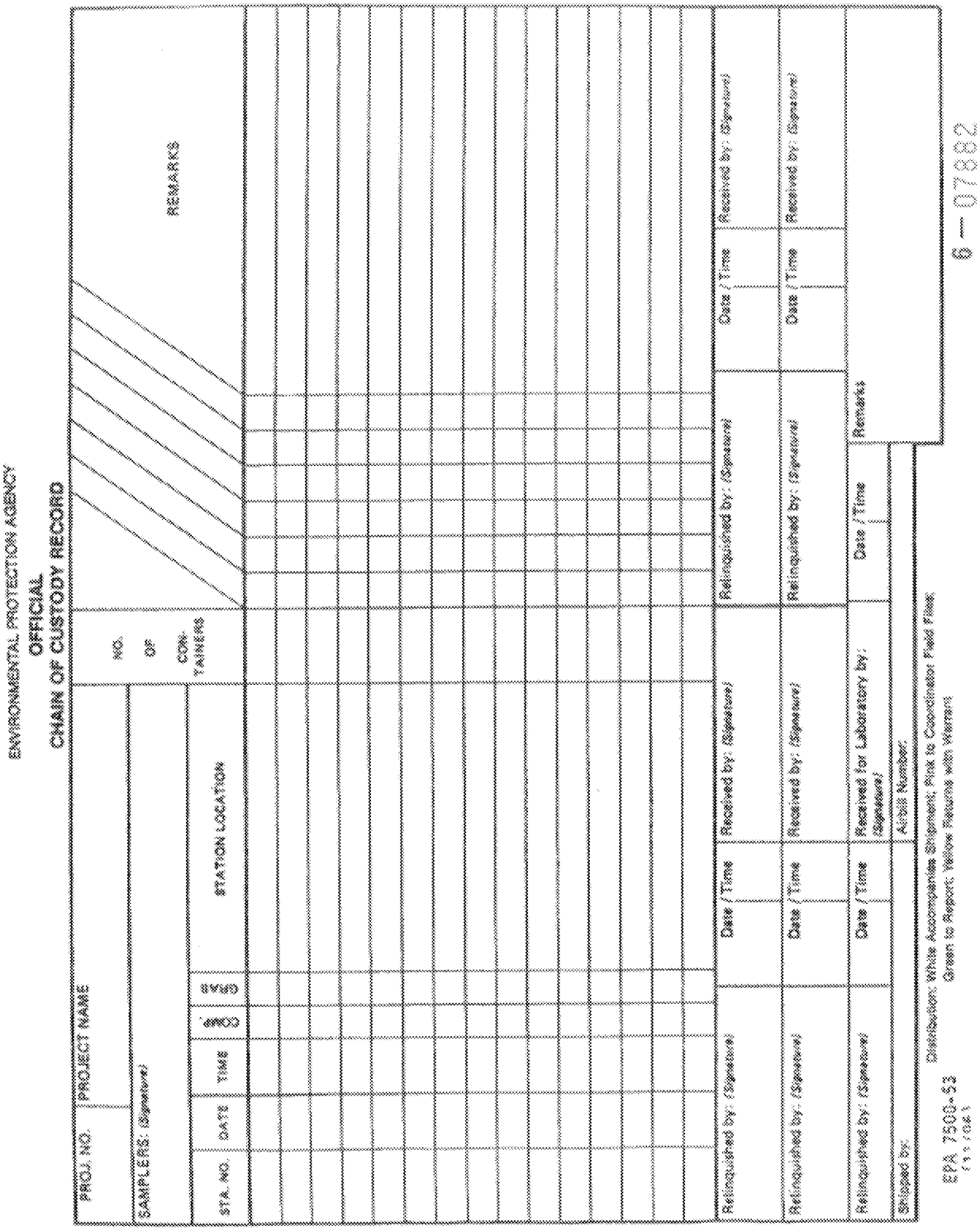
If a failure in the sampling or measurement system occurs, the Lead Inspector/Project Manager must be notified. The Quality Assurance Officer and/or Laboratory Point of Contact will act as advisors to the Lead Inspector/Project Manager. The Lead Inspector/Project Manager will be responsible for any decision concerning corrective action. Corrective action in the field or in the laboratory will be documented in the field notes and/or in the final laboratory analytical report based on the action(s) required.

B.3 Sampling Handling & Custody

The date and time of sample collection will be recorded on the field activity log and on all samples: additionally, that information will be recorded on the Chain of Custody (COC) form. The desired analytical tests to be performed and any preservatives used will also be noted on the COC form. An example COC format is attached in Figure B.3.

Prior to shipment, all samples shall be in custody with the inspection/sampling team. Sample team shall keep all samples in an environment that maintain its preservation (e.g., inside cooler(s) with double bagged ice and packing material) In lieu of tied on tags, stick on sample labels may be used as long as they contain the following information: sampler name, date, time, station location, sampler signature, sample # and analysis requested. Custody seals shall be used on each sample container and sample coolers, unless samples are hand delivered to the designated laboratory by a member of the inspection/sampling team along as the custody chain is not breached.

Figure B.3. Official Chain of Custody Example



B.4 Analytical Methods

Identify analytical methods to be followed (with all options) & required equipment:
See Table B.4 – Analytical Methods, Preservatives and Containers for Samples.

Specify any specific method performance criteria:
N/A

Provide validation information for non-standard methods:
N/A

Identify procedures to follow when failures occur:
If failure(s) occur during the analysis, the Laboratory Point of Contact will contact the Lead Inspector/Project Manager within 24-hours, and communicate the failure and identify potential corrective remedies. The Lead Inspector/Project Manager will make the determination on the remedy. The failure(s) and corrective remedies will be document via email and cc: the first-line supervisor and the QA Officer.

Identify individuals responsible for corrective action and appropriate documentation:
Jeff Wright – Laboratory Coordinator
David Bordelon – Project Manager

Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	7	VOC	TO-15	28		6L Summa Canister	1	None
Liquid	3	VOC	8260B	14		40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14		EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Typical Analytical Method No.

Volatile Organics by GC/MS
SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA – MC
CLP - VOA – LC
Std. Methods 6210B
Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC
SW-846 - 8021B
EPA500 - 502.2
EPA600 - 601
EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C
Std. Methods 6230D

Semi-Volatile Organics by GC/MS
SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410

PAH (HPLC)
SW846 - 8310

Inorganic Analytes
SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides
SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs
SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

B.5 Quality Control

Identified below are a number of quality control samples that will be collected.

Trip Blanks

Number of Blank(s): Example: One sample for each sample shipping container that contains samples for VOC analysis.

Trip Blank Type: A trip blank provided by the laboratory will accompany the samples from time of collection to receipt at the laboratory

Describe Preparation: For each trip blank, type II reagent grade water from the laboratory will be placed in three 40-ml vials and preserved with HCL. The VOC analysis will be consistent with the analysis on the environmental/waste samples.

Field Blanks

Number of Blank(s): Example: N/A

Field Blank Type: N/A

Describe Preparation: N/A

Equipment Rinsate Blanks

All equipment will be dedicated, no decontamination is expected.

Rinsate Type: N/A

Describe Preparation: N/A

Blind Replicate or Duplicate Samples

One duplicate sample will be collected per 10 samples.

Sample Matrix: Air

Location: From the location within the Polymer building approximately 20-30 feet from the kettle.

Matrix Spike (MS) / Matrix Spike Duplicate (MSD) Samples

N/A

Sample Matrix: N/A

Location: N/A

B.6 Instrument/Equipment Testing, Inspection, and Maintenance

EPA field personnel will use the PID as appropriate based on the project-specific field parameter needs and/or Health and Safety conditions. Along with data collection, measurements from this instrument may be used to alert field personnel to potential hazardous conditions. In addition, readings collected by the instrument may be documented in the field logbook and included in the final inspection report. The instrument will be maintained in accordance with the manufacturer's recommendations detailed in the instrument manual.

B.7 Instrument/Equipment Calibration and Frequency

Identify all tools, gauges, instruments, and other sampling, measuring, and test equipment used for data generation or collection activities affecting quality that must be controlled and calibrated:
MultiRAE

Describe or reference how calibration will be conducted using certified equipment and/or standards with known valid relationships to nationally recognized performance standards. If no such nationally recognized standards exist, document the basis for the calibration:
The MultiRAE instrument will be calibrated using isobutylene and mixed calibration gasses prior to entry of the facility in accordance with the procedures listed in the instrument manual. This calibration will be confirmed by a bump test prior to each use of the instrument. Should the bump test fail, the instrument will be recalibrated before use.

EPA field personnel shall record field usage in the maintenance/calibration logbook that is maintained with the equipment along with the inspection/sampling logbook.

B.8 Inspection/Acceptance of Supplies & Consumables

The EPA Project Manager will be responsible for inspecting sample containers prior to leaving for the inspection. Only new sample containers accompanied by the manufacturer's certification of pre-cleaning will be used. The sample containers will be inspected for cracks, ill-fitting lids, or other defects prior to use and will be discarded if defects are found.

B.9 Data Acquisition Requirements for Non-Direct Measurements

Records may be collected during the inspection/sampling event to document activities at the facility. Documents may be requested for a period of up to XX years prior to the inspection/sampling event. These records will be used for determining the facility's compliance with the requirements of RCRA.

B.10 Data Management

Data for this project will be produced both onsite and at the designated/approved Laboratory. Laboratory data will be submitted to the EPA Project Manager and will be included in the subsequent inspection report. Data collected during the inspection may be designated as Confidential Business Information (CBI) by representatives of CRS. For any information for which a CBI claim is made that information will be handled in accordance with the provisions specified for RCRA CBI. All records and documents generated during this project will be handled in accordance with EPA's "Standard Operating Procedures for Record and Information Management"

SECTION C – ASSESSMENT AND OVERSIGHT

C.1 Assessments and Response Actions

Documentation and analytical results collected during this project will be evaluated to determine the compliance status as it applies to the facility's requirements under RCRA. Results of this evaluation will determine what action, if any, the Agency should take in response to any Areas of Concern identified during the inspection. The magnitude and breadth of any concerns identified will determine the appropriate response on the part of the Agency which includes but is not limited to the issuance of administrative orders, administrative penalty orders, or judicial referral.

C.2 Reports to Management

This project will result in the generation of an inspection report which will include an inspection narrative, a photographic log, documents collected during the inspection, and analytical reports for all samples collected, if any.

SECTION D – DATA VALIDATION AND USABILITY

D.1 Data Review, Verification, and Validation

Data will be accepted if they meet the following criteria:

1. Field logs are complete.
2. Prior to releasing the analytical data, the laboratory staff well review both the sample and QC data to verify sample identity, instrument calibration, quantitation limits, dilution factors, numerical computations, accuracy of transcriptions, and chemical interpretations. In addition, the QC data are tabulated and the results reviewed to ascertain whether they were within the project-required limits for accuracy and precision. Any non-conforming data will be discussed in the data package case narrative. If necessary, qualifiers are applied based on this information. The laboratory staff review will consist of a Peer review, a Senior Chemist review, a Point of Contact review, and a QA Officer review. The review will follow the US EPA National Functional Guidelines for Organic Methods Data Review (SOM02.2), US EPA National Functional Guidelines for Inorganic Data Review (ISM02.2).
3. Field data is reviewed to ensure that they are complete; that sample collection information is thoroughly documented; and that any deviations from the QAPP are noted.
4. Actual sampling locations is documented in the inspection logbook. Locations were determined using GPS instrumentation, linear measurements, and/or photographic references.
5. Sample handling procedures are documented on chain of custody forms.

Any deviations from the QAPP are to be reported in the field logs. The Lead Inspector/Project Manager will verify the contents of these logs. If the data fails to meet the criteria they will be flagged as estimated. Any flagged data will be discussed with management to determine if the data point will be rejected and re-sampling done.

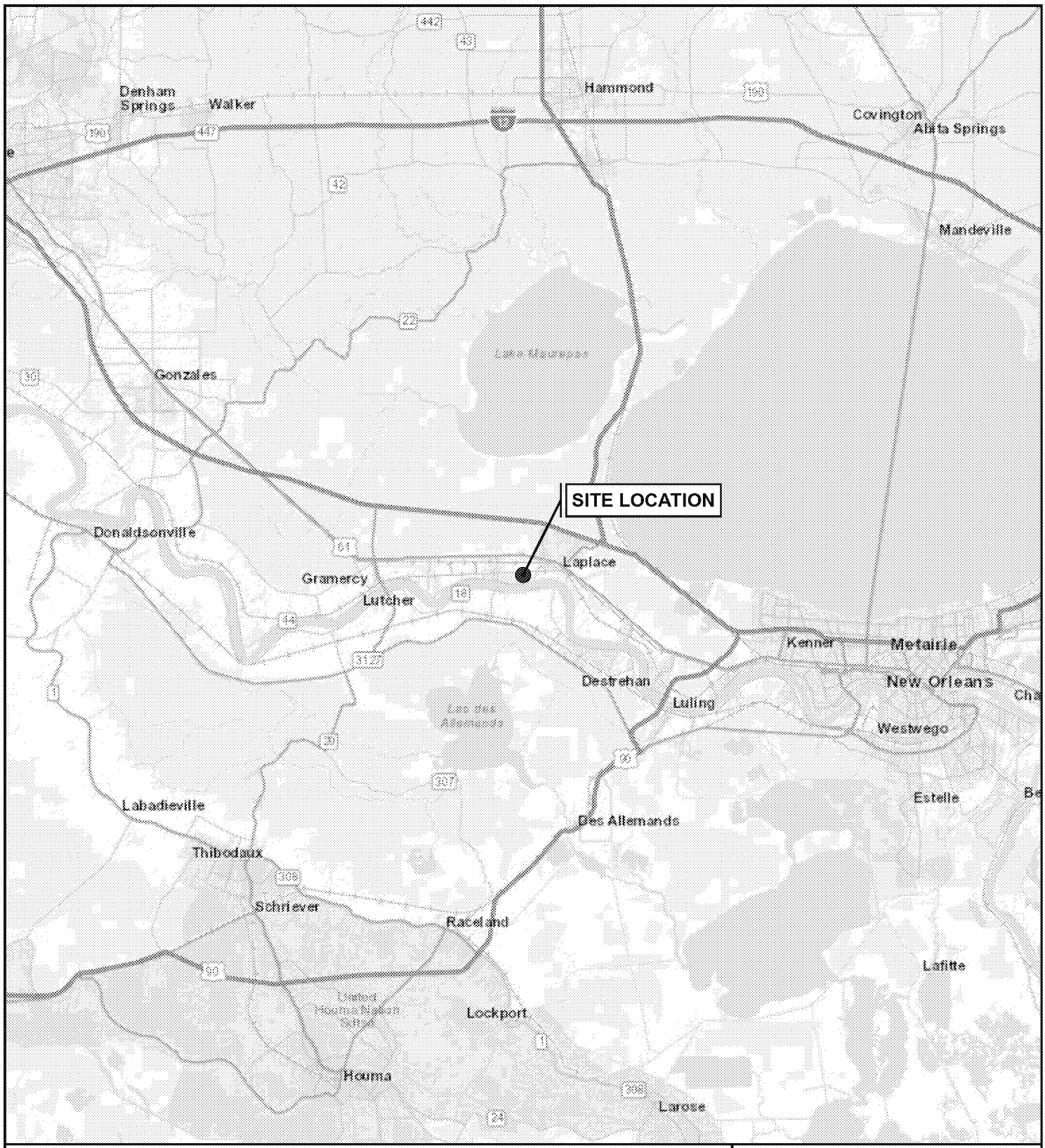
D.2 Verification and Validation Methods

Field data will be validated by the Lead Inspector/Project Manager, and any problems identified during this project will be documented in the field logs. The laboratory supervisor will validate laboratory data according to methods established in their QA Plan.
The Lead Inspector/Project Manager will review and verify field logs and analytical data reports. Any problems or deviations identified will be discussed with the project team and the first-line supervisor to determine corrective action measures.

D.3 Reconciliation with User Requirements

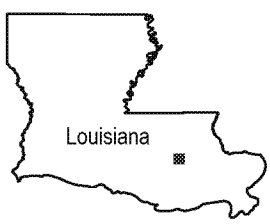
The designated laboratory will provide a final laboratory report along with the supporting electronic data in a usable spreadsheet format. All laboratory bench sheets and equipment calibrations will be maintained by the designated laboratory and will be available upon request. The data will be used to support any future enforcement actions or litigation.

APPENDIX A: FACILITY MAP



LEGEND

- SITE LOCATION



N

0 10 20

SCALE IN MILES

SOURCE: WORLD STREET MAPS; ESRI
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT A

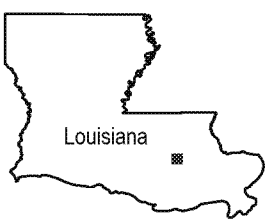
SITE LOCATION MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\pro\RCRA Denka Support\RCRA Denka Support.aprx 4:41 PM 4/28/2022 covasj

LEGEND

● SITE LOCATION



N

0 4,000 8,000

SCALE IN FEET

SOURCE: NATIONAL GEOGRAPHIC TOPO; ESRI
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT B

SITE AREA MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\pro\RCRA Denka Support\RCRA Denka Support.aprx 4:51 PM 4/28/2022 covasj

LEGEND

- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLY BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER

N

0 40 80

SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY, 2022
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT C
SITE LAYOUT MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\meaabgs1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\prot\RCRA Denka Support\RCRA Denka Support.aprx 4:47 PM 4/28/2022 cervasq

ATTACHMENT F

Air Analytical Results Table

Attachment F
Summary of Air Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-A-BD	DR-A-BK	DR-A-BU	DR-A-KD	DR-A-KD	DR-A-KP	DR-A-KT	DR-A-PU
			Sample ID	DR-A-BD-05052022-01	DR-A-BK-05052022-01	DR-A-BU-05052022-01	DR-A-KD-05052022-02 D2	DR-A-KD-050522-01 D1	DR-A-KP-05052022-01	DR-A-KT-05052022-01	DR-A-PU-05052022-01
			Date	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FS	FD	FS	FS	FS	FS
TO-15											
1,1,1-Trichloroethane	71-55-6	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	79-34-5	ug/m3	--	9.56 U	16.2 U	11.9 U	8.53 U	7.43 U	9.22 U	6.47 U	10.6 U
1,1,2-Trichloroethane	79-00-5	ug/m3	--	ND	6.4 U	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	75-34-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene	75-35-4	ug/m3	--	ND	ND	ND	ND	ND	4.89 U	ND	ND
1,2,4-Trichlorobenzene	120-82-1	ug/m3	--	66.4 U	120 U	89.2 U	45.7 U	51.2 U	55.8 U	41.9 U	132 U
1,2,4-Trimethylbenzene	95-63-6	ug/m3	--	18.3 U	31.7 U	27.6 U	ND	ND	ND	ND	26.3 U
1,2-Dibromoethane	106-93-4	ug/m3	--	ND	12.5 U	10.4 U	ND	ND	ND	ND	6.89 U
1,2-Dichloroethane	107-06-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloropropane	78-87-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	108-67-8	ug/m3	--	7 U	13.7 U	9.46 U	4.93 U	5.76 U	6.31 U	5.91 U	9.36 U
1,3-Butadiene	106-99-0	ug/m3	--	ND	ND	15.7 U	10.9 U	9.91 U	18.2 U	16.6 U	15.4 U
Acetonitrile	75-05-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Acetylene	74-86-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Acrolein	107-02-8	ug/m3	--	59 U	85.2 U	49.6 U	186 U	172 U	120 U	157 U	133 U
Acrylonitrile	107-13-1	ug/m3	--	ND	6.55 U	4.46 U	ND	ND	ND	ND	ND
Benzene	71-43-2	ug/m3	--	23.5 U	22.2 U	25.3 U	24.8 U	25.9 U	24.9 U	27.9 U	20.8 U
Bromochloromethane	74-97-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	75-27-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	75-25-2	ug/m3	--	8.66 U	15.6 U	12 U	8.03 U	6.85 U	6.86 U	6.23 U	10.7 U
Bromomethane	74-83-9	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	75-15-0	ug/m3	--	ND	ND	22.4 U	ND	18.5 U	ND	15 U	8.99 U
Carbon Tetrachloride	56-23-5	ug/m3	--	ND	ND	ND	ND	ND	2.28 U	ND	ND
Chlorobenzene	108-90-7	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	75-00-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	67-66-3	ug/m3	--	ND	4.33 U	4.89 U	5.24 U	4.82 U	17.9 U	25.7 U	3.65 U
Chloromethane	74-87-3	ug/m3	--	15.8 U	13 U	17.5 U	19 U	15 U	14.3 U	17.7 U	15.6 U
Chloroprene	126-99-8	ug/m3	--	**969 D**	**1050 D**	**10200 D**	**18400 D**	**19000 D**	**193000 D**	**243000 D**	**4390 D**
cis-1,2-Dichloroethylene	156-59-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	10061-01-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	124-48-1	ug/m3	--	ND	7.98 U	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	75-71-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Dichloromethane	75-09-2	ug/m3	--	ND	4.39 U	ND	ND	ND	4.49 U	ND	ND
Dichlorotetrafluoroethane	76-14-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Ethyl Acrylate	140-88-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND

Attachment F
Summary of Air Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-A-BD	DR-A-BK	DR-A-BU	DR-A-KD	DR-A-KD	DR-A-KP	DR-A-KT	DR-A-PU
			Sample ID	DR-A-BD-05052022-01	DR-A-BK-05052022-01	DR-A-BU-05052022-01	DR-A-KD-05052022-02 D2	DR-A-KD-050522-01 D1	DR-A-KP-05052022-01	DR-A-KT-05052022-01	DR-A-PU-05052022-01
			Date	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FS	FD	FS	FS	FS	FS
Ethyl tert-Butyl Ether	637-92-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	100-41-4	ug/m3	--	4.11 U	7.75 U	5.4 U	5.48 U	4.92 U	4.44 U	3.79 U	4.74 U
Ethylene oxide	75-21-8	ug/m3	--	12.7 U	ND	ND	ND	ND	ND	ND	ND
Hexachloro-1,3-butadiene	87-68-3	ug/m3	--	101 U	187 U	128 U	64.5 U	66.3 U	91.5 U	61.2 U	277 U
m,p-Xylene	108-38-3, 106-42-3	ug/m3	--	ND	16.9 U	12.9 U	10.5 U	10.1 U	9.79 U	7.83 U	11 U
m-Dichlorobenzene	541-73-1	ug/m3	--	12.4 U	27.1 U	18.9 U	9.34 U	10 U	10.1 U	9.4 U	17.8 U
Methyl Isobutyl Ketone	108-10-1	ug/m3	--	22.3 U	20.7 U	18.5 U	17.5 U	14 U	13.8 U	21.2 U	18.1 U
Methyl Methacrylate	80-62-6	ug/m3	--	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	ND
Methyl tert-Butyl Ether	1634-04-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
n-Octane	111-65-9	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
o-Dichlorobenzene	95-50-1	ug/m3	--	16.4 U	33.5 U	29.3 U	11.4 U	13 U	13.1 U	14.1 U	26.6 U
o-Xylene	95-47-6	ug/m3	--	4.66 U	8.57 U	6.57 U	4.92 U	4.19 U	4.53 U	3.79 U	5.92 U
p-Dichlorobenzene	106-46-7	ug/m3	--	14.1 U	29.2 U	20.2 U	10.1 U	11.3 U	10.5 U	10.5 U	19.5 U
Propylene	115-07-1	ug/m3	--	71.9 U	63.8 U	65.9 U	69.2 U	68.3 U	65.2 U	73.6 U	62.3 U
Styrene	100-42-5	ug/m3	--	5.59 U	9.69 U	7.6 U	4.48 U	4.87 U	4.31 U	4.31 U	7 U
tert-Amyl Methyl Ether	994-05-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethylene	127-18-4	ug/m3	--	ND	6.62 U	5.93 U	ND	ND	ND	ND	ND
Toluene	108-88-3	ug/m3	--	**217 D**	**4720 D**	**914 D**	**9890 D**	**10300 D**	**10500 D**	**5820 D**	**774 D**
trans-1,2-Dichloroethylene	156-60-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	10061-02-6	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethylene	79-01-6	ug/m3	--	24.8 U	21.9 U	24.4 U	24.7 U	25 U	ND	ND	24.1 U
Trichlorofluoromethane	75-69-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Trichlorotrifluoroethane	76-13-1	ug/m3	--	ND	19.4 U	21 U	21.7 U	18.3 U	19.8 U	18.2 U	19.7 U
Vinyl chloride	75-01-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
ug/m3 = micrograms per cubic meter
ND = Indicates the compound was analyzed for, but not detected
U = Under detection Limit
D = Resullt obtained by dilution
BOLD = analyte was detected

ATTACHMENT G

Air Analytical Results – Laboratory Deliverable

Eastern Research Group
601 Keystone Park Drive
Suite 700
Morrisville, NC 27560

June 07, 2022

Shaun Burke
OECA
2890 Woodbridge Avenue
Edison, NJ 08837
Project Name: Denka

Dear Shaun Burke,

This report contains the analytical results for the sample(s) received under chain(s) of custody by Eastern Research Group on 05/09/22 10:03.

Values below the MDL for QC results in this report are recorded as ND, however the actual values are reported in the accompanying Excel report with a "U" flag (Under the detection limit). The actual values are reported in AQS.

This test is accredited under the 2016 TNI Standard for Environmental Laboratories (FL DOH Certification # E87673). All analyses were performed as described in the US EPA-approved QAPP, under the contract for UATMP, NATTS, CSATAM, PAMS and NMOC support (US EPA Contract No. EP-D-14-030). This cover page is an integral part of this report, and any exceptions or comments are noted on the last page.

Release of the data contained in this data package and in the data submitted in the electronic data deliverable, has been authorized by the Program Manager, or the Program Manager's designee as verified by the following signature.

The issuance of the final Certificate of Analysis takes precedence over any previous Report. If you have any questions, please contact me at 919-468-7872.

Sincerely,

Randolph Bower
TO-15 Task Lead
randy.bower@erg.com

The information contained in this report and its attachment(s) are intended only for the use of the individual to whom it is addressed and may contain information that is privileged, confidential, or exempt from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this report is strictly prohibited. If you have received this report in error, please notify randy.bower@erg.com and delete the report without retaining any copies.

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

ANALYTICAL REPORT FOR SAMPLES

SampleName	LabNumber	Matrix	Sampled	Received
DR-A-KT-05052022-01	2050917-01	Air	05/05/22 17:06	05/09/22 10:03
DR-A-KD-050522-01 D1	2050917-02	Air	05/05/22 17:05	05/09/22 10:03
DR-A-BK-05052022-01	2050917-03	Air	05/05/22 16:05	05/09/22 10:03
DR-A-KP-05052022-01	2050917-04	Air	05/05/22 17:04	05/09/22 10:03
DR-A-KD-05052022-02 D2	2050917-05	Air	05/05/22 17:05	05/09/22 10:03
DR-A-BU-05052022-01	2050917-06	Air	05/05/22 16:31	05/09/22 10:03
DR-A-PU-05052022-01	2050917-07	Air	05/05/22 17:03	05/09/22 10:03
DR-A-BD-05052022-01	2050917-08	Air	05/05/22 16:31	05/09/22 10:03

The results in this report apply only to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KT-05052022-01 **Lab ID:** 2050917-01 **Sampled:** 05/05/22 17:06
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT070 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/14/22 01:03

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	138
Propylene	42.7	73.60	U	43.3
Dichlorodifluoromethane	ND	ND	U	17.1
Chloromethane	8.53	17.70	U	35.8
Dichlorotetrafluoroethane	ND	ND	U	10.4
Vinyl chloride	ND	ND	U	9.88
1,3-Butadiene	7.48	16.60	U	26.0
Ethylene oxide	ND	ND	U	60.3
Bromomethane	ND	ND	U	25.7
Chloroethane	ND	ND	U	20.6
Acetonitrile	ND	ND	U	173
Acrolein	68.4	157.00	U	222
Trichlorofluoromethane	ND	ND	U	29.5
Acrylonitrile	ND	ND	U	21.1
1,1-Dichloroethene	ND	ND	U	14.4
Dichloromethane	ND	ND	U	249
Carbon Disulfide	4.81	15.00	U	17.8
Trichlorotrifluoroethane	2.37	18.20	U	11.4
trans-1,2-Dichloroethylene	ND	ND	U	10.9
1,1-Dichloroethane	ND	ND	U	9.85
Methyl tert-Butyl Ether	ND	ND	U	8.43
Chloroprene	**66900**	**243,000.00**	D	**702**
cis-1,2-Dichloroethylene	ND	ND	U	28.6
Bromochloromethane	ND	ND	U	9.51
Chloroform	5.25	25.70	U	9.56
Ethyl tert-Butyl Ether	ND	ND	U	8.53
1,2-Dichloroethane	ND	ND	U	8.93
1,1,1-Trichloroethane	ND	ND	U	14.9
Benzene	8.71	27.90	U	12.9
Carbon Tetrachloride	ND	ND	U	14.1
tert-Amyl Methyl Ether	ND	ND	U	10.5
1,2-Dichloropropane	ND	ND	U	11.4
Ethyl Acrylate	ND	ND	U	16.6
Bromodichloromethane	ND	ND	U	31.9
Trichloroethylene	ND	ND	U	15.4
Methyl Methacrylate	ND	ND	CE, U	83.8
cis-1,3-Dichloropropene	ND	ND	U	8.78
Methyl Isobutyl Ketone	5.16	21.20	U	38.7
trans-1,3-Dichloropropene	ND	ND	U	12.4
1,1,2-Trichloroethane	ND	ND	U	11.8

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KT-05052022-01 **Lab ID:** 2050917-01 **Sampled:** 05/05/22 17:06
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT070 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/14/22 01:03

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**1540**	**5,820.00**	D	**49.4**
Dibromochloromethane	ND	ND	U	11.0
1,2-Dibromoethane	ND	ND	U	13.8
n-Octane	ND	ND	U	18.1
Tetrachloroethylene	ND	ND	U	36.0
Chlorobenzene	ND	ND	U	13.1
Ethylbenzene	0.870	3.79	U	14.1
m,p-Xylene	1.80	7.83	U	40.2
Bromoform	0.601	6.23	U	13.7
Styrene	1.01	4.31	U	14.8
1,1,2,2-Tetrachloroethane	0.941	6.47	U	11.9
o-Xylene	0.870	3.79	U	19.3
1,3,5-Trimethylbenzene	1.20	5.91	U	18.6
1,2,4-Trimethylbenzene	ND	ND	U	14.3
m-Dichlorobenzene	1.56	9.40	U	20.3
p-Dichlorobenzene	1.74	10.50	U	21.2
o-Dichlorobenzene	2.34	14.10	U	23.5
1,2,4-Trichlorobenzene	5.63	41.90	U	78.2
Hexachloro-1,3-butadiene	5.73	61.20	U	92.4

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SUBMITTED: 05/09/22
AQS SITE CODE:
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Description: DR-A-KD-050522-01 D1 **Lab ID:** 2050917-02 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT094 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 22:57

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	138
Propylene	39.6	68.30	U	43.2
Dichlorodifluoromethane	ND	ND	U	17.0
Chloromethane	7.23	15.00	U	35.7
Dichlorotetrafluoroethane	ND	ND	U	10.3
Vinyl chloride	ND	ND	U	9.85
1,3-Butadiene	4.47	9.91	U	25.9
Ethylene oxide	ND	ND	U	60.0
Bromomethane	ND	ND	U	25.6
Chloroethane	ND	ND	U	20.5
Acetonitrile	ND	ND	U	173
Acrolein	75.0	172.00	U	221
Trichlorofluoromethane	ND	ND	U	29.4
Acrylonitrile	ND	ND	U	21.0
1,1-Dichloroethene	ND	ND	U	14.4
Dichloromethane	ND	ND	U	248
Carbon Disulfide	5.94	18.50	U	17.8
Trichlorotrifluoroethane	2.38	18.30	U	11.4
trans-1,2-Dichloroethylene	ND	ND	U	10.8
1,1-Dichloroethane	ND	ND	U	9.81
Methyl tert-Butyl Ether	ND	ND	U	8.39
Chloroprene	**5240**	**19,000.00**	D	**26.6**
cis-1,2-Dichloroethylene	ND	ND	U	28.5
Bromochloromethane	ND	ND	U	9.47
Chloroform	0.986	4.82	U	9.52
Ethyl tert-Butyl Ether	ND	ND	U	8.49
1,2-Dichloroethane	ND	ND	U	8.89
1,1,1-Trichloroethane	ND	ND	U	14.9
Benzene	8.09	25.90	U	12.9
Carbon Tetrachloride	ND	ND	U	14.0
tert-Amyl Methyl Ether	ND	ND	U	10.4
1,2-Dichloropropane	ND	ND	U	11.3
Ethyl Acrylate	ND	ND	U	16.5
Bromodichloromethane	ND	ND	U	31.8
Trichloroethylene	4.64	25.00	U	15.4
Methyl Methacrylate	ND	ND	CE, U	83.4
cis-1,3-Dichloropropene	ND	ND	U	8.74
Methyl Isobutyl Ketone	3.42	14.00	U	38.5
trans-1,3-Dichloropropene	ND	ND	U	12.3
1,1,2-Trichloroethane	ND	ND	U	11.8

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AQS SITE CODE:
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Description: DR-A-KD-050522-01 D1 **Lab ID:** 2050917-02 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT094 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 22:57

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2720**	**10,300.00**	D	**49.2**
Dibromochloromethane	ND	ND	U	10.9
1,2-Dibromoethane	ND	ND	U	13.8
n-Octane	ND	ND	U	18.0
Tetrachloroethylene	ND	ND	U	35.9
Chlorobenzene	ND	ND	U	13.0
Ethylbenzene	1.13	4.92	U	14.0
m,p-Xylene	2.32	10.10	U	40.0
Bromoform	0.661	6.85	U	13.6
Styrene	1.14	4.87	U	14.8
1,1,2,2-Tetrachloroethane	1.08	7.43	U	11.8
o-Xylene	0.964	4.19	U	19.3
1,3,5-Trimethylbenzene	1.17	5.76	U	18.5
1,2,4-Trimethylbenzene	ND	ND	U	14.3
m-Dichlorobenzene	1.66	10.00	U	20.3
p-Dichlorobenzene	1.87	11.30	U	21.1
o-Dichlorobenzene	2.15	13.00	U	23.4
1,2,4-Trichlorobenzene	6.89	51.20	U	77.9
Hexachloro-1,3-butadiene	6.20	66.30	U	92.1

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SUBMITTED: 05/09/22
AQS SITE CODE:
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Description: DR-A-BK-05052022-01 **Lab ID:** 2050917-03 **Sampled:** 05/05/22 16:05
Pressure @ Receipt: 4.50 "Hg **Canister #:** 5015 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 15:37

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	121
Propylene	37.0	63.80	U	38.1
Dichlorodifluoromethane	ND	ND	U	15.0
Chloromethane	6.29	13.00	U	31.4
Dichlorotetrafluoroethane	ND	ND	U	9.12
Vinyl chloride	ND	ND	U	8.68
1,3-Butadiene	ND	ND	U	22.8
Ethylene oxide	ND	ND	U	52.9
Bromomethane	ND	ND	U	22.6
Chloroethane	ND	ND	U	18.1
Acetonitrile	ND	ND	U	152
Acrolein	37.1	85.20	U	195
Trichlorofluoromethane	ND	ND	U	25.9
Acrylonitrile	3.01	6.55	U	18.5
1,1-Dichloroethene	ND	ND	U	12.7
Dichloromethane	1.26	4.39	U	218
Carbon Disulfide	ND	ND	U	15.7
Trichlorotrifluoroethane	2.52	19.40	U	10.0
trans-1,2-Dichloroethylene	ND	ND	U	9.55
1,1-Dichloroethane	ND	ND	U	8.65
Methyl tert-Butyl Ether	ND	ND	U	7.40
Chloroprene	**290**	**1,050.00**	D	**23.5**
cis-1,2-Dichloroethylene	ND	ND	U	25.1
Bromochloromethane	ND	ND	U	8.35
Chloroform	0.884	4.33	U	8.39
Ethyl tert-Butyl Ether	ND	ND	U	7.49
1,2-Dichloroethane	ND	ND	U	7.84
1,1,1-Trichloroethane	ND	ND	U	13.1
Benzene	6.95	22.20	U	11.4
Carbon Tetrachloride	ND	ND	U	12.4
tert-Amyl Methyl Ether	ND	ND	U	9.21
1,2-Dichloropropane	ND	ND	U	9.99
Ethyl Acrylate	ND	ND	U	14.6
Bromodichloromethane	ND	ND	U	28.0
Trichloroethylene	4.06	21.90	U	13.6
Methyl Methacrylate	ND	ND	CE, U	73.6
cis-1,3-Dichloropropene	ND	ND	U	7.71
Methyl Isobutyl Ketone	5.05	20.70	U	34.0
trans-1,3-Dichloropropene	ND	ND	U	10.9
1,1,2-Trichloroethane	1.17	6.40	U	10.4

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BK-05052022-01 **Lab ID:** 2050917-03 **Sampled:** 05/05/22 16:05
Pressure @ Receipt: 4.50 "Hg **Canister #:** 5015 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 15:37

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**1250**	**4,720.00**	D	**43.3**
Dibromochloromethane	0.935	7.98	U	9.63
1,2-Dibromoethane	1.63	12.50	U	12.1
n-Octane	ND	ND	U	15.9
Tetrachloroethylene	0.974	6.62	U	31.7
Chlorobenzene	ND	ND	U	11.5
Ethylbenzene	1.78	7.75	U	12.4
m,p-Xylene	3.89	16.90	U	35.3
Bromoform	1.51	15.60	U	12.0
Styrene	2.27	9.69	U	13.0
1,1,2,2-Tetrachloroethane	2.36	16.20	U	10.4
o-Xylene	1.97	8.57	U	17.0
1,3,5-Trimethylbenzene	2.79	13.70	U	16.3
1,2,4-Trimethylbenzene	6.43	31.70	U	12.6
m-Dichlorobenzene	4.50	27.10	U	17.9
p-Dichlorobenzene	4.84	29.20	U	18.6
o-Dichlorobenzene	5.56	33.50	U	20.6
1,2,4-Trichlorobenzene	16.1	120.00	U	68.7
Hexachloro-1,3-butadiene	17.5	187.00	U	81.2

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
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AQS SITE CODE:
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Description: DR-A-KP-05052022-01 **Lab ID:** 2050917-04 **Sampled:** 05/05/22 17:04
Pressure @ Receipt: 5.50 "Hg **Canister #:** 5040 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 19:48

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	133
Propylene	37.8	65.20	U	41.6
Dichlorodifluoromethane	ND	ND	U	16.4
Chloromethane	6.89	14.30	U	34.3
Dichlorotetrafluoroethane	ND	ND	U	9.97
Vinyl chloride	ND	ND	U	9.48
1,3-Butadiene	8.19	18.20	U	24.9
Ethylene oxide	ND	ND	U	57.8
Bromomethane	ND	ND	U	24.7
Chloroethane	ND	ND	U	19.8
Acetonitrile	ND	ND	U	166
Acrolein	52.4	120.00	U	213
Trichlorofluoromethane	ND	ND	U	28.3
Acrylonitrile	ND	ND	U	20.2
1,1-Dichloroethene	1.23	4.89	U	13.9
Dichloromethane	1.29	4.49	U	239
Carbon Disulfide	ND	ND	U	17.1
Trichlorotrifluoroethane	2.58	19.80	U	11.0
trans-1,2-Dichloroethylene	ND	ND	U	10.4
1,1-Dichloroethane	ND	ND	U	9.45
Methyl tert-Butyl Ether	ND	ND	U	8.09
Chloroprene	**53100**	**193,000.00**	D	**128**
cis-1,2-Dichloroethylene	ND	ND	U	27.5
Bromochloromethane	ND	ND	U	9.12
Chloroform	3.66	17.90	U	9.17
Ethyl tert-Butyl Ether	ND	ND	U	8.18
1,2-Dichloroethane	ND	ND	U	8.57
1,1,1-Trichloroethane	ND	ND	U	14.3
Benzene	7.77	24.90	U	12.4
Carbon Tetrachloride	0.362	2.28	U	13.5
tert-Amyl Methyl Ether	ND	ND	U	10.1
1,2-Dichloropropane	ND	ND	U	10.9
Ethyl Acrylate	ND	ND	U	15.9
Bromodichloromethane	ND	ND	U	30.6
Trichloroethylene	ND	ND	U	14.8
Methyl Methacrylate	ND	ND	CE, U	80.4
cis-1,3-Dichloropropene	ND	ND	U	8.42
Methyl Isobutyl Ketone	3.37	13.80	U	37.1
trans-1,3-Dichloropropene	ND	ND	U	11.9
1,1,2-Trichloroethane	ND	ND	U	11.4

CERTIFICATE OF ANALYSIS

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KP-05052022-01 **Lab ID:** 2050917-04 **Sampled:** 05/05/22 17:04
Pressure @ Receipt: 5.50 "Hg **Canister #:** 5040 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 19:48

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2780**	**10,500.00**	D	**47.4**
Dibromochloromethane	ND	ND	U	10.5
1,2-Dibromoethane	ND	ND	U	13.3
n-Octane	ND	ND	U	17.4
Tetrachloroethylene	ND	ND	U	34.6
Chlorobenzene	ND	ND	U	12.5
Ethylbenzene	1.02	4.44	U	13.5
m,p-Xylene	2.25	9.79	U	38.6
Bromoform	0.662	6.86	U	13.1
Styrene	1.01	4.31	U	14.2
1,1,2,2-Tetrachloroethane	1.34	9.22	U	11.4
o-Xylene	1.04	4.53	U	18.6
1,3,5-Trimethylbenzene	1.28	6.31	U	17.8
1,2,4-Trimethylbenzene	ND	ND	U	13.7
m-Dichlorobenzene	1.68	10.10	U	19.5
p-Dichlorobenzene	1.74	10.50	U	20.4
o-Dichlorobenzene	2.17	13.10	U	22.5
1,2,4-Trichlorobenzene	7.51	55.80	U	75.1
Hexachloro-1,3-butadiene	8.56	91.50	U	88.7

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AQS SITE CODE:
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Description: DR-A-KD-05052022-02 D2 **Lab ID:** 2050917-05 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 7.50 "Hg **Canister #:** 5025 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 20:51

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	144
Propylene	40.1	69.20	U	45.0
Dichlorodifluoromethane	ND	ND	U	17.7
Chloromethane	9.19	19.00	U	37.2
Dichlorotetrafluoroethane	ND	ND	U	10.8
Vinyl chloride	ND	ND	U	10.3
1,3-Butadiene	4.90	10.90	U	27.0
Ethylene oxide	ND	ND	U	62.6
Bromomethane	ND	ND	U	26.8
Chloroethane	ND	ND	U	21.4
Acetonitrile	ND	ND	U	180
Acrolein	80.8	186.00	U	231
Trichlorofluoromethane	ND	ND	U	30.7
Acrylonitrile	ND	ND	U	21.9
1,1-Dichloroethene	ND	ND	U	15.0
Dichloromethane	ND	ND	U	258
Carbon Disulfide	ND	ND	U	18.5
Trichlorotrifluoroethane	2.83	21.70	U	11.9
trans-1,2-Dichloroethylene	ND	ND	U	11.3
1,1-Dichloroethane	ND	ND	U	10.2
Methyl tert-Butyl Ether	ND	ND	U	8.76
Chloroprene	**5070**	**18,400.00**	D	**27.8**
cis-1,2-Dichloroethylene	ND	ND	U	29.8
Bromochloromethane	ND	ND	U	9.88
Chloroform	1.07	5.24	U	9.93
Ethyl tert-Butyl Ether	ND	ND	U	8.86
1,2-Dichloroethane	ND	ND	U	9.28
1,1,1-Trichloroethane	ND	ND	U	15.5
Benzene	7.76	24.80	U	13.4
Carbon Tetrachloride	ND	ND	U	14.6
tert-Amyl Methyl Ether	ND	ND	U	10.9
1,2-Dichloropropane	ND	ND	U	11.8
Ethyl Acrylate	ND	ND	U	17.2
Bromodichloromethane	ND	ND	U	33.1
Trichloroethylene	4.58	24.70	U	16.1
Methyl Methacrylate	ND	ND	CE, U	87.0
cis-1,3-Dichloropropene	ND	ND	U	9.12
Methyl Isobutyl Ketone	4.27	17.50	U	40.2
trans-1,3-Dichloropropene	ND	ND	U	12.9
1,1,2-Trichloroethane	ND	ND	U	12.3

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AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KD-05052022-02 D2 **Lab ID:** 2050917-05 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 7.50 "Hg **Canister #:** 5025 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 20:51

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2620**	**9,890.00**	D	**51.3**
Dibromochloromethane	ND	ND	U	11.4
1,2-Dibromoethane	ND	ND	U	14.4
n-Octane	ND	ND	U	18.8
Tetrachloroethylene	ND	ND	U	37.5
Chlorobenzene	ND	ND	U	13.6
Ethylbenzene	1.26	5.48	U	14.6
m,p-Xylene	2.41	10.50	U	41.8
Bromoform	0.775	8.03	U	14.2
Styrene	1.05	4.48	U	15.4
1,1,2,2-Tetrachloroethane	1.24	8.53	U	12.3
o-Xylene	1.13	4.92	U	20.1
1,3,5-Trimethylbenzene	1.00	4.93	U	19.3
1,2,4-Trimethylbenzene	ND	ND	U	14.9
m-Dichlorobenzene	1.55	9.34	U	21.1
p-Dichlorobenzene	1.68	10.10	U	22.1
o-Dichlorobenzene	1.90	11.40	U	24.4
1,2,4-Trichlorobenzene	6.15	45.70	U	81.3
Hexachloro-1,3-butadiene	6.04	64.50	U	96.0

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BU-05052022-01 **Lab ID:** 2050917-06 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT120 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 16:40

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	139
Propylene	38.2	65.90	U	43.7
Dichlorodifluoromethane	ND	ND	U	17.2
Chloromethane	8.48	17.50	U	36.1
Dichlorotetrafluoroethane	ND	ND	U	10.5
Vinyl chloride	ND	ND	U	9.97
1,3-Butadiene	7.08	15.70	U	26.2
Ethylene oxide	ND	ND	U	60.8
Bromomethane	ND	ND	U	26.0
Chloroethane	ND	ND	U	20.8
Acetonitrile	ND	ND	U	175
Acrolein	21.6	49.60	U	224
Trichlorofluoromethane	ND	ND	U	29.8
Acrylonitrile	2.05	4.46	U	21.3
1,1-Dichloroethene	ND	ND	U	14.6
Dichloromethane	ND	ND	U	251
Carbon Disulfide	7.17	22.40	U	18.0
Trichlorotrifluoroethane	2.73	21.00	U	11.5
trans-1,2-Dichloroethylene	ND	ND	U	11.0
1,1-Dichloroethane	ND	ND	U	9.93
Methyl tert-Butyl Ether	ND	ND	U	8.50
Chloroprene	**2820**	**10,200.00**	D	**27.0**
cis-1,2-Dichloroethylene	ND	ND	U	28.9
Bromochloromethane	ND	ND	U	9.59
Chloroform	1.00	4.89	U	9.64
Ethyl tert-Butyl Ether	ND	ND	U	8.60
1,2-Dichloroethane	ND	ND	U	9.01
1,1,1-Trichloroethane	ND	ND	U	15.1
Benzene	7.89	25.30	U	13.1
Carbon Tetrachloride	ND	ND	U	14.2
tert-Amyl Methyl Ether	ND	ND	U	10.6
1,2-Dichloropropane	ND	ND	U	11.5
Ethyl Acrylate	ND	ND	U	16.7
Bromodichloromethane	ND	ND	U	32.2
Trichloroethylene	4.54	24.40	U	15.6
Methyl Methacrylate	ND	ND	CE, U	84.5
cis-1,3-Dichloropropene	ND	ND	U	8.86
Methyl Isobutyl Ketone	4.50	18.50	U	39.0
trans-1,3-Dichloropropene	ND	ND	U	12.5
1,1,2-Trichloroethane	ND	ND	U	11.9

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BU-05052022-01 **Lab ID:** 2050917-06 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT120 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 16:40

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**242**	**914.00**	D	**49.8**
Dibromochloromethane	ND	ND	U	11.1
1,2-Dibromoethane	1.35	10.40	U	13.9
n-Octane	ND	ND	U	18.2
Tetrachloroethylene	0.873	5.93	U	36.4
Chlorobenzene	ND	ND	U	13.2
Ethylbenzene	1.24	5.40	U	14.2
m,p-Xylene	2.97	12.90	U	40.5
Bromoform	1.16	12.00	U	13.8
Styrene	1.78	7.60	U	15.0
1,1,2,2-Tetrachloroethane	1.73	11.90	U	12.0
o-Xylene	1.51	6.57	U	19.5
1,3,5-Trimethylbenzene	1.92	9.46	U	18.8
1,2,4-Trimethylbenzene	5.61	27.60	U	14.4
m-Dichlorobenzene	3.14	18.90	U	20.5
p-Dichlorobenzene	3.35	20.20	U	21.4
o-Dichlorobenzene	4.86	29.30	U	23.7
1,2,4-Trichlorobenzene	12.0	89.20	U	78.9
Hexachloro-1,3-butadiene	12.0	128.00	U	93.3

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SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-PU-05052022-01 **Lab ID:** 2050917-07 **Sampled:** 05/05/22 17:03
Pressure @ Receipt: 5.50 "Hg **Canister #:** SAT003 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 17:42

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	135
Propylene	36.1	62.30	U	42.4
Dichlorodifluoromethane	ND	ND	U	16.7
Chloromethane	7.52	15.60	U	35.1
Dichlorotetrafluoroethane	ND	ND	U	10.2
Vinyl chloride	ND	ND	U	9.68
1,3-Butadiene	6.94	15.40	U	25.5
Ethylene oxide	ND	ND	U	59.0
Bromomethane	ND	ND	U	25.2
Chloroethane	ND	ND	U	20.2
Acetonitrile	ND	ND	U	170
Acrolein	57.9	133.00	U	218
Trichlorofluoromethane	ND	ND	U	28.9
Acrylonitrile	ND	ND	U	20.7
1,1-Dichloroethene	ND	ND	U	14.1
Dichloromethane	ND	ND	U	244
Carbon Disulfide	2.88	8.99	U	17.5
Trichlorotrifluoroethane	2.56	19.70	U	11.2
trans-1,2-Dichloroethylene	ND	ND	U	10.7
1,1-Dichloroethane	ND	ND	U	9.64
Methyl tert-Butyl Ether	ND	ND	U	8.25
Chloroprene	**1210**	**4,390.00**	D	**26.2**
cis-1,2-Dichloroethylene	ND	ND	U	28.0
Bromochloromethane	ND	ND	U	9.31
Chloroform	0.747	3.65	U	9.36
Ethyl tert-Butyl Ether	ND	ND	U	8.35
1,2-Dichloroethane	ND	ND	U	8.75
1,1,1-Trichloroethane	ND	ND	U	14.6
Benzene	6.49	20.80	U	12.7
Carbon Tetrachloride	ND	ND	U	13.8
tert-Amyl Methyl Ether	ND	ND	U	10.3
1,2-Dichloropropane	ND	ND	U	11.1
Ethyl Acrylate	ND	ND	U	16.2
Bromodichloromethane	ND	ND	U	31.2
Trichloroethylene	4.48	24.10	U	15.1
Methyl Methacrylate	ND	ND	U	82.0
cis-1,3-Dichloropropene	ND	ND	U	8.60
Methyl Isobutyl Ketone	4.42	18.10	U	37.9
trans-1,3-Dichloropropene	ND	ND	U	12.1
1,1,2-Trichloroethane	ND	ND	U	11.6

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REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-PU-05052022-01 **Lab ID:** 2050917-07 **Sampled:** 05/05/22 17:03
Pressure @ Receipt: 5.50 "Hg **Canister #:** SAT003 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 17:42

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**205**	**774.00**	D	**48.3**
Dibromochloromethane	ND	ND	U	10.7
1,2-Dibromoethane	0.895	6.89	U	13.5
n-Octane	ND	ND	U	17.7
Tetrachloroethylene	ND	ND	U	35.3
Chlorobenzene	ND	ND	U	12.8
Ethylbenzene	1.09	4.74	U	13.8
m,p-Xylene	2.53	11.00	U	39.4
Bromoform	1.03	10.70	U	13.4
Styrene	1.64	7.00	U	14.5
1,1,2,2-Tetrachloroethane	1.54	10.60	U	11.6
o-Xylene	1.36	5.92	U	18.9
1,3,5-Trimethylbenzene	1.90	9.36	U	18.2
1,2,4-Trimethylbenzene	5.33	26.30	U	14.0
m-Dichlorobenzene	2.95	17.80	U	19.9
p-Dichlorobenzene	3.23	19.50	U	20.8
o-Dichlorobenzene	4.41	26.60	U	23.0
1,2,4-Trichlorobenzene	17.8	132.00	U	76.6
Hexachloro-1,3-butadiene	25.9	277.00	U	90.5

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SUBMITTED: 05/09/22
AQS SITE CODE:
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Description: DR-A-BD-05052022-01 **Lab ID:** 2050917-08 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 7.0 "Hg **Canister #:** 5014 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 18:45

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	145
Propylene	41.7	71.90	U	45.4
Dichlorodifluoromethane	ND	ND	U	17.9
Chloromethane	7.64	15.80	U	37.5
Dichlorotetrafluoroethane	ND	ND	U	10.9
Vinyl chloride	ND	ND	U	10.4
1,3-Butadiene	5.72	12.70	U	27.3
Ethylene oxide	ND	ND	U	63.2
Bromomethane	ND	ND	U	27.0
Chloroethane	ND	ND	U	21.6
Acetonitrile	ND	ND	U	182
Acrolein	25.7	59.00	U	233
Trichlorofluoromethane	ND	ND	U	30.9
Acrylonitrile	ND	ND	U	22.1
1,1-Dichloroethene	ND	ND	U	15.1
Dichloromethane	ND	ND	U	261
Carbon Disulfide	ND	ND	U	18.7
Trichlorotrifluoroethane	ND	ND	U	12.0
trans-1,2-Dichloroethylene	ND	ND	U	11.4
1,1-Dichloroethane	ND	ND	U	10.3
Methyl tert-Butyl Ether	ND	ND	U	8.84
Chloroprene	**267**	**969.00**	D	**28.1**
cis-1,2-Dichloroethylene	ND	ND	U	30.0
Bromochloromethane	ND	ND	U	9.97
Chloroform	ND	ND	U	10.0
Ethyl tert-Butyl Ether	ND	ND	U	8.94
1,2-Dichloroethane	ND	ND	U	9.36
1,1,1-Trichloroethane	ND	ND	U	15.7
Benzene	7.34	23.50	U	13.6
Carbon Tetrachloride	ND	ND	U	14.8
tert-Amyl Methyl Ether	ND	ND	U	11.0
1,2-Dichloropropane	ND	ND	U	11.9
Ethyl Acrylate	ND	ND	U	17.4
Bromodichloromethane	ND	ND	U	33.5
Trichloroethylene	4.61	24.80	U	16.2
Methyl Methacrylate	ND	ND	CE, U	87.8
cis-1,3-Dichloropropene	ND	ND	U	9.21
Methyl Isobutyl Ketone	5.43	22.30	U	40.6
trans-1,3-Dichloropropene	ND	ND	U	13.0
1,1,2-Trichloroethane	ND	ND	U	12.4

CERTIFICATE OF ANALYSIS

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PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BD-05052022-01 **Lab ID:** 2050917-08 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 7.0 "Hg **Canister #:** 5014 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 18:45

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**57.5**	**217.00**	D	**51.8**
Dibromochloromethane	ND	ND	U	11.5
1,2-Dibromoethane	ND	ND	U	14.5
n-Octane	ND	ND	U	19.0
Tetrachloroethylene	ND	ND	U	37.8
Chlorobenzene	ND	ND	U	13.7
Ethylbenzene	0.945	4.11	U	14.8
m,p-Xylene	ND	ND	U	42.1
Bromoform	0.836	8.66	U	14.4
Styrene	1.31	5.59	U	15.5
1,1,2,2-Tetrachloroethane	1.39	9.56	U	12.5
o-Xylene	1.07	4.66	U	20.3
1,3,5-Trimethylbenzene	1.42	7.00	U	19.5
1,2,4-Trimethylbenzene	3.72	18.30	U	15.0
m-Dichlorobenzene	2.06	12.40	U	21.3
p-Dichlorobenzene	2.34	14.10	U	22.3
o-Dichlorobenzene	2.72	16.40	U	24.6
1,2,4-Trichlorobenzene	8.93	66.40	U	82.0
Hexachloro-1,3-butadiene	9.49	101.00	U	96.9

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REPORTED: 06/07/22 13:36
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AQS SITE CODE:
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Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Blank (B2E1302-BLK1) Prepared & Analyzed: 05/13/22

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Acetylene	ND	ppbv				U
Propylene	ND	ppbv				U
Dichlorodifluoromethane	ND	ppbv				U
Chloromethane	ND	ppbv				U
Dichlorotetrafluoroethane	ND	ppbv				U
Vinyl chloride	ND	ppbv				U
1,3-Butadiene	ND	ppbv				U
Ethylene oxide	ND	ppbv				U
Bromomethane	ND	ppbv				U
Chloroethane	ND	ppbv				U
Acetonitrile	ND	ppbv				U
Acrolein	ND	ppbv				U
Trichlorofluoromethane	ND	ppbv				U
Acrylonitrile	ND	ppbv				U
1,1-Dichloroethene	ND	ppbv				U
Dichloromethane	ND	ppbv				U
Carbon Disulfide	ND	ppbv				U
Trichlorotrifluoroethane	ND	ppbv				U
trans-1,2-Dichloroethylene	ND	ppbv				U
1,1-Dichloroethane	ND	ppbv				U
Methyl tert-Butyl Ether	ND	ppbv				U
Chloroprene	ND	ppbv				U
cis-1,2-Dichloroethylene	ND	ppbv				U
Bromochloromethane	ND	ppbv				U
Chloroform	ND	ppbv				U
Ethyl tert-Butyl Ether	ND	ppbv				U
1,2-Dichloroethane	ND	ppbv				U
1,1,1-Trichloroethane	ND	ppbv				U
Benzene	ND	ppbv				U
Carbon Tetrachloride	ND	ppbv				U
tert-Amyl Methyl Ether	ND	ppbv				U
1,2-Dichloropropane	ND	ppbv				U
Ethyl Acrylate	ND	ppbv				U
Bromodichloromethane	ND	ppbv				U
Trichloroethylene	ND	ppbv				U
Methyl Methacrylate	ND	ppbv				U
cis-1,3-Dichloropropene	ND	ppbv				U

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AQS SITE CODE:
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Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Blank (B2E1302-BLK1) Continued			Prepared & Analyzed: 05/13/22			
Methyl Isobutyl Ketone	ND	ppbv				U
trans-1,3-Dichloropropene	ND	ppbv				U
1,1,2-Trichloroethane	ND	ppbv				U
Toluene	ND	ppbv				U
Dibromochloromethane	ND	ppbv				U
1,2-Dibromoethane	ND	ppbv				U
n-Octane	ND	ppbv				U
Tetrachloroethylene	ND	ppbv				U
Chlorobenzene	ND	ppbv				U
Ethylbenzene	ND	ppbv				U
m,p-Xylene	ND	ppbv				U
Bromoform	ND	ppbv				U
Styrene	ND	ppbv				U
1,1,2,2-Tetrachloroethane	ND	ppbv				U
o-Xylene	ND	ppbv				U
1,3,5-Trimethylbenzene	ND	ppbv				U
1,2,4-Trimethylbenzene	ND	ppbv				U
m-Dichlorobenzene	ND	ppbv				U
p-Dichlorobenzene	ND	ppbv				U
o-Dichlorobenzene	ND	ppbv				U
1,2,4-Trichlorobenzene	ND	ppbv				U
Hexachloro-1,3-butadiene	ND	ppbv				U
Duplicate (B2E1302-DUP2)	**Source: 2050917-05**		Prepared: 05/05/22 Analyzed: 05/13/22			**D**
Acetylene	ND	ppbv	ND		25	U
Propylene	ND	ppbv	ND		25	U
Dichlorodifluoromethane	ND	ppbv	ND		25	U
Chloromethane	ND	ppbv	ND		25	U
Dichlorotetrafluoroethane	ND	ppbv	ND		25	U
Vinyl chloride	ND	ppbv	ND		25	U
1,3-Butadiene	ND	ppbv	ND		25	U
Ethylene oxide	ND	ppbv	ND		25	U
Bromomethane	ND	ppbv	ND		25	U
Chloroethane	ND	ppbv	ND		25	U
Acetonitrile	ND	ppbv	ND		25	U
Acrolein	ND	ppbv	ND		25	U
Trichlorofluoromethane	ND	ppbv	ND		25	U
Acrylonitrile	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

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Edison, NJ 08837
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Duplicate (B2E1302-DUP2) Continued **Source: 2050917-05** Prepared: 05/05/22 Analyzed: 05/13/22 **D**

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
1,1-Dichloroethene	ND	ppbv	ND		25	U
Dichloromethane	ND	ppbv	ND		25	U
Carbon Disulfide	ND	ppbv	ND		25	U
Trichlorotrifluoroethane	ND	ppbv	ND		25	U
trans-1,2-Dichloroethylene	ND	ppbv	ND		25	U
1,1-Dichloroethane	ND	ppbv	ND		25	U
Methyl tert-Butyl Ether	ND	ppbv	ND		25	U
Chloroprene	5060	ppbv	5,070.00	0.185	25	D
cis-1,2-Dichloroethylene	ND	ppbv	ND		25	U
Bromochloromethane	ND	ppbv	ND		25	U
Chloroform	ND	ppbv	ND		25	U
Ethyl tert-Butyl Ether	ND	ppbv	ND		25	U
1,2-Dichloroethane	ND	ppbv	ND		25	U
1,1,1-Trichloroethane	ND	ppbv	ND		25	U
Benzene	ND	ppbv	ND		25	U
Carbon Tetrachloride	ND	ppbv	ND		25	U
tert-Amyl Methyl Ether	ND	ppbv	ND		25	U
1,2-Dichloropropane	ND	ppbv	ND		25	U
Ethyl Acrylate	ND	ppbv	ND		25	U
Bromodichloromethane	ND	ppbv	ND		25	U
Trichloroethylene	ND	ppbv	ND		25	U
Methyl Methacrylate	ND	ppbv	ND		25	CE, U
cis-1,3-Dichloropropene	ND	ppbv	ND		25	U
Methyl Isobutyl Ketone	ND	ppbv	ND		25	U
trans-1,3-Dichloropropene	ND	ppbv	ND		25	U
1,1,2-Trichloroethane	ND	ppbv	ND		25	U
Toluene	2590	ppbv	2,620.00	1.14	25	D
Dibromochloromethane	ND	ppbv	ND		25	U
1,2-Dibromoethane	ND	ppbv	ND		25	U
n-Octane	ND	ppbv	ND		25	U
Tetrachloroethylene	ND	ppbv	ND		25	U
Chlorobenzene	ND	ppbv	ND		25	U
Ethylbenzene	ND	ppbv	ND		25	U
m,p-Xylene	ND	ppbv	ND		25	U
Bromoform	ND	ppbv	ND		25	U
Styrene	ND	ppbv	ND		25	U
1,1,2,2-Tetrachloroethane	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Duplicate (B2E1302-DUP2) Continued	**Source: 2050917-05**	Prepared: 05/05/22 Analyzed: 05/13/22				**D**
o-Xylene	ND	ppbv	ND		25	U
1,3,5-Trimethylbenzene	ND	ppbv	ND		25	U
1,2,4-Trimethylbenzene	ND	ppbv	ND		25	U
m-Dichlorobenzene	ND	ppbv	ND		25	U
p-Dichlorobenzene	ND	ppbv	ND		25	U
o-Dichlorobenzene	ND	ppbv	ND		25	U
1,2,4-Trichlorobenzene	ND	ppbv	ND		25	U
Hexachloro-1,3-butadiene	ND	ppbv	ND		25	U
Duplicate (B2E1302-DUP3)	**Source: 2050917-02**	Prepared: 05/05/22 Analyzed: 05/14/22				**D**
Acetylene	ND	ppbv	ND		25	U
Propylene	ND	ppbv	ND		25	U
Dichlorodifluoromethane	ND	ppbv	ND		25	U
Chloromethane	ND	ppbv	ND		25	U
Dichlorotetrafluoroethane	ND	ppbv	ND		25	U
Vinyl chloride	ND	ppbv	ND		25	U
1,3-Butadiene	ND	ppbv	ND		25	U
Ethylene oxide	ND	ppbv	ND		25	U
Bromomethane	ND	ppbv	ND		25	U
Chloroethane	ND	ppbv	ND		25	U
Acetonitrile	ND	ppbv	ND		25	U
Acrolein	ND	ppbv	ND		25	U
Trichlorofluoromethane	ND	ppbv	ND		25	U
Acrylonitrile	ND	ppbv	ND		25	U
1,1-Dichloroethene	ND	ppbv	ND		25	U
Dichloromethane	ND	ppbv	ND		25	U
Carbon Disulfide	ND	ppbv	ND		25	U
Trichlorotrifluoroethane	ND	ppbv	ND		25	U
trans-1,2-Dichloroethylene	ND	ppbv	ND		25	U
1,1-Dichloroethane	ND	ppbv	ND		25	U
Methyl tert-Butyl Ether	ND	ppbv	ND		25	U
Chloroprene	5270	ppbv	5,240.00	0.622	25	D
cis-1,2-Dichloroethylene	ND	ppbv	ND		25	U
Bromochloromethane	ND	ppbv	ND		25	U
Chloroform	ND	ppbv	ND		25	U
Ethyl tert-Butyl Ether	ND	ppbv	ND		25	U
1,2-Dichloroethane	ND	ppbv	ND		25	U
1,1,1-Trichloroethane	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Duplicate (B2E1302-DUP3) Continued **Source: 2050917-02** Prepared: 05/05/22 Analyzed: 05/14/22 **D**

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Benzene	ND	ppbv	ND		25	U
Carbon Tetrachloride	ND	ppbv	ND		25	U
tert-Amyl Methyl Ether	ND	ppbv	ND		25	U
1,2-Dichloropropane	ND	ppbv	ND		25	U
Ethyl Acrylate	ND	ppbv	ND		25	U
Bromodichloromethane	ND	ppbv	ND		25	U
Trichloroethylene	ND	ppbv	ND		25	U
Methyl Methacrylate	ND	ppbv	ND		25	CE, U
cis-1,3-Dichloropropene	ND	ppbv	ND		25	U
Methyl Isobutyl Ketone	ND	ppbv	ND		25	U
trans-1,3-Dichloropropene	ND	ppbv	ND		25	U
1,1,2-Trichloroethane	ND	ppbv	ND		25	U
Toluene	2740	ppbv	2,720.00	0.636	25	D
Dibromochloromethane	ND	ppbv	ND		25	U
1,2-Dibromoethane	ND	ppbv	ND		25	U
n-Octane	ND	ppbv	ND		25	U
Tetrachloroethylene	ND	ppbv	ND		25	U
Chlorobenzene	ND	ppbv	ND		25	U
Ethylbenzene	ND	ppbv	ND		25	U
m,p-Xylene	ND	ppbv	ND		25	U
Bromoform	ND	ppbv	ND		25	U
Styrene	ND	ppbv	ND		25	U
1,1,2,2-Tetrachloroethane	ND	ppbv	ND		25	U
o-Xylene	ND	ppbv	ND		25	U
1,3,5-Trimethylbenzene	ND	ppbv	ND		25	U
1,2,4-Trimethylbenzene	ND	ppbv	ND		25	U
m-Dichlorobenzene	ND	ppbv	ND		25	U
p-Dichlorobenzene	ND	ppbv	ND		25	U
o-Dichlorobenzene	ND	ppbv	ND		25	U
1,2,4-Trichlorobenzene	ND	ppbv	ND		25	U
Hexachloro-1,3-butadiene	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Sequence 2205037

Calibration Check (2205037-CCV1) Prepared & Analyzed: 05/13/22

Analyte	Result	Units	% Difference	Limit (%)	Notes
Acetylene	2.31	ppbv	-11.4	30.00	
Propylene	2.33	ppbv	-10.1	30.00	
Dichlorodifluoromethane	2.43	ppbv	-6.2	30.00	
Chloromethane	2.44	ppbv	-5.8	30.00	
Dichlorotetrafluoroethane	2.47	ppbv	-6.6	30.00	
Vinyl chloride	2.45	ppbv	-5.6	30.00	
1,3-Butadiene	2.44	ppbv	-6.1	30.00	
Ethylene oxide	2.39	ppbv	-0.9	30.00	
Bromomethane	2.50	ppbv	-3.9	30.00	
Chloroethane	2.55	ppbv	-2.5	30.00	
Acetonitrile	2.86	ppbv	11.0	30.00	
Acrolein	2.37	ppbv	-8.7	30.00	
Trichlorofluoromethane	2.29	ppbv	-11.6	30.00	
Acrylonitrile	2.56	ppbv	-5.0	30.00	
1,1-Dichloroethene	2.36	ppbv	-9.9	30.00	
Dichloromethane	2.85	ppbv	8.4	30.00	
Carbon Disulfide	2.48	ppbv	-10.2	30.00	
Trichlorotrifluoroethane	2.22	ppbv	-16.0	30.00	
trans-1,2-Dichloroethylene	2.65	ppbv	1.4	30.00	
1,1-Dichloroethane	2.47	ppbv	-5.4	30.00	
Methyl tert-Butyl Ether	2.57	ppbv	-1.8	30.00	
Chloroprene	2.53	ppbv	-3.6	30.00	
cis-1,2-Dichloroethylene	2.60	ppbv	0.7	30.00	
Bromochloromethane	2.55	ppbv	-1.6	30.00	
Chloroform	2.50	ppbv	-5.4	30.00	
Ethyl tert-Butyl Ether	2.60	ppbv	0.08	30.00	
1,2-Dichloroethane	2.51	ppbv	-2.9	30.00	
1,1,1-Trichloroethane	2.38	ppbv	-8.7	30.00	
Benzene	2.45	ppbv	-6.3	30.00	
Carbon Tetrachloride	2.37	ppbv	-8.8	30.00	
tert-Amyl Methyl Ether	2.68	ppbv	3.5	30.00	
1,2-Dichloropropane	2.59	ppbv	-0.1	30.00	
Ethyl Acrylate	2.62	ppbv	0.3	30.00	
Bromodichloromethane	2.57	ppbv	-1.5	30.00	

The results in this report apply only to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Sequence 2205037

Calibration Check (2205037-CCV1) Continued Prepared & Analyzed: 05/13/22

Analyte	Result	Units	% Difference	Limit (%)	Notes
Trichloroethylene	2.63	ppbv	0.7	30.00	
Methyl Methacrylate	2.53	ppbv	-2.2	30.00	
cis-1,3-Dichloropropene	2.55	ppbv	-1.8	30.00	
Methyl Isobutyl Ketone	2.71	ppbv	4.5	30.00	
trans-1,3-Dichloropropene	2.38	ppbv	-8.7	30.00	
1,1,2-Trichloroethane	2.56	ppbv	-2.1	30.00	
Toluene	2.69	ppbv	3.6	30.00	
Dibromochloromethane	2.43	ppbv	-6.3	30.00	
1,2-Dibromoethane	2.40	ppbv	-8.5	30.00	
n-Octane	3.05	ppbv	16.9	30.00	
Tetrachloroethylene	2.49	ppbv	-5.3	30.00	
Chlorobenzene	2.53	ppbv	-3.1	30.00	
Ethylbenzene	2.65	ppbv	2.0	30.00	
m,p-Xylene	5.75	ppbv	11.0	30.00	
Bromoform	2.47	ppbv	-4.9	30.00	
Styrene	2.94	ppbv	12.9	30.00	
1,1,2,2-Tetrachloroethane	2.63	ppbv	0.8	30.00	
o-Xylene	2.77	ppbv	6.1	30.00	
1,3,5-Trimethylbenzene	2.68	ppbv	2.6	30.00	
1,2,4-Trimethylbenzene	2.87	ppbv	9.7	30.00	
m-Dichlorobenzene	2.57	ppbv	-1.3	30.00	
p-Dichlorobenzene	2.58	ppbv	-0.8	30.00	
o-Dichlorobenzene	2.59	ppbv	-1.0	30.00	
1,2,4-Trichlorobenzene	3.11	ppbv	14.5	30.00	
Hexachloro-1,3-butadiene	3.06	ppbv	12.5	30.00	

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Notes and Definitions

U	Under Detection Limit
D	This result obtained by dilution.
CE	Not reportable due to a co-eluting compound.
ND	Analyte NOT DETECTED
NR	Not Reported
MDL	Method Detection Limit
RPD	Relative Percent Difference

Note: This test is accredited under the 2016 TNI Standard; however the following analytes are not accredited: acetylene, bromodichloroethane, dichlorotetrafluoromethane, ethyl tert butyl ether, n-octane, tert amyl methyl ether, trichlorofluoroethane, and bromochloromethane.

ERG LIMS ID # 2050917-01

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KT-05052022-01 Canister Number: 5A5070

City/State: LAPLACE, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: — Cleaning Batch # : H2-1367

Collection Date: 5/5/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): — Duplicate Event (Y/N): —

TOXICS (Y/N): TO-15 Duplicate Can # : —

METHANE (Y/N): —

Relinquished by: RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-6 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1638 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1706 Sample Duration (3 or 24 hr): 30 min

Operator: DMB Elapsed Time: 28

Field Final Can. Press.: -6 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [illegible] Date: 5/5/22

Lab Recovery

Received by: CL Date: 5/9/22

Lab Final Can. Press.: 6.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

D1

ERG
Eastern Research Group, Inc.
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

ERG LIMS ID # 20S0917-02

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KD-050522-01
Canister Number: SAT094
City/State: LAVACE, LA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: —
Cleaning Batch # : H1-1367
Collection Date: 5/5/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): —
Duplicate Event (Y/N): Yes
TOXICS (Y/N): TO-15
Duplicate Can # : 5025
METHANE (Y/N): —
Relinquished by: RHB
Date: ~~5/24~~ RHB 5/4/22

Field Setup

Received by: DMB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-9
Elapsed Timer Reset (Y/N): —
Setup Date: 5/5/22 1639
Canister Valve Opened (Y/N): Y
Field Initial Can Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1705'
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 26 min
Field Final Can. Press.: -6' psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 6.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-03

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BK-05052022-01
Canister Number: 5015
City/State: LAPLACE, LA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: –
Cleaning Batch # : HZ-1367
Collection Date: 05/05/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): –
Duplicate Event (Y/N): N
TOXICS (Y/N): TO-15
Duplicate Can # : –
METHANE (Y/N): –
Relinquished by: RMB
Date: 5/4/22

Field Setup

Received by: DB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-12
Elapsed Timer Reset (Y/N): N/A
Setup Date: 5/5/22 1536
Canister Valve Opened (Y/N): Y
Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1605
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 30 min
Field Final Can. Press.: -5 psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 4.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-04

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KP-0505 2022-01 Canister Number: 5040

City/State: LAPLACE, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: - Cleaning Batch # : H2-1367

Collection Date: 5/5/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): - Duplicate Event (Y/N): -

TOXICS (Y/N): TO-15 Duplicate Can # : -

METHANE (Y/N): -

Relinquished by: RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-5 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1638 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1704 Sample Duration (3 or 24 hr): 30 min.

Operator: DMB Elapsed Time: 26 min

Field Final Can. Press.: -5 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/11/22

Lab Final Can. Press.: 5.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

D2

ERG LIMS ID # 2050417-05

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KD-05052022-02 Canister Number: 5025

City/State: LAPLACE, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: — Cleaning Batch # : H2-1367

Collection Date: ~~of~~ on 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): — Duplicate Event (Y/N): Y

TOXICS (Y/N): TO-15 Duplicate Can # : 5AT094

METHANE (Y/N): —

Relinquished by: 5/4/22 Date:

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-10 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1639 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1705 Sample Duration (3 or 24 hr): 30 min

Operator: DMB Elapsed Time: 26 min

Field Final Can. Press.: -7 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 7.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ERG LIMS ID # 2050917-06

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BU-0505 2022-01 Canister Number: SAT120

City/State: Wallace, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: Cleaning Batch # : H2-1367

Collection Date: 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): — Duplicate Event (Y/N): —

TOXICS (Y/N): TO-15 Duplicate Can # : —

METHANE (Y/N): —

Relinquished by: 5/4/22 RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-1 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1604 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1631 Sample Duration (3 or 24 hr): 30 —

Operator: DMB Elapsed Time: 27 min

Field Final Can. Press.: -6 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 6.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ERG
Eastern Research Group, Inc.
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

ERG LIMS ID # 2050917-07

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-PU-05052022-01
Canister Number: SAT003
City/State: LAPLACE, WA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: —
Cleaning Batch # : H1-1367
Collection Date: 05/05/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): —
Duplicate Event (Y/N): N
TOXICS (Y/N): TO-15
Duplicate Can # : —
METHANE (Y/N): —
Relinquished by: RMB
Date: 5/4/22

Field Setup

Received by: DMB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-4
Elapsed Timer Reset (Y/N): N/A
Setup Date: 5/5/22 1637
Canister Valve Opened (Y/N): Y
Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1703
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 26
Field Final Can. Press.: -5 psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 5.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-08

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BD-05052022-01 Canister Number: 5014

City/State: Waulace, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: – Cleaning Batch # : H2-1367

Collection Date: 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): – Duplicate Event (Y/N): –

TOXICS (Y/N): Y - TO-15 Duplicate Can # : –

METHANE (Y/N): –

Relinquished by: RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 mm

System #: Pit1-14 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1605 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1631 Sample Duration (3 or 24 hr): 30 mm

Operator: DMB Elapsed Time: 26 m

Field Final Can. Press.: -7 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 7 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ATTACHMENT H

Liquid Analytical Results Table

Attachment H
Summary of Liquid Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-L-LA	DR-L-Lb	DR-L-Lb
			Sample ID	DR-L-LA-05052022-01	DR-L-LB-05052022-01	DR-L-LB-05052022-02
			Date	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FD
EPA 8260						
1,1,1-Trichloroethane	71-55-6	mg/L	--	0.5 U	0.5 U	0.5 U
1,1,2,2-Tetrachloroethane	79-34-5	mg/L	--	0.5 U	0.5 U	0.5 U
1,1,2-Trichloroethane	79-00-5	mg/L	--	0.5 U	0.5 U	0.5 U
1,1-Dichloroethane	75-34-3	mg/L	--	0.5 U	0.5 U	0.5 U
1,1-Dichloroethene	75-35-4	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dibromo-3-chloropropane	96-12-8	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dibromoethane (EDB)	106-93-4	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dichloroethane	107-06-2	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dichloropropane	78-87-5	mg/L	--	0.5 U	0.5 U	0.5 U
2-Butanone (MEK)	78-93-3	mg/L	--	1 U	1 U	1 U
2-Hexanone	591-78-6	mg/L	--	1 U	1 U	1 U
4-Methyl-2-pentanone (MIBK)	108-10-1	mg/L	--	1 U	1 U	1 U
Acetone	67-64-11	mg/L	--	1 U	1 U	1 U
Benzene	71-43-2	mg/L	--	0.5 U	0.5 U	0.5 U
Bromodichloromethane	75-27-4	mg/L	--	0.5 U	0.5 U	0.5 U
Bromoform	75-25-2	mg/L	--	0.5 U	0.5 U	0.5 U
Bromomethane	74-83-9	mg/L	--	0.5 U	0.5 U	0.5 U
Carbon disulfide	75-15-0	mg/L	--	0.5 U	0.5 U	0.5 U
Carbon tetrachloride	56-23-5	mg/L	--	0.5 U	0.5 U	0.5 U
Chlorobenzene	108-90-7	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroethane	75-00-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroform	67-66-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloromethane	74-87-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroprene	126-99-8	mg/L	--	**341**	**62.8**	**64.1**
cis-1,2-Dichloroethene	156-59-2	mg/L	--	0.5 U	0.5 U	0.5 U
cis-1,3-Dichloropropene	10061-01-5	mg/L	--	0.5 U	0.5 U	0.5 U
Dibromochloromethane	124-48-1	mg/L	--	0.5 U	0.5 U	0.5 U
Dichlorodifluoromethane	75-71-8	mg/L	--	0.5 U	0.5 U	0.5 U
Ethylbenzene	100-41-4	mg/L	--	0.5 U	0.5 U	0.5 U
Isopropylbenzene (Cumene)	98-82-8	mg/L	--	0.5 U	0.5 U	0.5 U
m&p-Xylene	179601-23-1	mg/L	--	1 U	1 U	1 U
Methyl acetate	79-20-9	mg/L	--	1 U	1 U	1 U
Methylene Chloride	75-09-2	mg/L	--	0.5 U	0.5 U	0.5 U
Methyl-tert-butyl ether	1634-04-4	mg/L	--	0.5 U	0.5 U	0.5 U
o-Xylene	95-47-6	mg/L	--	0.5 U	0.5 U	0.5 U
Styrene	100-42-5	mg/L	--	0.5 U	0.5 U	0.5 U
Tetrachloroethene	127-18-4	mg/L	--	0.5 U	0.5 U	0.5 U
Toluene	108-88-3	mg/L	--	**7.6**	**8.4**	**8**
trans-1,2-Dichloroethene	156-60-5	mg/L	--	0.5 U	0.5 U	0.5 U
trans-1,3-Dichloropropene	10061-02-6	mg/L	--	0.5 U	0.5 U	0.5 U
Trichloroethene	79-01-6	mg/L	--	0.5 U	0.5 U	0.5 U
Trichlorofluoromethane	75-69-4	mg/L	--	0.5 U	0.5 U	0.5 U
Vinyl chloride	75-01-4	mg/L	--	0.2 U	0.2 U	0.2 U

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
mg/L = milligrams per liter
U = Indicates the compound was analyzed for, but not detected
BOLD = analyte was detected

ATTACHMENT I

Solid Analytical Results Table

Attachment I
Summary of Solid Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-S-BP
			Sample ID	DR-S-BP-05052022-02
			Date	05/05/2022
Analyte	**CAS.NO**	**Units**	**Type**	**FS**
EPA 8260				
1,1,1-Trichloroethane	71-55-6	mg/kg	--	13.9 U
1,1,2,2-Tetrachloroethane	79-34-5	mg/kg	--	13.9 U
1,1,2-Trichloroethane	79-00-5	mg/kg	--	13.9 U
1,1-Dichloroethane	75-34-3	mg/kg	--	13.9 U
1,1-Dichloroethene	75-35-4	mg/kg	--	13.9 U
1,2-Dibromo-3-chloropropane	96-12-8	mg/kg	--	13.9 U
1,2-Dibromoethane (EDB)	106-93-4	mg/kg	--	13.9 U
1,2-Dichloroethane	107-06-2	mg/kg	--	13.9 U
1,2-Dichloropropane	78-87-5	mg/kg	--	13.9 U
2-Butanone (MEK)	78-93-3	mg/kg	--	27.8 U
2-Hexanone	591-78-6	mg/kg	--	27.8 U
4-Methyl-2-pentanone (MIBK)	108-10-1	mg/kg	--	27.8 U
Acetone	67-64-11	mg/kg	--	27.8 U
Benzene	71-43-2	mg/kg	--	13.9 U
Bromodichloromethane	75-27-4	mg/kg	--	13.9 U
Bromoform	75-25-2	mg/kg	--	13.9 U
Bromomethane	74-83-9	mg/kg	--	13.9 U
Carbon disulfide	75-15-0	mg/kg	--	13.9 U
Carbon tetrachloride	56-23-5	mg/kg	--	13.9 U
Chlorobenzene	108-90-7	mg/kg	--	13.9 U
Chloroethane	75-00-3	mg/kg	--	13.9 U
Chloroform	67-66-3	mg/kg	--	13.9 U
Chloromethane	74-87-3	mg/kg	--	13.9 U
Chloroprene	126-99-8	mg/kg	--	**1080**
cis-1,2-Dichloroethene	156-59-2	mg/kg	--	13.9 U
cis-1,3-Dichloropropene	10061-01-5	mg/kg	--	13.9 U
Dibromochloromethane	124-48-1	mg/kg	--	13.9 U
Dichlorodifluoromethane	75-71-8	mg/kg	--	13.9 U
Ethylbenzene	100-41-4	mg/kg	--	13.9 U
Isopropylbenzene (Cumene)	98-82-8	mg/kg	--	13.9 U
m&p-Xylene	179601-23-1	mg/kg	--	27.8 U
Methyl acetate	79-20-9	mg/kg	--	27.8 U
Methylene Chloride	75-09-2	mg/kg	--	13.9 U
Methyl-tert-butyl ether	1634-04-4	mg/kg	--	13.9 U
o-Xylene	95-47-6	mg/kg	--	13.9 U
Styrene	100-42-5	mg/kg	--	13.9 U
Tetrachloroethene	127-18-4	mg/kg	--	13.9 U
Toluene	108-88-3	mg/kg	--	**240**
trans-1,2-Dichloroethene	156-60-5	mg/kg	--	13.9 U
trans-1,3-Dichloropropene	10061-02-6	mg/kg	--	13.9 U
Trichloroethene	79-01-6	mg/kg	--	13.9 U
Trichlorofluoromethane	75-69-4	mg/kg	--	13.9 U
Vinyl chloride	75-01-4	mg/kg	--	5.6 U

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
mg/L = milligrams per liter
U = Indicates the compound was analyzed for, but not detected
BOLD = analyte was detected

ATTACHMENT J

Solid and Liquid Analytical Results – Laboratory Deliverable

Pace Analytical Services, LLC
1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
(504)469-0333

May 19, 2022

Jeff Wright
Weston Solutions, Inc.
13702 Coursey Blvd.
Bldg #7, STE A
Baton Rouge, LA 70817

RE: Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Dear Jeff Wright:

Enclosed are the analytical results for sample(s) received by the laboratory on May 06, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Clay Ledet
clay.ledet@pacelabs.com
(504)469-0333
Project Manager

Enclosures

cc: David Bordelon, Weston Solutions, Inc.

REPORT OF LABORATORY ANALYSIS

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St. Rose, LA 70087
(504)469-0333

CERTIFICATIONS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 0025721
Kansas Department of Health and Environment (NELAC): E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP): 02006
Texas Commission on Env. Quality (NELAC): T104704405-09-TX
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119

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SAMPLE SUMMARY

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20243028001	**DR-L-LB-05052022-01**	Water	05/05/22 15:45	05/06/22 17:50
20243028002	**DR-L-LB-05052022-02**	Water	05/05/22 15:45	05/06/22 17:50
20243028003	**DR-L-LA-05052022-01**	Water	05/05/22 17:10	05/06/22 17:50
20243028004	**DR-S-BP-05052022-02**	Solid	05/05/22 16:10	05/06/22 17:50

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ED_013532_00008923-00112

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SAMPLE ANALYTE COUNT

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20243028001	**DR-L-LB-05052022-01**	EPA 8260	SLK	46
20243028002	**DR-L-LB-05052022-02**	EPA 8260	SLK	46
20243028003	**DR-L-LA-05052022-01**	EPA 8260	SLK	46
20243028004	**DR-S-BP-05052022-02**	EPA 8260	JRP	46

PASI-N = Pace Analytical Services - New Orleans

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
3 samples were analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255081

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20243028001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 1213307)
  - Chloroprene
- MSD (Lab ID: 1213308)
  - Chloroprene

R1: RPD value was outside control limits.

- MSD (Lab ID: 1213308)
  - 1,2-Dibromo-3-chloropropane
  - Methyl acetate

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255081

D4: Sample was diluted due to the presence of high levels of target analytes.

- DR-L-LA-05052022-01 (Lab ID: 20243028003)
  - Chloroprene
  - Toluene
- DR-L-LB-05052022-01 (Lab ID: 20243028001)
  - Toluene
- DR-L-LB-05052022-02 (Lab ID: 20243028002)
  - Chloroprene
  - Toluene
- MS (Lab ID: 1213307)
  - Toluene
- MSD (Lab ID: 1213308)
  - Toluene

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
1 sample was analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 5035/5030B with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255724

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20242755001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MSD (Lab ID: 1217691)
  - Chloroethane

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255724

D4: Sample was diluted due to the presence of high levels of target analytes.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Vinyl chloride

E: Analyte concentration exceeded the calibration range. The reported result is estimated.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Chloroprene

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:01	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:01	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:01	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:01	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:01	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:01	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:01	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:01	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:01	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:01	74-87-3	
Chloroprene	**62.8**	mg/L	5.0	1000		05/12/22 13:08	126-99-8	M1
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:01	96-12-8	R1
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:01	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:01	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:01	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:01	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:01	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:01	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:01	79-20-9	R1
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:01	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:01	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:01	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:01	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:01	127-18-4	
Toluene	**8.4**	mg/L	0.50	100		05/11/22 23:01	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:01	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:01	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:01	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:08	2037-26-5	
Toluene-d8 (S)	104	%.	76-124	100		05/11/22 23:01	2037-26-5	

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St. Rose, LA 70087
(504)469-0333

ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Surrogates								
4-Bromofluorobenzene (S)	101	%.	78-121	100		05/11/22 23:01	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	1000		05/12/22 13:08	460-00-4	
Dibromofluoromethane (S)	102	%.	74-128	1000		05/12/22 13:08	1868-53-7	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:01	1868-53-7	

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:19	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:19	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:19	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:19	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:19	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:19	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:19	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:19	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:19	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:19	74-87-3	
Chloroprene	**64.1**	mg/L	5.0	1000		05/12/22 13:26	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:19	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:19	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:19	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:19	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:19	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:19	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:19	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:19	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:19	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:19	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:19	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:19	100-42-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:19	127-18-4	
Toluene	**8.0**	mg/L	0.50	100		05/11/22 23:19	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:19	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:19	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:19	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:26	2037-26-5	
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:19	2037-26-5	
4-Bromofluorobenzene (S)	100	%.	78-121	100		05/11/22 23:19	460-00-4	
4-Bromofluorobenzene (S)	100	%.	78-121	1000		05/12/22 13:26	460-00-4	
Dibromofluoromethane (S)	103	%.	74-128	1000		05/12/22 13:26	1868-53-7	
Dibromofluoromethane (S)	100	%.	74-128	100		05/11/22 23:19	1868-53-7	

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:36	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:36	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:36	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:36	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:36	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:36	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:36	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:36	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:36	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:36	74-87-3	
Chloroprene	**341**	mg/L	50.0	10000		05/12/22 20:04	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:36	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:36	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:36	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-59-2	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:36	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:36	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:36	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:36	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:36	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:36	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:36	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:36	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:36	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:36	127-18-4	
Toluene	**7.6**	mg/L	0.50	100		05/11/22 23:36	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:36	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:36	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:36	95-47-6	
Surrogates								
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:36	2037-26-5	
Toluene-d8 (S)	101	%.	76-124	10000		05/12/22 20:04	2037-26-5	
4-Bromofluorobenzene (S)	98	%.	78-121	100		05/11/22 23:36	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	10000		05/12/22 20:04	460-00-4	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:36	1868-53-7	
Dibromofluoromethane (S)	103	%.	74-128	10000		05/12/22 20:04	1868-53-7	

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	67-64-1	
Benzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-43-2	
Bromodichloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-27-4	
Bromoform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-25-2	
Bromomethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-83-9	
2-Butanone (MEK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	78-93-3	
Carbon disulfide	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-15-0	
Carbon tetrachloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	56-23-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Chlorobenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-90-7	
Chloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-00-3	
Chloroform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	67-66-3	
Chloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-87-3	
Chloroprene	**1080**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	126-99-8	E
1,2-Dibromo-3-chloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	96-12-8	
Dibromochloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	106-93-4	
Dichlorodifluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-71-8	
1,1-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-34-3	
1,2-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	107-06-2	
1,1-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-35-4	
cis-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-59-2	
trans-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-60-5	
1,2-Dichloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	78-87-5	
cis-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-02-6	
Ethylbenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-41-4	
2-Hexanone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	98-82-8	
Methyl acetate	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	79-20-9	
Methylene Chloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	1634-04-4	
Styrene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-34-5	
Tetrachloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	127-18-4	
Toluene	**240**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-88-3	
1,1,1-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-00-5	
Trichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-01-6	
Trichlorofluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-69-4	
Vinyl chloride	ND	mg/kg	5.6	50	05/19/22 09:30	05/19/22 14:09	75-01-4	D4
m&p-Xylene	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	179601-23-1	
o-Xylene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	95-47-6	
Surrogates								
Toluene-d8 (S)	100	%.	75-125	50	05/19/22 09:30	05/19/22 14:09	2037-26-5	
4-Bromofluorobenzene (S)	103	%.	64-139	50	05/19/22 09:30	05/19/22 14:09	460-00-4	
Dibromofluoromethane (S)	97	%.	66-143	50	05/19/22 09:30	05/19/22 14:09	1868-53-7	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255081
QC Batch Method: EPA 8260
Analysis Method: EPA 8260
Analysis Description: 8260 MSV
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028001, 20243028002, 20243028003

METHOD BLANK: 1213305
Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloropropane	mg/L	ND	0.0050	05/11/22 19:49	
2-Butanone (MEK)	mg/L	ND	0.010	05/11/22 19:49	
2-Hexanone	mg/L	ND	0.010	05/11/22 19:49	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/11/22 19:49	
Acetone	mg/L	ND	0.010	05/11/22 19:49	
Benzene	mg/L	ND	0.0050	05/11/22 19:49	
Bromodichloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Bromoform	mg/L	ND	0.0050	05/11/22 19:49	
Bromomethane	mg/L	ND	0.0050	05/11/22 19:49	
Carbon disulfide	mg/L	ND	0.0050	05/11/22 19:49	
Carbon tetrachloride	mg/L	ND	0.0050	05/11/22 19:49	
Chlorobenzene	mg/L	ND	0.0050	05/11/22 19:49	
Chloroethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroform	mg/L	ND	0.0050	05/11/22 19:49	
Chloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroprene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	
Dibromochloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Ethylbenzene	mg/L	ND	0.0050	05/11/22 19:49	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/11/22 19:49	
m&p-Xylene	mg/L	ND	0.010	05/11/22 19:49	
Methyl acetate	mg/L	ND	0.010	05/11/22 19:49	
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/11/22 19:49	
Methylene Chloride	mg/L	ND	0.0050	05/11/22 19:49	
o-Xylene	mg/L	ND	0.0050	05/11/22 19:49	
Styrene	mg/L	ND	0.0050	05/11/22 19:49	
Tetrachloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Toluene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213305 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Trichlorofluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Vinyl chloride	mg/L	ND	0.0020	05/11/22 19:49	
4-Bromofluorobenzene (S)	%.	99	78-121	05/11/22 19:49	
Dibromofluoromethane (S)	%.	102	74-128	05/11/22 19:49	
Toluene-d8 (S)	%.	104	76-124	05/11/22 19:49	

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloropropane	mg/L	ND	0.0050	05/12/22 11:06	
2-Butanone (MEK)	mg/L	ND	0.010	05/12/22 11:06	
2-Hexanone	mg/L	ND	0.010	05/12/22 11:06	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/12/22 11:06	
Acetone	mg/L	ND	0.010	05/12/22 11:06	
Benzene	mg/L	ND	0.0050	05/12/22 11:06	
Bromodichloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Bromoform	mg/L	ND	0.0050	05/12/22 11:06	
Bromomethane	mg/L	ND	0.0050	05/12/22 11:06	
Carbon disulfide	mg/L	ND	0.0050	05/12/22 11:06	
Carbon tetrachloride	mg/L	ND	0.0050	05/12/22 11:06	
Chlorobenzene	mg/L	ND	0.0050	05/12/22 11:06	
Chloroethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroform	mg/L	ND	0.0050	05/12/22 11:06	
Chloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroprene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Dibromochloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Ethylbenzene	mg/L	ND	0.0050	05/12/22 11:06	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/12/22 11:06	
m&p-Xylene	mg/L	ND	0.010	05/12/22 11:06	
Methyl acetate	mg/L	ND	0.010	05/12/22 11:06	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/12/22 11:06	
Methylene Chloride	mg/L	ND	0.0050	05/12/22 11:06	
o-Xylene	mg/L	ND	0.0050	05/12/22 11:06	
Styrene	mg/L	ND	0.0050	05/12/22 11:06	
Tetrachloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Toluene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Trichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Trichlorofluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Vinyl chloride	mg/L	ND	0.0020	05/12/22 11:06	
4-Bromofluorobenzene (S)	%.	98	78-121	05/12/22 11:06	
Dibromofluoromethane (S)	%.	103	74-128	05/12/22 11:06	
Toluene-d8 (S)	%.	102	76-124	05/12/22 11:06	

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.048	96	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.062	123	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.056	112	75-121	
1,1-Dichloroethane	mg/L	0.05	0.051	101	71-127	
1,1-Dichloroethene	mg/L	0.05	0.046	92	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.050	100	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.055	109	75-125	
1,2-Dichloroethane	mg/L	0.05	0.052	103	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	105	72-125	
2-Butanone (MEK)	mg/L	0.05	0.059	117	34-170	
2-Hexanone	mg/L	0.05	0.061	122	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.057	115	58-141	
Acetone	mg/L	0.05	0.068	135	16-192	
Benzene	mg/L	0.05	0.051	101	74-132	
Bromodichloromethane	mg/L	0.05	0.054	108	73-117	
Bromoform	mg/L	0.05	0.056	112	58-132	
Bromomethane	mg/L	0.05	0.037	74	47-157	
Carbon disulfide	mg/L	0.05	0.043	87	52-145	
Carbon tetrachloride	mg/L	0.05	0.049	98	68-129	
Chlorobenzene	mg/L	0.05	0.052	103	79-121	
Chloroethane	mg/L	0.05	0.043	86	34-160	
Chloroform	mg/L	0.05	0.050	100	70-120	
Chloromethane	mg/L	0.05	0.038	76	44-142	
Chloroprene	mg/L	0.05	0.047	94	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.048	95	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.052	105	77-121	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Dibromochloromethane	mg/L	0.05	0.053	106	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.031	62	28-148	
Ethylbenzene	mg/L	0.05	0.052	104	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.050	100	77-126	
m&p-Xylene	mg/L	0.1	0.10	103	78-119	
Methyl acetate	mg/L	0.05	0.053	106	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.053	106	58-135	
Methylene Chloride	mg/L	0.05	0.048	95	49-145	
o-Xylene	mg/L	0.05	0.051	103	77-121	
Styrene	mg/L	0.05	0.050	101	81-123	
Tetrachloroethene	mg/L	0.05	0.059	117	62-138	
Toluene	mg/L	0.05	0.051	102	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.048	95	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.050	99	77-117	
Trichlorofluoromethane	mg/L	0.05	0.040	79	45-164	
Vinyl chloride	mg/L	0.05	0.035	70	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			102	74-128	
Toluene-d8 (S)	%.			104	76-124	

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.050	100	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.057	115	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.054	108	75-121	
1,1-Dichloroethane	mg/L	0.05	0.054	108	71-127	
1,1-Dichloroethene	mg/L	0.05	0.051	102	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.047	95	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.051	103	75-125	
1,2-Dichloroethane	mg/L	0.05	0.054	107	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	106	72-125	
2-Butanone (MEK)	mg/L	0.05	0.055	110	34-170	
2-Hexanone	mg/L	0.05	0.053	106	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.052	104	58-141	
Acetone	mg/L	0.05	0.065	129	16-192	
Benzene	mg/L	0.05	0.053	106	74-132	
Bromodichloromethane	mg/L	0.05	0.053	106	73-117	
Bromoform	mg/L	0.05	0.050	99	58-132	
Bromomethane	mg/L	0.05	0.057	113	47-157	
Carbon disulfide	mg/L	0.05	0.049	97	52-145	
Carbon tetrachloride	mg/L	0.05	0.051	101	68-129	
Chlorobenzene	mg/L	0.05	0.053	107	79-121	
Chloroethane	mg/L	0.05	0.071	143	34-160	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloroform	mg/L	0.05	0.052	105	70-120	
Chloromethane	mg/L	0.05	0.063	127	44-142	
Chloroprene	mg/L	0.05	0.049	98	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.050	101	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.053	106	77-121	
Dibromochloromethane	mg/L	0.05	0.050	100	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.052	104	28-148	
Ethylbenzene	mg/L	0.05	0.053	106	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.051	102	77-126	
m&p-Xylene	mg/L	0.1	0.11	107	78-119	
Methyl acetate	mg/L	0.05	0.046	92	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.052	104	58-135	
Methylene Chloride	mg/L	0.05	0.054	107	49-145	
o-Xylene	mg/L	0.05	0.052	103	77-121	
Styrene	mg/L	0.05	0.051	101	81-123	
Tetrachloroethene	mg/L	0.05	0.051	102	62-138	
Toluene	mg/L	0.05	0.051	103	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.052	104	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.051	102	77-117	
Trichlorofluoromethane	mg/L	0.05	0.053	106	45-164	
Vinyl chloride	mg/L	0.05	0.053	106	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			104	74-128	
Toluene-d8 (S)	%.			102	76-124	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/L	ND	5	5	4.8	5.6	96	112	73-141	15	20	
1,1,2,2-Tetrachloroethane	mg/L	ND	5	5	5.5	6.8	110	135	48-148	20	20	
1,1,2-Trichloroethane	mg/L	ND	5	5	5.1	6.1	101	121	46-154	18	20	
1,1-Dichloroethane	mg/L	ND	5	5	5.8	6.7	116	134	63-145	15	20	
1,1-Dichloroethene	mg/L	ND	5	5	4.9	5.5	98	109	28-176	11	20	
1,2-Dibromo-3-chloropropane	mg/L	ND	5	5	4.4	5.5	89	110	40-152	21	20	R1
1,2-Dibromoethane (EDB)	mg/L	ND	5	5	4.9	5.8	98	116	69-134	17	20	
1,2-Dichloroethane	mg/L	ND	5	5	4.7	5.7	95	114	51-147	18	20	
1,2-Dichloropropane	mg/L	ND	5	5	4.9	5.7	98	113	64-140	15	20	
2-Butanone (MEK)	mg/L	ND	5	5	5.1	6.0	101	120	10-200	17	20	
2-Hexanone	mg/L	ND	5	5	5.2	6.3	105	125	40-157	18	20	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	5	5	5.0	6.1	99	121	36-165	20	20	
Acetone	mg/L	ND	5	5	6.1	7.2	122	143	10-200	16	20	
Benzene	mg/L	ND	5	5	5.0	5.8	100	117	29-186	16	20	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Bromodichloromethane	mg/L	ND	5	5	4.9	5.8	99	116	58-139	16	20	
Bromoform	mg/L	ND	5	5	5.0	6.0	101	121	57-135	18	20	
Bromomethane	mg/L	ND	5	5	4.0	4.1	80	81	42-168	1	20	
Carbon disulfide	mg/L	ND	5	5	4.9	5.1	97	102	44-170	4	20	
Carbon tetrachloride	mg/L	ND	5	5	5.1	5.9	101	119	45-162	16	20	
Chlorobenzene	mg/L	ND	5	5	4.9	5.8	99	116	71-135	17	20	
Chloroethane	mg/L	ND	5	5	4.7	4.8	95	96	32-175	1	20	
Chloroform	mg/L	ND	5	5	4.8	5.7	96	114	61-136	17	20	
Chloromethane	mg/L	ND	5	5	4.1	4.1	80	79	38-154	1	20	
Chloroprene	mg/L	62.8	5	5	64.6	62.7	37	-2	59-153	3	20	M1
cis-1,2-Dichloroethene	mg/L	ND	5	5	4.7	5.5	93	109	44-160	16	20	
cis-1,3-Dichloropropene	mg/L	ND	5	5	4.8	5.6	96	112	47-153	15	20	
Dibromochloromethane	mg/L	ND	5	5	4.8	5.8	97	116	64-130	18	20	
Dichlorodifluoromethane	mg/L	ND	5	5	3.6	3.6	72	72	22-160	0	20	
Ethylbenzene	mg/L	ND	5	5	5.0	6.0	100	119	51-153	17	20	
Isopropylbenzene (Cumene)	mg/L	ND	5	5	5.0	6.1	101	123	68-145	20	20	
m&p-Xylene	mg/L	ND	10	10	10.1	11.9	101	119	30-173	16	20	
Methyl acetate	mg/L	ND	5	5	4.5	5.7	90	114	20-173	23	20	R1
Methyl-tert-butyl ether	mg/L	ND	5	5	4.8	5.8	96	117	36-160	19	20	
Methylene Chloride	mg/L	ND	5	5	4.8	5.5	95	110	56-140	14	20	
o-Xylene	mg/L	ND	5	5	4.9	5.9	98	118	10-197	18	20	
Styrene	mg/L	ND	5	5	4.8	5.6	95	111	37-163	16	20	
Tetrachloroethene	mg/L	ND	5	5	5.1	5.9	102	117	18-193	14	20	
Toluene	mg/L	8.4	5	5	13.0	13.2	93	97	33-175	2	20	D4
trans-1,2-Dichloroethene	mg/L	ND	5	5	4.9	5.6	99	112	63-140	13	20	
trans-1,3-Dichloropropene	mg/L	ND	5	5	4.9	5.8	98	116	47-153	17	20	
Trichloroethene	mg/L	ND	5	5	4.9	5.6	97	112	24-181	14	20	
Trichlorofluoromethane	mg/L	ND	5	5	4.5	4.7	91	94	37-182	3	20	
Vinyl chloride	mg/L	ND	5	5	4.0	4.1	81	81	19-169	0	20	
4-Bromofluorobenzene (S)	%.						101	104	78-121			
Dibromofluoromethane (S)	%.						102	102	74-128			
Toluene-d8 (S)	%.						103	101	76-124			

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255724
QC Batch Method: EPA 5035/5030B
Analysis Method: EPA 8260
Analysis Description: 8260 MSV 5030 Med Level
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028004

METHOD BLANK: 1217688
Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromo-3-chloropropane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromoethane (EDB)	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloropropane	mg/kg	ND	0.25	05/19/22 10:03	
2-Butanone (MEK)	mg/kg	ND	0.50	05/19/22 10:03	
2-Hexanone	mg/kg	ND	0.50	05/19/22 10:03	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.50	05/19/22 10:03	
Acetone	mg/kg	ND	0.50	05/19/22 10:03	
Benzene	mg/kg	ND	0.25	05/19/22 10:03	
Bromodichloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Bromoform	mg/kg	ND	0.25	05/19/22 10:03	
Bromomethane	mg/kg	ND	0.25	05/19/22 10:03	
Carbon disulfide	mg/kg	ND	0.25	05/19/22 10:03	
Carbon tetrachloride	mg/kg	ND	0.25	05/19/22 10:03	
Chlorobenzene	mg/kg	ND	0.25	05/19/22 10:03	
Chloroethane	mg/kg	ND	0.25	05/19/22 10:03	
Chloroform	mg/kg	ND	0.25	05/19/22 10:03	
Chloromethane	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Dibromochloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Dichlorodifluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Ethylbenzene	mg/kg	ND	0.25	05/19/22 10:03	
Isopropylbenzene (Cumene)	mg/kg	ND	0.25	05/19/22 10:03	
m&p-Xylene	mg/kg	ND	0.50	05/19/22 10:03	
Methyl acetate	mg/kg	ND	0.50	05/19/22 10:03	
Methyl-tert-butyl ether	mg/kg	ND	0.25	05/19/22 10:03	
Methylene Chloride	mg/kg	ND	0.25	05/19/22 10:03	
o-Xylene	mg/kg	ND	0.25	05/19/22 10:03	
Styrene	mg/kg	ND	0.25	05/19/22 10:03	
Tetrachloroethene	mg/kg	ND	0.25	05/19/22 10:03	
Toluene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Trichloroethene	mg/kg	ND	0.25	05/19/22 10:03	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1217688 Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichlorofluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Vinyl chloride	mg/kg	ND	0.10	05/19/22 10:03	
4-Bromofluorobenzene (S)	%.	101	64-139	05/19/22 10:03	
Dibromofluoromethane (S)	%.	102	66-143	05/19/22 10:03	
Toluene-d8 (S)	%.	101	75-125	05/19/22 10:03	

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	2.5	2.4	97	76-126	
1,1,2,2-Tetrachloroethane	mg/kg	2.5	2.7	107	65-129	
1,1,2-Trichloroethane	mg/kg	2.5	2.5	101	75-121	
1,1-Dichloroethane	mg/kg	2.5	2.5	99	71-127	
1,1-Dichloroethene	mg/kg	2.5	2.1	82	63-130	
1,2-Dibromo-3-chloropropane	mg/kg	2.5	2.4	98	59-131	
1,2-Dibromoethane (EDB)	mg/kg	2.5	2.6	102	75-125	
1,2-Dichloroethane	mg/kg	2.5	2.4	94	65-131	
1,2-Dichloropropane	mg/kg	2.5	2.6	104	72-125	
2-Butanone (MEK)	mg/kg	2.5	2.9	116	34-170	
2-Hexanone	mg/kg	2.5	2.8	112	52-147	
4-Methyl-2-pentanone (MIBK)	mg/kg	2.5	2.7	110	58-141	
Acetone	mg/kg	2.5	2.9	117	16-192	
Benzene	mg/kg	2.5	2.6	106	74-132	
Bromodichloromethane	mg/kg	2.5	2.4	96	73-117	
Bromoform	mg/kg	2.5	2.6	102	58-132	
Bromomethane	mg/kg	2.5	2.0	81	47-157	
Carbon disulfide	mg/kg	2.5	2.0	80	52-145	
Carbon tetrachloride	mg/kg	2.5	2.5	101	68-129	
Chlorobenzene	mg/kg	2.5	2.5	101	79-121	
Chloroethane	mg/kg	2.5	1.9	77	34-160	
Chloroform	mg/kg	2.5	2.5	98	70-120	
Chloromethane	mg/kg	2.5	3.1	122	44-142	
cis-1,2-Dichloroethene	mg/kg	2.5	2.5	100	71-124	
cis-1,3-Dichloropropene	mg/kg	2.5	2.5	102	77-121	
Dibromochloromethane	mg/kg	2.5	2.5	100	67-122	
Dichlorodifluoromethane	mg/kg	2.5	2.5	99	28-148	
Ethylbenzene	mg/kg	2.5	2.5	101	79-116	
Isopropylbenzene (Cumene)	mg/kg	2.5	2.6	103	77-126	
m&p-Xylene	mg/kg	5	5.0	100	78-119	
Methyl acetate	mg/kg	2.5	2.6	103	47-155	
Methyl-tert-butyl ether	mg/kg	2.5	2.4	97	58-135	
Methylene Chloride	mg/kg	2.5	2.4	97	49-145	
o-Xylene	mg/kg	2.5	2.5	101	77-121	
Styrene	mg/kg	2.5	2.5	99	81-123	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Tetrachloroethene	mg/kg	2.5	2.6	105	62-138	
Toluene	mg/kg	2.5	2.5	99	79-120	
trans-1,2-Dichloroethene	mg/kg	2.5	2.6	102	68-125	
trans-1,3-Dichloropropene	mg/kg	2.5	2.4	98	77-121	
Trichloroethene	mg/kg	2.5	2.6	104	77-117	
Trichlorofluoromethane	mg/kg	2.5	2.1	82	45-164	
Vinyl chloride	mg/kg	2.5	1.9	77	48-130	
4-Bromofluorobenzene (S)	%.			101	64-139	
Dibromofluoromethane (S)	%.			98	66-143	
Toluene-d8 (S)	%.			100	75-125	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	106	73-141	3	20	
1,1,2,2-Tetrachloroethane	mg/kg	ND	2.6	2.6	2.9	2.9	110	110	48-148	0	20	
1,1,2-Trichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	105	106	46-154	1	20	
1,1-Dichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	106	108	63-145	1	20	
1,1-Dichloroethene	mg/kg	ND	2.6	2.6	2.1	2.1	80	81	28-176	1	20	
1,2-Dibromo-3-chloropropane	mg/kg	ND	2.6	2.6	2.5	2.7	96	101	40-152	5	20	
1,2-Dibromoethane (EDB)	mg/kg	ND	2.6	2.6	2.8	2.9	105	109	69-134	3	20	
1,2-Dichloroethane	mg/kg	ND	2.6	2.6	2.6	2.6	97	99	51-147	2	20	
1,2-Dichloropropane	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	64-140	2	20	
2-Butanone (MEK)	mg/kg	ND	2.6	2.6	2.8	2.9	94	100	10-200	5	20	
2-Hexanone	mg/kg	ND	2.6	2.6	2.9	3.1	108	116	40-157	7	20	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	2.6	2.6	2.8	2.9	107	110	36-165	2	20	
Acetone	mg/kg	ND	2.6	2.6	2.8	3.1	94	105	10-200	10	20	
Benzene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	29-186	2	20	
Bromodichloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	104	58-139	1	20	
Bromoform	mg/kg	ND	2.6	2.6	2.7	2.8	102	107	57-135	4	20	
Bromomethane	mg/kg	ND	2.6	2.6	2.0	2.0	75	75	42-168	0	20	
Carbon disulfide	mg/kg	ND	2.6	2.6	2.0	2.0	75	76	44-170	2	20	
Carbon tetrachloride	mg/kg	ND	2.6	2.6	2.8	2.9	107	109	45-162	2	20	
Chlorobenzene	mg/kg	ND	2.6	2.6	2.9	2.9	109	111	71-135	2	20	
Chloroethane	mg/kg	ND	2.6	2.6	0.90	0.74	34	28	32-175	19	20	M1
Chloroform	mg/kg	ND	2.6	2.6	2.7	2.8	104	106	61-136	2	20	
Chloromethane	mg/kg	ND	2.6	2.6	3.4	3.4	128	127	38-154	1	20	
Chloroprene	mg/kg				2.8	2.8				2	20	
cis-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	44-160	1	20	
cis-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	47-153	1	20	
Dibromochloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	102	104	64-130	2	20	
Dichlorodifluoromethane	mg/kg	ND	2.6	2.6	2.8	2.7	105	103	22-160	2	20	
Ethylbenzene	mg/kg	ND	2.6	2.6	2.9	2.9	110	111	51-153	1	20	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Isopropylbenzene (Cumene)	mg/kg	ND	2.6	2.6	3.0	3.0	114	114	68-145	0	20	
m&p-Xylene	mg/kg	ND	5.3	5.3	5.7	5.8	108	110	30-173	1	20	
Methyl acetate	mg/kg	ND	2.6	2.6	2.6	2.7	99	103	20-173	4	20	
Methyl-tert-butyl ether	mg/kg	ND	2.6	2.6	2.7	2.7	100	102	36-160	2	20	
Methylene Chloride	mg/kg	ND	2.6	2.6	2.9	2.9	108	109	56-140	1	20	
o-Xylene	mg/kg	ND	2.6	2.6	3.0	3.0	113	113	10-197	1	20	
Styrene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	37-163	1	20	
Tetrachloroethene	mg/kg	ND	2.6	2.6	3.2	3.4	120	127	18-193	6	20	
Toluene	mg/kg	ND	2.6	2.6	2.8	2.8	107	108	33-175	0	20	
trans-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.9	2.9	108	108	63-140	0	20	
trans-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.7	2.7	101	102	47-153	1	20	
Trichloroethene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	24-181	1	20	
Trichlorofluoromethane	mg/kg	ND	2.6	2.6	1.9	2.0	73	74	37-182	1	20	
Vinyl chloride	mg/kg	ND	2.6	2.6	2.1	2.1	78	81	19-169	3	20	
4-Bromofluorobenzene (S)	%.						104	103	64-139			
Dibromofluoromethane (S)	%.						95	96	66-143			
Toluene-d8 (S)	%.						101	100	75-125			

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QUALIFIERS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The Nelac Institute

ANALYTE QUALIFIERS

D4	Sample was diluted due to the presence of high levels of target analytes.
E	Analyte concentration exceeded the calibration range. The reported result is estimated.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
R1	RPD value was outside control limits.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20243028001	**DR-L-LB-05052022-01**	EPA 8260	255081		
20243028002	**DR-L-LB-05052022-02**	EPA 8260	255081		
20243028003	**DR-L-LA-05052022-01**	EPA 8260	255081		
20243028004	**DR-S-BP-05052022-02**	EPA 5035/5030B	255724	EPA 8260	255848

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Pace

CHAIN-OF-CUSTODY / Analytical Request Docum

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be com

Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at https://info.pacelabs.com/

WO# : 20243028

20243028

tion A

uired Client Information:

- pany: weston solution inc.
- ress: 4324 S. Sherwood Forest Blvd #100
- n Rouge , LA 70816
- il: jeff.wright@westonsolutions.com
- ne: 225-772-7929 Fax:
- uested Due Date: 48 hr

Section B

Required Project Information:

- Report To: Jeff Wright
- Copy To:
- Purchase Order #:
- Project Name:
- Project #:

Section C

Invoice Information:

- Attention:
- Company Name:
- Address:
- Pace Quote:
- Pace Project Manager: clay.ledet@pacelabs.com,
- Pace Profile #: 17402/1-2

Regulatory Agency

State / Location

Requested Analysis Filtered (Y/N)

SAMPLE ID (One Character per box. (A-Z, 0-9 / , -) Sample Ids must be unique)	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED START DATE	COLLECTED START TIME	COLLECTED END DATE	COLLECTED END TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Other	Analysis Test Y/N	8260 Full List	8260 Full List	8260 Full List	Residual Chlorine (Y/N)
DR-L-LB-05052022-01	WW	G	5/5/22	1545				3				X						X			
DR-L-LB-05052022-02	WW	G	5/5/22	1545				3				X						X			
DR-L-LA-05052022-01	WW	G	5/5/22	~~1715~~ 1710				3				X						X			
DR-S-BP-05052022-01	SO	G	5/5/22	1610				2	X									X			

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
	Weston	5/6/22	14:15	Tylea Smith	5/6/22	14:15				
	Tylea Smith	5/6/22	14:15	[illegible]	5/6/22	15:5				
	[illegible]	5/6/22	1750	[illegible]	5/6/2022	1750	1.8°C	Y	Y	Y

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE of SAMPLER: DATE Signed:

TEMP in C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

E34 3.0

ED_013532_00008923-00135

WO#: 20243028

Pace

1000 Riverbend. Blvd., Suite F
St. Rose, LA 70087

Project : PM: CAL Due Date: 05/12/22
CLIENT: 20-WestonSol

Courier: ☑ Pace Courier ☐ Hired Courier ☐ Fed X ☐ UPS ☐ DHL ☐ USPS ☐ Customer ☐ Other

Custody Seal on Cooler/Box Present: ☐ YES ☑ NO **Custody Seals intact:** ☐ YES ☐ NO

Samples on ice: ☑ YES ☐ NO **Type of Ice:** (Wet) Blue None

Date and Initials of person examining contents: 5/9/22 CAL

Temp should be ≤6°C *Temp must be measured from Temperature blank when present

Cooler #1 Thermometer Used: 10 Cooler Temp °C: (Observed) 1.8 (CF) 0 (Actual) 1.8
Cooler #2 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #3 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #4 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____

Tracking #: ____

Temperature Blank Present*?	☐Yes ☐No ☑N/A	
Chain of Custody Present:	☑Yes ☐No ☐N/A	
Chain of Custody Complete:	☑Yes ☐No ☐N/A	
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	
Sampler Name & Signature on COC:	☐Yes ☑No ☐N/A	
Samples Arrived within Hold Time:	☑Yes ☐No ☐N/A	
Sufficient Volume:	☑Yes ☐No ☐N/A	
Correct Containers Used:	☑Yes ☐No ☐N/A	
Filtered vol. Rec. for Diss. tests	☐Yes ☐No ☑N/A	
Sample Labels match COC:	☑Yes ☐No ☐N/A	
All containers received within manafacture's precautionary and/or expiration dates.	☑Yes ☐No ☐N/A	
All containers needing chemical preservation have been checked (except VOA, coliform, & O&G).	☐Yes ☐No ☑N/A	If No, was preserative added? ☐Yes ☐No If added record lot #.: HNO3 ____ H2SO4 ____ Date: ____ Time: ____
All containers preservation checked found to be in compliance with EPA recommendation.	☐Yes ☐No ☑N/A	
Headspace in VOA Vials (>6mm):	☐Yes ☑No ☐N/A	
Trip Blank Present:	☐Yes ☑No	

Client Notification/ Resolution:

Person Contacted: ____ Date/Time: ____

Comments/ Resolution: ____

Attachment 8

Daily Activity Summary for May 5, 2022 – FY2022 Denka Sampling Investigation

From: Penland, John
To: christopher-meyers@denkape.com; Bordelon, David
Cc: Osbourne, Margaret; Yurk, Jeffrey; Delgado, Eric
Subject: Daily Summary May 5, 2022 - FY2022 RCRA Sampling Investigation at the Denka facility located in LaPlace, LA (LAR000009415)
Date: Thursday, May 5, 2022 11:23:00 PM

All,
Here is a summary of my notes from today's inspection. If there are any errors or omissions please le t me know.

Inspection Participants

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Chris Meyers		Denka Performance Elastomer, LLC.		christopher-meyers@denkape.com
Cory Green	Sr. SHE Consultant	Denka Performance Elastomer, LLC.	985-536-7583	cory-green@denkape.com
Patrick Walsh	SHE/PSM Manager	Denka Performance Elastomer, LLC.	985-536-7573	patrick-walsh@denkape.com
David Bordelon		EPA - START		david.bordelon@westonsolutions.com
Derrick Cobb		EPA - START		derrick.cobb@westonsolutions.com
Jose Ojeda		EPA - START		jose.ojeda@westonsolutions.com
Jeff Wright		EPA - START		jeff.wright@westonsolutions.com
Luke Murray		EPA - START		luke.murray@mecx.net
Bob Holden		Jones Walker		
Jason Hutt		Bracewell		
Kevin Volkell		Bracewell		
Jorge Lavastida		Denka Performance Elastomer, LLC.		

Introduction

On May 5, 2022, I conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality. This inspection is a follow-up to the April 18-21, 2021, RCRA inspection where initial concerns were raised about the generation and management of the "neoprene popcorn" generated in the poly unit. This inspection involved observation of the facility's standard operating procedures and sample collection of air, liquid, and solid media associated with or impacted by the "neoprene popcorn" generation and management procedures.

Summary

- Inspection start – approximately 09:30am
- I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility.
- Denka had been notified of this sampling inspection through their counsel on April 29, 2022 and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.
- During our initial meeting I explained that the purpose of this sampling inspection was to collect information and samples related to the generation and management of the "neoprene popcorn". At this time, EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022 inspection.
- According to Chris Meyers, following the completion of the April 18-21, 2022 inspection, additional information concerning the amount of residual chloroprene present in the "neoprene popcorn" was located and will be provided as part of the response to the records request originating from EPA during that inspection.
- I asked whether Denka considered the "neoprene popcorn" to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had sold the stabilized "neoprene popcorn" for its commercial value previously, though it does not currently do so.
- I explained the D001 flammable solids definition and asked whether that could apply as the "neoprene popcorn" had been previously described by the Poly Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated.
- I explained the D003 reactivity definition and its association with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the "neoprene popcorn".
- As part of this inspection, I requested and received the following documents marked as Confidential:
    - PK Pump Out and Strainer Cleaning Operation

Clearing Unstripped Emulsion Storage Tank for Cleaning
    - 3 Engineering Drawings of the Brine Pit
    - Raw Materials Characteristics and Hazards
    - Emergency Stabilizer Make-up
- David Bordelon arrived at approximately 12:00pm
- At approximately 12:30pm we conducted our initial reconnaissance of the planned sample collection area and equipment staging location.
- We departed the facility for lunch at approximately 1:00pm
- We returned to the facility at approximately 2:15pm and briefed the START contractors.
- Initiated sampling at approximately 3:30pm
- A detailed sampling report will be prepared by the START contractors to accompany the report from the laboratory
- Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel.
- During this inspection I collected both photos and video recordings which are being claimed as Confidential by Denka.
- For all Confidential claims asserted by Denka please refer to the Region 6 CBI letter provided during the April 18-21, 2022 inspection.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Hutt, Jason [jason.hutt@bracewell.com]
Sent: 7/27/2022 7:26:18 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Voelkel, Kevin [kevin.voelkel@bracewell.com]; Meyers, Christopher [christopher-meyers@denka-pe.com]; Penland, John [Penland.John@epa.gov]; Lavastida, Jorge [jorge-lavastida@denka-pe.com]; Kusaka, Akihiko [Akihiko-Kusaka@denka-pe.com]; Holden, Bob [bholden@joneswalker.com]
Subject: RE: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Margaret – thank you for forwarding the transmittal from John Penland to Chris Meyers, which attached the Final Inspection Report. Three quick items:

1. I have confirmed with Chris that he did not receive the transmittal. The email address is correct, so we don't yet have a good explanation for the confusion. It is possible that the file size (11 MB) caused the issue. DPE requests a short extension of time to respond before the report is posted to EPA's website. Our strong preference would be an extension until 10 days after receipt of the second RCRA inspection report (anticipated to be transmitted to us on Friday, July 29, 2022). This will allow concurrent responses to the two reports, if any.

2. Please provide an unredacted copy of the report.

3. When you or John transmits the upcoming RCRA inspection report, please copy Bob Holden, Kevin Voelkel and me. We will be requesting an unredacted copy of that report as well.

Thanks in advance, - Jason

JASON B. HUTT
Partner
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T: +1.202.828.5850 | F: +1.202.857.2114 | M: +1.202.255.2042

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bracewell.com | profile | LinkedIn | Twitter

CONFIDENTIALITY STATEMENT
This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Wednesday, July 27, 2022 1:00 PM

To: Hutt, Jason <jason.hutt@bracewell.com>
Subject: FW: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

---

From: Penland, John <Penland.John@epa.gov>
Sent: Wednesday, July 20, 2022 10:47 AM
To: christopher-meyers@denka-pe.com
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Craig Easley <craig.easley@la.gov>
Subject: FY2022 RCRA Sampling Inspection for Denka - Final inspection report

Mr. Meyers,

On May 5, 2022, the United States Environmental Protection Agency conducted a sampling inspection at your facility under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA) and your Denka's RCRA Permit. A copy of the final inspection report is attached to this email. Please review the report, note the areas of concern, and take any actions necessary to ensure compliance with RCRA. The attached inspection report will be posted to EPA's public website after July 29, 2022.

Thank you for the cooperation extended to EPA personnel while at this facility. If you have any questions about this inspection report, please contact me using the information included in my signature block. An unredacted copy can also be made available to you on request.

Thank you,

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 2/16/2022 7:31:43 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]
Subject: Re: Denka - 2017 state inspection report

And may need to look at their source of DW for their workers…

Sent from my iPhone

On Feb 16, 2022, at 1:29 PM, Gilrein, Stephen <gilrein.stephen@epa.gov> wrote:

And I think SDWA (UIC)- but also need Mort to take a look, and do they fall under core TSCA?

Sent from my iPhone

On Feb 16, 2022, at 1:27 PM, Osbourne, Margaret <osbourne.margaret@epa.gov> wrote:

Right. CWA too.

From: Gilrein, Stephen <gilrein.stephen@epa.gov>
Sent: Wednesday, February 16, 2022 1:26 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Seager, Cheryl <Seager.Cheryl@epa.gov>
Subject: Re: Denka - 2017 state inspection report

Let's make sure it covers all media they are subject to, not just air and RCRA

Sent from my iPhone

On Feb 16, 2022, at 1:24 PM, Gilrein, Stephen <gilrein.stephen@epa.gov> wrote:

Wow

Sent from my iPhone

On Feb 16, 2022, at 1:11 PM, Osbourne, Margaret <osbourne.margaret@epa.gov> wrote:

Wow – looks like the decision has already been made…

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Wednesday, February 16, 2022 1:09 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Hi Margaret – Rosemarie had a call with Mary Greene and Diana Saenz this morning (I couldn't attend, unfortunately) and the outcome was that Mary and Rosemarie would like to schedule an NEIC-led multi-media inspection as soon as feasible. That creates some logistical hurdles for us all to work through. The advantage of an NEIC-led inspection is that they have their own sampling capability and we wouldn't need a TD (and therefore would not need ERG). NEIC would also be responsible for the inspection report. The difficulty will be getting this on NEIC's calendar and potentially shifting other scheduled inspections.

I will schedule a time for all of us to meet, but wanted to convey this message ASAP to this core group.

Thank you!
Lynne

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, February 11, 2022 12:23 AM
To: Davies, Lynne <Davies.Lynne@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>; Greene, Mary <Greene.Mary.E@epa.gov>
Cc: Penland, John <Penland.John@epa.gov>; Deppe, Fred <Deppe.Fred@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Denka - 2017 state inspection report

Here is the link to the Louisiana 2017 RCRA inspection report: https://edms.deq.louisiana.gov/app/doc/view?doc=10860843

John Penland is the inspector assigned to Denka. Should we wait to draft the TD until a decision is made to either proceed now with RCRA or to wait until after the CAA settlement is final? I defer to you.

Thanks,
Margaret

From: Davies, Lynne <Davies.Lynne@epa.gov>
Sent: Thursday, February 10, 2022 8:12 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: Denka - 2017 state inspection report

Hi all – Mary Greene (AED Director) contacted Greg and requested a copy of the state RCRA 2017 inspection report. Do we have a copy and if so, would you mind sending it to her?

She also asked for the RCRA permit, which I found on LDEQ's website, so I forwarded her the link (it's a large file).

Also, Kim Chavez in my group can start drafting a TD for a potential Denka inspection in April. We have funds we could devote to ERG sampling, etc. If you'd like to start that process, I'm happy to schedule a meeting to get that TD rolling.

Many thanks!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

Message

From: Davies, Lynne [Davies.Lynne@epa.gov]
Sent: 8/8/2022 1:38:51 PM
To: Joe Watson [joe.watson@erg.com]
CC: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: FW: DPE April Inspection Report, Redactions for CBI
Attachments: image001.png; image002.png; image003.png; April Inspection_Redacted.pdf

Hi Joe – this is the redacted version of the Denka April inspection provided by Denka's counsel. This will be useful as ERG performs its own redacted version and you can compare with what the company redacted. We'll chat on Wednesday and thanks!
Lynne

Lynne Davies
Chief, Waste Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-0278

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, August 5, 2022 6:46 PM
To: Davies, Lynne <Davies.Lynne@epa.gov>
Subject: Fwd: DPE April Inspection Report, Redactions for CBI

Sent from my iPhone

Begin forwarded message:

> **From:** "Holden, Bob" <bholden@joneswalker.com>
> **Date:** August 5, 2022 at 4:59:18 PM CDT
> **To:** "Penland, John" <Penland.John@epa.gov>, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>, "Osbourne, Margaret" <osbourne.margaret@epa.gov>, Craig Easley <craig.easley@la.gov>, "Deppe, Fred" <Deppe.Fred@epa.gov>
> **Cc:** "Christopher Meyers (christopher-meyers@denka-pe.com)" <christopher-meyers@denka-pe.com>, "Jason B. Hutt (jason.hutt@bracewell.com)" <jason.hutt@bracewell.com>, "Kevin M. Voelkel (kevin.voelkel@bracewell.com)" <kevin.voelkel@bracewell.com>, "Bartholomew, Trey" <tbartholomew@joneswalker.com>
> **Subject: DPE April Inspection Report, Redactions for CBI**
>
> Dear Mr. Penland and all:
>
> On behalf of Denka Performance Elastomer LLC (DPE), we appreciate the opportunity to assert Confidential Business Information (CBI) protection from public disclosure of confidential process, trade

secret, and business information contained in the Resource Conservation and Recovery Act (RCRA) Inspection Report for the inspection of the DPE facility on April 18 – 21, 2022.

Per the discussions between DPE counsel and EPA, attached is a CBI-redacted of the April Inspection Report. We will provide CBI-redactions of the report appendices on Monday, August 8.

We are also working on the May Inspection Report, and plan to have our CBI –redactions to you by Monday, August 8.

We are reviewing the Areas of Concern in the April and May reports. We will provide a written response to the Areas of Concern for the April Report within 30 days from today (by September 6 in view of the Labor Day holiday), and we will provide a written response to the Areas of Concern in the May report within 30 days of our submittal of the CBI-redacted version.

Please let us know if you have any questions or comments about this.

Bob Holden

Robert E. Holden
Partner
D: 504.582.8139
BHolden@joneswalker.com

Jones Walker LLP
201 St. Charles Ave, Ste 5100
New Orleans, LA 70170
joneswalker.com

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JONES
WALKER

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	04/18/2022 – 04/21/2022	
Media Program:	Resource Conservation and Recovery Act (RCRA)	
Regulatory Status	Large Quantity Generator (LQG) Treatment, Storage, and Disposal Facility (TSDF), National Compliance Initiative, Environmental Justice	
Company Name:	**Denka Performance Elastomers, LLC**	
Facility Name:	**Pontchartrain Site**	
Facility Physical Location:	560 Highway 44	
(city, state, zip code)	LaPlace, LA, 70068	
Mailing address:	See facility address	
(city, state, zip code)		
County/Parish:	St. John the Baptist Parish	
Facility Phone Number		
Facility Contact:	Christopher Meyers	Sr. Consultant
	christopher-meyers@denka-pe.com	
FRS Number:	110067396669	
RCRA Identification &Permit Number:	LAR000009415	
LDEQ Agency Interest Number:	199310	
NAICS:	325110, 325212, 325199	
SIC:	2822, 2869	

Personnel participating in inspection:		
Justin Young	USEPA HQ	RCRA Inspector
John Penland	USEPA Region 6	Sr. RCRA Inspector
Kenneth AuBuchon	USEPA Region 6	Clean Water Act Inspector
Joseph Watson	ERG (USEPA Contractor)	Senior Chemical Engineer
Janosh Wolters	ERG (USEPA Contractor)	Energy Engineer
George Wieber	ERG (USEPA Contractor)	Chemical Engineer
Christopher Meyers	Denka Performance Elastomer, LLC (DPE)	Sr. Consultant
Cory Green	Denka Performance Elastomer, LLC (DPE)	Sr. SHE Consultant
Kevin Voelkel	Bracewell, LLP (Counsel for DPE)	Associate

EPA Lead Inspector Signature/Date	JUSTIN YOUNG Digitally signed by JUSTIN YOUNG Date: 2022.07.29 17:02:38 -04'00'	
	Justin Young (OECA Waste Enforcement Branch)	Date
Supervisor Signature/Date		
	Lynne Davies (OECA Waste Enforcement Branch)	Date

THIS VERSION HAS BEEN REDACTED FOR DPE CONFIDENTIAL INFORMATION

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Justin Young (USEPA HQ), John Penland (USEPA Region 6), Kenneth AuBuchon (USEPA Region 6), Joseph Watson (Eastern Research Group, Inc. [ERG]), and Janosh Wolters (ERG) arrived at the Denka Performance Elastomers, LLC (DPE) Pontchartrain Site at 10:05 on April 18, 2022 for an unannounced compliance inspection. The inspection team met with Christopher Meyers/ Sr. Consultant, Cory Green/ Sr. SHE Consultant and Kevin Voelkel/Bracewell Associate at the Opening Conference. The inspection team presented their credentials to Mr. Meyers and Mr. Green. The scope of the inspection is a compliance evaluation inspection (CEI) to include all parts of RCRA including RCRA Air (AA, BB, CC). Inspector AuBuchon conducted a separate Clean Water Act inspection while on-site and will produce a separate report. George Wieber (ERG) joined the EPA inspection team a day later on April 19, 2022, and Inspector Watson was present during the first and last days of the inspection (April 18 and 21, 2022). The Louisiana Department of Environmental Quality (LDEQ) also had representatives present during the inspection, including Terry Dedon, Jimbo Earles, Jenifer Kidd, and Karen Price. Each LDEQ representative was present for only one or two days of the inspection, with at least one LDEQ representative present during each day of the inspection.

A photographic log for photographs taken during the inspection is included as Appendix 1. Sign-in sheets for each day of the inspection and for the closing conference are provided in Appendix 2.

FACILITY DESCRIPTION

General Facility Description

DPE manufactures neoprene [poly(beta-chloroprene)] polymer at the Pontchartrain site and is permitted under hazardous waste operating permit number LAD000009415. The site is owned by DuPont de Nemours, Inc, and DPE purchased the neoprene operations and business in 2015. DuPont de Nemours, Inc also operates on site, but the manufacturing operations are separate from DPE and do not involve neoprene manufacture. DPE operates its facility with 240 employees, working two shifts 24/7 for 365 days per year.

DPE manages neoprene manufacturing as three main processes: monomer synthesis, polymerization, and finishing. Raw materials used on site or imported are listed in Appendixs 3 and 4. Additional DPE processes and operations that occur on site (excluding DuPont de Nemours, Inc. operations) include underground injection wells, a halogen acid furnace, wastewater treatment, and air pollution control such as the Regenerative Thermal Oxidizer (RTO).

Permit and Compliance History

The hazardous waste operating permit for DPE lists the permitted units at the site, including container storage areas (CSAs), hazardous waste tanks, ancillary equipment, and the halogen acid production furnace, as shown in Table 1 below.

Table 1. Hazardous Waste Permitted Units

Location	Unit Type	Unit Name
CD Synthesis Area	Hazardous waste tank	Waste Organic Tank
	Hazardous waste tank	Catalyst Sludge Receiver Tank
	Hazardous waste tank	Isom Purge Tank
	Hazardous waste tank	No. 2 Monomers HCl Feed
	Hazardous waste tank	No. 1 Waste Organic Tank
	Hazardous waste tank	No. 2 Waste Organic Tank
	Hazardous waste tank	No. 3 Waste Organic Tank
	Hazardous waste tank	No. 4 Waste Organic Tank
	Hazardous waste tank	No. 5 Waste Organic Tank
	Hazardous waste tank	No. 6 Waste Organic Tank
	Hazardous waste tank	No. 1 HCl Unit Feed
	Hazardous waste tank	No. 2 HCl Unit Feed
	CSA	South/North Drum Pad
	Industrial furnace	Hydrochloric acid production furnace
Aqueous Waste Area	Hazardous waste tank	Emergency Aqueous Waste Tank
	Hazardous waste tank	Aqueous Clarifier Tank
	Hazardous waste tank	Aqueous Diversion Tank
	Hazardous waste tank	Brine Neutralization Tank
	Ancillary equipment	Aqueous Waste Filtration Units
	CSA	Monomers Drum Pad
Polymers Area	Hazardous waste tank	CD Heels Tank

Prior to this inspection, the most recent RCRA inspection at DPE occurred in October 2021, was conducted by LDEQ and found no violations or compliance issues. Prior to the 2021 inspection, state RCRA inspections also occurred in 2019 and 2017. No informal or formal enforcement actions have been taken against DPE under the RCRA program in the past 5 years. LDEQ and Denka signed an Administrative Order on Consent in 2017 under the Clean Air Act to reduce chloroprene emissions, and DPE was issued notices of violations by LDEQ in 2018. Several violations have also been identified under the Clean Water Act, with exceedances noted at a discharge point for fecal coliform, oil and grease, and/or total suspended solids on at least one occasion since 2020.

Monomer Synthesis – Monomer Unit and Isomerization Unit

[redacted]

[redacted]

[redacted]

[redacted]

Polymer Unit

[redacted]

[redacted]

[redacted]

Finishing Unit

[redacted]

Underground Injection Well System

The underground injection well system at the site receives aqueous waste streams from the HCl Recovery Unit, blowdown from JVC systems and knockout pots, equipment wash waters, water from the area sumps, contact stormwater, and waste brine from the CD Synthesis Unit (list of streams and compositions included in Appendix 7; analytical results for Dynawave Scrubber effluent in Appendix 13). Aqueous wastes are received in storage tanks (including the Diversion Tank, Aqueous Clarifier Tank, Emergency Aqueous Tank, or North and South Brine Tanks) prior to mixing to achieve the desired specific gravity. Aqueous wastes are then pumped through permitted aqueous waste filtration units and then into one of the three hazardous waste underground injection wells. There are three underground injection wells for hazardous waste (wells #4, #7, and #8) and one underground injection well for nonhazardous material. The Diversion Tank, Aqueous Clarifier Tank, and Emergency Aqueous Tank are permitted hazardous waste tanks. The hazardous waste underground injection wells are permitted as Class I Hazardous Waste Disposal Wells (under Conservation Order no. IMD 2001-13WD). Wastes generated from the underground injection well system include solids from filtration units (waste profile AW-025) and waste coagulated polymer from cleanout of the injection tubing (waste profile AW-036) which are managed as nonhazardous wastes. A process flow diagram for the units associated with the underground injection wells is included in Appendix 5.

HCl Recovery Unit

The HCl Recovery Unit receives material streams from the Monomer Emission Reduction Project (MERP) closed vent system, monomer area process wastes, and the permitted CD Heels Tank. Wastes from the monomer area processes are received in two permitted HCl Feed Tanks, which are mixed and controlled for the desired composition of material going to the HCl Recovery Unit. Five permitted Waste Organic Storage Tanks located in the 1236 Tank Farm are also used for receiving liquid hazardous wastes and blending prior to injection into the HCl Recovery Unit or for shipment off site (standard operating procedure and blending conditions provided in Appendix 14). The HCl Feed Tanks and the Waste Organic Storage Tanks are permitted hazardous waste tanks. The material from the MERP, HCl Feed Tanks, and Waste Organic Storage Tanks is atomized with air, preheated with natural gas, and sent to one of two parallel combustion chambers. The combustion gases are sent to quenchers and then primary absorbers. Gases from the two parallel primary absorbers are then combined and sent to a scrubbing train consisting of a secondary absorber, tertiary absorber, and vent scrubber (packed columns). Gases leaving the vent scrubber are then sent to a Dynawave scrubber unit for a final scrubbing step. Acidic aqueous material generated from the primary and secondary absorbers is sent to permitted hazardous waste storage tanks before transfer to the underground injection well system, where it is used to control pH of wastewaters. Effluent from the Dynawave scrubber is also sent to the underground injection well system. A process flow diagram for the HCl Recovery Unit (also referred to as the Hydrochloric Acid Production Furnace) is included in Appendix 8.

Ancillary Processes

The wastewater treatment system on site receives wastewaters from the polymerization and finishing process. A process flow diagram is provided in Appendix 8. The wastewater treatment system at the Pontchartrain site is permitted under Louisiana Pollution Discharge Elimination System (LPDES) permit number LA0127190. Wastes from the wastewater treatment system include digester sludge (waste profile WWT-038) and dewatered solids (waste profile WWT-180), which are both managed as nonhazardous wastes.

Air emissions from various operations and units in the monomer synthesis, polymerization, and finishing areas (such as reactor vents or storage tank vents) are controlled by the MERP closed vent system, the air-rich header, or the nitrogen-rich header. The units connected to the MERP or one of the header systems are shown in Appendix 8. The MERP transfers process emissions to the HCl Recovery Unit. The air-rich header and nitrogen-rich header transfer process emissions to the RTO on site.

DPE develops waste profiles for waste streams; waste profiles referenced in this section were either provided during post-inspection follow up or provided as part of a pre-inspection 3007 request, unless otherwise noted. Waste profiles provided as part of a pre-inspection 3007 request are included in Appendix 10. Hazardous waste tanks are listed in Table 1 of the hazardous waste operating permit (Section III.O.7), and hazardous waste containers are managed in satellite accumulation areas (SAAs), central accumulation areas (CAAs), or permitted container storage areas (CSAs). There are two CSAs on site: the Monomers CSA and the South/North CSA.

Section II - OBSERVATIONS

The inspection team arrived at the DPE Pontchartrain site at 10:00 am on the morning of April 18, 2022. The inspection team signed in, received badges, and proceeded to Building 8000 for the opening conference. Following the opening conference, the inspection team remained in Building 8000 and discussed general site information and an overview of manufacturing processes and waste management on site.

The inspection team returned on April 19, 2022 at approximately 7:50 am to continue the inspection and discussion of process information. Inspector Wolters calibrated the flame ionization detector (FID) on the Toxic Vapor Analyzer (TVA) 2020 at approximately 9:45 am using zero air and methane gas at 500 and 10,000 parts per million (ppm). Inspector Wolters conducted a bump test of the TVA 2020 after calibration to ensure the equipment was operating properly. All readings during the bump check were within 10 percent of the span gas concentrations. The inspection team conducted monitoring with the TVA 2020 during the inspection in accordance with EPA Method 21. The inspection team began a walkthrough of the Monomer Synthesis Process Area at 11:00 am. The inspection team observed the LPC Reactor, the Preflash, the Pentane Stripper, the Heads Column Make line coming off the Heads Concentrator Column, the Recovery Column Tails line coming off the Recovery Column, a stripper in the CD Synthesis Unit, and in-line strainers in the CD Synthesis Unit. During the afternoon, the inspection team continued process discussions and conducted an out brief at approximately 4:00pm. The inspection team departed the facility for the day at 4:30pm.

The inspection team returned on April 20, 2022 at approximately 7:45 am. Inspectors Wolters and Wieber calibrated the TVA 2020 and conducted a bump check of the TVA 2020. All readings during the bump check were within 10 percent of the span gas concentrations. The inspection team had a brief meeting to discuss sampling equipment with DPE personnel and outside counsel from Bracewell, and the on-site team was joined remotely by additional USEPA personnel, Inspector Watson, and Bracewell representatives via conference call. The call concluded at approximately 9:50 am, and the inspection team then continued process discussions. During the afternoon, Inspectors Wolters and Wieber recalibrated the TVA 2020 and conducted a bump check before the inspection team commenced a walkthrough at approximately 12:45 pm. All readings during the bump check were within 10 percent of the span gas concentrations. The inspection team returned to the Monomer Synthesis Process Area and observed the effluent tank from the JVC systems, the Catalyst Sludge Receiver Tank, a waste brine decanter tank, and a closed roll-off container being used for cleanout at the Isomerization Unit. The inspection team then moved to the HCl Recovery Unit at 2:00 pm. At the HCl Recovery Unit area, the inspection team observed the hazardous waste HCl Feed Tanks and secondary containment area as well as the top of the combustion chamber on the HCl Recovery Unit. The inspection team then moved to the Polymerization Process Area at 2:50 pm. The inspection team observed the inside of the polymerization process building including Poly Kettles and strainers. The inspection team also observed the OBP located immediately outside the polymerization process building. The inspection team then moved to the South/North CSA at 4:05 pm. The inspection team observed containers of hazardous and nonhazardous waste at Pad 1 and Pad 2 in the South/North CSA. The inspection team then returned to the office area at 4:20 pm for an out brief with facility personnel before departing at 5:30 pm.

The inspection team returned on April 21, 2022 at approximately 7:55 am. Inspectors Wolters and Wieber calibrated the TVA 2020 and conducted a bump check of the TVA 2020. The inspection team then commenced a walkthrough at 9:15 am. The inspection team returned to the Monomer Synthesis Process Area to view the flash tank used in the CD Synthesis Unit. At approximately 9:40 am, the inspection team moved to the underground injection well system. The inspection team observed the North and South Brine Tanks, the Diversion Tank, the Aqueous Clarifier Tank, primary filters for aqueous streams going to the wells, the Monomers CSA and a CAA located next to the CSA, and the injection well #8. The inspection team then moved to the Polymerization Process Area at approximately 10:30 am. The inspection team observed the Neoprene Lab, a CAA located outside the lab, and the hazardous waste CD Heels Tank. The inspection team then moved to observe the Emergency Aqueous Tank and the CAA located next to it at approximately 11:45 am. The inspection team then returned to the office area at around 12 noon. The inspection team began the closing conference at approximately 2:30 pm, and the inspection team departed the facility at 4:00 pm.

Further details regarding each of the areas observed during the walkthrough are discussed in the sections below.

Monomer Synthesis Process Area

The inspection team observed units in the Monomer Synthesis Process Area on April 19th-21st, 2022. On the distillation train, Inspector Wieber monitored components located along the outlet line for the Heads Column Make stream and the Recovery Column Tails stream using the TVA 2020, with no detections noted (Photos 1 through 3 and Photo 6, Appendix 1). The inspection team noted that the components were tagged with identification numbers, but the components subject to RCRA Subpart BB did not have markings or indications to distinguish them from other components [AOC 1]. The inspection team also observed a plastic SAA container near the outlet line for the Recovery Column Tails stream labeled as "DCB Purge Bottoms" that is used for collecting residuals from samples (Photo 5, Appendix 1) [AOC 2]. When the SAA is full, the material is transferred to a 55-gallon drum and managed as hazardous waste. DPE did not provide a waste profile for the DCB Purge Bottoms waste based on reviewed documents. Also located in the area of the distillation train, the inspection team observed grating along the ground for the area sump. Liquids from the area sump are fed to the underground injection well system through the permitted Aqueous Clarifier Tank. Mr. Timothy Brack, a DPE production engineer, stated that solids from the area sump are occasionally scooped out and disposed (waste profile DCB-012); the waste profile identifies monomer sump solids as nonhazardous waste managed in drums.

At the CD Synthesis Unit, the inspection team observed the in-line strainers leading to the primary decanter. The strainers are cleaned about once per week, with wastes disposed as nonhazardous waste. Further discussion of this waste stream is included in the Records Review section of this report. The inspection team also observed the permitted Catalyst Sludge Receiver Tank and the decanter tanks. Inspector Wieber monitored five valves and two pumps in hazardous waste service on the hard-piped line leading to the hazardous waste Catalyst Sludge Receiver Tank, and no concentrations above background were observed. The inspection team did observe an open-ended line in hazardous waste

service along the same piping run that was not double-blocked and only had a single closed valve as seen in Photo 9 of Appendix 1 [AOC 3]. Inspector Wieber also monitored five valves and four flanges on top of the Catalyst Sludge Receiver Tank, with no detections noted using the TVA 2020. The inspection team observed a black material on top of the tank that DPE personnel stated may have been a spill of inhibitor material. Inspector Wieber monitored around the area of the black material and no concentrations above background were observed the TVA 2020. Inspector Wieber also monitored components on a line outlet from one of the CD Synthesis Unit stripper columns that led to the MERP closed vent system, and no concentrations above background were observed using the TVA 2020.

The inspection team was unable to enter near the Isomerization Unit due to cleanout activities occurring during the inspection. Facility personnel stated that supplied air equipment and related PPE is required to enter the area during cleanout activities. A vacuum box container was located immediately outside the Isomerization Unit area that was being used for cleanout wastes (Photo 12, Appendix 1). The inspection team was informed that the vacuum box was currently empty and had not yet received wastes. Inspector Wieber monitored around the openings of the vacuum box, and no concentrations above background were observed using the TVA 2020. The inspection team observed that the flanged closure device on the vacuum box did not have all of the bolts in place, and duct tape was used to secure the closure device [AOC 4].

HCl Recovery Unit

The inspection team observed the HCl Recovery Unit on April 20th, 2022. At the containment area for the HCl Feed Tanks, the inspection team observed plastic filled with sawdust covering an open-ended line (Photo 14, Appendix 1). The opening was due to an in-line strainer that had been removed for servicing, and the plastic with sawdust was placed over the opening to collect any residue left after removal of the strainer [AOC 3]. Inspector Penland observed the top of one of the HCl Feed Tanks, and he noted that the roof of the tank and its closure devices appeared closed and in good condition. While at the HCl Recovery Unit, the inspection team met the contractor from EMSI who conducts LDAR monitoring at DPE. The contractor stated that the TVA 1000 model is used for conducting LDAR monitoring, with methane gas used for calibration. The inspection team asked the contractor from EMSI to monitor a pump and valve associated with the HCl Feed Tanks, and the monitoring technique appeared to follow Method 21 procedures.

The inspection team also observed the top of the HCl Recovery Unit combustion chamber. Inspector Wieber monitored three valves and five flanges along the line from the HCl Feed Tanks that leads to the combustion chamber, and no concentrations above background were observed (Photo 16, Appendix 1).

Polymerization Process Area

The inspection team observed units in the Polymerization Process Area on April 20th and 21st, 2022. While in the area, the inspection team observed several flyers posted on the wall indicating process hazards and management associated with Poly Kettle strainer waste (also referred to as "popcorn neoprene", or waste neoprene polymer). The flyers are included in Appendixs 15 through 17. The inspection team entered the building containing the Poly Kettles and observed the Poly Kettles as well as

the outlet lines leading to the emulsion storage tanks. While in the building containing the Poly Kettles, the EPA inspection team made the decision to don full-face respirators as informed by the team's health and safety plan (HASP) and due to the volatile organic compound (VOC) readings from the PID while inside the building. The inspection team did not observe DPE employees wearing respirators inside the building during the inspection. The inspection team observed that the outlet lines from the Poly Kettles have in-line strainers that capture Poly Kettle strainer waste. Poly Kettle strainer waste was observed on surfaces near the strainers, including along grating on the floor below the strainers. Based on review of process documentation, it appears that the sumps beneath the grating lead to the OBP. Photos 17 through 20 in Appendix 1 show observations of strainers and Poly Kettles inside the building. Jumius Roussell, the Area Manager of the Polymerization Process Units, explained that after each batch, operators remove Poly Kettle strainer waste from the in-line strainers following a purge process. The Poly Kettle strainer waste from the in-line strainers is placed in one of the open-topped bins with wheels (example seen in Photo 20, Appendix 1) and manually transferred to the OBP; the SOP requires operators to wear full-face respirators during removal and transfer of the Poly Kettle strainer waste, though this process was not observed during the inspection. [redacted] Mr. Roussell also stated during the description of the polymerization process that the Poly Kettle strainer waste is at risk of self-ignition due to exothermic reaction if left to dry, but that the waste will not ignite while transported to the OBP if it is done immediately and kept wet [AOC 5].

The inspection team then moved outside of the building containing the Poly Kettles to observe the OBP. The inspection team remained wearing full-face respirators while in the vicinity of the OBP; DPE operators accompanying the inspection team at the OBP did not don respirators at the time of the inspection. While approaching the edge of the OBP, the EPA inspection team made the decision to exit the area as informed by the team's HASP and PID readings at the time. Inspector Wolters took photographs of the OBP at the time (Photos 21 and 24, Appendix 1). The inspection team did not perform closer monitoring of the OBP with the TVA 2020 due to the VOC readings from the PID in the areas along the edge of the OBP. An open roll-off container containing Poly Kettle strainer waste and an excavator were observed next to the OBP (Photo 25, Appendix 1), and a TVA 2020 reading near the opening of the roll-off container showed a detection of 44.0 ppm for total VOCs.

Mr. Roussell stated that the excavator is intermittently used to dredge Poly Kettle strainer waste from the OBP, and the waste is then placed in the open roll-off container. The material in the open roll-off container is managed as nonhazardous waste (waste profile FIN-018), and the OBP appeared to be a treatment unit for the Poly Kettle strainer waste to react further before transferring into the open roll-off container [AOC 6]. The inspection team asked what VOCs may have caused the high readings on the PID while near the OBP. Mr. Roussell and an engineer for the Polymerization Process Area, Mr. Kisheon, mentioned that possible VOCs coming from the OBP were likely chloroprene-related or rosin. Mr. Meyers also later stated that the possible VOCs may have been ortho-dichlorobenzene, chloroprene, toluene, or ACR material. Patrick Walsh, EHS Manager at DPE, stated that it would not be feasible to

place the Poly Kettle strainer waste material in sample containers directly out of the strainers for analysis offsite since the material is still "curing" (reacting). The inspection team did not sample Poly Kettle strainer waste at the time due to the characteristics of the material as described by Mr. Roussell and Mr. Walsh. The inspection team did not sample the OBP or dredged Poly Kettle strainer waste, based on EPA's HASP and the respiratory protection factor of air-purifying full-face respirators. The inspection team determined that respirators were not adequate for proper respiratory protection during sampling activities.

The inspection team also observed the CD Heels Tank in the Polymerization Process Area, which is used to manage hazardous waste from the polymerization process, primarily bottoms from the CD Refining Column. At the bottom of the CD Heels Tank, the inspection team observed a funnel opening with a lid used to pour liquid waste from the Neoprene Lab into the CD Heels Tank. Inspector Wieber monitored around the lid of the funnel and noted a reading of 55.6 ppm on the TVA 2020. The inspection team also observed a white tag on one of the valves which was identified as a LDAR repair tag for components that are identified as leaking (Photo 53, Appendix 1). The inspection team also observed the roof of the CD Heels Tank. Inspector Wieber monitored a manway, five flanges, two valves, and one vent associated with the CD Heels Tank and no concentrations above background were observed using the TVA 2020.

South/North CSA

The inspection team observed the South/North CSA on April 20th, 2022. The inspection team first observed Pad 2 of the CSA (the southern pad). The inspection team observed fifty-two 55-gallon hazardous waste drums at Pad 2, with labels such as "CD Heels Solids", "HCl Feed", "Neoprene Lab Solids", "Monomer Lab Waste", and "Contaminated Trash Meso Solids". The hazardous waste containers were labeled as hazardous and were closed. The oldest accumulation start date observed was May 9th, 2021. Two of the 55-gallon drums containing hazardous waste were not labeled with an accumulation start date (Photos 26 and 27, Appendix 1) [AOC 7]. Nonhazardous waste containers and empty containers were also present in the Pad 2 area.

The inspection team also observed Pad 1 of the CSA (the northern pad). The inspection team observed four 55-gallon drums labeled as "Waste Organic" with a waste profile number of DCB-008 and no accumulation start date (Photos 28 through 33, Appendix 1) [AOC 7]. Adjacent to the Waste Organic 55-gallon drums, the inspection team also observed totes containing liquid, with some unlabeled and others labeled as "HCl Overflow – hazardous" (Photo 40, Appendix 1) [AOC 7]. Mr. Green stated that the material in the totes will be transferred to the underground injection well system for injection.

The inspection team also observed an accumulation area for waste lamps, paint solids, bulbs, and PCB wastes. The area is shown in Photos 35 through 39 of Appendix 1. The accumulation area had signage identifying the area as a "hazardous waste satellite accumulation area". There were multiple 55-gallon drums of material in the area, with each type of waste separated and identified with signage [AOC 8].

The inspection team also observed pallets of nonhazardous waste containers, empty containers, and raw material containers in the Pad 1 area as well. The inspection team asked if DPE had a system for

separating incompatible wastes, and Mr. Green stated that standard operating procedures or training guides are available for container management at DPE. Following the inspection, DPE provided a training guide for drum storage personnel which specifies management of hazardous and non-hazardous waste containers in SAAs, CAAs, and CSAs (Appendix 18).

Underground Injection Well Area and Monomers CSA

The inspection team observed the underground injection well area and the Monomers CSA on April 21st, 2022. The North and South Brine Tanks, Diversion Tank, and Aqueous Clarifier Tank are located within a concrete containment area that drains to a concrete-lined secondary containment pit in close proximity to the tanks. The concrete containment area is marked with signage stating, "Danger Hazardous Waste Management Unit Unauthorized Personnel Keep Out". The Aqueous Clarifier Tank and the Diversion Tank receive the same waste streams, and DPE selects the receiving tank based on facility needs and capacity. Mr. Meyers stated that the Aqueous Clarifier Tank and the Diversion Tanks are permitted hazardous waste management units, but that the tanks were in nonhazardous waste service. DPE considers HCl acid material from the HCl Recovery Unit as a treatment chemical, not a waste, used to adjust the pH of liquid wastes prior to well injection. Mr. Green stated that in cases when the HCl Recovery Unit produces off-specification material, the material is still sent to the Aqueous Clarifier Tank or Diversion Tank to maintain the pH in the tanks between 8 and 10. DPE provided a 1998 memorandum to support its classification of the HCl acid material as a treatment chemical (Appendix 19).

The inspection team also observed the primary filters used for the injection wells, including one that was in use at the time of the inspection (Photo 43, Appendix 1). The inspection team observed liquids dripping out of the outlet line of the pressure relief valve for the filter. Inspector Wieber monitored the opening of the outlet line and observed a reading of 33.4 ppm on the TVA 2020.

The inspection team also observed the Monomer CSA cleaning pad located immediately north of the concrete containment area for the tanks. The cleaning pad area is used for washing filters from the underground injection well system, with generated sludges and waste filters managed as nonhazardous waste (waste profile AW-025). There were no containers or filters located in the area at the time of the inspection. Located adjacent to the cleaning pad is a central accumulation area (CAA) that also did not have any containers present at the time of the inspection. The CAA was located in concrete secondary containment with a fire extinguisher nearby, but the inspection team did not observe a spill kit or signage indicating the area as a CAA (Photo 48, Appendix 1) [AOC 9].

The inspection team also observed injection well #8 and its secondary containment area (Photos 44 and 45, Appendix 1). A sump pump is present in the secondary containment of the well and is used to transfer accumulated liquids from the containment to the Diversion Tank. [redacted]

Neoprene Lab

The inspection team observed the Neoprene Lab located in the Polymerization Process Area on April 21st, 2022. Outside the Neoprene Lab, the inspection team observed a CAA for the Polymerization Process Area. The CAA had six empty 55-gallon drums and a drum with sawdust present at the time of the inspection. The EPA inspection team had decided to don full-face respirators while inside the Neoprene Lab as informed by the team's HASP and PID readings while inside the building. DPE lab personnel were not wearing respirators while inside the laboratory areas during the inspection. [redacted] Liquid wastes containing chloroprene are stored in small containers in a freezer inside the lab and transferred to the CD Heels Tank for disposal twice a day. Solid hazardous wastes from lab activities are disposed of in SAA containers and managed as hazardous waste. There were several SAA containers in the Neoprene Lab, including a labeled drum for spent COD Vials (waste profile FIN-159). The inspection team observed two SAA containers located in a fume hood that were unlabeled [AOC 2]. The inspection team also observed an amber glass container labeled as "Inhibited Waste Brine", and follow-up information from DPE noted that the liquid in the container is used as a process sample and returned to the process once tested. Waste profiles for other waste streams from the Neoprene Lab are included in the Records Review section of this report.

CAA near Emergency Aqueous Tank

The inspection team observed the CAA near the Emergency Aqueous Tank on April 21st, 2022. The CAA is located within the secondary containment area of the 2 MM LB Crude Chloroprene Storage Tank. The inspection team observed approximately 17 totes labeled as "low pH Water" with no hazardous waste indication (Photos 55 through 61, Appendix 1). Mr. Roussell stated that the pH of the water in the totes is approximately 2 and that the totes are generated from the ACR process. The earliest start accumulation date observed on the totes was April 17, 2022. Inspector Wieber monitored two of the totes, and no concentrations above background were observed using the TVA 2020. The inspection team requested analytical data or a waste profile for the waste in the totes, which was provided in follow-up documentation as waste profile PLY-213 (Appendix 20). The material is identified as characteristic hazardous waste in the waste profile, and it was not identified as such on the totes in the CAA [AOC 7]. In addition to the totes, the inspection team observed 55-gallon drums of ortho-dichlorobenzene raw material in the same secondary containment area. The inspection team also briefly observed the Emergency Aqueous Tank while at the CAA and did not note any concerns.

Records Review

The inspection team reviewed the following compliance documents as part of the records review.

Standard Operating Procedures (SOPs):

DPE provided SOPs for waste-generating activities at the Pontchartrain site. In particular, the SOP for cleaning popcorn neoprene out of in-line strainers in the CD Synthesis Unit (Appendix 21) was reviewed in addition to the SOP (training guide) for waste container management (Appendix 18). The SOP for cleaning in-line strainers in the CD Synthesis Unit includes flushing with water, removing waste neoprene material out of the strainer, and placing the waste neoprene material into a bucket. The

material in the bucket is then steamed for 2 hours to "deactivate" the waste material based on the provided SOP (Appendix 21). The action of steaming the waste material for deactivation prior to disposal may be considered a form of treatment not covered in the hazardous waste operating permit [AOC 10].

The SOP for container management addresses filling containers, weekly inspections, aisle space, labeling, transportation and handling of containers, and different requirements for SAAs, CAAs, and CSAs. The container management SOP did not discuss separating incompatible wastes in detail but did mention "containers of incompatible materials must not be stored together". There were no other observations noted during cursory review of other SOPs provided.

Waste Profiles and Analytical Data:
DPE provided analytical data and waste profiles for waste streams generated at the Pontchartrain site as part of the pre-inspection request and during inspection follow up. Analytical data, waste profiles, or related information for waste neoprene/Poly Kettle strainer waste, Heads Column Make, recovery column tails, HCl Recovery unit wastes, CD Brine from the CD Synthesis Unit, monomer sump solids, and lab wastes were reviewed, in particular, based on observations during the inspection. DPE provided two waste profiles relevant to waste neoprene polymer (also referred to as "popcorn neoprene", coagulated polymer, or Poly Kettle strainer waste in this report); the waste profile numbers were AW-036 and FIN-018 (included in Appendix 10), which both identified the material as nonhazardous waste. The waste profiles corresponded to different generation points for waste neoprene throughout the process. The waste profile FIN-018 shows that the material is 100 percent neoprene rubber, and the waste profile AW-036 shows typically 80% neoprene rubber with the remaining 20percent composed of water, sand/dirt, and small amounts (<0.1 percent each) of toluene, chloroprene, 3,4-DCB, and 1,4-DCB. DPE provided analytical data for waste neoprene polymer for several 2019 samples removed from strainers (as included in Appendix 22). The analytical data show beta-chloroprene levels ("BCD" in the analytical reports) in the waste neoprene polymer with concentrations ranging from approximately 2.0 to 8.3 weight percent. Analytical data for "Waste Neoprene" was also provided from 2016 (Appendix 23) showing 356 mg/kg of chloroprene in the sample. Additionally, a waste recertification from December 2021 for waste profile FIN-018 shows that the waste has a declared composition containing 19.8 percent water, 0.01 percent chloroprene, 0.01 percent toluene, and trace acetic acid in addition to the neoprene rubber (Appendix 24), which is not shown on the FIN-018 waste profile [AOC 5]. Metals analysis of the waste neoprene (Appendix 25) showed that the material is not characteristic for toxicity due to metals.

DPE does not have waste profiles for the Heads Column Make or Recovery Column Tails waste streams, but analytical data was provided. [redacted] Based on the generation process and documentation for the hazardous waste determination of combined HCl feed stream from the Monomers unit (Appendix 28),

the Heads Make Column and Recovery Column Tails may be classified as F024 or F025 listed waste with potential characteristics of D001 and D002 [AOC 11].

DPE also provided analytical data and information pertaining to the wastes sent to the underground injection well system from the HCl Recovery Unit, including the waste streams from the primary and secondary scrubbers and the Dynawave Scrubber effluent. Analytical from the Dynawave Scrubber effluent (Appendix 13) shows nondetects for volatile compounds that were analyzed for, which included chloroprene, and only chromium and nickel were detected in metals analysis. For the hydrochloric acid produced from the primary and secondary scrubbers, DPE provided a memorandum from 1998 (Appendix 19) classifying the hydrochloric acid stream as a treatment chemical as opposed to a waste. Based on F024 and F025 listings of the HCl feed stream (Appendix 28), the HCl produced from the HCl Recovery Unit would also retain the listed hazardous waste codes [AOC 11]. Additionally, the material would have the D002 waste code for corrosivity (as supported by Appendix 6) since subsequent disposal of the aqueous waste in the underground injection wells may constitute land disposal of the HCl from the HCl Recovery Unit [AOC 12].

DPE provided documentation addressing management of the brine material generated from the flash tank in the CD Synthesis Unit and sent to the North or South Brine Tanks. DPE manages the brine material stream as a treatment chemical as stated in the same 1998 memorandum addressing the hydrochloric acid stream from the HCl Recovery Unit (Appendix 19). The SOP for Aqueous Waste Storage and Neutralization (Appendix 29) does state: "CD Brine is known to contain trace amounts of 3,4-DCB, 1,4-DCB, and alpha-CD with the major organic constituent being 5 to 20 ppm beta-CD". Based on generation process in a flash tank from monomer synthesis, the waste brine may be considered F024 listed hazardous waste. Additionally, subsequent disposal of the aqueous waste in the underground injection wells may constitute land disposal of the waste brine material from the flash tank in the CD Synthesis Unit [AOC 11, AOC 12].

DPE provided a waste profile for its monomer sump solids (Appendix 30), which is managed as nonhazardous waste when the solids are cleaned out of the sump (waste profile DCB-012). Based on the waste profile, the monomer sump solids are nonhazardous and expected to contain a maximum of 1 percent organics consisting of toluene; 1,4-DCB; and/or 3,4-DCB.

Waste profiles for materials from the Neoprene Lab included profiles for "Neoprene Lab Waste Liquids" (FIN-118), "Neoprene Lab Waste Solids" (FIN-121), and "COD Digestion Solution" (FIN-159). The waste liquids are identified as hazardous under waste codes D001, D002, D039, F002, F003, and F005 (included in Appendix 10). The waste solids are identified as nonhazardous wastes on the waste profile (included in Appendix 10). The COD digestion solution waste is identified as hazardous under waste codes D002, D007, D009, and D011 (included in Appendix 10). The inspection team noted that Neoprene Lab Solids were managed as hazardous waste based on on-site observations of labeled containers. This observation is not consistent with the waste profile listed for Neoprene Lab Waste Solids [AOC 13].

Waste Manifests and Shipments:

DPE also provided copies of signed manifests and land disposal restriction (LDR) forms (Appendix 31). A majority of the available manifests were difficult to read due to faded text, but the LDR forms were reviewed for the off-site waste shipments. LDR forms for Neoprene Lab Solids listed the material as hazardous waste with the waste profile number FIN-118, which is the profile number corresponding to Neoprene Lab Waste Liquids. There were no other observations noted during review of the inspection logs.

In addition to the hazardous waste manifests and LDR forms, DPE also provided documentation pertaining to the amounts of each type of waste sent off site for the years 2019 through 2021 (Appendix 32). DPE also provided a similar list specific to waste profile FIN-018 (waste neoprene) sent off site during the same period (Appendix 33). [redacted]
More recent records show that waste neoprene is sent off site to Waste Pro – River Birch (EPA ID LAR000086413), which is a Subtitle D landfill and active large quantity generator of hazardous waste under RCRA (Appendix 34) [AOC 14].

Inspection Logs:
Following the inspection, DPE provided electronic records of inspection logs for the CAA near the CD Heels Tank, the CAA outside the Neoprene Lab in the Polymerization Process Area, and the South/North CSA for the years 2019 through 2021 (Appendix 35). The inspection team reviewed the available inspection records and noted several issues or components missing from the inspection forms [AOC 15]:

- Approximately half of the inspection forms did not list the number of containers present in the area at the time, though this is listed as a prompt on the inspection checklist.
- There were several instances in which an inspection record was not available for a period of over seven days. The time intervals identified without an inspection record that were over seven days are as follows:
    - For the CD Heels Tank CAA Storage Pad
        - Between August 24, 2021 to November 10, 2021
        - Between February 8, 2022 to February 22, 2022
        - Between April 5, 2022 to April 19, 2022
    - For the Poly Building CAA Drum Pad
        - Between August 24, 2021 to November 10, 2021
    - For the South/North CSA
        - Between December 12, 2019 to December 30, 2019
        - Between March 17, 2020 to March 25, 2020
        - Between August 19, 2020 to August 31, 2020
        - Between September 27, 2021 to November 1, 2021
- Multiple inspection forms did not have an inspector name listed on the form.
- In instances where an "Abnormal" observation was noted, no additional notes or indication of remedial action to address issues was provided. For example, the inspection log from May 5, 2020 for the CAA near the CD Heels Tank indicated the presence of a spill and signs of corrosion

or leaks from containers based on the checklist responses (listed as "Abnormal"). There were no additional notes regarding cleanup of the spill or response to the problem.

- For the inspection log on January 29, 2019 at the CAA near the Neoprene Lab, the notes indicate that four totes were present that had been dated October 2018. This would be close to or exceeding the 90-day time limit on accumulation of containers in a CAA, and the inspection log did not indicate in Item 13 that any containers were over 60 days old. This is a discrepancy between the notes and the checklist response.

The inspection team also noted instances where an inspection form was submitted twice on the same day. There were no other observations noted during review of the inspection logs.

LDAR Program:
EMSI is the contractor that manages the LDAR program at the DPE Pontchartrain site. DPE provided the EMSI SOP for conducting LDAR monitoring (Appendix 36), the manual developed by DPE for the LDAR program (Appendix 37), and a backup file for the LDAR database which is managed through the LeakDAS software platform. The EMSI SOP shows that calibration gases include a zero air; a 500 ppm methane; a 1,000 ppm methane; and a 10,000 ppm methane. The contractor has three TVAs available and conducts quarterly precision testing as well as daily calibration and bump checks based on the SOP. Monitoring methods as described for each component also appeared adequate. The DPE LDAR manual provides a brief description of applicable LDAR regulations at the site, roles and responsibilities, leak thresholds and repair schedules, monitoring frequencies, and definitions for classifying components as unsafe or difficult to monitor. There were no other observations noted during review of the LDAR documentation.

Contingency Plan:
DPE's contingency plan and quick reference guide are both included as Appendixs to the facility hazardous waste operating permit. DPE sent copies of the contingency plan to the state police, local police, local emergency preparedness office, and the local medical facility. The cover letters for the contingency plan as sent to these entities as well as the return receipts are provided in Appendixs 38 and 39, respectively. There were no other observations noted during review of the contingency plan.

Section III – AREAS OF CONCERN
The following areas of concern (AOCs) were identified as part of the walkthrough and records review during and after the on-site inspection.

1. The inspection team noted that components subject to regulation under Subpart BB were not marked or identified in a way that would distinguish them from other pieces of equipment. Components are assigned an individual identification number for the purposes of LDAR monitoring and had tags, but physical labeling of each component specific to RCRA was not observed during the walkthrough (Photos 1 through 3, 6, 9, and 16; Appendix 1).
2. A generator must mark its satellite accumulation area containers with the words "hazardous waste" as well as an indication of the hazards of the contents.

a. The inspection team observed two improperly or unlabeled satellite containers in the Neoprene Lab that were used to accumulate hazardous waste (Photos 49 and 50, Appendix 1).
b. The inspection team observed containers that were used to accumulate hazardous waste near the point of generation as satellite accumulation containers, but they were not labeled as "hazardous waste". The containers were located at the base of the Recovery Column, nearby the Catalyst Sludge Receiver, and nearby the HCl Feed tanks (Photos 5, 10, and 15; Appendix 1).

3. The inspection team observed open-ended lines that did not have a cap, blind flange, or second valve during the walkthrough.
   a. One open-ended line was observed along the piping [redacted]
   b. An open-ended line for a strainer removed for servicing was observed at the secondary containment area for the permitted HCl Feed Tanks. [redacted]
4. [redacted]
5. Waste neoprene, also referred to as popcorn neoprene, coagulated polymer, or Poly Kettle strainer waste, is generated at several points in the process at the DPE Pontchartrain site and appears to be mischaracterized as a nonhazardous waste stream. [redacted] Associated waste profiles that were identified for waste neoprene include FIN-018, AW-036, and CDS-102 (note that CDS-102 is only referenced in a SOP, and no waste profile was received from DPE). Waste profile FIN-018 (included in Appendix 10) defines waste chloroprene as 100 percent neoprene rubber, but a waste re-certification form from DPE (Appendix 24) and analytical data of waste neoprene (Appendixs 22 and 23) show that the waste neoprene contains other compounds such as chloroprene. Additionally, while exact composition varies for the waste generation points, the waste neoprene waste streams appear to exhibit hazardous characteristics of reactivity. Evidence suggesting the reactivity of the Poly Kettle strainer waste (FIN-018) at the point of generation includes the following:
   - Flyers posted on the wall of a building in the Polymerization Process Area addressing hazards and management of Poly Kettle strainer waste (Appendixs 15 through 17)
   - Statement from Mr. Roussell that the Poly Kettle strainer waste is at risk of self-ignition due to exothermic reaction if left to dry after being removed from the Poly Kettle strainers.

- Statement from Mr. Walsh suggesting it would not be feasible to place the Poly Kettle strainer waste into a container for sampling since the material is still "curing" (reacting).

Additionally, the waste neoprene generated from cleaning out in-line strainers in the CD Synthesis Unit (waste profile CDS-102) also appears to exhibit hazardous characteristics of reactivity based on the description provided in a SOP for the removal and steaming of waste neoprene ("popcorn polymer") from the strainer (Appendix 21). The SOP states that, "Popcorn polymer can be stored safely after it has been steamed for at least 2 hours. Steaming removes all CD liquid and vapor from the polymer and is the most acceptable method of preparing popcorn polymer for disposal," and, "[s]team the polymer for at least 2 hours to deactivate it".

6. 40 CFR 260.10 defines "treatment" as: "any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to [...] render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume". [redacted] Therefore, the OBP may be operating as an unpermitted hazardous waste treatment unit. Additionally, it is uncertain whether the material is completely [redacted] Therefore, the roll-off container may be accumulating hazardous waste as an open hazardous waste container and potentially also an unpermitted treatment unit.
7. Hazardous waste containers must be labeled with the words "hazardous waste", an indication of the hazards of the contents, and an accumulation start date.
    a. The inspection team observed six separate 55-gallon drums and several totes labeled as hazardous in the South/North CSA that were not labeled with a start accumulation date. (Photos 26 through 33 and Photo 40, Appendix 1)
    b. The inspection team observed approximately 17 totes labeled as "low pH Water" with no hazardous waste indication in the CAA near the Emergency Aqueous Tank. The inspection team requested analytical data or a waste profile for the waste in the totes, which was provided in follow-up documentation as waste profile PLY-213 (Appendix 20). The material is identified as characteristic hazardous waste in the waste profile, and the totes were not labeled as hazardous waste in the CAA (Photos 55 through 61, Appendix 1).
8. Based on labeling of the accumulation area in the South/North CSA, DPE manages used lamps and used batteries as hazardous waste instead of under the regulations set forth in 40 CFR 273. DPE also labeled the areas for accumulation of these wastes as satellite accumulation areas within the South/North CSA. The area in the South/North CSA accumulating the used lamp and used battery wastes is not at or near the point of generation of the wastes, and the collective capacity of containers in the area is greater than 55 gallons. The signage in the area indicates that the containers are not labeled with the start accumulation date until full. (Photos 35 through 39, Appendix 1)

9. The inspection team did not observe spill control equipment at the CAA in the underground injection well area (Photo 48, Appendix 1).
10. Waste neoprene from the in-line filters [redacted] The steaming process would be considered "treatment" based on the regulatory definition (as included in AOC 6), and the bucket, or vessel used to steam the polymer, may be considered an unpermitted treatment unit.
11. Waste streams generated from the Monomer Synthesis Process may be F024 or F025 listed wastes, including CD Brine generated from the flasher tank in the CD Synthesis Unit and waste that is sent to the HCl Recovery Unit. This determination is supported by documentation provided by DPE (Appendix 28). Listed hazardous waste would retain its listing throughout the HCl Recovery Unit process and in mixing for disposal via underground injection wells.
12. CD Brine generated [redacted] are both sent to the underground injection well system and mixed with aqueous waste for pH or specific gravity adjustment. DPE provided documentation stating that the CD Brine and HCl material streams are not considered wastes since they are used to replace commercial product for achieving permit requirements for underground injection of waste (Appendix 19). Underground injection of the mixed aqueous material may be considered "land disposal" of the CD Brine and HCl material, so the CD Brine and HCl streams would be considered wastes and retain associated characteristic and listed waste codes.
13. The management and identification of Neoprene Lab Waste Solids and Neoprene Lab Waste Liquids is not consistent. The waste profile identifies Neoprene Lab Waste Solids (FIN-121) as a nonhazardous waste and the Neoprene Lab Waste Liquids (FIN-118) as a hazardous waste. The inspection team observed containers managed on site and identified in waste manifests as hazardous wastes with the FIN-118 waste profile number but labeled as "Neoprene Lab Solids".
14. Waste neoprene under the waste profile FIN-018 is currently sent off site to Waste Pro – River Birch (EPA ID LAR000086413) which is a Subtitle D landfill (Appendix 34). Waste shipment data showed that a total of over 4.2 million pounds of FIN-018 waste was sent off site as nonhazardous waste for disposal during the years 2019 through 2021 (Appendix 33). As explained in AOC 5, the waste neoprene may be a characteristic hazardous waste, and hazardous waste must be disposed of at a RCRA Subtitle C permitted facility.
15. During records review of the available CAA and CSA inspection logs, the inspection team noted that there were gaps in available weekly inspection logs for longer than one week at a given location (exact dates listed in Records Review section of this report), some inspection logs were incomplete or did not identify the inspector that conducted the inspection, and notes listed in the forms did not align with the checklist in some instances. The inspection team also noted that in one instance a leaking container was recorded for the CAA near the CD Heels Tank (occurring on May 5, 2020), but no remedial measure or resolution addressing the leaking container was documented for the issue.

<u>Closing Conference</u>

EPA inspectors Justin Young, John Penland, Kenneth AuBuchon, Joseph Watson, Janosh Wolters, and George Wieber conducted a closing conference at the DPE Pontchartrain site at approximately 14:30 on April 21, 2022 for the inspection. During the closing conference, the inspection team reviewed AOCs 1 through 9, as noted during the inspection. Also present for the closing conference were Terry Dedon of LDEQ; Chris Meyers, Cory Green, Akihiko Kusaka, and Patrick Walsh of DPE; and Kevin Voelkel of Bracewell (DPE counsel). Others also joined the closing conference remotely via conference call including Lynne Davies, Fred Deppe, Marcia Moncrieffe, Negin Mostaghim, Russell Murdock, Jeffrey Yurk, and Margaret Osbourne of the USEPA; Jorge Lavastida of DPE; and Jason Hutt of Bracewell (DPE counsel).

Additionally, AOCs 10 through 15 were determined after the conclusion of the inspection and were not included in the closing conference.

Section IV – FOLLOW UP

After exiting the Facility on April 21, 2022, EPA received follow-up documentation from DPE on May 10, 2022. The cover letter for the documents delivered is included in Appendix 40. Documents were delivered via file transfer protocol (FTP) site managed by Bracewell.

A sampling event was conducted on May 5, 2022 at the DPE Pontchartrain site to evaluate the process of generating Poly Kettle strainer waste and its subsequent management and disposal. A separate report was completed to address the sampling, analytical results, and observations made during that event.

Section V – LIST OF APPENDICES

Appendix 1 – (CBI) Photo Log – 63 photos taken
Appendix 2 – Inspection Sign-in Sheets
Appendix 3 – (CBI) List of Raw Materials Used Onsite
Appendix 4 – (CBI) List of Imported Raw Materials
Appendix 5 – (CBI) Detailed Process Flow Diagram for Monomer Synthesis Process
Appendix 6 – (CBI) Aqueous Waste Streams for Elementary Neutralization
Appendix 7 – (CBI) Aqueous Waste Streams going to the Underground Injection Well System
Appendix 8 – Site Process Flow Diagrams
Appendix 9 – (CBI) CD Heels Tank Hazardous Waste Determination
Appendix 10 – Compiled Waste Profiles received prior to the Inspection on March 18, 2022
Appendix 11 – (CBI) OBP Construction Diagrams
Appendix 12 – (CBI) Structural Integrity Test for the OBP
Appendix 13 – (CBI) Analytical Data for the Dynawave Scrubber
Appendix 14 – (CBI) 1236 Tank Farm Standard Operating Procedure
Appendix 15 – (CBI) Popcorn Neoprene Flyer (#04)
Appendix 16 – (CBI) Popcorn Neoprene Flyer (#39)
Appendix 17 – (CBI) Popcorn Neoprene Flyer (#40)
Appendix 18 – (CBI) Waste Container Management Training Guide

Appendix 19 – (CBI) Waste Determination Memorandum for CD Brine and HCl Recovery Unit Effluent
Appendix 20 – Waste Profile for Water with ACR (PLY-213)
Appendix 21 – (CBI) Standard Operating Procedure for Cleaning Popcorn Neoprene Strainers
Appendix 22 – (CBI) Waste Neoprene 2019 Analytical Data
Appendix 23 – (CBI) Waste Neoprene 2016 Analytical Data
Appendix 24 – Profile Recertification Form for Waste Profile FIN-018
Appendix 25 – (CBI) Metals Analytical Data for Waste Profile FIN-018
Appendix 26 – (CBI) Composition Data for Heads Column Make Waste Stream
Appendix 27 – (CBI) Composition Data for Recovery Column Tails Waste Stream
Appendix 28 – (CBI) HCl Recovery Unit Hazardous Waste Determination
Appendix 29 – (CBI) Standard Operating Conditions for Underground Injection Well System
Appendix 30 – Waste Profile for Monomer Sump Solids (DCB-012)
Appendix 31 – Waste Manifests and LDR Forms
Appendix 32 – Summary of Wastes sent Offsite 2019 through 2021
Appendix 33 – Summary of Waste Neoprene sent Offsite 2019 through 2021
Appendix 34 – Container Waste Management
Appendix 35 – (CBI) Weekly Inspection Logs
Appendix 36 – EMSI LDAR Standard Operating Procedure
Appendix 37 – (CBI) DPE LDAR Manual
Appendix 38 – Letters sent to Local Authorities for Contingency Plan
Appendix 39 – Return Receipts for Contingency Plan Letters sent to Local Authorities
Appendix 40 – DPE Follow-up Response received on May 10, 2022

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 8/11/2022 5:02:32 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Can you send me the final START report that has the sampling results?
Attachments: Redacted - FY2022 RCRA Sampling Inspection Report-Denka.pdf

It's attachment 7 of this report

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Thursday, August 11, 2022 11:59 AM
To: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Can you send me the final START report that has the sampling results?

Margaret Osbourne
Chief, Waste Enforcement Branch
Enforcement and Compliance Assurance Division
EPA Region 6
1201 Elm St, Suite 500, ECDS
Dallas, TX 75270
214-665-6508 (office)
972-322-9381 (cell)

EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	May 05, 2022	
Media Program:	Resource Conservation and Recovery Act	
Regulatory Program(s)	Large Quantity Generator, Treatment Storage and Disposal Facility	
Company Name:	**Denka Performance Elastomer, LLC.**	
Facility Name:	**Pontchartrain Site**	
Facility Physical Location:	560 Highway 44	
(city, state, zip code)	LaPlace, LA 70068	
Mailing address:		
(city, state, zip code)		
County/Parish:	St. John the Baptists Parish	
Facility Phone Number		
Facility Contact:	Christopher Meyers	Sr. Consultant
	Christopher-meyers@denka-pe.com	
FRS Number:	110067396669	
Identification/Permit Number:	LAR000009415	
Media Identifier Number:	See above	
NAICS:	325110, 325212, 325199	
SIC:	2822, 2869	

Personnel participating in inspection:		
John Penland	USEPA Region 6 - ECAD	Sr. RCRA Inspector
Christopher Meyers	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Cory Green	Denka Performance Elastomer, LLC.	Sr. SHE Consultant
Patrick Walsh	Denka Performance Elastomer, LLC.	SHE/PSM Manager
David Bordelon	USEPA START	
Derrick Cobb	USEPA START	
Jose Ojeda	USEPA START	
Jeff Wright	USEPA START	
Luke Murray	USEPA START	

EPA Lead Inspector Signature/Date	JOHN PENLAND Digitally signed by JOHN PENLAND DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JOHN PENLAND, 0.9.2342.19200300.100.1.1=68001003655750 Date: 2022.07.19 15:49:55 -05'00'	
	John Penland – Sr. RCRA Inspector	Date
Supervisor Signature/Date	JEFFREY YURK Digitally signed by JEFFREY YURK Date: 2022.07.19 15:55:17 -05'00'	
	Jeff Yurk – RCRA Enforcement Section Chief	Date

6ENFORM-019-R8.2 (02/12/2020)

ED_013532_00008991-00001

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On May 5, 2022, I, John Penland, conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). I was accompanied on this inspection by members of the Superfund Technical Assistance and Response Team (START) who were engaged to collect samples. This inspection is a follow-up to the April 18-21, 2022, Resource Conservation and Recovery Act (RCRA) inspection where initial concerns were raised about the generation and management of the waste generated from the strainers associated with the batch reactor vessels (kettles) located in the Polymer Unit (Poly-kettle Strainer Waste; also known as: waste neoprene; neoprene popcorn; or waste coag). This inspection focused on observation of the facility's standard operating procedures specific to the management of the Poly-kettle Strainer Waste and sample collection of air, liquid, and solid media associated with or impacted by the Poly-kettle Strainer Waste generation and management procedures.

This report serves as documentation of all onsite activities and observations during this inspection of the Denka facility. Photographs and video recordings taken during the inspection to document onsite observations are included as Attachment 1. A summary of all areas of concern identified during this inspection is provided in Section IV. Unless otherwise specified, the statements cited in this report reflect those claims made by facility personnel to me or documents reviewed by me during this inspection.

Facility Description

Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality.

Denka has been the focus of multiple inspections under the Clean Air Act, Resource Conservation and Recovery Act, and Clean Water Act. For a more complete description of the facility's units and operations refer to the report documenting the April 18-21, 2022, RCRA inspection. This inspection report is focused on the generation and management of the Poly-kettle Strainer Waste described below.

Poly-kettle Strainer Waste

Neoprene "popcorn" is partially reacted neoprene generated from the auto-polymerization of chloroprene. It is created in the neoprene reactors in the Polymer Unit at Denka and separated from the neoprene emulsion product by a canister filter, referred to as a "strainer." Denka personnel remove this material, now referred to in this report as Poly-kettle Strainer Waste, and transfer it to the Outside Brine Pit. The Outside Brine Pit at Denka is an inground tank used for the accumulation, stabilization, and storage of the Poly-kettle Strainer Waste from the Polymer Building. According to Denka internal

Standard Operating Procedures, the Poly-kettle Strainer Waste consists of neoprene, chloroprene, toluene, 2,3-dichloro-1,3-butadiene, and stabilizers. Denka's written hazard descriptions of these materials indicate that the Poly-kettle Strainer Waste may meet the definitions for the hazardous waste characteristics of reactivity and ignitability.

Section II - OBSERVATIONS

I conducted the onsite inspection during the normal business hours of May 5, 2022, beginning at 0930 hours Central Time. During this inspection, the facility was in the process of winding down operations in preparation for a facility-wide turnaround. However, Denka was still conducting normal operations in the Polymer Unit. Denka was notified of this inspection through their counsel Bracewell, LLP on April 29, 2022, and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.

I began this inspection with an initial briefing where I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility. I explained that the purpose of this inspection was to collect information and samples related to the generation and management of the Poly-kettle Strainer Waste. I also informed them that EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022, inspection.

In furtherance of this inquiry, I asked whether Denka considered the Poly-kettle Strainer Waste to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had previously sold the stabilized Poly-kettle Strainer Waste for its commercial value, though it does not currently do so. I explained the D001 flammable solids definition as discussed in 40 CFR 261.21(a)(2) and the associated Background Information Document and asked whether that characteristic could apply since the Poly-kettle Strainer Waste had been previously described by the Polymer Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated. I explained the D003 reactivity definition in 40 CFR 261.23(a)(1), the associated Background Information Document, and its link with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the Poly-kettle Strainer Waste.

During the opening meeting, I also requested and received the following documents marked as Confidential:

1) PK Pump Out and Strainer Cleaning Operation
2) Clearing Unstripped Emulsion Storage Tank for Cleaning
3) Engineering Drawings of the Outside Brine Pit
4) Raw Materials Characteristics and Hazards

5) Emergency Stabilizer Make-up.

These documents are included as Attachments 2 through 6. In addition, according to Chris Meyers, following the completion of the April 18-21, 2022, inspection, additional information concerning the amount of residual chloroprene present in the Poly-kettle Strainer Waste was located and provided as part of the response to the records request originating from EPA during the April 18-21, 2022, inspection. Those records are included in the report documenting that April 18-21, 2022, inspection.

David Bordelon, an employee of Weston Solutions, LLC. and the team lead for a sampling team activated under the START contract for EPA, arrived at approximately 1200hours Central Time. Following his introduction and at approximately 1230hours Central Time we conducted our initial reconnaissance of the planned sample collection area and equipment staging location. We departed the facility for lunch and a separate planning discussion at approximately 1300hours. When we returned to the facility at approximately 1415hours, we briefed the rest of START sampling team who had arrived in the interim. After staging our sampling equipment and donning personal protective equipment (PPE), the START team initiated sample collection at approximately 1530hours. A detailed sampling report describing the collection and analysis of the samples has been prepared by the START contractors and is included as Attachment 7. This report from the START contractors also includes the final analytical results for the collected samples which are discussed in the next section.

During the Poly-kettle Strainer Cleaning operation, the Denka employee removing the Poly-kettle Strainer Waste from the strainer was wearing an air-purifying respirator as required by Denka's SOP. However, the sampling team observed and documented multiple Denka personnel observing the operation without any respiratory protection.

Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel who attended via video call. This meeting and the inspection concluded at approximately 1830hours.

Section III - FOLLOW-UP

Sample Result Summary

Sample DR-S-BP-05052022-01

This grab sample is of Poly-kettle Strainer Waste which was being removed from the Outside Brine Pit following an unknown period of stabilization. According to Denka operators, the material we sampled is typical of the stabilized Poly-kettle Strainer Waste normally shipped offsite for disposal. Residual chloroprene is present in this sample at 1,080 mg/kg.

Sample DR-L-LB-05052022-01 and Field Duplicate DR-L-LB-05052022-02

This grab sample and its field duplicate are of liquid collected from the Outside Brine Pit as found prior to the addition of the Poly-kettle Strainer Waste observed during the inspection.

Chloroprene is present in the sample at 62.8 mg/L and the field duplicate at 64.1 mg/L before the addition of the Poly-kettle Strainer Waste.

Sample DR-L-LA-05052022-01

This grab sample is of liquid collected from the Outside Brine Pit approximately 10 minutes after the addition of the Poly-kettle Strainer Waste observed during the inspection. The chloroprene concentration in this sample is 341 mg/L. The increase in the chloroprene concentration of this sample over the concentration of Sample DR-L-LB-05052022-01 is interpreted to represent the release of chloroprene from the Poly-kettle Strainer Waste to the liquid in the Outside Brine Pit where it will continue to evaporate.

Sample DR-A-BK-0502022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer approximately 30 minutes before the Poly-kettle Strainer Waste generating procedure. This sample serves as the background reading for the waste generating process inside the Polymer building. The reported chloroprene concentration is 1,050 $\mu g/m^3$.

Sample DR-A-KP-05052022-01

This approximately 30-minute, 6-liter air sample was collected at the polymer kettle strainer during the Poly-kettle Strainer Waste generating procedure. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer and the evaporation of the chloroprene from the Poly-kettle Strainer Waste. Since this sample remained at the strainer following the removal of the waste, a difference between the measurement for this sample and sample DR-A-KT-05052022-01 would illustrate the impact of direct volatilization of chloroprene from the Poly-kettle Strainer Waste. The reported chloroprene concentration in this sample is 193,000 $\mu g/m^3$.

Sample DR-A-KT-05052022-01

This approximately 30-minute, 6-liter air sample, was started at the Poly-kettle Strainer, alongside sample DR-A-KP-05052022-01 during waste generation and traveled with the Poly-kettle Strainer Waste to the Outside Brine Pit. The concentration of chloroprene in this sample is interpreted to be dependent on the concentration of chloroprene released during the opening of the screen, the evaporation of the chloroprene from the Poly-kettle Strainer Waste, and the transport and dumping of that waste into the Outside Brine Pit. Since this sample remained near the waste throughout the process, the concentration of chloroprene in this sample is expected to be dependent on the volatilization of chloroprene from the waste during the strainer cleaning and disposal process. The reported Chloroprene concentration in this sample is 243,000 $\mu g/m^3$.

Samples DR-A-KD-05052022-01 and DR-A-KD-05052022-02

These approximately 30-minute, 6-liter air samples were collected approximately 20 feet from the Poly-kettle Strainer during the waste generating procedure. These are collocated samples serving the same purpose of a field duplicate in this context. These samples indicate the presence of

chloroprene in the air at a downflow location from the strainer. The concentration in these samples is interpreted to be dependent on the concentration of chloroprene released during the opening of the strainer, the volatilization of the chloroprene from the Poly-kettle Strainer Waste, and the rate of dispersion of chloroprene vapor. The reported chloroprene concentration in sample DR-A-05052022-01 is 19,000 μg/m^3 and in sample DR-A005052022-02 is 18,400 μg/m^3.

Sample DR-A-PU

This approximately 30-minute, 6-liter air sample was collected between the Polymer building and the Outside Brine Pit during the Poly-kettle Strainer Waste generation and Outside Brine Pit addition. This sample location was originally intended to measure the release of chloroprene from the Poly-kettle Strainer Waste during its addition to the Outside Brine Pit. However, this sample was collected 15 feet away from the Outside Brine Pit. Due to this distance and chloroprene's rate of dispersion, this sample does not serve its intended purpose. The reported chloroprene concentration in this sample is 4,390 μg/m^3.

Sample DR-A-BU

This approximately 30-minute, 6-liter air sample was collected from a location immediately adjacent to the Outside Brine Pit, on the upwind edge, during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit by Denka's employees using an excavator. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal. The reported chloroprene concentration in this sample is 10,200 μg/m^3.

Sample DR-A-BD

This approximately 30-minute, 6-liter sample was collected from a location 20 feet from the Outside Brine Pit, on the downwind side, during the removal of stabilized Poly-kettle Strainer Waste. The concentration of chloroprene in this sample is interpreted to be dependent on the volatilization of chloroprene from the Outside Brine Pit during the removal activity and the rate of dispersion of chloroprene vapors in the air. The reported chloroprene concentration in this sample is 969 μg/m^3.

Section IV – AREAS OF CONCERN

<u>Generation and Management of the Poly-kettle Strainer Waste</u>

Based on its management and the written hazard descriptions provided by Denka, the Poly-kettle Strainer Waste may be a hazardous waste demonstrating the characteristics of ignitability and reactivity. Chloroprene is a Volatile Organic Compound present in this waste at its point of generation and is capable of being released to this environment through evaporation if not properly contained.

Based on the results for air samples taken during the Poly-kettle Strainer Waste generating procedure, the waste is being released to the air during this procedure as evidenced by the increase in chloroprene concentrations.

Based on the results for liquid samples DR-L-LB-05052022-01 and DR-L-LA-05052022-01, Poly-kettle Strainer Waste is introducing chloroprene to the Outside Brine Pit which is not designed to

contain Volatile Organic Compounds. Therefore, the Poly-kettle Strainer Waste is being released to the air as it evaporates from the Outside Brine Pit.

Based on the results for air samples taken during the removal of stabilized Poly-kettle Strainer Waste from the Outside Brine Pit, Poly-kettle Strainer Waste is being released to the air during this process.

Based on the results for solid sample DR-S-BP-05052022-02 the stabilized Poly-kettle Strainer Waste has concentrations of chloroprene that require additional containment measures to prevent release to the environment. The Roll-off container used for the accumulation of this waste is not designed to prevent releases of Volatile Organic Compounds. Since the chloroprene component of the Poly-kettle Strainer Waste is a volatile organic compound, it will evaporate and be released from the roll-off container during storage.

Respiratory Protection of Facility Personnel

The Raw Materials Chemicals and Hazards document presented to me by the facility describes Chloroprene (CD) as a "a toxic material with an AEL (Acceptable Exposure Limit) for CD in air of .2 ppm. Rubber gloves and coverall goggles are required for valving, and a full-face respirator is required when handling CD liquid or when the presence of CD vapor is possible." The SOP for the Poly-kettle Strainer Waste generating operation requires personnel to wear an air-purifying respirator during the process.

During this inspection, the sampling team observed and documented multiple Denka personnel without any respiratory protection during the Poly-kettle Strainer cleaning operation. Based on the results for the air samples collected during this inspection, the chloroprene concentration inside the Polymer Building was greater than the AEL described in the facility's documents during normal operations even prior to the Poly-kettle Strainer cleaning operation.

A full-face air-purifying respirator has an assigned protection factor of 50, which means that a chloroprene concentration above 10ppmv would exceed the AEL calculated for this type of respiratory protection. The concentration of chloroprene sampled during the strainer cleaning operation exceeded 50ppmv.

Section V – LIST OF ATTACHMENTS

Attachment 1 – Photo and Video Log (CBI)
Attachment 2 – PK Pump Out and Strainer Cleaning Operation (CBI)
Attachment 3 – Clearing Unstripped Emulsion Storage Tank for Cleaning (CBI)
Attachment 4 – Engineering Drawings of the Outside Brine Pit (CBI)
Attachment 5 – Raw Materials Characteristics and Hazards (CBI)
Attachment 6 – Emergency Stabilizer Make-up (CBI)
Attachment 7 – START Technical Support Report for ECAD - Denka Enforcement Multimedia Sampling
Attachment 8 – Daily Activity Summary for May 5, 2022 – FY2022 Denka Sampling Investigation

Attachment 1

Photo and Video Log (CBI)

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
1	DSCN0619.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2
2	DSCN0620.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2
3	DSCN0621.JPG	5/5/2022	1539	Jose Ojeda	West	Sample DR-A-BK-05052022-01, located near Poly-kettle Strainers 1 and 2. Poor quality image
4	DSCN0622.MOV	5/5/2022	1539	Jose Ojeda	N/A	Accidental video recorded while exiting the Polymer building. Length- 1min 32sec
5	DSCN0623.MOV	5/5/2022	1541	Jose Ojeda	NA	Accidental video recorded while preparing sampling equipment in the staging area. Length- 4sec
6	DSCN0624.JPG	5/5/2022	1553	Jose Ojeda	North-Northwest	Sample collection for Sample DR-L-LB-05052022-01 and DR-L-LB05052022-02 from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
7	DSCN0625.JPG	5/5/2022	1554	Jose Ojeda	North-Northwest	Sample collection for Sample DR-L-LB-05052022-01 and DR-L-LB05052022-02 from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
8	DSCN0626.JPG	5/5/2022	1604	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
9	DSCN0627.JPG	5/5/2022	1604	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
10	DSCN0628.JPG	5/5/2022	1605	Jose Ojeda	West	Sample DR-A-BU-05052022-01, located immediately adjacent to the Poly-kettle Waste stabilization cell of the Outside Brine Pit.

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
11	DSCN0629.JPG	5/5/2022	1605	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
12	DSCN0630.JPG	5/5/2022	1606	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
13	DSCN0631.JPG	5/5/2022	1606	Jose Ojeda	South	Sample DR-A-BD-05052022-01, located approximately 20 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit.
14	DSCN0632.JPG	5/5/2022	1611	Jose Ojeda	North	Removal of stabilized Poly-kettle Strainer Waste from the stabilization cell of the Outside Brine Pit by Denka personnel using an excavator.
15	DSCN0633.JPG	5/5/2022	1612	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
16	DSCN0634.JPG	5/5/2022	1613	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
17	DSCN0635.JPG	5/5/2022	1613	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
18	DSCN0636.JPG	5/5/2022	1614	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
19	DSCN0637.JPG	5/5/2022	1614	Jose Ojeda	North	Collection of Sample DR-S-BP-05052022-01 from the bucket of the excavator
20	DSCN0638.MOV	5/5/2022	1616	Jose Ojeda	N/A	Accidental video recorded while preparing sampling equipment in the staging area. Length- 4sec
21	DSCN0639.MOV	5/5/2022	1616	Jose Ojeda	N/A	Accidental video recorded while preparing sampling equipment in the staging area. Length- 7sec

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
22	DSCN0640.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
23	DSCN0641.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
24	DSCN0642.JPG	5/5/2022	1637	Jose Ojeda	South	Sample DR-A-PU-05052022-01, located approximately 15 feet from the Poly-kettle Waste stabilization cell of the Outside Brine Pit, near the Polymer building.
25	DSCN0643.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01, located near Poly-kettle Strainers 1 and 2
26	DSCN0644.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
27	DSCN0645.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
28	DSCN0646.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
29	DSCN0647.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
30	DSCN0648.JPG	5/5/2022	1638	Jose Ojeda	West	Sample DR-A-KT-05052022-01 and DR-A-KP-05052022-01, located near Poly-kettle Strainers 1 and 2
31	DSCN0649.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
32	DSCN0650.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
33	DSCN0651.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
34	DSCN0652.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
35	DSCN0653.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
36	DSCN0654.JPG	5/5/2022	1639	Jose Ojeda	West	Sample DR-A-KD-05052022-01 and DR-A-KD-05052022-02, located 15 feet away from Poly-kettle Strainers 1 and 2
37	DSCN0655.MOV	5/5/2022	1641	Jose Ojeda	N/A	Video recording of the Poly-kettle Strainer cleaning operation. Recording begins at the opening of the Poly-kettle Strainer and ends with the placement of the Poly-kettle Strainer Waste into the stablization cell of the Outside Brine Pit. Length- 11min 53sec
38	DSCN0656.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.
39	DSCN0657.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo/Video Number	File Name	Date	Time	Photographer	Facing	Description
40	DSCN0658.JPG	5/5/2022	1703	Jose Ojeda	Northwest	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste. Sample DR-A-KT-05052022-01 near the Outside Brine Pit.
41	DSCN0659.MOV	5/5/2022	1704	Jose Ojeda	N/A	Video recording of part of the collection of Sample DR-L-LA-05052022-01. Length- 11sec
42	DSCN0660.JPG	5/5/2022	1706	Jose Ojeda	South	Collection of Sample DR-L-BA-05052022-01 from stabilization cell of the Outside Brine Pit following the addition of the Poly-kettle Strainer Waste.
43	DSCN0661.MOV	5/5/2022	1707	Jose Ojeda	N/A	Video recording of part of the collection of Sample DR-L-LA-05052022-01. Length- 15sec
44						
45						
46						
47						

Attachment 2

PK Pump Out and Strainer Cleaning Operation (CBI)

Attachment 3

Clearing Unstripped Emulsion Storage Tank for Cleaning (CBI)

Attachment 4

Engineering Drawings of the Outside Brine Pit (CBI)

Attachment 5

Raw Materials Characteristics and Hazards (CBI)

Attachment 6

Emergency Stabilizer Make-up (CBI)

Attachment 7

START Technical Support Report for ECAD - Denka Enforcement Multimedia Sampling

TECHNICAL SUPPORT REPORT

FOR

ECAD - DENKA ENFORCEMENT MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY-44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

Prepared for

U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

EPA Contract Number EP-S5-17-02
Technical Direction Document No. 0005/22-471
Weston Work Order No. 20600.012.005.5471
NRC Report No. N/A
FPN N/A
SSID 0600
EPA OSC Eric Delgado

Prepared by

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Frisco, Texas 75034

July 2022

PROJECT SUMMARY

This final report describes the U.S. Environmental Protection Agency (EPA) Region 6 Technical Support actions for the Enforcement and Compliance Assurance Division (ECAD) Denka Enforcement Multimedia Sampling event in LaPlace, St. John the Baptist Parish, Louisiana. A detailed report follows this project summary, and the attachments are provided as separate portable document format (PDF) files.

On April 22, 2022, the Superfund Technical Assessment and Response Team (START) was notified by EPA Region 6 On-Scene Coordinator (OSC) Eric Delgado of an EPA inspection conducted at the Denka Performance Elastomers, LLC (Denka) manufacturing facility. The OSC stated that a Resource Conservation and Recovery Act (RCRA) inspection at the facility was hindered due to inspectors encountering volatile organic compound (VOC) vapor readings that indicated additional respiratory protection would be necessary to continue the investigation. The OSC requested that START assist the ECAD in the inspection process by collecting solid, liquid and air samples, readings by a handheld VOC photoionization detector (PID), and documentation during a specific waste handling procedure conducted by Denka during the neoprene manufacturing process. Due to restrictions during the RCRA inspection that prevented the subcontractors from conducting Level B work, EPA tasked START to collect air, liquid, and solid samples to support RCRA inspection activities (Attachments F-J). Work performed by START during Denka's waste handling procedure was conducted in Level B personal protective equipment (PPE).

START coordinated with OSC Delgado and ECAD Lead Inspector John Penland to develop a Quality Assurance Project Plan (QAPP) documenting the project goals, sampling approach, quality assurance requirements, and analytical specifications. The goal of the event was to gather data to determine if waste material (referred to as "polymer kettle strainer waste") removed from the neoprene process lines was a source of chloroprene emissions, and to estimate the amount of chloroprene emitted from the material during its management. START was informed that the neoprene manufacturing process involves removing partially reacted neoprene solids from the process lines by forcing the liquids from each of the reactor kettles through strainers, each containing two baskets lined with disposable filter bags. The kettles are serviced between each

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product batch by Denka staff to remove the filter bag and solids from the strainer and replace the filter bag. The facility identified the polymer kettle strainer waste as a reactive material that would exothermically polymerize under normal conditions, presenting a physical and inhalation hazard due to the presence of chloroprene. The solids from the kettle are transferred by cart to a pit outside of the process building. Here, the materials are covered with brine water, allowing the waste to polymerize in a controlled environment. The stabilized polymer kettle strainer waste is removed from the brine pit using an excavator and placed into an open-topped roll-off container. The material is then sent to a non-hazardous waste landfill for final disposal.

START provided five personnel to execute the QAPP goals as approved by EPA. During the event, START collected eight air samples (seven locations and one co-located quality assurance/quality control [QA/QC] sample) using 6-liter summa canisters outfitted with a 200-milliliter-per-hour (ml/hr) flow controller. This canister setup enabled the collection of 6 liters of air over a 30-minute period. Sample locations and rationale were designed to collect representative air samples throughout the polymer kettle strainer waste removal process, along with background samples for comparison purposes. In addition to air samples, one solid and two liquid waste samples were collected from the brine pit to gather analytical information for these waste streams. Detailed information regarding sample collection is provided within Section 3 of this report. Analytical results for the air, solid and liquid samples are provided within Attachments F, G, H, and I of this report.

This Technical Support Report was prepared to describe the technical scope of work completed as part of Technical Direction Document (TDD) No. 0005/22-471.

[ ]	The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.
[X]	The EPA Task Monitor has provided final approval of this report. Therefore, Weston Solutions, Inc. has submitted this report with the Task Monitor's approval.

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1. INTRODUCTION

On April 22, 2022, the Superfund Technical Assessment and Response Team (START) contractor received a phone call from Eric Delgado, the EPA Region 6 On Scene Coordinator (OSC), regarding an EPA inspection conducted at the Denka Performance Elastomers, LLC (Denka) manufacturing facility (site). The OSC stated that a Resource Conservation and Recovery Act (RCRA) inspection at the facility was hindered due to the inspectors encountering volatile organic compound (VOC) vapor readings that indicated additional respiratory protection would be necessary to continue the investigation. The OSC requested that START assist the Enforcement and Compliance Assurance Division (ECAD) in the inspection process by collecting air, liquid, and solid waste samples; conducting air monitoring activities with a handheld VOC photoionization detector (PID) meter: and documenting specific waste handling procedures conducted by Denka during the neoprene manufacturing process. Due to the levels of VOCs documented by the RCRA inspectors, work conducted by START during Denka's waste handling process would be conducted in Level B personal protective equipment (PPE).

On April 22, 2022, the U.S. Environmental Protection Agency (EPA) activated Weston Solutions, Inc. (WESTON®), the EPA Region 6 START contractor, under Technical Direction Document (TDD) No. 0005/22-471, to provide support and to compile documentation of technical support activities at the Site.

2. BACKGROUND AND SITE DESCRIPTION

EPA RCRA personnel inspected the Denka Performance Elastomers facility from April 18 through April 21, 2022. During the inspection, concerns were raised regarding the handling and classification of polymer kettle strainer waste generated in Denka's polymer unit. Information provided by Denka regarding the generation of the polymer kettle strainer waste stated that the process stream of product neoprene emulsion in the polymer unit passes from the reactor kettles through strainers with metal baskets lined with fabric filter bags. The filters remove the solid, partially polymerized pieces of neoprene. The facility stated that the kettle strainers are serviced between production batches.

The procedure for removing the polymer kettle strainer waste begins when the kettle requiring service is taken offline and depressurized. A technician wearing a respirator positions a cart

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beneath the strainer and opens the horizontal vessel. Polymer kettle strainer waste is then removed from the baskets and placed into the cart along with the fabric filter bags. The facility stated that the polymer kettle strainer waste is reactive when exposed to the atmosphere and will exothermically polymerize generating chloroprene vapors and pose a potential ignition hazard. To safely allow the reaction of the waste material, the worker transports the waste to a concrete pit outside of the polymer building. Workers place the waste into the upstream cell of the pit and cover the material with brine. The brine prevents the potential combustion of the polymer kettle strainer waste due to the ongoing auto-polymerization reaction.

Once the waste material reaches a state at which the facility determines the waste material can be extracted, the material is removed from the pit and placed into an open-topped roll-off container using an excavator. Residual brine liquids drain from the roll-off container onto the ground surface and flow into drainage channels that direct the liquids to the middle cell of the pit. Wastewaters from the pit are pumped to the on-site wastewater treatment plant. Material within the roll-off box is sent to a non-hazardous disposal facility.

During the RCRA inspection, EPA representatives observed the waste generating units and utilized a VOC PID meter to monitor the atmosphere during operations. During the evaluation of the polymer unit, the inspectors documented VOC readings above the levels that the inspectors believed would allow them to collect samples safely. The EPA ECAD determined that Level B PPE would be required to conduct activities within the polymer unit during the waste generating and removal processes and contacted the EPA Region 6 Superfund and Emergency Management Division for assistance.

3. SUMMARY OF ACTIONS

3.1 OBJECTIVES AND PLANNING

START, in conjunction with OSC Delgado and ECAD inspector John Penland developed a site-specific Quality Assurance Project Plan (QAPP) to identify the project goals and means by which these objectives would be achieved (Attachment E). The goal of the project was to assess the facility's waste management processes conducted by Denka personnel cleaning the kettle strainers inside of the polymer unit and the potential impact to human health and the environment stemming from these practices. The evaluation of the processes and potential impacts to human health and

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the environment would be achieved by collecting air, liquid, and solid waste samples; conducting air monitoring using a VOC PID meter; as well as observing and documenting the waste management practices.

Air samples would include background locations, areas within the polymer unit building housing the kettles (both before and during Denka's servicing of the strainers), areas upwind and downwind of the brine pit, and near the material as it was transferred from the building to the brine pit. Liquid samples (2) would be collected from the brine pit before placement of the solids and 10 minutes after placement of the solids. One solid sample would be collected from solids removed from the brine pit, prior to placement into the waste neoprene roll-off box. A list of sample identification numbers and location descriptions is provided in Section 3.4.

The team reviewed the sampling approach with Denka personnel to ensure that coordination and safety requirements were met. Sampling efforts were coordinated with the Denka facility so that the sampling team was in place prior to and during the servicing of the kettle strainers and to enable collection of background air samples approximately 30 minutes prior to the servicing. The sampling team planned to collect split liquid and solid samples for the Denka facility and record the transfer of custody to the appropriate personnel.

Due to the high levels of VOCs measured with the handheld PID meter during the April RCRA inspection, all sampling efforts after the opening of the strainer would be conducted by personnel in Level B PPE. The sampling group was comprised of two teams of two people. One team served as the primary sampling team and the second as the backup/rescue team. The backup/rescue team was able to step into the sampling role if the sampling efforts exceeded the timeframe permitted by the Self-Contained Breathing Apparatus (SCBAs). The primary sampling team would don new tanks and serve as the backup team at that point.

3.2 SAMPLING ACTIVITIES

On May 5, 2022, START mobilized five people to the Denka facility to conduct sampling, monitoring, and documentation activities. The START Field Team Leader (FTL) met with ECAD inspector John Penland at the facility to conduct a site walk to orient the team prior to the sampling event. START and Mr. Penland observed the locations of the kettles, identified the strainer that would be serviced, the brine pit, and areas outside of the polymer unit that could be utilized as a

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support zone. The team was briefed as to the specific air sampling locations, liquid sampling location, solid waste sampling location, sequence of events, safety protocols, and documentation requirements. Winds at the site were documented to be from the south at 10-20 miles per hour.

Sampling activities were initiated at 1530 hours with the deployment and collection of the background air sampling canister (DR-A-BK-05052022-01). The background location was selected to provide a baseline level of VOCs within the polymer unit building prior to the servicing of the strainer. The canister was placed approximately 5 feet east of the strainer to be serviced.

To determine the impact of adding polymer kettle strainer waste to the brine pit liquids, liquid samples were collected before and after the addition of the waste. At 1545 hours, START collected a water sample (DR-L-LB-05052022-01) and duplicate (DR-L-LB-05052022-02) from the brine pit to determine the VOC levels within the liquid prior to the addition of polymer kettle strainer waste. After the addition of the waste material to the brine pit (1651 hours), a liquid sample (DR-L-LA-05052022-01) was collected from the brine pit at 1710 hours to determine the VOC levels. Split samples of the liquid material were provided to Denka.

To assess the potential impacts to the atmosphere caused by the removal of solid materials from the brine pit and placing the material into a dedicated roll-off box, the EPA team collected air and solid samples during Denka's removal of solids from the brine pit. Prior to the removal, START placed canisters approximately 2 feet upwind (DR-A-BU-05052022-01) and 20 feet downwind (DR-A-BD-05052022-01) of the brine pit. The canisters were activated at 1604 hours, and Denka personnel began removing solid material from the brine pit using an excavator at approximately 1610 hours, placing the material into an open-topped roll-off box. START collected and split with Denka a solid waste sample (DR-S-BP-05052022-01) from the excavator bucket at 1610 hours. Air sample collection was completed at 1631 hours.

Once the background air sample had been collected at approximately 1600 hours, START began deploying air sampling canisters at the following locations:

- Canister placed approximately 5 feet from strainer to be serviced – DR-A-KP-05052022-01
- Canister placed approximately 15 feet east of the strainer – DR-A-KD-05052022-01. This sample had a co-located canister (DR-A-KD-05052022-02) for QA purposes.

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- Canister that remained within approximately 5 feet of the cart as it was loaded with waste material and transported to the brine pit. Once material was placed in the brine pit, the canister was placed approximately 3 feet from the downwind (north) side of the pit. - DR-A-KT-05052022-01
- Canister placed approximately 15 feet upwind (south) of the brine pit. – DR-A-PU-05052022-01

Between 1637 and 1639 hours, START opened the canister valves at the locations described above in anticipation of the start of the strainer servicing process. At 1642 hours, the Denka technician, in level C PPE, began closing valves, venting the kettle, and opening the strainer. At 1645 hours, after a reading of 40 parts per million (ppm), the lamp on the START VOC PID meter malfunctioned (lamp error message) and would no longer read or record data. The Denka technician placed the cart beneath the strainer and began removing the waste material from the baskets using a metal hook. Once approximately one-half of the material was removed from the strainer, the technician removed the basket (two baskets per strainer) and dumped the contents into the cart, including the fabric filter bags. After completing the first basket, the same approach was taken with the second. A new filter bag was placed into the baskets and the baskets were returned into the strainer. The strainer lid was closed, and the screws were tightened. The technician completed removal of the polymer kettle strainer waste and filter bag by 1649 hours and began transporting the material from the polymer unit building to the brine pit. All material was placed into the pit by 1651 hours.

Sample Summary:

- DR-S-BP-05052022-01 – Solid sample from brine pit
- DR-A-BU-05052022-01 – Air sample upwind (south) of brine pit during removal.
- DR-A-BD-05052022-01 – Air sample downwind (north) of brine pit during removal.
- DR-L-LB-05052022-01 – Liquid sample from brine pit before addition of material from strainer.
- DR-L-LB-05052022-02– Duplicate: Liquid sample from brine pit before addition of material from strainer.
- DR-L-LA-05052022-01 – Liquid sample from brine pit after addition of material from strainer.

- DR-A-BK-05052022-01 – Background air sample from strainer area prior to waste removal.
- DR-A-KP-05052022-01 – Air sample from strainer area during waste removal.
- DR-A-KD-05052022-01 – Air sample from 15 feet east of strainer during waste removal.
- DR-A-KD-05052022-02– Duplicate: Air sample from 15 feet east of strainer during waste removal.
- DR-A-KT-05052022-01 – Air sample collected in proximation with cart transportation waste material from strainer to brine pit.
- DR-A-PU-05052022-01 – Air sample collected approximately 15 feet upwind (south) of the brine pit during strainer servicing.

After collection of the final sample the START team completed documentation and preservation of all sample media and packaged all equipment. START participated in a post event debrief at the Denka offices where ECAD inspector John Penland reviewed activities conducted in the field.

Due to the time at which the field activities and debrief were completed, START was unable to ship or transport samples to the respective laboratories on May 5, 2022. All sample media was transported to the WESTON Baton Rouge, LA, office and secured within the locked building. The solid and liquid the samples were picked up by the Pace Analytical courier on May 6, 2022, and delivered to the laboratory on the same day for VOC analysis by SW-846 method 8260. Air samples were shipped to Eastern Research Group (ERG) laboratory on May 6, 2022, for VOC analysis by EPA Compendium TO-15.

4. LIST OF ATTACHMENTS

Attachment A	Site Location Map
Attachment B	Site Area Map
Attachment C	Site Layout Map
Attachment D	Sample Location Map
Attachment E	Site-Specific Quality Assurance Project Plan
Attachment F	Air Analytical Results Table
Attachment G	Air Analytical Results – Laboratory Deliverables
Attachment H	Liquid Analytical Results Table

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Attachment I Solid Analytical Results Table

Attachment J Solid and Liquid Analytical Results – Laboratory Deliverables

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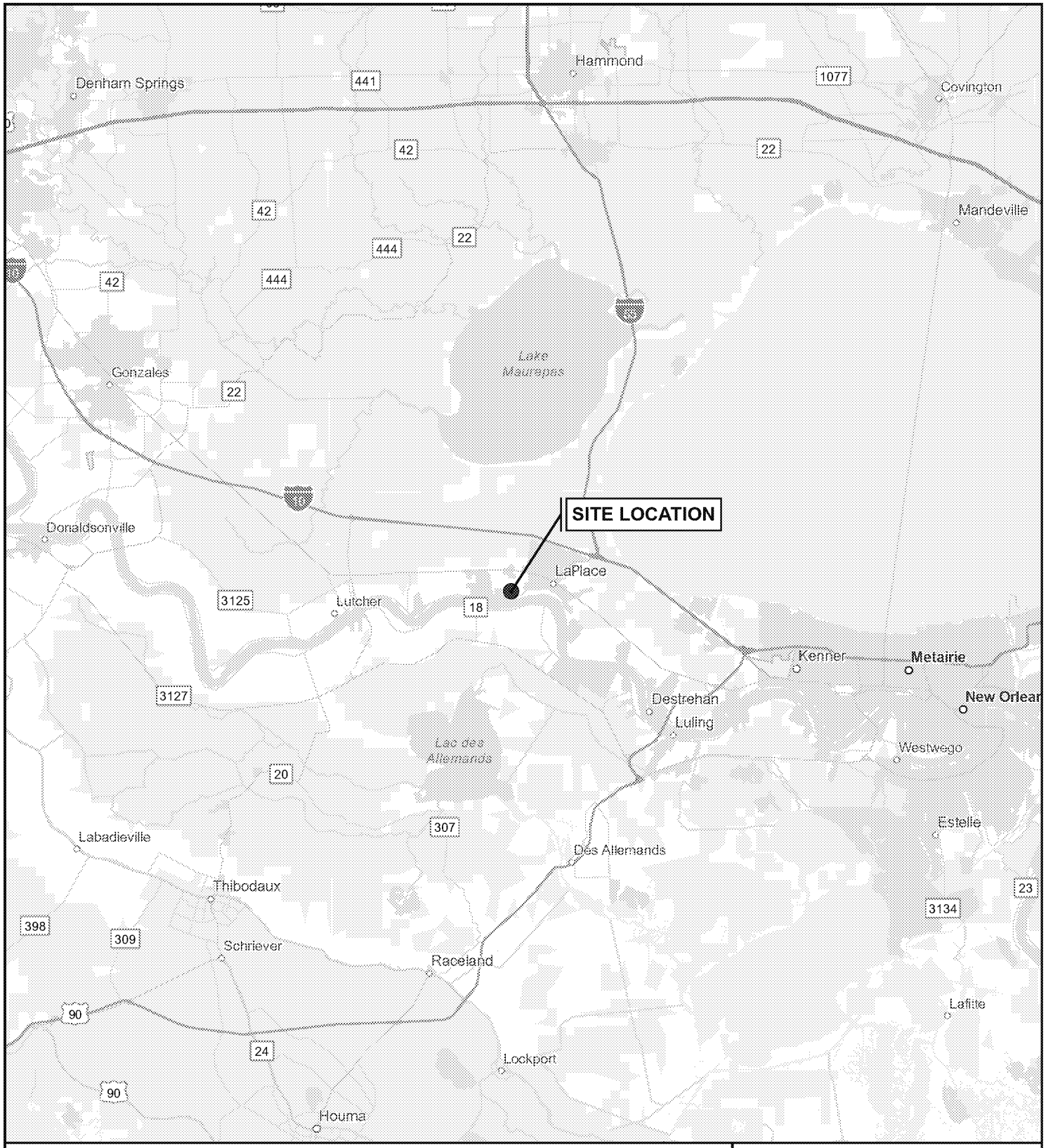
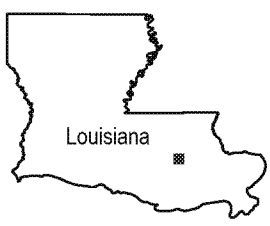
ATTACHMENT A

Site Location Map



LEGEND

- SITE LOCATION



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SCALE IN MILES

SOURCE: WORLD STREET MAPS; ESRI
TDD: 0005/22-471

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ATTACHMENT A

SITE LOCATION MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

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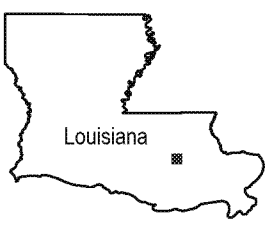
ATTACHMENT B

Site Area Map

LEGEND

- SITE LOCATION



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SOURCE: NATIONAL GEOGRAPHIC TOPO; ESRI
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT B

SITE AREA MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

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ATTACHMENT C

Site Layout Map

LEGEND

- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLYMER UNIT BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER

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SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY; 2022
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT C

SITE LAYOUT MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 12:16 PM 7/5/2022 covasj

ATTACHMENT D

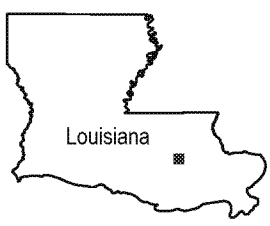
Sample Location Map

LEGEND

1. DR-S-BP-05052022-01 – Solid sample from brine pit.
2. DR-A-BU-05052022-01 – Air sample upwind of brine pit during removal.
3. DR-A-BD-05052022-01 – Air sample downwind of brine pit during removal.
4. DR-L-LB-05052022-01 – Liquid sample from brine pit before addition of material from kettle.
5. DR-L-LB-05052022-02– Duplicate: Liquid sample from brine pit before addition of material from kettle.
6. DR-L-LA-05052022-01 – Liquid sample from brine pit after addition of material from kettle.
7. DR-A-BK-05052022-01 – Background air sample from kettle area prior to waste removal.
8. DR-A-KP-05052022-01 – Air sample from kettle area during waste removal.
9. DR-A-KD-05052022-01 – Air sample from 15 feet east of kettle during waste removal.
10. DR-A-KD-05052022-02– Duplicate: Air sample from 15 feet east of kettle during waste removal.
11. DR-A-KT-05052022-01 – Air sample collected in proximation with cart transportation waste material from kettle to brine pit. Arrow indicates general travel path.
12. DR-A-PU-05052022-01 – Air sample collected approximately 15 feet upwind (south) of the brine pit during kettle servicing.

LEGEND

- TRAVEL PATH
- 1 SAMPLE LOCATION
- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLYMER UNIT BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER



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SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY; 2022
TDD: 0005/22-471

US EPA REGION 6

ATTACHMENT D

SAMPLE LOCATION MAP
ECAD - DENKA ENFORCEMENT
MULTIMEDIA SAMPLING
560 LOUISIANA HIGHWAY 44
LAPLACE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
JULY 2022	20600.012.005.5471	AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\ECAD - Denka Enforcement Multimedia Sampling\pro\ECAD - Denka Enforcement Multimedia Sampling\ECAD - Denka Enforcement Multimedia Sampling.aprx 2:24 PM 7/5/2022 covasj

ATTACHMENT E

Site Specific QAPP

Region 6 - Enforcement & Compliance Assurance Division

QUALITY ASSURANCE PROJECT PLAN

DENKA PERFORMANCE ELASTOMERS

560 Louisiana Highway 44, LaPlace, LA 70068

Prepared by:

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Prepared for:

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Enforcement & Compliance Assurance Division
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April 29, 2022

SECTION A – PROJECT MANAGEMENT

A.1 Denka Performance Elastomers QAPP

Denka Performance Elastomers
Quality Assurance Project Plan

Prepared by:

David Bordelon START Date: 4/29/2022

Approvals:

_____ Date: _____

_____ Date: _____

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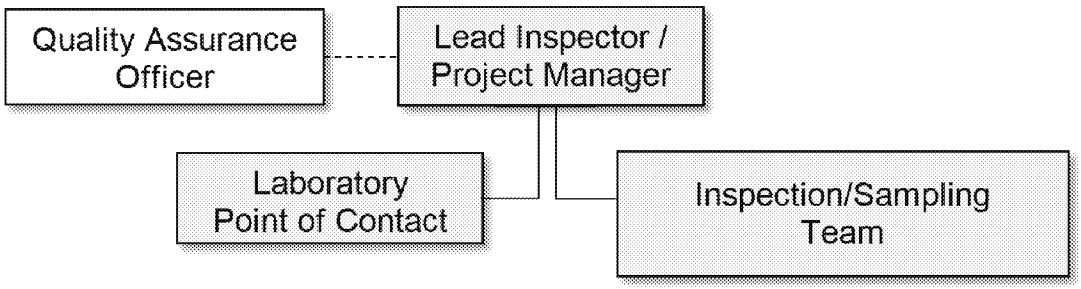
A.3 / A.4 Project Organization and Distribution List

The individuals participating in the project and their specific roles and responsibilities are shown below. These individuals will receive copies of the approved Quality Assurance Project Plan (QAPP) and subsequent revisions:

Table A.1: Roles & Responsibilities/Distribution List

Individual(s) Assigned:	Responsible for:	Authorized to:
John Penland 214-755-8795	Lead Inspector / Project Manager	Project Decisions, Lead and Assist Team Member(s), Collect and Assess Data
Jeff Wright START – R6 225-278-8406	Laboratory Point of Contact	Lab coordination for scheduling, analyses, validation, and deliverables.
David Bordelon START – R6 225-772-7921	Inspection/Sampling Team Member(s)	Inspect / Sample / Collect Data
Erik Hadwin START – R6 225-773-9104		

Figure A.1: Project Organization Chart



For current R6 Organization Chart, click on the following link:

https://usepa.sharepoint.com/sites/R6_Development/r6app/keypers/Lists/Organization%20List/AllItems.aspx?__utma=172919287.230895279.1551278682.1560952790.1560952937.338&__utmb=172919287.6.9.1560956460225&__utmc=172919287&__utmx=-&__utmz=172919287.1527106362.1.1.utmcsr=(direct)|utmccn=(direct)|utmcmd=(none)&__utmv=-&__utmk=55076843

A.5 Problem Definition and Background

Problem(s) to be resolved, decision(s) to be made and/or hypothesis to be tested:

This QAPP will address both the potential offsite migration of hazardous waste and potential hazardous was being processed, stored, and treated on site. Data gathered using handheld meters during the site inspection indicated that fugitive emissions of chloroprene were encountered during normal plant processes and further investigation was necessary to confirm the meter readings. See pre-inspection plan for further details.

Historical & background information:

EPA RCRA personnel conducted an inspection of the Denka Performance Elastomers facility on April 18-21 of 2022. During the inspection concerns were raised regarding the handling and classification of polymer kettle strainer waste generated in Denka's polymer unit. Information provided by Denka regarding the generation of the polymer kettle strainer waste stated that the process stream of product neoprene emulsion in the polymer unit passes from the reactor kettles through metal screens lined with a fabric filter sleeves. The filters remove the solid, partially polymerized pieces of neoprene. The facility stated that the kettle screens and filters are serviced between each production batch.

The procedure for removing the polymer kettle strainer waste begins when the kettle requiring service is taken offline and depressurized. Personnel wearing a respirator position a cart beneath the kettle and open the horizontal vessel. Polymer kettle strainer waste is then removed from the screens and placed into the cart along with the fabric sleeve. The facility stated that the polymer kettle strainer waste is reactive when exposed to the atmosphere and will exothermically polymerize generating chloroprene vapors. To inhibit the reaction of the waste material, the worker transports the waste to a concrete pit located outside of the polymer building. Workers place the waste into the upstream cell of the pit and cover the material with brine. The brine prevents the auto-polymerization of the polymer kettle strainer waste from combusting.

Once the waste material reaches a stable state, the material is removed from pit and placed into an open-topped roll-off container using an excavator. Residual brine liquids that drain from the roll-off container onto the ground surface flow into drainage channels which direct the liquids to the middle cell of the pit. Wastewaters from the pit are pumped to the onsite wastewater treatment plant. Material within the roll-off box is sent to a non-hazardous disposal facility.

During the RCRA inspection, EPA representatives were conducting observations of the waste generating units and utilizing a VOC meter to monitor the work atmosphere during operations. During the evaluation of the polymer unit the inspectors documented VOC readings above the levels which the inspectors believed would allow them to collect samples safely. The EPA ECAD determined that level B PPE would be required to conduct activities within the Polymer unit during the waste generating and removal processes and contacted the EPA Region 6 Superfund and Emergency Management Division for assistance.

A.6 Project/Task Description

The project goal will be to assess the impact to human health and the environment stemming from the waste management practices conducted by Denka personnel during the cleaning of screens within "kettles" inside of the Denka Polymer Unit. The screens remove solid waste materials from the process liquids and are periodically removed and solids placed within a brine pit. The solids are considered by Denka personnel to be reactive and if exposed to atmospheres outside of the process unit will exothermically polymerize, releasing chloroprene as a vapor and produce a significant amount of heat. Denka personnel have indicated that if left unchecked, the material will self-combust.

The placement within the brine pit reportedly enables the polymerization to occur beneath the liquid surface and reduce/restrict off gassing and self-combustion.

The sampling tasks will include collection of air, liquid, and solid samples. Air samples will include background locations, within the building housing the kettles both before and during Denka's servicing the screens, and in close proximity to the material during the transfer from the building to the brine pit. Liquid samples will be collected from the brine pit before placement of the solids, 10 minutes after placement of the solids, and 1 hour after placement of the solids. One solid sample will be collected from the brine pit or from the waste neoprene roll-off box depending upon accessibility and age of the material within the roll-off box.

Sampling efforts will be coordinated with the Denka facility to have the sampling team in place prior to and during the servicing of the screens. Background air samples will be collected approximately one hour prior to the servicing and the final liquid sample will be collected one hour after the placement of the last load of solid waste material into brine pit. The sampling team will collected split samples for the Denka facility and record the transfer of custody to the appropriate personnel.

Due to the high levels of VOCs measured with the handheld meters during the inspection, all sampling efforts (with the exception of background air samples) will be conducted by personnel in level B PPE. The sampling group will be comprised of two teams of two personnel. One team will serve as the primary sampling team and the second as the backup/rescue team. The backup/rescue team will step into the sampling roll if the sampling efforts exceed the timeframe permitted by the SCBAs. The primary team will don new tanks and serve as the backup team at that point.

The team will review the sampling approach with Denka personnel to ensure coordination and safety requirements are met.

All sampling activities will be documented within a site logbook and electronic devices. Sample media will be packaged appropriately with the proper preservatives and containers and shipped on the same day as collected. If the site activities exceed the timeframe needed to ship samples on the same day the samples will be properly preserved and placed within a locked facility overnight.

<u>This QAPP has been prepared to address:</u>

To determine 1) if hazardous waste is being improperly managed and 2) if hazardous waste is being released into the environment

<u>The work to be performed includes:</u>

1)Sampling of air before and during waste handling, 2) Sampling of liquids within the brine pit, 3) Sampling of solid waste with the brine pit and designated roll-off box, and 4) Observation and documentation of waste handling techniques.

<u>List samples/measurements to be collected/made and data to be obtained:</u>

1) Air – EPA TO-15 analysis (approximate 30 min sample period per canister)
    a. Background –

i. Upwind/downwind of Polymer building prior to screen change out.
ii. Two sample points within Polymer building prior to screen change out.

b. Polymer Building
i. One sample at kettle/screen during removal to determine immediate vicinity chloroprene.
ii. One sample 20-30 feet away to determine effectiveness of vent hose.

c. Travel corridor – one sample taken from the point at which the popcorn polymer placed within the wheelbarrow is transported from the kettle to the brine pit and continuing sampling at the brine pit until the summa canister has completed the collection

2) Brine Pit Liquid – EPA 8260B (chloroprene included in compound list)
a. Background – a liquid sample will be collected from the brine pit prior to the waste material being placed into the pit.
b. Initial sample – a sample will be collected approximately 10 minutes after the waste material has been placed into the brine pit. This will capture changes to the brine solution due to the polymer reaction.
c. Post sample - a sample will be collected approximately 1 hour after the waste material has been placed into the brine pit. This will capture changes to the brine solution after the majority of the polymer reaction has occurred.

3) Solid Brine Pit Sample – sample will be analyzed for EPA 8260B (chloroprene included in compound list). A sample of the solid material produced within the brine solution will be collected to determine the amount of free chloroprene within the solid.

Special personnel or equipment requirements:

Due levels of VOCs recorded during the site inspection using a PID meter, all work conducted during the kettle/screen servicing will be conducted in level B PPE. All personnel conducting the work will be HAZWOPER trained and experienced in level B work. Health monitoring will be conducted during operations.

Proposed work schedule (dates and time of sample collection):

All sampling efforts will be coordinated with Denka and the servicing of the kettle/screens. Times and dates are unknown at this time

Products to be produced:

At the conclusion of the inspection a XX report will be produced which will include a laboratory report along with a QA/QC review.

A.7 Quality Objectives & Criteria

This inspection will be conducted under the authority of EPA RCRA.

To support this requirement, EPA has developed a systematic planning process based on a graded approach for environmental decision making called the Data Quality Objectives (DQO) Process. The DQO Process is the Agency's preferred planning process and provides quality objectives and performance criteria based on the user's determination of tolerable error in the results. For details on the DQO Process and guidance on how and when it may be used, see the "*Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA QA/G-4) (EPA, February 2006).*" This process has limited applicability to most enforcement inspection activities, since generally only Special Projects lend themselves to development of formal DQOs and defining of error limits, hypothesis testing, etc.

All data collected shall be in accordance with the appropriate EPA methodologies and protocols found in the appropriate regulatory guidance. The data shall be used to determine the following:

1. Levels of hazardous materials entering the atmosphere as fugitive emissions due to waste handling procedures.
2. Levels of hazardous materials entering the facilities waste water stream as a result of the facility's waste handling procedures.
3. Reactivity of the polymer popcorn

The data must meet the approved method accuracy requirements such as those found in Industry-specific methods (40 CFR 136). All supporting QA/QC information shall be provided. The data may be used to support any future enforcement actions.

A.8 Special Training/Certification

At a minimum, field personnel have completed the required Health and Safety 24-hour initial and 8-hour annual training that is mandatory under OSHA 29 CFR 1910.120(e)(8) and EPA Order 3500.1 requirements. Under various programs, this training is mandatory to maintain inspector credentials. All non-credentialed personnel (e.g. inspectors in training) must meet the 29 CFR 1910.120(e)(8) requirements, and should be in accompanied by credentialed personnel while inspecting/sampling at the facility/site. Inspection personnel must be familiar with and follow bio-security procedures.

Additional Special Training:
No additional training is required at this time.

A.9 Documents and Records

The records for this project will include miscellaneous correspondence, field notes, laboratory analytical reports, photo logs, and inspection reports. All laboratory reports will be submitted to the EPA Lead Inspector/Project Manager. Field notes will include observations about facility conditions at the site(s) where samples are collected. Any noteworthy deviation from the procedures specified in the QAPP will be recorded in the field activity logs. Laboratory analytical reports will be generated for all of the samples received by the laboratory. Each set of samples will include a chain of custody form signed by the samplers and the laboratory recipient. All samples will be delivered by Weston Solutions personnel directly to the laboratory.

The EPA Project Manager will disseminate copies of the QAPP to the people listed in the distribution list once it is approved. Any revisions to the QAPP will be numbered sequentially. It will be the responsibility of the EPA Project Manager to ensure that each person on the distribution list receives copies of any revisions.
All EPA records and documents from this project will be handled according to the following EPA Region 6 Field Activities Quality System Procedures:

- Records Management - R6PROC-003
- Management of Sampling and Environmental Data - R6PROC-004
- Field Documentation - R6PROC-005
- Field Equipment Inventory and Management - R6PROC-006
- Field Inspections and Investigations - R6PROC-007
- Field Activities Report Preparation and Distribution- R6PROC-008

The designated and/or contracted laboratory/ies will manage the testing and original raw data from this project (both hard copy and electronic) in accordance with their established and accredited procedures. Any deviations from these procedures shall be approved by the EPA Project Manager before implementation.

SECTION B – DATA GENERATION & ACQUISITION

B.1 Sampling Process Design (Experimental Design)

The decision on whether or not to collect a sample will be contingent upon the following factors:

1. The facility representatives can conduct the service of removing the screens from the kettles and follow standard operating procedures regarding the collection and disposal of the waste stream.
2. EPA contractors can retrieve liquid samples from the brine pit utilizing tools available to the team.
3. EPA contractors can retrieve solid samples from the brine pit utilizing tools available to the team.

Because these samples are to be the result of an inspection and/or a one-time inspection/sampling event, a detail process design is not feasible or appropriate. However, the procedures to be followed from initiation to final report could be described as followed:

Step 1: The COR directs the START contractor to assemble sampling equipment, chain of custody forms, pre-inspection plan, QAPP, sampling equipment/containers, ice chests, etc. and notifies laboratory to expect samples of a particular matrix for a specific analysis (see Table B.1).

Step 2: The START contractor proceeds to field for observation, data gathering, and sample collection, if the situation warrants.

Step 3: START Contractor transports/ships sample(s) along with chain of custody forms to the laboratory for analytical testing.

Step 4: Analytical results are received from laboratory, EPA representatives evaluate data, attaches to report along with a QA/QC review, and takes any required action.

<u>Types and number of samples required</u>:
See Table B.1.

<u>Sampling network design & rationale for design</u>:
EPA representatives will collect samples to determine if hazardous wastes form the facility have been released into the environment.

Air samples will be collected and analyzed for VOCs via method TO-15 based upon previous field observations and records. Samples will be collected using 6-liter summa type air canisters with evacuated contents, creating a vacuum by which air in taken into the canister. A 200ml/minute flow controller will be attached to the orifice of the summa canister, allowing an approximate 30-minute sample to be collected. Air samples will be collected from the kettle area during servicing, along the pathway from the polymer building to the brine pit, and at the edge of the brine pit. Background samples will be

collected to provide a comparison value by which the release of materials into the atmosphere during the kettle servicing can be prepared.

Liquid samples will be collected from the brine pit and analyzed for VOCs via method 8260B. Samples will be collected from multiple depths within the brine pit using a container affixed to an extension pole. A background sample will be collected prior to the popcorn polymer waste product being introduced to the pit. After the waste material has been added to the pit the team will wait approximately 10 minutes prior to collecting the first sample. The facility has stated that the waste material will react and polymerize within this controlled environment to form neoprene. The EPA has surmised that this initial 10-minute time period will allow for the reaction of the material to begin. A second sample will be collected one hour after the waste material is added to the pit.

After the one-hour period the team will assess if the waste material has reacted to form neoprene. If solid material is noted within the brine pit the team will collect a solid sample and analyze the sample for VOCs via method 8260B. The solid sample will be collected using a screen attached to the extension pole. The solid material sample will be collected using a Terra Core or Encore sampling device. These devices collect the appropriate amount of sample material while limiting the loss of VOCS from the sample. Samples will be placed into the appropriate containers and preserved as the method instructs.

Table B.1 Samples by Matrix

Matrix	# of Matrix Samples	# of Field Blank**	# of Trip Blank*	# of Blind Duplicate	# of MS/MSD	Total # of Samples	Analysis *Example:* *TCLP RCRA 8 Metals SW846 6010C/7471*
Air	7			1		8	VOC by TO-15
Liquid	3		1	1		5	VOC by 8260B
Solid	1					1	VOC by 8260B

Note: *Trip blanks are for VOC analyses only. ** Field blanks column may also include rinsate blanks.

Typical Analytical Method No.

Volatile Organics by GC/MS
SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA – MC
CLP - VOA – LC
Std. Methods 6210B
Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC
SW-846 - 8021B
EPA500 - 502.2
EPA600 - 601

Semi-Volatile Organics by GC/MS
SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410

PAH
SW846 - 8310 (HPLC)

Inorganic Analytes
SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides
SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs
SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C
Std. Methods 6230D

Sampling locations & frequency of sampling:
Sampling is anticipated to be a single event from locations will include the following:

1. Air background locations
    a. Upwind of Polymer Building
    b. Downwind of Polymer Building
    c. Inside of polymer building near kettles
    d. Inside of polymer building 20-30 feet from kettles
2. Air Samples
    a. Inside of polymer building near kettle during screen servicing
    b. Inside of polymer building 20-30 feet away from kettle during screen servicing
    c. Collected alongside of the waste product as it is transported from the kettle to the brine pit.
3. Liquid Samples from Brine Pit
    a. Background sample collected prior to waste placement.
    b. After waste placement and after a 10-minute waiting period
    c. After waste placement and after a 1-hour waiting period
4. Solid Sample – to be collected from the brine pit after the 1-hour waiting period

Sample matrices:
See Table B.1.

Classification of measurement parameters:
Critical – For enforcement case development

Validation study information, for non-standard situations:
N/A: Standard laboratory validation is required.

B.2 Sampling Methods

Identify sample collection procedures:

AIR
Air samples will be analyzed for VOCs using EPA method TO-15 and collected following EPA SOP 1704 (Appendix B). START will utilize a 6-liter summa canister with particulate filters and inline pressure regulators and gauges to collect samples from 3-5 feet above ground surface. All air samples will be collected using flow controllers set to draw 200ml/minute of air into the summa canister. Batch certified summa canisters, particulate filters (as needed) and gauges will be provided by the contracted laboratory. Inline gauges will be set to collect a representative sample over the 30-minute period and retain at a minimum -2" Hg vacuum reading at the end of the sampling period. START will document that all normal vent systems will be operating normally at the time of the event. PID readings will be taken continuously during the sampling event.
Prior to the sampling event, each summa canister will be leak checked by START. With the inline regulator/gauge attached and shut in with a Swagelok nut the canisters

vacuum will be applied to the regulator by opening the summa canister valve until the gauge reading stabilizes. The summa canister valve will then be closed, and the gauge readings monitored for one minute. If the gauge loses more than 2" Hg of vacuum the fittings will be adjusted and the test repeated until a satisfactory result indicating no leakage around the flow controller is achieved.
START will document the time, temperature, ambient pressure, and canister pressure for each summa canister at the time of deployment and collection. Each summa canister will be equipped with a sample tagged affixed to the canister housing. The site-specific sample ID will be written onto each tag at deployment. At the time of collection, the inline regulator will be removed from the canister and a Swagelok nut installed at the inlet. Canisters will be placed within the designated container and prepared for shipment.

LIQUID
Upon initiation of sampling, the EPA team will place barriers around the sampling area to prevent any liquid from spilling onto the ground surface surrounding the brine pit. PID readings will be taken continuously during the sampling event. Readings will be recorded in the site logbook and electronically. An extension pole will be outfitted with a glass 8-ounce jar and secured with a pipe clamp and serve as the sample collection mechanism. New jars and clamps will be utilized for each sample event.
The samples will be placed directly into laboratory-supplied pre-preserved 40-ml VOA vial containers (3 per sample) and labelled according to the procedures described in this document. The sampling team will ensure that no air is captured within the vials during the collection process. Samples will be placed within a laboratory-provided "bubble wrap" bag and then placed inside of a zipper lock quart baggie. The sealed samples will be placed on ice immediately. All documentation of sample collection and chain of custody procedures will follow instructions provided in this QAPP.

SOLID
Samples will be collected from the brine pit using an extension pole and a screen. The solid material will be extracted from the pit and immediately placed into a dedicated aluminum pan. Sample cores will be collected according to VOC TerraCore sampling protocols. A Terra Core sampling kit will be utilized to extract 5-gram sample of the solid from the solid material. All debris will be removed from the outside of the sampling tool and the plug will be squared off to the lip of the sampler. The plunger will be rotated 90 degrees and the plug released into the 40 ml pre-labeled, pre-preserved (methanol) vial. A second sample using the same methods will be collected adjacent to the first to insure against breakage and provide additional sample volume should the analysis require a "re-run". Samples will be placed within a laboratory provided "bubble wrap" bag and then placed inside of a zipper lock quart baggie. The sealed samples will be placed on ice immediately. All documentation of sample collection and chain of custody procedures will follow instructions provided in this QAPP.

<u>Identify sampling methods and equipment:</u>

Sampling methods and regulatory citation: The analytical methods, sample containers, holding times, and sample preservation requirements are presented in Table B.4 and apply to EPA Sampling Methods:
8260B and TO-15

Sampling equipment available during the inspection/sampling event:
The team anticipates using summa canisters with 200ml/minute flow controllers to collect air samples.
The team anticipates using a container attached to an extension pole to collect liquid samples.
The team anticipates using a screen attached to an extension pole to collect a solid sample.

Implementation requirements: Will be based on based on the Lead Inspector's field observations, field conditions, facility operations and/or timing.

Sample preservation requirements: See Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Decontamination procedures: All equipment will be dedicated to the sample media collection. No decontamination will be conducted.

Any support facilities needed: No support facilities will be needed.

If a failure in the sampling or measurement system occurs, the Lead Inspector/Project Manager must be notified. The Quality Assurance Officer and/or Laboratory Point of Contact will act as advisors to the Lead Inspector/Project Manager. The Lead Inspector/Project Manager will be responsible for any decision concerning corrective action. Corrective action in the field or in the laboratory will be documented in the field notes and/or in the final laboratory analytical report based on the action(s) required.

B.3 Sampling Handling & Custody

The date and time of sample collection will be recorded on the field activity log and on all samples: additionally, that information will be recorded on the Chain of Custody (COC) form. The desired analytical tests to be performed and any preservatives used will also be noted on the COC form. An example COC format is attached in Figure B.3.

Prior to shipment, all samples shall be in custody with the inspection/sampling team. Sample team shall keep all samples in an environment that maintain its preservation (e.g., inside cooler(s) with double bagged ice and packing material) In lieu of tied on tags, stick on sample labels may be used as long as they contain the following information: sampler name, date, time, station location, sampler signature, sample # and analysis requested. Custody seals shall be used on each sample container and sample coolers, unless samples are hand delivered to the designated laboratory by a member of the inspection/sampling team along as the custody chain is not breached.

Figure B.3. Official Chain of Custody Example

ENVIRONMENTAL PROTECTION AGENCY

OFFICIAL CHAIN OF CUSTODY RECORD

PROJ. NO. | PROJECT NAME

SAMPLERS: (Signature)

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CON-TAINERS	REMARKS

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	
Shipped by:	Airbill Number:				

Distribution: White Accompanies Shipment; Pink to Coordinator Field Files; Green to Report; Yellow Returns with Waybill

EPA 7500-53 (11/88)

6 — 07882

B.4 Analytical Methods

Identify analytical methods to be followed (with all options) & required equipment:
See Table B.4 – Analytical Methods, Preservatives and Containers for Samples.

Specify any specific method performance criteria:
N/A

Provide validation information for non-standard methods:
N/A

Identify procedures to follow when failures occur:
If failure(s) occur during the analysis, the Laboratory Point of Contact will contact the Lead Inspector/Project Manager within 24-hours, and communicate the failure and identify potential corrective remedies. The Lead Inspector/Project Manager will make the determination on the remedy. The failure(s) and corrective remedies will be document via email and cc: the first-line supervisor and the QA Officer.

Identify individuals responsible for corrective action and appropriate documentation:
Jeff Wright – Laboratory Coordinator
David Bordelon – Project Manager

Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Air	7	VOC	TO-15	28		6L Summa Canister	1	None
Liquid	3	VOC	8260B	14		40-mL glass vials	3	HCl w/ Ice (<6°c)
Solid	1	VOC	8260B	14		EnCore® 5 Gram Sampler	2	NaHSO4 w/ Ice (<6 °c)

Typical Analytical Method No.

Volatile Organics by GC/MS
SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA – MC
CLP - VOA – LC
Std. Methods 6210B
Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC
SW-846 - 8021B
EPA500 - 502.2
EPA600 - 601
EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C
Std. Methods 6230D

Semi-Volatile Organics by GC/MS
SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410

PAH (HPLC)
SW846 - 8310

Inorganic Analytes
SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides
SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs
SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

B.5 Quality Control

Identified below are a number of quality control samples that will be collected.

Trip Blanks

Number of Blank(s): Example: One sample for each sample shipping container that contains samples for VOC analysis.

Trip Blank Type: A trip blank provided by the laboratory will accompany the samples from time of collection to receipt at the laboratory

Describe Preparation: For each trip blank, type II reagent grade water from the laboratory will be placed in three 40-ml vials and preserved with HCL. The VOC analysis will be consistent with the analysis on the environmental/waste samples.

Field Blanks

Number of Blank(s): Example: N/A

Field Blank Type: N/A

Describe Preparation: N/A

Equipment Rinsate Blanks

All equipment will be dedicated, no decontamination is expected.

Rinsate Type: N/A

Describe Preparation: N/A

Blind Replicate or Duplicate Samples

One duplicate sample will be collected per 10 samples.

Sample Matrix: Air

Location: From the location within the Polymer building approximately 20-30 feet from the kettle.

Matrix Spike (MS) / Matrix Spike Duplicate (MSD) Samples

N/A

Sample Matrix: N/A

Location: N/A

B.6 Instrument/Equipment Testing, Inspection, and Maintenance

EPA field personnel will use the PID as appropriate based on the project-specific field parameter needs and/or Health and Safety conditions. Along with data collection, measurements from this instrument may be used to alert field personnel to potential hazardous conditions. In addition, readings collected by the instrument may be documented in the field logbook and included in the final inspection report. The instrument will be maintained in accordance with the manufacturer's recommendations detailed in the instrument manual.

B.7 Instrument/Equipment Calibration and Frequency

Identify all tools, gauges, instruments, and other sampling, measuring, and test equipment used for data generation or collection activities affecting quality that must be controlled and calibrated:
MultiRAE

Describe or reference how calibration will be conducted using certified equipment and/or standards with known valid relationships to nationally recognized performance standards. If no such nationally recognized standards exist, document the basis for the calibration:
The MultiRAE instrument will be calibrated using isobutylene and mixed calibration gasses prior to entry of the facility in accordance with the procedures listed in the instrument manual. This calibration will be confirmed by a bump test prior to each use of the instrument. Should the bump test fail, the instrument will be recalibrated before use.

EPA field personnel shall record field usage in the maintenance/calibration logbook that is maintained with the equipment along with the inspection/sampling logbook.

B.8 Inspection/Acceptance of Supplies & Consumables

The EPA Project Manager will be responsible for inspecting sample containers prior to leaving for the inspection. Only new sample containers accompanied by the manufacturer's certification of pre-cleaning will be used. The sample containers will be inspected for cracks, ill-fitting lids, or other defects prior to use and will be discarded if defects are found.

B.9 Data Acquisition Requirements for Non-Direct Measurements

Records may be collected during the inspection/sampling event to document activities at the facility. Documents may be requested for a period of up to XX years prior to the inspection/sampling event. These records will be used for determining the facility's compliance with the requirements of RCRA.

B.10 Data Management

Data for this project will be produced both onsite and at the designated/approved Laboratory. Laboratory data will be submitted to the EPA Project Manager and will be included in the subsequent inspection report. Data collected during the inspection may be designated as Confidential Business Information (CBI) by representatives of CRS. For any information for which a CBI claim is made that information will be handled in accordance with the provisions specified for RCRA CBI. All records and documents generated during this project will be handled in accordance with EPA's "Standard Operating Procedures for Record and Information Management"

SECTION C – ASSESSMENT AND OVERSIGHT

C.1 Assessments and Response Actions

Documentation and analytical results collected during this project will be evaluated to determine the compliance status as it applies to the facility's requirements under RCRA. Results of this evaluation will determine what action, if any, the Agency should take in response to any Areas of Concern identified during the inspection. The magnitude and breadth of any concerns identified will determine the appropriate response on the part of the Agency which includes but is not limited to the issuance of administrative orders, administrative penalty orders, or judicial referral.

C.2 Reports to Management

This project will result in the generation of an inspection report which will include an inspection narrative, a photographic log, documents collected during the inspection, and analytical reports for all samples collected, if any.

SECTION D – DATA VALIDATION AND USABILITY

D.1 Data Review, Verification, and Validation

Data will be accepted if they meet the following criteria:

1. Field logs are complete.
2. Prior to releasing the analytical data, the laboratory staff well review both the sample and QC data to verify sample identity, instrument calibration, quantitation limits, dilution factors, numerical computations, accuracy of transcriptions, and chemical interpretations. In addition, the QC data are tabulated and the results reviewed to ascertain whether they were within the project-required limits for accuracy and precision. Any non-conforming data will be discussed in the data package case narrative. If necessary, qualifiers are applied based on this information. The laboratory staff review will consist of a Peer review, a Senior Chemist review, a Point of Contact review, and a QA Officer review. The review will follow the US EPA National Functional Guidelines for Organic Methods Data Review (SOM02.2), US EPA National Functional Guidelines for Inorganic Data Review (ISM02.2).
3. Field data is reviewed to ensure that they are complete; that sample collection information is thoroughly documented; and that any deviations from the QAPP are noted.
4. Actual sampling locations is documented in the inspection logbook. Locations were determined using GPS instrumentation, linear measurements, and/or photographic references.
5. Sample handling procedures are documented on chain of custody forms.

Any deviations from the QAPP are to be reported in the field logs. The Lead Inspector/Project Manager will verify the contents of these logs. If the data fails to meet the criteria they will be flagged as estimated. Any flagged data will be discussed with management to determine if the data point will be rejected and re-sampling done.

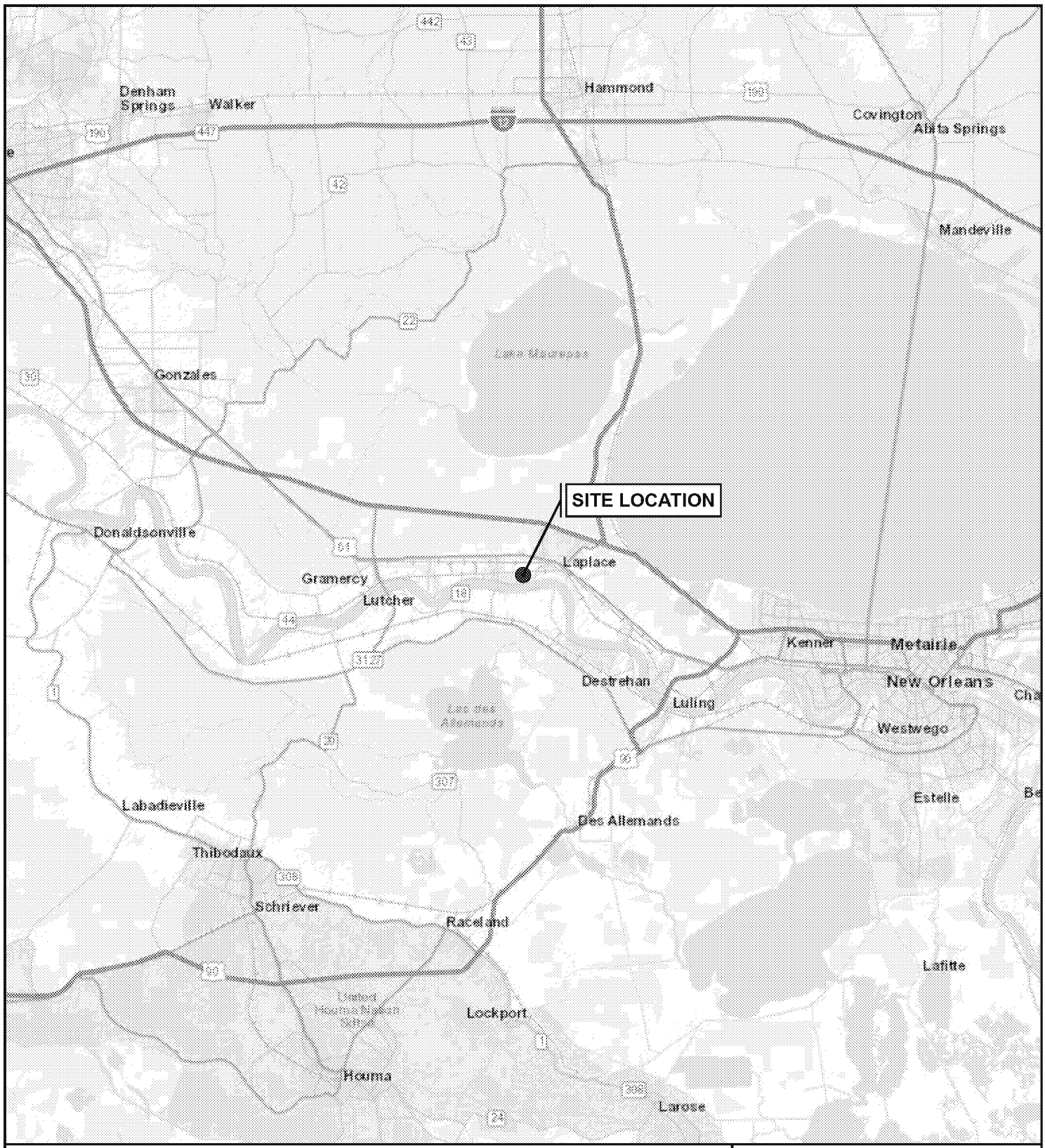
D.2 Verification and Validation Methods

Field data will be validated by the Lead Inspector/Project Manager, and any problems identified during this project will be documented in the field logs. The laboratory supervisor will validate laboratory data according to methods established in their QA Plan.
The Lead Inspector/Project Manager will review and verify field logs and analytical data reports. Any problems or deviations identified will be discussed with the project team and the first-line supervisor to determine corrective action measures.

D.3 Reconciliation with User Requirements

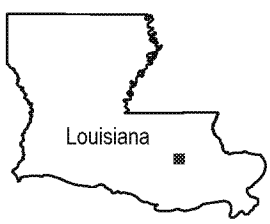
The designated laboratory will provide a final laboratory report along with the supporting electronic data in a usable spreadsheet format. All laboratory bench sheets and equipment calibrations will be maintained by the designated laboratory and will be available upon request. The data will be used to support any future enforcement actions or litigation.

APPENDIX A: FACILITY MAP



LEGEND

- SITE LOCATION



N

0 10 20

SCALE IN MILES

SOURCE: WORLD STREET MAPS; ESRI
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT A

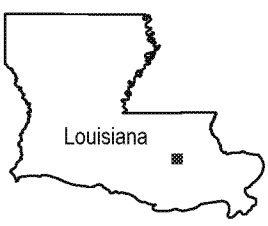
SITE LOCATION MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\pro\RCRA Denka Support\RCRA Denka Support.aprx 4:41 PM 4/28/2022 covasj

LEGEND

- SITE LOCATION



N

0 4,000 8,000

SCALE IN FEET

SOURCE: NATIONAL GEOGRAPHIC TOPO; ESRI
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT B

SITE AREA MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\nasatxgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\pro\RCRA Denka Support\RCRA Denka Support.aprx 4:51 PM 4/28/2022 covasj

LEGEND

- BRINE PIT
- EQUIPMENT STORAGE AWNING
- POLY BUILDING
- WASTE NEOPRENE ROLL-OFF CONTAINER

0 40 80

SCALE IN FEET

SOURCE: ©NEARMAP IMAGERY; 2022
TDD:
SSID:
NRC:

US EPA REGION 6

ATTACHMENT C

SITE LAYOUT MAP
RCRA DENKA SUPPORT
LATITUDE: 30.05888° N
LONGITUDE: 90.52426° W
RESERVE, ST. JOHN THE BAPTIST PARISH, LOUISIANA

DATE	PROJECT NO	SCALE
APRIL 2022		AS SHOWN

FILE: \\nasabgis1\ATX_GIS_Data\EPA\Region 6 START IV\Superfund\RCRA Denka Support\rcra\RCRA Denka Support\RCRA Denka Support.aprx 4:47 PM 4/28/2022 cevasq

ATTACHMENT F

Air Analytical Results Table

Attachment F
Summary of Air Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-A-BD	DR-A-BK	DR-A-BU	DR-A-KD	DR-A-KD	DR-A-KP	DR-A-KT	DR-A-PU
			Sample ID	DR-A-BD-05052022-01	DR-A-BK-05052022-01	DR-A-BU-05052022-01	DR-A-KD-05052022-02 D2	DR-A-KD-050522-01 D1	DR-A-KP-05052022-01	DR-A-KT-05052022-01	DR-A-PU-05052022-01
			Date	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FS	FD	FS	FS	FS	FS
TO-15											
1,1,1-Trichloroethane	71-55-6	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	79-34-5	ug/m3	--	9.56 U	16.2 U	11.9 U	8.53 U	7.43 U	9.22 U	6.47 U	10.6 U
1,1,2-Trichloroethane	79-00-5	ug/m3	--	ND	6.4 U	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	75-34-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene	75-35-4	ug/m3	--	ND	ND	ND	ND	ND	4.89 U	ND	ND
1,2,4-Trichlorobenzene	120-82-1	ug/m3	--	66.4 U	120 U	89.2 U	45.7 U	51.2 U	55.8 U	41.9 U	132 U
1,2,4-Trimethylbenzene	95-63-6	ug/m3	--	18.3 U	31.7 U	27.6 U	ND	ND	ND	ND	26.3 U
1,2-Dibromoethane	106-93-4	ug/m3	--	ND	12.5 U	10.4 U	ND	ND	ND	ND	6.89 U
1,2-Dichloroethane	107-06-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloropropane	78-87-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	108-67-8	ug/m3	--	7 U	13.7 U	9.46 U	4.93 U	5.76 U	6.31 U	5.91 U	9.36 U
1,3-Butadiene	106-99-0	ug/m3	--	ND	ND	15.7 U	10.9 U	9.91 U	18.2 U	16.6 U	15.4 U
Acetonitrile	75-05-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Acetylene	74-86-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Acrolein	107-02-8	ug/m3	--	59 U	85.2 U	49.6 U	186 U	172 U	120 U	157 U	133 U
Acrylonitrile	107-13-1	ug/m3	--	ND	6.55 U	4.46 U	ND	ND	ND	ND	ND
Benzene	71-43-2	ug/m3	--	23.5 U	22.2 U	25.3 U	24.8 U	25.9 U	24.9 U	27.9 U	20.8 U
Bromochloromethane	74-97-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	75-27-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	75-25-2	ug/m3	--	8.66 U	15.6 U	12 U	8.03 U	6.85 U	6.86 U	6.23 U	10.7 U
Bromomethane	74-83-9	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	75-15-0	ug/m3	--	ND	ND	22.4 U	ND	18.5 U	ND	15 U	8.99 U
Carbon Tetrachloride	56-23-5	ug/m3	--	ND	ND	ND	ND	ND	2.28 U	ND	ND
Chlorobenzene	108-90-7	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	75-00-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	67-66-3	ug/m3	--	ND	4.33 U	4.89 U	5.24 U	4.82 U	17.9 U	25.7 U	3.65 U
Chloromethane	74-87-3	ug/m3	--	15.8 U	13 U	17.5 U	19 U	15 U	14.3 U	17.7 U	15.6 U
Chloroprene	126-99-8	ug/m3	--	**969 D**	**1050 D**	**10200 D**	**18400 D**	**19000 D**	**193000 D**	**243000 D**	**4390 D**
cis-1,2-Dichloroethylene	156-59-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	10061-01-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	124-48-1	ug/m3	--	ND	7.98 U	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	75-71-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Dichloromethane	75-09-2	ug/m3	--	ND	4.39 U	ND	ND	ND	4.49 U	ND	ND
Dichlorotetrafluoroethane	76-14-2	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Ethyl Acrylate	140-88-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND

Attachment F
Summary of Air Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-A-BD	DR-A-BK	DR-A-BU	DR-A-KD	DR-A-KD	DR-A-KP	DR-A-KT	DR-A-PU
			Sample ID	DR-A-BD-05052022-01	DR-A-BK-05052022-01	DR-A-BU-05052022-01	DR-A-KD-05052022-02 D2	DR-A-KD-050522-01 D1	DR-A-KP-05052022-01	DR-A-KT-05052022-01	DR-A-PU-05052022-01
			Date	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FS	FD	FS	FS	FS	FS
Ethyl tert-Butyl Ether	637-92-3	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	100-41-4	ug/m3	--	4.11 U	7.75 U	5.4 U	5.48 U	4.92 U	4.44 U	3.79 U	4.74 U
Ethylene oxide	75-21-8	ug/m3	--	12.7 U	ND	ND	ND	ND	ND	ND	ND
Hexachloro-1,3-butadiene	87-68-3	ug/m3	--	101 U	187 U	128 U	64.5 U	66.3 U	91.5 U	61.2 U	277 U
m,p-Xylene	108-38-3, 106-42-3	ug/m3	--	ND	16.9 U	12.9 U	10.5 U	10.1 U	9.79 U	7.83 U	11 U
m-Dichlorobenzene	541-73-1	ug/m3	--	12.4 U	27.1 U	18.9 U	9.34 U	10 U	10.1 U	9.4 U	17.8 U
Methyl Isobutyl Ketone	108-10-1	ug/m3	--	22.3 U	20.7 U	18.5 U	17.5 U	14 U	13.8 U	21.2 U	18.1 U
Methyl Methacrylate	80-62-6	ug/m3	--	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	0 CE, U	ND
Methyl tert-Butyl Ether	1634-04-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
n-Octane	111-65-9	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
o-Dichlorobenzene	95-50-1	ug/m3	--	16.4 U	33.5 U	29.3 U	11.4 U	13 U	13.1 U	14.1 U	26.6 U
o-Xylene	95-47-6	ug/m3	--	4.66 U	8.57 U	6.57 U	4.92 U	4.19 U	4.53 U	3.79 U	5.92 U
p-Dichlorobenzene	106-46-7	ug/m3	--	14.1 U	29.2 U	20.2 U	10.1 U	11.3 U	10.5 U	10.5 U	19.5 U
Propylene	115-07-1	ug/m3	--	71.9 U	63.8 U	65.9 U	69.2 U	68.3 U	65.2 U	73.6 U	62.3 U
Styrene	100-42-5	ug/m3	--	5.59 U	9.69 U	7.6 U	4.48 U	4.87 U	4.31 U	4.31 U	7 U
tert-Amyl Methyl Ether	994-05-8	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethylene	127-18-4	ug/m3	--	ND	6.62 U	5.93 U	ND	ND	ND	ND	ND
Toluene	108-88-3	ug/m3	--	**217 D**	**4720 D**	**914 D**	**9890 D**	**10300 D**	**10500 D**	**5820 D**	**774 D**
trans-1,2-Dichloroethylene	156-60-5	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	10061-02-6	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethylene	79-01-6	ug/m3	--	24.8 U	21.9 U	24.4 U	24.7 U	25 U	ND	ND	24.1 U
Trichlorofluoromethane	75-69-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND
Trichlorotrifluoroethane	76-13-1	ug/m3	--	ND	19.4 U	21 U	21.7 U	18.3 U	19.8 U	18.2 U	19.7 U
Vinyl chloride	75-01-4	ug/m3	--	ND	ND	ND	ND	ND	ND	ND	ND

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
ug/m3 = micrograms per cubic meter
ND = Indicates the compound was analyzed for, but not detected
U = Under detection Limit
D = Resullt obtained by dilution
BOLD = analyte was detected

ATTACHMENT G

Air Analytical Results – Laboratory Deliverable

Eastern Research Group
601 Keystone Park Drive
Suite 700
Morrisville, NC 27560

June 07, 2022

Shaun Burke
OECA
2890 Woodbridge Avenue
Edison, NJ 08837
Project Name: Denka

Dear Shaun Burke,

This report contains the analytical results for the sample(s) received under chain(s) of custody by Eastern Research Group on 05/09/22 10:03.

Values below the MDL for QC results in this report are recorded as ND, however the actual values are reported in the accompanying Excel report with a "U" flag (Under the detection limit). The actual values are reported in AQS.

This test is accredited under the 2016 TNI Standard for Environmental Laboratories (FL DOH Certification # E87673). All analyses were performed as described in the US EPA-approved QAPP, under the contract for UATMP, NATTS, CSATAM, PAMS and NMOC support (US EPA Contract No. EP-D-14-030). This cover page is an integral part of this report, and any exceptions or comments are noted on the last page.

Release of the data contained in this data package and in the data submitted in the electronic data deliverable, has been authorized by the Program Manager, or the Program Manager's designee as verified by the following signature.

The issuance of the final Certificate of Analysis takes precedence over any previous Report. If you have any questions, please contact me at 919-468-7872.

Sincerely,

Randolph Bower
TO-15 Task Lead
randy.bower@erg.com

The information contained in this report and its attachment(s) are intended only for the use of the individual to whom it is addressed and may contain information that is privileged, confidential, or exempt from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this report is strictly prohibited. If you have received this report in error, please notify randy.bower@erg.com and delete the report without retaining any copies.

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

ANALYTICAL REPORT FOR SAMPLES

SampleName	LabNumber	Matrix	Sampled	Received
DR-A-KT-05052022-01	2050917-01	Air	05/05/22 17:06	05/09/22 10:03
DR-A-KD-050522-01 D1	2050917-02	Air	05/05/22 17:05	05/09/22 10:03
DR-A-BK-05052022-01	2050917-03	Air	05/05/22 16:05	05/09/22 10:03
DR-A-KP-05052022-01	2050917-04	Air	05/05/22 17:04	05/09/22 10:03
DR-A-KD-05052022-02 D2	2050917-05	Air	05/05/22 17:05	05/09/22 10:03
DR-A-BU-05052022-01	2050917-06	Air	05/05/22 16:31	05/09/22 10:03
DR-A-PU-05052022-01	2050917-07	Air	05/05/22 17:03	05/09/22 10:03
DR-A-BD-05052022-01	2050917-08	Air	05/05/22 16:31	05/09/22 10:03

The results in this report apply only to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KT-05052022-01 **Lab ID:** 2050917-01 **Sampled:** 05/05/22 17:06
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT070 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/14/22 01:03

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	138
Propylene	42.7	73.60	U	43.3
Dichlorodifluoromethane	ND	ND	U	17.1
Chloromethane	8.53	17.70	U	35.8
Dichlorotetrafluoroethane	ND	ND	U	10.4
Vinyl chloride	ND	ND	U	9.88
1,3-Butadiene	7.48	16.60	U	26.0
Ethylene oxide	ND	ND	U	60.3
Bromomethane	ND	ND	U	25.7
Chloroethane	ND	ND	U	20.6
Acetonitrile	ND	ND	U	173
Acrolein	68.4	157.00	U	222
Trichlorofluoromethane	ND	ND	U	29.5
Acrylonitrile	ND	ND	U	21.1
1,1-Dichloroethene	ND	ND	U	14.4
Dichloromethane	ND	ND	U	249
Carbon Disulfide	4.81	15.00	U	17.8
Trichlorotrifluoroethane	2.37	18.20	U	11.4
trans-1,2-Dichloroethylene	ND	ND	U	10.9
1,1-Dichloroethane	ND	ND	U	9.85
Methyl tert-Butyl Ether	ND	ND	U	8.43
Chloroprene	**66900**	**243,000.00**	D	**702**
cis-1,2-Dichloroethylene	ND	ND	U	28.6
Bromochloromethane	ND	ND	U	9.51
Chloroform	5.25	25.70	U	9.56
Ethyl tert-Butyl Ether	ND	ND	U	8.53
1,2-Dichloroethane	ND	ND	U	8.93
1,1,1-Trichloroethane	ND	ND	U	14.9
Benzene	8.71	27.90	U	12.9
Carbon Tetrachloride	ND	ND	U	14.1
tert-Amyl Methyl Ether	ND	ND	U	10.5
1,2-Dichloropropane	ND	ND	U	11.4
Ethyl Acrylate	ND	ND	U	16.6
Bromodichloromethane	ND	ND	U	31.9
Trichloroethylene	ND	ND	U	15.4
Methyl Methacrylate	ND	ND	CE, U	83.8
cis-1,3-Dichloropropene	ND	ND	U	8.78
Methyl Isobutyl Ketone	5.16	21.20	U	38.7
trans-1,3-Dichloropropene	ND	ND	U	12.4
1,1,2-Trichloroethane	ND	ND	U	11.8

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KT-05052022-01 **Lab ID:** 2050917-01 **Sampled:** 05/05/22 17:06
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT070 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/14/22 01:03

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**1540**	**5,820.00**	D	**49.4**
Dibromochloromethane	ND	ND	U	11.0
1,2-Dibromoethane	ND	ND	U	13.8
n-Octane	ND	ND	U	18.1
Tetrachloroethylene	ND	ND	U	36.0
Chlorobenzene	ND	ND	U	13.1
Ethylbenzene	0.870	3.79	U	14.1
m,p-Xylene	1.80	7.83	U	40.2
Bromoform	0.601	6.23	U	13.7
Styrene	1.01	4.31	U	14.8
1,1,2,2-Tetrachloroethane	0.941	6.47	U	11.9
o-Xylene	0.870	3.79	U	19.3
1,3,5-Trimethylbenzene	1.20	5.91	U	18.6
1,2,4-Trimethylbenzene	ND	ND	U	14.3
m-Dichlorobenzene	1.56	9.40	U	20.3
p-Dichlorobenzene	1.74	10.50	U	21.2
o-Dichlorobenzene	2.34	14.10	U	23.5
1,2,4-Trichlorobenzene	5.63	41.90	U	78.2
Hexachloro-1,3-butadiene	5.73	61.20	U	92.4

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KD-050522-01 D1 **Lab ID:** 2050917-02 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT094 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 22:57

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	138
Propylene	39.6	68.30	U	43.2
Dichlorodifluoromethane	ND	ND	U	17.0
Chloromethane	7.23	15.00	U	35.7
Dichlorotetrafluoroethane	ND	ND	U	10.3
Vinyl chloride	ND	ND	U	9.85
1,3-Butadiene	4.47	9.91	U	25.9
Ethylene oxide	ND	ND	U	60.0
Bromomethane	ND	ND	U	25.6
Chloroethane	ND	ND	U	20.5
Acetonitrile	ND	ND	U	173
Acrolein	75.0	172.00	U	221
Trichlorofluoromethane	ND	ND	U	29.4
Acrylonitrile	ND	ND	U	21.0
1,1-Dichloroethene	ND	ND	U	14.4
Dichloromethane	ND	ND	U	248
Carbon Disulfide	5.94	18.50	U	17.8
Trichlorotrifluoroethane	2.38	18.30	U	11.4
trans-1,2-Dichloroethylene	ND	ND	U	10.8
1,1-Dichloroethane	ND	ND	U	9.81
Methyl tert-Butyl Ether	ND	ND	U	8.39
Chloroprene	**5240**	**19,000.00**	D	**26.6**
cis-1,2-Dichloroethylene	ND	ND	U	28.5
Bromochloromethane	ND	ND	U	9.47
Chloroform	0.986	4.82	U	9.52
Ethyl tert-Butyl Ether	ND	ND	U	8.49
1,2-Dichloroethane	ND	ND	U	8.89
1,1,1-Trichloroethane	ND	ND	U	14.9
Benzene	8.09	25.90	U	12.9
Carbon Tetrachloride	ND	ND	U	14.0
tert-Amyl Methyl Ether	ND	ND	U	10.4
1,2-Dichloropropane	ND	ND	U	11.3
Ethyl Acrylate	ND	ND	U	16.5
Bromodichloromethane	ND	ND	U	31.8
Trichloroethylene	4.64	25.00	U	15.4
Methyl Methacrylate	ND	ND	CE, U	83.4
cis-1,3-Dichloropropene	ND	ND	U	8.74
Methyl Isobutyl Ketone	3.42	14.00	U	38.5
trans-1,3-Dichloropropene	ND	ND	U	12.3
1,1,2-Trichloroethane	ND	ND	U	11.8

CERTIFICATE OF ANALYSIS

OECA
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KD-050522-01 D1 **Lab ID:** 2050917-02 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT094 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 22:57

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2720**	**10,300.00**	D	**49.2**
Dibromochloromethane	ND	ND	U	10.9
1,2-Dibromoethane	ND	ND	U	13.8
n-Octane	ND	ND	U	18.0
Tetrachloroethylene	ND	ND	U	35.9
Chlorobenzene	ND	ND	U	13.0
Ethylbenzene	1.13	4.92	U	14.0
m,p-Xylene	2.32	10.10	U	40.0
Bromoform	0.661	6.85	U	13.6
Styrene	1.14	4.87	U	14.8
1,1,2,2-Tetrachloroethane	1.08	7.43	U	11.8
o-Xylene	0.964	4.19	U	19.3
1,3,5-Trimethylbenzene	1.17	5.76	U	18.5
1,2,4-Trimethylbenzene	ND	ND	U	14.3
m-Dichlorobenzene	1.66	10.00	U	20.3
p-Dichlorobenzene	1.87	11.30	U	21.1
o-Dichlorobenzene	2.15	13.00	U	23.4
1,2,4-Trichlorobenzene	6.89	51.20	U	77.9
Hexachloro-1,3-butadiene	6.20	66.30	U	92.1

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BK-05052022-01 **Lab ID:** 2050917-03 **Sampled:** 05/05/22 16:05
Pressure @ Receipt: 4.50 "Hg **Canister #:** 5015 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 15:37

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	121
Propylene	37.0	63.80	U	38.1
Dichlorodifluoromethane	ND	ND	U	15.0
Chloromethane	6.29	13.00	U	31.4
Dichlorotetrafluoroethane	ND	ND	U	9.12
Vinyl chloride	ND	ND	U	8.68
1,3-Butadiene	ND	ND	U	22.8
Ethylene oxide	ND	ND	U	52.9
Bromomethane	ND	ND	U	22.6
Chloroethane	ND	ND	U	18.1
Acetonitrile	ND	ND	U	152
Acrolein	37.1	85.20	U	195
Trichlorofluoromethane	ND	ND	U	25.9
Acrylonitrile	3.01	6.55	U	18.5
1,1-Dichloroethene	ND	ND	U	12.7
Dichloromethane	1.26	4.39	U	218
Carbon Disulfide	ND	ND	U	15.7
Trichlorotrifluoroethane	2.52	19.40	U	10.0
trans-1,2-Dichloroethylene	ND	ND	U	9.55
1,1-Dichloroethane	ND	ND	U	8.65
Methyl tert-Butyl Ether	ND	ND	U	7.40
Chloroprene	**290**	**1,050.00**	D	**23.5**
cis-1,2-Dichloroethylene	ND	ND	U	25.1
Bromochloromethane	ND	ND	U	8.35
Chloroform	0.884	4.33	U	8.39
Ethyl tert-Butyl Ether	ND	ND	U	7.49
1,2-Dichloroethane	ND	ND	U	7.84
1,1,1-Trichloroethane	ND	ND	U	13.1
Benzene	6.95	22.20	U	11.4
Carbon Tetrachloride	ND	ND	U	12.4
tert-Amyl Methyl Ether	ND	ND	U	9.21
1,2-Dichloropropane	ND	ND	U	9.99
Ethyl Acrylate	ND	ND	U	14.6
Bromodichloromethane	ND	ND	U	28.0
Trichloroethylene	4.06	21.90	U	13.6
Methyl Methacrylate	ND	ND	CE, U	73.6
cis-1,3-Dichloropropene	ND	ND	U	7.71
Methyl Isobutyl Ketone	5.05	20.70	U	34.0
trans-1,3-Dichloropropene	ND	ND	U	10.9
1,1,2-Trichloroethane	1.17	6.40	U	10.4

CERTIFICATE OF ANALYSIS

OECA
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BK-05052022-01 **Lab ID:** 2050917-03 **Sampled:** 05/05/22 16:05
Pressure @ Receipt: 4.50 "Hg **Canister #:** 5015 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 15:37

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**1250**	**4,720.00**	D	**43.3**
Dibromochloromethane	0.935	7.98	U	9.63
1,2-Dibromoethane	1.63	12.50	U	12.1
n-Octane	ND	ND	U	15.9
Tetrachloroethylene	0.974	6.62	U	31.7
Chlorobenzene	ND	ND	U	11.5
Ethylbenzene	1.78	7.75	U	12.4
m,p-Xylene	3.89	16.90	U	35.3
Bromoform	1.51	15.60	U	12.0
Styrene	2.27	9.69	U	13.0
1,1,2,2-Tetrachloroethane	2.36	16.20	U	10.4
o-Xylene	1.97	8.57	U	17.0
1,3,5-Trimethylbenzene	2.79	13.70	U	16.3
1,2,4-Trimethylbenzene	6.43	31.70	U	12.6
m-Dichlorobenzene	4.50	27.10	U	17.9
p-Dichlorobenzene	4.84	29.20	U	18.6
o-Dichlorobenzene	5.56	33.50	U	20.6
1,2,4-Trichlorobenzene	16.1	120.00	U	68.7
Hexachloro-1,3-butadiene	17.5	187.00	U	81.2

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KP-05052022-01 **Lab ID:** 2050917-04 **Sampled:** 05/05/22 17:04
Pressure @ Receipt: 5.50 "Hg **Canister #:** 5040 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 19:48

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	133
Propylene	37.8	65.20	U	41.6
Dichlorodifluoromethane	ND	ND	U	16.4
Chloromethane	6.89	14.30	U	34.3
Dichlorotetrafluoroethane	ND	ND	U	9.97
Vinyl chloride	ND	ND	U	9.48
1,3-Butadiene	8.19	18.20	U	24.9
Ethylene oxide	ND	ND	U	57.8
Bromomethane	ND	ND	U	24.7
Chloroethane	ND	ND	U	19.8
Acetonitrile	ND	ND	U	166
Acrolein	52.4	120.00	U	213
Trichlorofluoromethane	ND	ND	U	28.3
Acrylonitrile	ND	ND	U	20.2
1,1-Dichloroethene	1.23	4.89	U	13.9
Dichloromethane	1.29	4.49	U	239
Carbon Disulfide	ND	ND	U	17.1
Trichlorotrifluoroethane	2.58	19.80	U	11.0
trans-1,2-Dichloroethylene	ND	ND	U	10.4
1,1-Dichloroethane	ND	ND	U	9.45
Methyl tert-Butyl Ether	ND	ND	U	8.09
Chloroprene	**53100**	**193,000.00**	D	**128**
cis-1,2-Dichloroethylene	ND	ND	U	27.5
Bromochloromethane	ND	ND	U	9.12
Chloroform	3.66	17.90	U	9.17
Ethyl tert-Butyl Ether	ND	ND	U	8.18
1,2-Dichloroethane	ND	ND	U	8.57
1,1,1-Trichloroethane	ND	ND	U	14.3
Benzene	7.77	24.90	U	12.4
Carbon Tetrachloride	0.362	2.28	U	13.5
tert-Amyl Methyl Ether	ND	ND	U	10.1
1,2-Dichloropropane	ND	ND	U	10.9
Ethyl Acrylate	ND	ND	U	15.9
Bromodichloromethane	ND	ND	U	30.6
Trichloroethylene	ND	ND	U	14.8
Methyl Methacrylate	ND	ND	CE, U	80.4
cis-1,3-Dichloropropene	ND	ND	U	8.42
Methyl Isobutyl Ketone	3.37	13.80	U	37.1
trans-1,3-Dichloropropene	ND	ND	U	11.9
1,1,2-Trichloroethane	ND	ND	U	11.4

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KP-05052022-01 **Lab ID:** 2050917-04 **Sampled:** 05/05/22 17:04
Pressure @ Receipt: 5.50 "Hg **Canister #:** 5040 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 19:48

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2780**	**10,500.00**	D	**47.4**
Dibromochloromethane	ND	ND	U	10.5
1,2-Dibromoethane	ND	ND	U	13.3
n-Octane	ND	ND	U	17.4
Tetrachloroethylene	ND	ND	U	34.6
Chlorobenzene	ND	ND	U	12.5
Ethylbenzene	1.02	4.44	U	13.5
m,p-Xylene	2.25	9.79	U	38.6
Bromoform	0.662	6.86	U	13.1
Styrene	1.01	4.31	U	14.2
1,1,2,2-Tetrachloroethane	1.34	9.22	U	11.4
o-Xylene	1.04	4.53	U	18.6
1,3,5-Trimethylbenzene	1.28	6.31	U	17.8
1,2,4-Trimethylbenzene	ND	ND	U	13.7
m-Dichlorobenzene	1.68	10.10	U	19.5
p-Dichlorobenzene	1.74	10.50	U	20.4
o-Dichlorobenzene	2.17	13.10	U	22.5
1,2,4-Trichlorobenzene	7.51	55.80	U	75.1
Hexachloro-1,3-butadiene	8.56	91.50	U	88.7

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KD-05052022-02 D2 **Lab ID:** 2050917-05 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 7.50 "Hg **Canister #:** 5025 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 20:51

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	144
Propylene	40.1	69.20	U	45.0
Dichlorodifluoromethane	ND	ND	U	17.7
Chloromethane	9.19	19.00	U	37.2
Dichlorotetrafluoroethane	ND	ND	U	10.8
Vinyl chloride	ND	ND	U	10.3
1,3-Butadiene	4.90	10.90	U	27.0
Ethylene oxide	ND	ND	U	62.6
Bromomethane	ND	ND	U	26.8
Chloroethane	ND	ND	U	21.4
Acetonitrile	ND	ND	U	180
Acrolein	80.8	186.00	U	231
Trichlorofluoromethane	ND	ND	U	30.7
Acrylonitrile	ND	ND	U	21.9
1,1-Dichloroethene	ND	ND	U	15.0
Dichloromethane	ND	ND	U	258
Carbon Disulfide	ND	ND	U	18.5
Trichlorotrifluoroethane	2.83	21.70	U	11.9
trans-1,2-Dichloroethylene	ND	ND	U	11.3
1,1-Dichloroethane	ND	ND	U	10.2
Methyl tert-Butyl Ether	ND	ND	U	8.76
Chloroprene	**5070**	**18,400.00**	D	**27.8**
cis-1,2-Dichloroethylene	ND	ND	U	29.8
Bromochloromethane	ND	ND	U	9.88
Chloroform	1.07	5.24	U	9.93
Ethyl tert-Butyl Ether	ND	ND	U	8.86
1,2-Dichloroethane	ND	ND	U	9.28
1,1,1-Trichloroethane	ND	ND	U	15.5
Benzene	7.76	24.80	U	13.4
Carbon Tetrachloride	ND	ND	U	14.6
tert-Amyl Methyl Ether	ND	ND	U	10.9
1,2-Dichloropropane	ND	ND	U	11.8
Ethyl Acrylate	ND	ND	U	17.2
Bromodichloromethane	ND	ND	U	33.1
Trichloroethylene	4.58	24.70	U	16.1
Methyl Methacrylate	ND	ND	CE, U	87.0
cis-1,3-Dichloropropene	ND	ND	U	9.12
Methyl Isobutyl Ketone	4.27	17.50	U	40.2
trans-1,3-Dichloropropene	ND	ND	U	12.9
1,1,2-Trichloroethane	ND	ND	U	12.3

CERTIFICATE OF ANALYSIS

OECA
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-KD-05052022-02 D2 **Lab ID:** 2050917-05 **Sampled:** 05/05/22 17:05
Pressure @ Receipt: 7.50 "Hg **Canister #:** 5025 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 20:51

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**2620**	**9,890.00**	D	**51.3**
Dibromochloromethane	ND	ND	U	11.4
1,2-Dibromoethane	ND	ND	U	14.4
n-Octane	ND	ND	U	18.8
Tetrachloroethylene	ND	ND	U	37.5
Chlorobenzene	ND	ND	U	13.6
Ethylbenzene	1.26	5.48	U	14.6
m,p-Xylene	2.41	10.50	U	41.8
Bromoform	0.775	8.03	U	14.2
Styrene	1.05	4.48	U	15.4
1,1,2,2-Tetrachloroethane	1.24	8.53	U	12.3
o-Xylene	1.13	4.92	U	20.1
1,3,5-Trimethylbenzene	1.00	4.93	U	19.3
1,2,4-Trimethylbenzene	ND	ND	U	14.9
m-Dichlorobenzene	1.55	9.34	U	21.1
p-Dichlorobenzene	1.68	10.10	U	22.1
o-Dichlorobenzene	1.90	11.40	U	24.4
1,2,4-Trichlorobenzene	6.15	45.70	U	81.3
Hexachloro-1,3-butadiene	6.04	64.50	U	96.0

CERTIFICATE OF ANALYSIS

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BU-05052022-01 **Lab ID:** 2050917-06 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT120 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 16:40

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	139
Propylene	38.2	65.90	U	43.7
Dichlorodifluoromethane	ND	ND	U	17.2
Chloromethane	8.48	17.50	U	36.1
Dichlorotetrafluoroethane	ND	ND	U	10.5
Vinyl chloride	ND	ND	U	9.97
1,3-Butadiene	7.08	15.70	U	26.2
Ethylene oxide	ND	ND	U	60.8
Bromomethane	ND	ND	U	26.0
Chloroethane	ND	ND	U	20.8
Acetonitrile	ND	ND	U	175
Acrolein	21.6	49.60	U	224
Trichlorofluoromethane	ND	ND	U	29.8
Acrylonitrile	2.05	4.46	U	21.3
1,1-Dichloroethene	ND	ND	U	14.6
Dichloromethane	ND	ND	U	251
Carbon Disulfide	7.17	22.40	U	18.0
Trichlorotrifluoroethane	2.73	21.00	U	11.5
trans-1,2-Dichloroethylene	ND	ND	U	11.0
1,1-Dichloroethane	ND	ND	U	9.93
Methyl tert-Butyl Ether	ND	ND	U	8.50
Chloroprene	**2820**	**10,200.00**	D	**27.0**
cis-1,2-Dichloroethylene	ND	ND	U	28.9
Bromochloromethane	ND	ND	U	9.59
Chloroform	1.00	4.89	U	9.64
Ethyl tert-Butyl Ether	ND	ND	U	8.60
1,2-Dichloroethane	ND	ND	U	9.01
1,1,1-Trichloroethane	ND	ND	U	15.1
Benzene	7.89	25.30	U	13.1
Carbon Tetrachloride	ND	ND	U	14.2
tert-Amyl Methyl Ether	ND	ND	U	10.6
1,2-Dichloropropane	ND	ND	U	11.5
Ethyl Acrylate	ND	ND	U	16.7
Bromodichloromethane	ND	ND	U	32.2
Trichloroethylene	4.54	24.40	U	15.6
Methyl Methacrylate	ND	ND	CE, U	84.5
cis-1,3-Dichloropropene	ND	ND	U	8.86
Methyl Isobutyl Ketone	4.50	18.50	U	39.0
trans-1,3-Dichloropropene	ND	ND	U	12.5
1,1,2-Trichloroethane	ND	ND	U	11.9

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BU-05052022-01 **Lab ID:** 2050917-06 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 6.50 "Hg **Canister #:** SAT120 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 16:40

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**242**	**914.00**	D	**49.8**
Dibromochloromethane	ND	ND	U	11.1
1,2-Dibromoethane	1.35	10.40	U	13.9
n-Octane	ND	ND	U	18.2
Tetrachloroethylene	0.873	5.93	U	36.4
Chlorobenzene	ND	ND	U	13.2
Ethylbenzene	1.24	5.40	U	14.2
m,p-Xylene	2.97	12.90	U	40.5
Bromoform	1.16	12.00	U	13.8
Styrene	1.78	7.60	U	15.0
1,1,2,2-Tetrachloroethane	1.73	11.90	U	12.0
o-Xylene	1.51	6.57	U	19.5
1,3,5-Trimethylbenzene	1.92	9.46	U	18.8
1,2,4-Trimethylbenzene	5.61	27.60	U	14.4
m-Dichlorobenzene	3.14	18.90	U	20.5
p-Dichlorobenzene	3.35	20.20	U	21.4
o-Dichlorobenzene	4.86	29.30	U	23.7
1,2,4-Trichlorobenzene	12.0	89.20	U	78.9
Hexachloro-1,3-butadiene	12.0	128.00	U	93.3

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-PU-05052022-01 **Lab ID:** 2050917-07 **Sampled:** 05/05/22 17:03
Pressure @ Receipt: 5.50 "Hg **Canister #:** SAT003 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 17:42

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	135
Propylene	36.1	62.30	U	42.4
Dichlorodifluoromethane	ND	ND	U	16.7
Chloromethane	7.52	15.60	U	35.1
Dichlorotetrafluoroethane	ND	ND	U	10.2
Vinyl chloride	ND	ND	U	9.68
1,3-Butadiene	6.94	15.40	U	25.5
Ethylene oxide	ND	ND	U	59.0
Bromomethane	ND	ND	U	25.2
Chloroethane	ND	ND	U	20.2
Acetonitrile	ND	ND	U	170
Acrolein	57.9	133.00	U	218
Trichlorofluoromethane	ND	ND	U	28.9
Acrylonitrile	ND	ND	U	20.7
1,1-Dichloroethene	ND	ND	U	14.1
Dichloromethane	ND	ND	U	244
Carbon Disulfide	2.88	8.99	U	17.5
Trichlorotrifluoroethane	2.56	19.70	U	11.2
trans-1,2-Dichloroethylene	ND	ND	U	10.7
1,1-Dichloroethane	ND	ND	U	9.64
Methyl tert-Butyl Ether	ND	ND	U	8.25
Chloroprene	**1210**	**4,390.00**	D	**26.2**
cis-1,2-Dichloroethylene	ND	ND	U	28.0
Bromochloromethane	ND	ND	U	9.31
Chloroform	0.747	3.65	U	9.36
Ethyl tert-Butyl Ether	ND	ND	U	8.35
1,2-Dichloroethane	ND	ND	U	8.75
1,1,1-Trichloroethane	ND	ND	U	14.6
Benzene	6.49	20.80	U	12.7
Carbon Tetrachloride	ND	ND	U	13.8
tert-Amyl Methyl Ether	ND	ND	U	10.3
1,2-Dichloropropane	ND	ND	U	11.1
Ethyl Acrylate	ND	ND	U	16.2
Bromodichloromethane	ND	ND	U	31.2
Trichloroethylene	4.48	24.10	U	15.1
Methyl Methacrylate	ND	ND	U	82.0
cis-1,3-Dichloropropene	ND	ND	U	8.60
Methyl Isobutyl Ketone	4.42	18.10	U	37.9
trans-1,3-Dichloropropene	ND	ND	U	12.1
1,1,2-Trichloroethane	ND	ND	U	11.6

CERTIFICATE OF ANALYSIS

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PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-PU-05052022-01 **Lab ID:** 2050917-07 **Sampled:** 05/05/22 17:03
Pressure @ Receipt: 5.50 "Hg **Canister #:** SAT003 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 17:42

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**205**	**774.00**	D	**48.3**
Dibromochloromethane	ND	ND	U	10.7
1,2-Dibromoethane	0.895	6.89	U	13.5
n-Octane	ND	ND	U	17.7
Tetrachloroethylene	ND	ND	U	35.3
Chlorobenzene	ND	ND	U	12.8
Ethylbenzene	1.09	4.74	U	13.8
m,p-Xylene	2.53	11.00	U	39.4
Bromoform	1.03	10.70	U	13.4
Styrene	1.64	7.00	U	14.5
1,1,2,2-Tetrachloroethane	1.54	10.60	U	11.6
o-Xylene	1.36	5.92	U	18.9
1,3,5-Trimethylbenzene	1.90	9.36	U	18.2
1,2,4-Trimethylbenzene	5.33	26.30	U	14.0
m-Dichlorobenzene	2.95	17.80	U	19.9
p-Dichlorobenzene	3.23	19.50	U	20.8
o-Dichlorobenzene	4.41	26.60	U	23.0
1,2,4-Trichlorobenzene	17.8	132.00	U	76.6
Hexachloro-1,3-butadiene	25.9	277.00	U	90.5

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SUBMITTED: 05/09/22
AQS SITE CODE:
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Description: DR-A-BD-05052022-01 **Lab ID:** 2050917-08 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 7.0 "Hg **Canister #:** 5014 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 18:45

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Acetylene	ND	ND	U	145
Propylene	41.7	71.90	U	45.4
Dichlorodifluoromethane	ND	ND	U	17.9
Chloromethane	7.64	15.80	U	37.5
Dichlorotetrafluoroethane	ND	ND	U	10.9
Vinyl chloride	ND	ND	U	10.4
1,3-Butadiene	5.72	12.70	U	27.3
Ethylene oxide	ND	ND	U	63.2
Bromomethane	ND	ND	U	27.0
Chloroethane	ND	ND	U	21.6
Acetonitrile	ND	ND	U	182
Acrolein	25.7	59.00	U	233
Trichlorofluoromethane	ND	ND	U	30.9
Acrylonitrile	ND	ND	U	22.1
1,1-Dichloroethene	ND	ND	U	15.1
Dichloromethane	ND	ND	U	261
Carbon Disulfide	ND	ND	U	18.7
Trichlorotrifluoroethane	ND	ND	U	12.0
trans-1,2-Dichloroethylene	ND	ND	U	11.4
1,1-Dichloroethane	ND	ND	U	10.3
Methyl tert-Butyl Ether	ND	ND	U	8.84
Chloroprene	**267**	**969.00**	D	**28.1**
cis-1,2-Dichloroethylene	ND	ND	U	30.0
Bromochloromethane	ND	ND	U	9.97
Chloroform	ND	ND	U	10.0
Ethyl tert-Butyl Ether	ND	ND	U	8.94
1,2-Dichloroethane	ND	ND	U	9.36
1,1,1-Trichloroethane	ND	ND	U	15.7
Benzene	7.34	23.50	U	13.6
Carbon Tetrachloride	ND	ND	U	14.8
tert-Amyl Methyl Ether	ND	ND	U	11.0
1,2-Dichloropropane	ND	ND	U	11.9
Ethyl Acrylate	ND	ND	U	17.4
Bromodichloromethane	ND	ND	U	33.5
Trichloroethylene	4.61	24.80	U	16.2
Methyl Methacrylate	ND	ND	CE, U	87.8
cis-1,3-Dichloropropene	ND	ND	U	9.21
Methyl Isobutyl Ketone	5.43	22.30	U	40.6
trans-1,3-Dichloropropene	ND	ND	U	13.0
1,1,2-Trichloroethane	ND	ND	U	12.4

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REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Description: DR-A-BD-05052022-01 **Lab ID:** 2050917-08 **Sampled:** 05/05/22 16:31
Pressure @ Receipt: 7.0 "Hg **Canister #:** 5014 **Received:** 05/09/22 10:03
Comments: **Analyzed:** 05/13/22 18:45

Air Toxics by EPA Compendium Method TO-15

Analyte	Results ppbv	Results ug/m³	Flag	MDL ppbv
Toluene	**57.5**	**217.00**	D	**51.8**
Dibromochloromethane	ND	ND	U	11.5
1,2-Dibromoethane	ND	ND	U	14.5
n-Octane	ND	ND	U	19.0
Tetrachloroethylene	ND	ND	U	37.8
Chlorobenzene	ND	ND	U	13.7
Ethylbenzene	0.945	4.11	U	14.8
m,p-Xylene	ND	ND	U	42.1
Bromoform	0.836	8.66	U	14.4
Styrene	1.31	5.59	U	15.5
1,1,2,2-Tetrachloroethane	1.39	9.56	U	12.5
o-Xylene	1.07	4.66	U	20.3
1,3,5-Trimethylbenzene	1.42	7.00	U	19.5
1,2,4-Trimethylbenzene	3.72	18.30	U	15.0
m-Dichlorobenzene	2.06	12.40	U	21.3
p-Dichlorobenzene	2.34	14.10	U	22.3
o-Dichlorobenzene	2.72	16.40	U	24.6
1,2,4-Trichlorobenzene	8.93	66.40	U	82.0
Hexachloro-1,3-butadiene	9.49	101.00	U	96.9

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AQS SITE CODE:
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Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Blank (B2E1302-BLK1) Prepared & Analyzed: 05/13/22

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Acetylene	ND	ppbv				U
Propylene	ND	ppbv				U
Dichlorodifluoromethane	ND	ppbv				U
Chloromethane	ND	ppbv				U
Dichlorotetrafluoroethane	ND	ppbv				U
Vinyl chloride	ND	ppbv				U
1,3-Butadiene	ND	ppbv				U
Ethylene oxide	ND	ppbv				U
Bromomethane	ND	ppbv				U
Chloroethane	ND	ppbv				U
Acetonitrile	ND	ppbv				U
Acrolein	ND	ppbv				U
Trichlorofluoromethane	ND	ppbv				U
Acrylonitrile	ND	ppbv				U
1,1-Dichloroethene	ND	ppbv				U
Dichloromethane	ND	ppbv				U
Carbon Disulfide	ND	ppbv				U
Trichlorotrifluoroethane	ND	ppbv				U
trans-1,2-Dichloroethylene	ND	ppbv				U
1,1-Dichloroethane	ND	ppbv				U
Methyl tert-Butyl Ether	ND	ppbv				U
Chloroprene	ND	ppbv				U
cis-1,2-Dichloroethylene	ND	ppbv				U
Bromochloromethane	ND	ppbv				U
Chloroform	ND	ppbv				U
Ethyl tert-Butyl Ether	ND	ppbv				U
1,2-Dichloroethane	ND	ppbv				U
1,1,1-Trichloroethane	ND	ppbv				U
Benzene	ND	ppbv				U
Carbon Tetrachloride	ND	ppbv				U
tert-Amyl Methyl Ether	ND	ppbv				U
1,2-Dichloropropane	ND	ppbv				U
Ethyl Acrylate	ND	ppbv				U
Bromodichloromethane	ND	ppbv				U
Trichloroethylene	ND	ppbv				U
Methyl Methacrylate	ND	ppbv				U
cis-1,3-Dichloropropene	ND	ppbv				U

CERTIFICATE OF ANALYSIS

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
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Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Blank (B2E1302-BLK1) Continued			Prepared & Analyzed: 05/13/22			
Methyl Isobutyl Ketone	ND	ppbv				U
trans-1,3-Dichloropropene	ND	ppbv				U
1,1,2-Trichloroethane	ND	ppbv				U
Toluene	ND	ppbv				U
Dibromochloromethane	ND	ppbv				U
1,2-Dibromoethane	ND	ppbv				U
n-Octane	ND	ppbv				U
Tetrachloroethylene	ND	ppbv				U
Chlorobenzene	ND	ppbv				U
Ethylbenzene	ND	ppbv				U
m,p-Xylene	ND	ppbv				U
Bromoform	ND	ppbv				U
Styrene	ND	ppbv				U
1,1,2,2-Tetrachloroethane	ND	ppbv				U
o-Xylene	ND	ppbv				U
1,3,5-Trimethylbenzene	ND	ppbv				U
1,2,4-Trimethylbenzene	ND	ppbv				U
m-Dichlorobenzene	ND	ppbv				U
p-Dichlorobenzene	ND	ppbv				U
o-Dichlorobenzene	ND	ppbv				U
1,2,4-Trichlorobenzene	ND	ppbv				U
Hexachloro-1,3-butadiene	ND	ppbv				U
Duplicate (B2E1302-DUP2)	**Source: 2050917-05**		Prepared: 05/05/22 Analyzed: 05/13/22			**D**
Acetylene	ND	ppbv	ND		25	U
Propylene	ND	ppbv	ND		25	U
Dichlorodifluoromethane	ND	ppbv	ND		25	U
Chloromethane	ND	ppbv	ND		25	U
Dichlorotetrafluoroethane	ND	ppbv	ND		25	U
Vinyl chloride	ND	ppbv	ND		25	U
1,3-Butadiene	ND	ppbv	ND		25	U
Ethylene oxide	ND	ppbv	ND		25	U
Bromomethane	ND	ppbv	ND		25	U
Chloroethane	ND	ppbv	ND		25	U
Acetonitrile	ND	ppbv	ND		25	U
Acrolein	ND	ppbv	ND		25	U
Trichlorofluoromethane	ND	ppbv	ND		25	U
Acrylonitrile	ND	ppbv	ND		25	U

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Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Duplicate (B2E1302-DUP2) Continued **Source: 2050917-05** Prepared: 05/05/22 Analyzed: 05/13/22 **D**

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
1,1-Dichloroethene	ND	ppbv	ND		25	U
Dichloromethane	ND	ppbv	ND		25	U
Carbon Disulfide	ND	ppbv	ND		25	U
Trichlorotrifluoroethane	ND	ppbv	ND		25	U
trans-1,2-Dichloroethylene	ND	ppbv	ND		25	U
1,1-Dichloroethane	ND	ppbv	ND		25	U
Methyl tert-Butyl Ether	ND	ppbv	ND		25	U
Chloroprene	5060	ppbv	5,070.00	0.185	25	D
cis-1,2-Dichloroethylene	ND	ppbv	ND		25	U
Bromochloromethane	ND	ppbv	ND		25	U
Chloroform	ND	ppbv	ND		25	U
Ethyl tert-Butyl Ether	ND	ppbv	ND		25	U
1,2-Dichloroethane	ND	ppbv	ND		25	U
1,1,1-Trichloroethane	ND	ppbv	ND		25	U
Benzene	ND	ppbv	ND		25	U
Carbon Tetrachloride	ND	ppbv	ND		25	U
tert-Amyl Methyl Ether	ND	ppbv	ND		25	U
1,2-Dichloropropane	ND	ppbv	ND		25	U
Ethyl Acrylate	ND	ppbv	ND		25	U
Bromodichloromethane	ND	ppbv	ND		25	U
Trichloroethylene	ND	ppbv	ND		25	U
Methyl Methacrylate	ND	ppbv	ND		25	CE, U
cis-1,3-Dichloropropene	ND	ppbv	ND		25	U
Methyl Isobutyl Ketone	ND	ppbv	ND		25	U
trans-1,3-Dichloropropene	ND	ppbv	ND		25	U
1,1,2-Trichloroethane	ND	ppbv	ND		25	U
Toluene	2590	ppbv	2,620.00	1.14	25	D
Dibromochloromethane	ND	ppbv	ND		25	U
1,2-Dibromoethane	ND	ppbv	ND		25	U
n-Octane	ND	ppbv	ND		25	U
Tetrachloroethylene	ND	ppbv	ND		25	U
Chlorobenzene	ND	ppbv	ND		25	U
Ethylbenzene	ND	ppbv	ND		25	U
m,p-Xylene	ND	ppbv	ND		25	U
Bromoform	ND	ppbv	ND		25	U
Styrene	ND	ppbv	ND		25	U
1,1,2,2-Tetrachloroethane	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Duplicate (B2E1302-DUP2) Continued	**Source: 2050917-05**	Prepared: 05/05/22 Analyzed: 05/13/22				**D**
o-Xylene	ND	ppbv	ND		25	U
1,3,5-Trimethylbenzene	ND	ppbv	ND		25	U
1,2,4-Trimethylbenzene	ND	ppbv	ND		25	U
m-Dichlorobenzene	ND	ppbv	ND		25	U
p-Dichlorobenzene	ND	ppbv	ND		25	U
o-Dichlorobenzene	ND	ppbv	ND		25	U
1,2,4-Trichlorobenzene	ND	ppbv	ND		25	U
Hexachloro-1,3-butadiene	ND	ppbv	ND		25	U
Duplicate (B2E1302-DUP3)	**Source: 2050917-02**	Prepared: 05/05/22 Analyzed: 05/14/22				**D**
Acetylene	ND	ppbv	ND		25	U
Propylene	ND	ppbv	ND		25	U
Dichlorodifluoromethane	ND	ppbv	ND		25	U
Chloromethane	ND	ppbv	ND		25	U
Dichlorotetrafluoroethane	ND	ppbv	ND		25	U
Vinyl chloride	ND	ppbv	ND		25	U
1,3-Butadiene	ND	ppbv	ND		25	U
Ethylene oxide	ND	ppbv	ND		25	U
Bromomethane	ND	ppbv	ND		25	U
Chloroethane	ND	ppbv	ND		25	U
Acetonitrile	ND	ppbv	ND		25	U
Acrolein	ND	ppbv	ND		25	U
Trichlorofluoromethane	ND	ppbv	ND		25	U
Acrylonitrile	ND	ppbv	ND		25	U
1,1-Dichloroethene	ND	ppbv	ND		25	U
Dichloromethane	ND	ppbv	ND		25	U
Carbon Disulfide	ND	ppbv	ND		25	U
Trichlorotrifluoroethane	ND	ppbv	ND		25	U
trans-1,2-Dichloroethylene	ND	ppbv	ND		25	U
1,1-Dichloroethane	ND	ppbv	ND		25	U
Methyl tert-Butyl Ether	ND	ppbv	ND		25	U
Chloroprene	5270	ppbv	5,240.00	0.622	25	D
cis-1,2-Dichloroethylene	ND	ppbv	ND		25	U
Bromochloromethane	ND	ppbv	ND		25	U
Chloroform	ND	ppbv	ND		25	U
Ethyl tert-Butyl Ether	ND	ppbv	ND		25	U
1,2-Dichloroethane	ND	ppbv	ND		25	U
1,1,1-Trichloroethane	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Batch B2E1302 - Summa Canister Prep

Duplicate (B2E1302-DUP3) Continued **Source: 2050917-02** Prepared: 05/05/22 Analyzed: 05/14/22 **D**

Analyte	Result	Units	Source Result	RPD	RPD Limit	Notes
Benzene	ND	ppbv	ND		25	U
Carbon Tetrachloride	ND	ppbv	ND		25	U
tert-Amyl Methyl Ether	ND	ppbv	ND		25	U
1,2-Dichloropropane	ND	ppbv	ND		25	U
Ethyl Acrylate	ND	ppbv	ND		25	U
Bromodichloromethane	ND	ppbv	ND		25	U
Trichloroethylene	ND	ppbv	ND		25	U
Methyl Methacrylate	ND	ppbv	ND		25	CE, U
cis-1,3-Dichloropropene	ND	ppbv	ND		25	U
Methyl Isobutyl Ketone	ND	ppbv	ND		25	U
trans-1,3-Dichloropropene	ND	ppbv	ND		25	U
1,1,2-Trichloroethane	ND	ppbv	ND		25	U
Toluene	2740	ppbv	2,720.00	0.636	25	D
Dibromochloromethane	ND	ppbv	ND		25	U
1,2-Dibromoethane	ND	ppbv	ND		25	U
n-Octane	ND	ppbv	ND		25	U
Tetrachloroethylene	ND	ppbv	ND		25	U
Chlorobenzene	ND	ppbv	ND		25	U
Ethylbenzene	ND	ppbv	ND		25	U
m,p-Xylene	ND	ppbv	ND		25	U
Bromoform	ND	ppbv	ND		25	U
Styrene	ND	ppbv	ND		25	U
1,1,2,2-Tetrachloroethane	ND	ppbv	ND		25	U
o-Xylene	ND	ppbv	ND		25	U
1,3,5-Trimethylbenzene	ND	ppbv	ND		25	U
1,2,4-Trimethylbenzene	ND	ppbv	ND		25	U
m-Dichlorobenzene	ND	ppbv	ND		25	U
p-Dichlorobenzene	ND	ppbv	ND		25	U
o-Dichlorobenzene	ND	ppbv	ND		25	U
1,2,4-Trichlorobenzene	ND	ppbv	ND		25	U
Hexachloro-1,3-butadiene	ND	ppbv	ND		25	U

CERTIFICATE OF ANALYSIS

OECA
2890 Woodbridge Avenue
Edison, NJ 08837
ATTN: Shaun Burke
PHONE: (202) 564-1039 **FAX:** (732) 321-6616

FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Sequence 2205037

Calibration Check (2205037-CCV1) Prepared & Analyzed: 05/13/22

Analyte	Result	Units	% Difference	Limit (%)	Notes
Acetylene	2.31	ppbv	-11.4	30.00	
Propylene	2.33	ppbv	-10.1	30.00	
Dichlorodifluoromethane	2.43	ppbv	-6.2	30.00	
Chloromethane	2.44	ppbv	-5.8	30.00	
Dichlorotetrafluoroethane	2.47	ppbv	-6.6	30.00	
Vinyl chloride	2.45	ppbv	-5.6	30.00	
1,3-Butadiene	2.44	ppbv	-6.1	30.00	
Ethylene oxide	2.39	ppbv	-0.9	30.00	
Bromomethane	2.50	ppbv	-3.9	30.00	
Chloroethane	2.55	ppbv	-2.5	30.00	
Acetonitrile	2.86	ppbv	11.0	30.00	
Acrolein	2.37	ppbv	-8.7	30.00	
Trichlorofluoromethane	2.29	ppbv	-11.6	30.00	
Acrylonitrile	2.56	ppbv	-5.0	30.00	
1,1-Dichloroethene	2.36	ppbv	-9.9	30.00	
Dichloromethane	2.85	ppbv	8.4	30.00	
Carbon Disulfide	2.48	ppbv	-10.2	30.00	
Trichlorotrifluoroethane	2.22	ppbv	-16.0	30.00	
trans-1,2-Dichloroethylene	2.65	ppbv	1.4	30.00	
1,1-Dichloroethane	2.47	ppbv	-5.4	30.00	
Methyl tert-Butyl Ether	2.57	ppbv	-1.8	30.00	
Chloroprene	2.53	ppbv	-3.6	30.00	
cis-1,2-Dichloroethylene	2.60	ppbv	0.7	30.00	
Bromochloromethane	2.55	ppbv	-1.6	30.00	
Chloroform	2.50	ppbv	-5.4	30.00	
Ethyl tert-Butyl Ether	2.60	ppbv	0.08	30.00	
1,2-Dichloroethane	2.51	ppbv	-2.9	30.00	
1,1,1-Trichloroethane	2.38	ppbv	-8.7	30.00	
Benzene	2.45	ppbv	-6.3	30.00	
Carbon Tetrachloride	2.37	ppbv	-8.8	30.00	
tert-Amyl Methyl Ether	2.68	ppbv	3.5	30.00	
1,2-Dichloropropane	2.59	ppbv	-0.1	30.00	
Ethyl Acrylate	2.62	ppbv	0.3	30.00	
Bromodichloromethane	2.57	ppbv	-1.5	30.00	

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REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Air Toxics by EPA Compendium Method TO-15 - Quality Control

Sequence 2205037

Calibration Check (2205037-CCV1) Continued Prepared & Analyzed: 05/13/22

Analyte	Result	Units	% Difference	Limit (%)	Notes
Trichloroethylene	2.63	ppbv	0.7	30.00	
Methyl Methacrylate	2.53	ppbv	-2.2	30.00	
cis-1,3-Dichloropropene	2.55	ppbv	-1.8	30.00	
Methyl Isobutyl Ketone	2.71	ppbv	4.5	30.00	
trans-1,3-Dichloropropene	2.38	ppbv	-8.7	30.00	
1,1,2-Trichloroethane	2.56	ppbv	-2.1	30.00	
Toluene	2.69	ppbv	3.6	30.00	
Dibromochloromethane	2.43	ppbv	-6.3	30.00	
1,2-Dibromoethane	2.40	ppbv	-8.5	30.00	
n-Octane	3.05	ppbv	16.9	30.00	
Tetrachloroethylene	2.49	ppbv	-5.3	30.00	
Chlorobenzene	2.53	ppbv	-3.1	30.00	
Ethylbenzene	2.65	ppbv	2.0	30.00	
m,p-Xylene	5.75	ppbv	11.0	30.00	
Bromoform	2.47	ppbv	-4.9	30.00	
Styrene	2.94	ppbv	12.9	30.00	
1,1,2,2-Tetrachloroethane	2.63	ppbv	0.8	30.00	
o-Xylene	2.77	ppbv	6.1	30.00	
1,3,5-Trimethylbenzene	2.68	ppbv	2.6	30.00	
1,2,4-Trimethylbenzene	2.87	ppbv	9.7	30.00	
m-Dichlorobenzene	2.57	ppbv	-1.3	30.00	
p-Dichlorobenzene	2.58	ppbv	-0.8	30.00	
o-Dichlorobenzene	2.59	ppbv	-1.0	30.00	
1,2,4-Trichlorobenzene	3.11	ppbv	14.5	30.00	
Hexachloro-1,3-butadiene	3.06	ppbv	12.5	30.00	

CERTIFICATE OF ANALYSIS

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FILE #: 0325.00.000
REPORTED: 06/07/22 13:36
SUBMITTED: 05/09/22
AQS SITE CODE:
SITE CODE: Denka

Notes and Definitions

U	Under Detection Limit
D	This result obtained by dilution.
CE	Not reportable due to a co-eluting compound.
ND	Analyte NOT DETECTED
NR	Not Reported
MDL	Method Detection Limit
RPD	Relative Percent Difference

Note: This test is accredited under the 2016 TNI Standard; however the following analytes are not accredited: acetylene, bromodichloroethane, dichlorotetrafluoromethane, ethyl tert butyl ether, n-octane, tert amyl methyl ether, trichlorofluoroethane, and bromochloromethane.

ERG
Eastern Research Group, Inc.
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

ERG LIMS ID # 2050917-01

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KT-05052022-01
Canister Number: 5A5070
City/State: LAPLACE, LA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: —
Cleaning Batch # : H2-1367
Collection Date: 5/5/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): —
Duplicate Event (Y/N): —
TOXICS (Y/N): TO-15
Duplicate Can # : —
METHANE (Y/N): —
Relinquished by: RMB
Date: 5/4/22

Field Setup

Received by: DMB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-6
Elapsed Timer Reset (Y/N): N/A
Setup Date: 5/5/22 1638
Canister Valve Opened (Y/N): Y
Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1706
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 28
Field Final Can. Press.: -6 psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CL
Date: 5/9/22
Lab Final Can. Press.: 6.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

D1

ERG
Eastern Research Group, Inc.
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

ERG LIMS ID # 20S0917-02

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KD-050522-01
Canister Number: SAT094
City/State: LAVACE, LA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: —
Cleaning Batch # : H1-1367
Collection Date: 5/5/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): —
Duplicate Event (Y/N): Yes
TOXICS (Y/N): TO-15
Duplicate Can # : 5025
METHANE (Y/N): —
Relinquished by: RHB
Date: ~~5/24~~ RHB 5/4/22

Field Setup

Received by: DMB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-9
Elapsed Timer Reset (Y/N): —
Setup Date: 5/5/22 1639
Canister Valve Opened (Y/N): Y
Field Initial Can Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1705'
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 26 min
Field Final Can. Press.: -6' psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 6.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-03

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BK-05052022-01
Canister Number: 5015
City/State: LAPLACE, LA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: –
Cleaning Batch # : HZ-1367
Collection Date: 05/05/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): –
Duplicate Event (Y/N): N
TOXICS (Y/N): TO-15
Duplicate Can # : –
METHANE (Y/N): –
Relinquished by: RMB
Date: 5/4/22

Field Setup

Received by: DB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-12
Elapsed Timer Reset (Y/N): N/A
Setup Date: 5/5/22 1536
Canister Valve Opened (Y/N): Y
Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1605
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 30 min
Field Final Can. Press.: -5 psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: [signature]
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 4.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-04

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KP-0505 2022-01 Canister Number: 5040

City/State: LaPlace, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: - Cleaning Batch # : H2-1367

Collection Date: 5/5/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): - Duplicate Event (Y/N): -

TOXICS (Y/N): TO-15 Duplicate Can # : -

METHANE (Y/N): -

Relinquished by: RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-5 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1638 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1704 Sample Duration (3 or 24 hr): 30 min.

Operator: DMB Elapsed Time: 26 min

Field Final Can. Press.: -5 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/11/22

Lab Final Can. Press.: 5.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

D2

ERG LIMS ID # 2050417-05

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-KD-05052022-02 Canister Number: 5025

City/State: LAPLACE, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: — Cleaning Batch # : H2-1367

Collection Date: ~~of~~ on 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): — Duplicate Event (Y/N): Y

TOXICS (Y/N): TO-15 Duplicate Can # : 5AT094

METHANE (Y/N): —

Relinquished by: 5/4/22 Date:

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-10 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1639 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1705 Sample Duration (3 or 24 hr): 30 min

Operator: DMB Elapsed Time: 26 min

Field Final Can. Press.: -7 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 7.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ERG LIMS ID # 2050917-06

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BU-0505 2022-01 Canister Number: SAT120

City/State: Wallace, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: Cleaning Batch # : H2-1367

Collection Date: 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): — Duplicate Event (Y/N): —

TOXICS (Y/N): TO-15 Duplicate Can # : —

METHANE (Y/N): —

Relinquished by: 5/4/22 RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 min

System #: PH1-1 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1604 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1631 Sample Duration (3 or 24 hr): 30 —

Operator: DMB Elapsed Time: 27 min

Field Final Can. Press.: -6 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 6.5 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ERG
Eastern Research Group, Inc.
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

ERG LIMS ID # 2050917-07

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-PU-05052022-01
Canister Number: SAT003
City/State: LAPLACE, WA
Lab Initial Can. Press. ("Hg): 29.7
AQS Code: —
Cleaning Batch # : H1-1367
Collection Date: 05/05/22
Date Can. Cleaned: 4/27/22
Options:
SNMOC (Y/N): —
Duplicate Event (Y/N): N
TOXICS (Y/N): TO-15
Duplicate Can # : —
METHANE (Y/N): —
Relinquished by: RMB
Date: 5/4/22

Field Setup

Received by: DMB
Date: 5/5/22
Operator: DMB
MFC Setting: 30 min
System #: PH1-4
Elapsed Timer Reset (Y/N): N/A
Setup Date: 5/5/22 1637
Canister Valve Opened (Y/N): Y
Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1703
Sample Duration (3 or 24 hr): 30 min
Operator: DMB
Elapsed Time: 26
Field Final Can. Press.: -5 psig psia "Hg (Circle one)
Status: VALID VOID (Circle one)
Canister Valve Closed (Y/N): Y
Relinquished by: DMB
Date: 5/5/22

Lab Recovery

Received by: CCC
Date: 5/9/22
Lab Final Can. Press.: 5.5 psig "Hg (Circle one)
Status: VALID VOID (Circle one)
Gauge: 1 3 (Circle one)
If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler
Canary: Lab Copy
Pink: Field Copy

ERG LIMS ID # 2050917-08

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

AIR TOXICS SAMPLE CHAIN OF CUSTODY

Lab Pre-Sampling

Site Code: DR-A-BD-05052022-01 Canister Number: 5014

City/State: Waulace, LA Lab Initial Can. Press. ("Hg): 29.7

AQS Code: – Cleaning Batch # : H2-1367

Collection Date: 05/05/22 Date Can. Cleaned: 4/27/22

Options:

SNMOC (Y/N): – Duplicate Event (Y/N): –

TOXICS (Y/N): Y - TO-15 Duplicate Can # : –

METHANE (Y/N): –

Relinquished by: RMB Date: 5/4/22

Field Setup

Received by: DMB Date: 5/5/22

Operator: DMB MFC Setting: 30 mm

System #: Pit1-14 Elapsed Timer Reset (Y/N): N/A

Setup Date: 5/5/22 1605 Canister Valve Opened (Y/N): Y

Field Initial Can. Press.: -30 psig psia "Hg (Circle one)

Field Recovery

Recovery Date: 5/5/22 1631 Sample Duration (3 or 24 hr): 30 mm

Operator: DMB Elapsed Time: 26 m

Field Final Can. Press.: -7 psig psia "Hg (Circle one)

Status: VALID VOID (Circle one) Canister Valve Closed (Y/N): Y

Relinquished by: [signature] Date: 5/5/22

Lab Recovery

Received by: CCC Date: 5/9/22

Lab Final Can. Press.: 7 psig "Hg (Circle one)

Status: VALID VOID (Circle one) Gauge: 1 3 (Circle one)

If void, why:

Samples stored in Air Tox Lab (Room 130)

01-2022

Comments:

White: Sample Traveler Canary: Lab Copy Pink: Field Copy

ATTACHMENT H

Liquid Analytical Results Table

Attachment H
Summary of Liquid Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-L-LA	DR-L-Lb	DR-L-Lb
			Sample ID	DR-L-LA-05052022-01	DR-L-LB-05052022-01	DR-L-LB-05052022-02
			Date	05/05/2022	05/05/2022	05/05/2022
Analyte	CAS.NO	Units	Type	FS	FS	FD
EPA 8260						
1,1,1-Trichloroethane	71-55-6	mg/L	--	0.5 U	0.5 U	0.5 U
1,1,2,2-Tetrachloroethane	79-34-5	mg/L	--	0.5 U	0.5 U	0.5 U
1,1,2-Trichloroethane	79-00-5	mg/L	--	0.5 U	0.5 U	0.5 U
1,1-Dichloroethane	75-34-3	mg/L	--	0.5 U	0.5 U	0.5 U
1,1-Dichloroethene	75-35-4	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dibromo-3-chloropropane	96-12-8	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dibromoethane (EDB)	106-93-4	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dichloroethane	107-06-2	mg/L	--	0.5 U	0.5 U	0.5 U
1,2-Dichloropropane	78-87-5	mg/L	--	0.5 U	0.5 U	0.5 U
2-Butanone (MEK)	78-93-3	mg/L	--	1 U	1 U	1 U
2-Hexanone	591-78-6	mg/L	--	1 U	1 U	1 U
4-Methyl-2-pentanone (MIBK)	108-10-1	mg/L	--	1 U	1 U	1 U
Acetone	67-64-11	mg/L	--	1 U	1 U	1 U
Benzene	71-43-2	mg/L	--	0.5 U	0.5 U	0.5 U
Bromodichloromethane	75-27-4	mg/L	--	0.5 U	0.5 U	0.5 U
Bromoform	75-25-2	mg/L	--	0.5 U	0.5 U	0.5 U
Bromomethane	74-83-9	mg/L	--	0.5 U	0.5 U	0.5 U
Carbon disulfide	75-15-0	mg/L	--	0.5 U	0.5 U	0.5 U
Carbon tetrachloride	56-23-5	mg/L	--	0.5 U	0.5 U	0.5 U
Chlorobenzene	108-90-7	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroethane	75-00-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroform	67-66-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloromethane	74-87-3	mg/L	--	0.5 U	0.5 U	0.5 U
Chloroprene	126-99-8	mg/L	--	**341**	**62.8**	**64.1**
cis-1,2-Dichloroethene	156-59-2	mg/L	--	0.5 U	0.5 U	0.5 U
cis-1,3-Dichloropropene	10061-01-5	mg/L	--	0.5 U	0.5 U	0.5 U
Dibromochloromethane	124-48-1	mg/L	--	0.5 U	0.5 U	0.5 U
Dichlorodifluoromethane	75-71-8	mg/L	--	0.5 U	0.5 U	0.5 U
Ethylbenzene	100-41-4	mg/L	--	0.5 U	0.5 U	0.5 U
Isopropylbenzene (Cumene)	98-82-8	mg/L	--	0.5 U	0.5 U	0.5 U
m&p-Xylene	179601-23-1	mg/L	--	1 U	1 U	1 U
Methyl acetate	79-20-9	mg/L	--	1 U	1 U	1 U
Methylene Chloride	75-09-2	mg/L	--	0.5 U	0.5 U	0.5 U
Methyl-tert-butyl ether	1634-04-4	mg/L	--	0.5 U	0.5 U	0.5 U
o-Xylene	95-47-6	mg/L	--	0.5 U	0.5 U	0.5 U
Styrene	100-42-5	mg/L	--	0.5 U	0.5 U	0.5 U
Tetrachloroethene	127-18-4	mg/L	--	0.5 U	0.5 U	0.5 U
Toluene	108-88-3	mg/L	--	**7.6**	**8.4**	**8**
trans-1,2-Dichloroethene	156-60-5	mg/L	--	0.5 U	0.5 U	0.5 U
trans-1,3-Dichloropropene	10061-02-6	mg/L	--	0.5 U	0.5 U	0.5 U
Trichloroethene	79-01-6	mg/L	--	0.5 U	0.5 U	0.5 U
Trichlorofluoromethane	75-69-4	mg/L	--	0.5 U	0.5 U	0.5 U
Vinyl chloride	75-01-4	mg/L	--	0.2 U	0.2 U	0.2 U

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
mg/L = milligrams per liter
U = Indicates the compound was analyzed for, but not detected
BOLD = analyte was detected

ATTACHMENT I

Solid Analytical Results Table

Attachment I
Summary of Solid Analytical Data
ECAD - Denka Enforcement Multimedia Sampling

			Station	DR-S-BP
			Sample ID	DR-S-BP-05052022-02
			Date	05/05/2022
Analyte	**CAS.NO**	**Units**	**Type**	**FS**
EPA 8260				
1,1,1-Trichloroethane	71-55-6	mg/kg	--	13.9 U
1,1,2,2-Tetrachloroethane	79-34-5	mg/kg	--	13.9 U
1,1,2-Trichloroethane	79-00-5	mg/kg	--	13.9 U
1,1-Dichloroethane	75-34-3	mg/kg	--	13.9 U
1,1-Dichloroethene	75-35-4	mg/kg	--	13.9 U
1,2-Dibromo-3-chloropropane	96-12-8	mg/kg	--	13.9 U
1,2-Dibromoethane (EDB)	106-93-4	mg/kg	--	13.9 U
1,2-Dichloroethane	107-06-2	mg/kg	--	13.9 U
1,2-Dichloropropane	78-87-5	mg/kg	--	13.9 U
2-Butanone (MEK)	78-93-3	mg/kg	--	27.8 U
2-Hexanone	591-78-6	mg/kg	--	27.8 U
4-Methyl-2-pentanone (MIBK)	108-10-1	mg/kg	--	27.8 U
Acetone	67-64-11	mg/kg	--	27.8 U
Benzene	71-43-2	mg/kg	--	13.9 U
Bromodichloromethane	75-27-4	mg/kg	--	13.9 U
Bromoform	75-25-2	mg/kg	--	13.9 U
Bromomethane	74-83-9	mg/kg	--	13.9 U
Carbon disulfide	75-15-0	mg/kg	--	13.9 U
Carbon tetrachloride	56-23-5	mg/kg	--	13.9 U
Chlorobenzene	108-90-7	mg/kg	--	13.9 U
Chloroethane	75-00-3	mg/kg	--	13.9 U
Chloroform	67-66-3	mg/kg	--	13.9 U
Chloromethane	74-87-3	mg/kg	--	13.9 U
Chloroprene	126-99-8	mg/kg	--	**1080**
cis-1,2-Dichloroethene	156-59-2	mg/kg	--	13.9 U
cis-1,3-Dichloropropene	10061-01-5	mg/kg	--	13.9 U
Dibromochloromethane	124-48-1	mg/kg	--	13.9 U
Dichlorodifluoromethane	75-71-8	mg/kg	--	13.9 U
Ethylbenzene	100-41-4	mg/kg	--	13.9 U
Isopropylbenzene (Cumene)	98-82-8	mg/kg	--	13.9 U
m&p-Xylene	179601-23-1	mg/kg	--	27.8 U
Methyl acetate	79-20-9	mg/kg	--	27.8 U
Methylene Chloride	75-09-2	mg/kg	--	13.9 U
Methyl-tert-butyl ether	1634-04-4	mg/kg	--	13.9 U
o-Xylene	95-47-6	mg/kg	--	13.9 U
Styrene	100-42-5	mg/kg	--	13.9 U
Tetrachloroethene	127-18-4	mg/kg	--	13.9 U
Toluene	108-88-3	mg/kg	--	**240**
trans-1,2-Dichloroethene	156-60-5	mg/kg	--	13.9 U
trans-1,3-Dichloropropene	10061-02-6	mg/kg	--	13.9 U
Trichloroethene	79-01-6	mg/kg	--	13.9 U
Trichlorofluoromethane	75-69-4	mg/kg	--	13.9 U
Vinyl chloride	75-01-4	mg/kg	--	5.6 U

Notes
FS - Field Sample
FD = Field Duplicate
CAS.No = Chemical Abstract System Registry Number
mg/L = milligrams per liter
U = Indicates the compound was analyzed for, but not detected
BOLD = analyte was detected

ATTACHMENT J

Solid and Liquid Analytical Results – Laboratory Deliverable

Pace Analytical Services, LLC
1000 Riverbend Blvd - Suite F
St. Rose, LA 70087
(504)469-0333

May 19, 2022

Jeff Wright
Weston Solutions, Inc.
13702 Coursey Blvd.
Bldg #7, STE A
Baton Rouge, LA 70817

RE: Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Dear Jeff Wright:

Enclosed are the analytical results for sample(s) received by the laboratory on May 06, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Clay Ledet
clay.ledet@pacelabs.com
(504)469-0333
Project Manager

Enclosures

cc: David Bordelon, Weston Solutions, Inc.

REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 0025721
Kansas Department of Health and Environment (NELAC): E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP): 02006
Texas Commission on Env. Quality (NELAC): T104704405-09-TX
U.S. Dept. of Agriculture Foreign Soil Import: P330-10-00119

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ED_013532_00008991-00111

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SAMPLE SUMMARY

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20243028001	**DR-L-LB-05052022-01**	Water	05/05/22 15:45	05/06/22 17:50
20243028002	**DR-L-LB-05052022-02**	Water	05/05/22 15:45	05/06/22 17:50
20243028003	**DR-L-LA-05052022-01**	Water	05/05/22 17:10	05/06/22 17:50
20243028004	**DR-S-BP-05052022-02**	Solid	05/05/22 16:10	05/06/22 17:50

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ED_013532_00008991-00112

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SAMPLE ANALYTE COUNT

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20243028001	**DR-L-LB-05052022-01**	EPA 8260	SLK	46
20243028002	**DR-L-LB-05052022-02**	EPA 8260	SLK	46
20243028003	**DR-L-LA-05052022-01**	EPA 8260	SLK	46
20243028004	**DR-S-BP-05052022-02**	EPA 8260	JRP	46

PASI-N = Pace Analytical Services - New Orleans

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
3 samples were analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255081

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20243028001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 1213307)
  - Chloroprene
- MSD (Lab ID: 1213308)
  - Chloroprene

R1: RPD value was outside control limits.

- MSD (Lab ID: 1213308)
  - 1,2-Dibromo-3-chloropropane
  - Methyl acetate

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255081

D4: Sample was diluted due to the presence of high levels of target analytes.

- DR-L-LA-05052022-01 (Lab ID: 20243028003)
  - Chloroprene
  - Toluene
- DR-L-LB-05052022-01 (Lab ID: 20243028001)
  - Toluene
- DR-L-LB-05052022-02 (Lab ID: 20243028002)
  - Chloroprene
  - Toluene
- MS (Lab ID: 1213307)
  - Toluene
- MSD (Lab ID: 1213308)
  - Toluene

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

General Information:
1 sample was analyzed for EPA 8260 by Pace Analytical Services New Orleans. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 5035/5030B with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 255724

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 20242755001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MSD (Lab ID: 1217691)
  - Chloroethane

Additional Comments:

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PROJECT NARRATIVE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Method: **EPA 8260**
Description: 8260 MSV 5030 Med Level
Client: Weston Solutions, Inc.
Date: May 19, 2022

Analyte Comments:

QC Batch: 255724

D4: Sample was diluted due to the presence of high levels of target analytes.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Vinyl chloride

E: Analyte concentration exceeded the calibration range. The reported result is estimated.
- DR-S-BP-05052022-02 (Lab ID: 20243028004)
  - Chloroprene

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:01	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:01	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:01	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:01	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:01	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:01	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:01	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:01	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:01	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:01	74-87-3	
Chloroprene	**62.8**	mg/L	5.0	1000		05/12/22 13:08	126-99-8	M1
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:01	96-12-8	R1
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:01	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:01	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:01	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:01	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:01	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:01	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:01	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:01	79-20-9	R1
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:01	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:01	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:01	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:01	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:01	127-18-4	
Toluene	**8.4**	mg/L	0.50	100		05/11/22 23:01	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:01	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:01	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:01	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:01	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:01	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:01	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:08	2037-26-5	
Toluene-d8 (S)	104	%.	76-124	100		05/11/22 23:01	2037-26-5	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-01 **Lab ID: 20243028001** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Surrogates								
4-Bromofluorobenzene (S)	101	%.	78-121	100		05/11/22 23:01	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	1000		05/12/22 13:08	460-00-4	
Dibromofluoromethane (S)	102	%.	74-128	1000		05/12/22 13:08	1868-53-7	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:01	1868-53-7	

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:19	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:19	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:19	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:19	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:19	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:19	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:19	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:19	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:19	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:19	74-87-3	
Chloroprene	**64.1**	mg/L	5.0	1000		05/12/22 13:26	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:19	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:19	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:19	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-59-2	
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:19	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:19	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:19	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:19	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:19	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:19	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:19	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:19	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:19	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:19	100-42-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LB-05052022-02 **Lab ID: 20243028002** Collected: 05/05/22 15:45 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:19	127-18-4	
Toluene	**8.0**	mg/L	0.50	100		05/11/22 23:19	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:19	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:19	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:19	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:19	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:19	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:19	95-47-6	
Surrogates								
Toluene-d8 (S)	102	%.	76-124	1000		05/12/22 13:26	2037-26-5	
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:19	2037-26-5	
4-Bromofluorobenzene (S)	100	%.	78-121	100		05/11/22 23:19	460-00-4	
4-Bromofluorobenzene (S)	100	%.	78-121	1000		05/12/22 13:26	460-00-4	
Dibromofluoromethane (S)	103	%.	74-128	1000		05/12/22 13:26	1868-53-7	
Dibromofluoromethane (S)	100	%.	74-128	100		05/11/22 23:19	1868-53-7	

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/L	1.0	100		05/11/22 23:36	67-64-1	
Benzene	ND	mg/L	0.50	100		05/11/22 23:36	71-43-2	
Bromodichloromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-27-4	
Bromoform	ND	mg/L	0.50	100		05/11/22 23:36	75-25-2	
Bromomethane	ND	mg/L	0.50	100		05/11/22 23:36	74-83-9	
2-Butanone (MEK)	ND	mg/L	1.0	100		05/11/22 23:36	78-93-3	
Carbon disulfide	ND	mg/L	0.50	100		05/11/22 23:36	75-15-0	
Carbon tetrachloride	ND	mg/L	0.50	100		05/11/22 23:36	56-23-5	
Chlorobenzene	ND	mg/L	0.50	100		05/11/22 23:36	108-90-7	
Chloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-00-3	
Chloroform	ND	mg/L	0.50	100		05/11/22 23:36	67-66-3	
Chloromethane	ND	mg/L	0.50	100		05/11/22 23:36	74-87-3	
Chloroprene	**341**	mg/L	50.0	10000		05/12/22 20:04	126-99-8	D4
1,2-Dibromo-3-chloropropane	ND	mg/L	0.50	100		05/11/22 23:36	96-12-8	
Dibromochloromethane	ND	mg/L	0.50	100		05/11/22 23:36	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/L	0.50	100		05/11/22 23:36	106-93-4	
Dichlorodifluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-71-8	
1,1-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	75-34-3	
1,2-Dichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	107-06-2	
1,1-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	75-35-4	
cis-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-59-2	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-L-LA-05052022-01 **Lab ID: 20243028003** Collected: 05/05/22 17:10 Received: 05/06/22 17:50 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260							
	Pace Analytical Services - New Orleans							
trans-1,2-Dichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	156-60-5	
1,2-Dichloropropane	ND	mg/L	0.50	100		05/11/22 23:36	78-87-5	
cis-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/L	0.50	100		05/11/22 23:36	10061-02-6	
Ethylbenzene	ND	mg/L	0.50	100		05/11/22 23:36	100-41-4	
2-Hexanone	ND	mg/L	1.0	100		05/11/22 23:36	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/L	0.50	100		05/11/22 23:36	98-82-8	
Methyl acetate	ND	mg/L	1.0	100		05/11/22 23:36	79-20-9	
Methylene Chloride	ND	mg/L	0.50	100		05/11/22 23:36	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/L	1.0	100		05/11/22 23:36	108-10-1	
Methyl-tert-butyl ether	ND	mg/L	0.50	100		05/11/22 23:36	1634-04-4	
Styrene	ND	mg/L	0.50	100		05/11/22 23:36	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-34-5	
Tetrachloroethene	ND	mg/L	0.50	100		05/11/22 23:36	127-18-4	
Toluene	**7.6**	mg/L	0.50	100		05/11/22 23:36	108-88-3	D4
1,1,1-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	71-55-6	
1,1,2-Trichloroethane	ND	mg/L	0.50	100		05/11/22 23:36	79-00-5	
Trichloroethene	ND	mg/L	0.50	100		05/11/22 23:36	79-01-6	
Trichlorofluoromethane	ND	mg/L	0.50	100		05/11/22 23:36	75-69-4	
Vinyl chloride	ND	mg/L	0.20	100		05/11/22 23:36	75-01-4	
m&p-Xylene	ND	mg/L	1.0	100		05/11/22 23:36	179601-23-1	
o-Xylene	ND	mg/L	0.50	100		05/11/22 23:36	95-47-6	
Surrogates								
Toluene-d8 (S)	103	%.	76-124	100		05/11/22 23:36	2037-26-5	
Toluene-d8 (S)	101	%.	76-124	10000		05/12/22 20:04	2037-26-5	
4-Bromofluorobenzene (S)	98	%.	78-121	100		05/11/22 23:36	460-00-4	
4-Bromofluorobenzene (S)	97	%.	78-121	10000		05/12/22 20:04	460-00-4	
Dibromofluoromethane (S)	101	%.	74-128	100		05/11/22 23:36	1868-53-7	
Dibromofluoromethane (S)	103	%.	74-128	10000		05/12/22 20:04	1868-53-7	

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Acetone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	67-64-1	
Benzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-43-2	
Bromodichloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-27-4	
Bromoform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-25-2	
Bromomethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-83-9	
2-Butanone (MEK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	78-93-3	
Carbon disulfide	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-15-0	
Carbon tetrachloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	56-23-5	

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ANALYTICAL RESULTS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Sample: DR-S-BP-05052022-02 **Lab ID: 20243028004** Collected: 05/05/22 16:10 Received: 05/06/22 17:50 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5030 Med Level	Analytical Method: EPA 8260 Preparation Method: EPA 5035/5030B							
	Pace Analytical Services - New Orleans							
Chlorobenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-90-7	
Chloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-00-3	
Chloroform	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	67-66-3	
Chloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	74-87-3	
Chloroprene	**1080**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	126-99-8	E
1,2-Dibromo-3-chloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	96-12-8	
Dibromochloromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	106-93-4	
Dichlorodifluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-71-8	
1,1-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-34-3	
1,2-Dichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	107-06-2	
1,1-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-35-4	
cis-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-59-2	
trans-1,2-Dichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	156-60-5	
1,2-Dichloropropane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	78-87-5	
cis-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	10061-02-6	
Ethylbenzene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-41-4	
2-Hexanone	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	591-78-6	
Isopropylbenzene (Cumene)	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	98-82-8	
Methyl acetate	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	79-20-9	
Methylene Chloride	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	1634-04-4	
Styrene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	100-42-5	
1,1,2,2-Tetrachloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-34-5	
Tetrachloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	127-18-4	
Toluene	**240**	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	108-88-3	
1,1,1-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-00-5	
Trichloroethene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	79-01-6	
Trichlorofluoromethane	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	75-69-4	
Vinyl chloride	ND	mg/kg	5.6	50	05/19/22 09:30	05/19/22 14:09	75-01-4	D4
m&p-Xylene	ND	mg/kg	27.8	50	05/19/22 09:30	05/19/22 14:09	179601-23-1	
o-Xylene	ND	mg/kg	13.9	50	05/19/22 09:30	05/19/22 14:09	95-47-6	
Surrogates								
Toluene-d8 (S)	100	%.	75-125	50	05/19/22 09:30	05/19/22 14:09	2037-26-5	
4-Bromofluorobenzene (S)	103	%.	64-139	50	05/19/22 09:30	05/19/22 14:09	460-00-4	
Dibromofluoromethane (S)	97	%.	66-143	50	05/19/22 09:30	05/19/22 14:09	1868-53-7	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255081
QC Batch Method: EPA 8260
Analysis Method: EPA 8260
Analysis Description: 8260 MSV
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028001, 20243028002, 20243028003

METHOD BLANK: 1213305
Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,1-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloroethane	mg/L	ND	0.0050	05/11/22 19:49	
1,2-Dichloropropane	mg/L	ND	0.0050	05/11/22 19:49	
2-Butanone (MEK)	mg/L	ND	0.010	05/11/22 19:49	
2-Hexanone	mg/L	ND	0.010	05/11/22 19:49	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/11/22 19:49	
Acetone	mg/L	ND	0.010	05/11/22 19:49	
Benzene	mg/L	ND	0.0050	05/11/22 19:49	
Bromodichloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Bromoform	mg/L	ND	0.0050	05/11/22 19:49	
Bromomethane	mg/L	ND	0.0050	05/11/22 19:49	
Carbon disulfide	mg/L	ND	0.0050	05/11/22 19:49	
Carbon tetrachloride	mg/L	ND	0.0050	05/11/22 19:49	
Chlorobenzene	mg/L	ND	0.0050	05/11/22 19:49	
Chloroethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroform	mg/L	ND	0.0050	05/11/22 19:49	
Chloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Chloroprene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	
Dibromochloromethane	mg/L	ND	0.0050	05/11/22 19:49	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Ethylbenzene	mg/L	ND	0.0050	05/11/22 19:49	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/11/22 19:49	
m&p-Xylene	mg/L	ND	0.010	05/11/22 19:49	
Methyl acetate	mg/L	ND	0.010	05/11/22 19:49	
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/11/22 19:49	
Methylene Chloride	mg/L	ND	0.0050	05/11/22 19:49	
o-Xylene	mg/L	ND	0.0050	05/11/22 19:49	
Styrene	mg/L	ND	0.0050	05/11/22 19:49	
Tetrachloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Toluene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/11/22 19:49	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213305 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichloroethene	mg/L	ND	0.0050	05/11/22 19:49	
Trichlorofluoromethane	mg/L	ND	0.0050	05/11/22 19:49	
Vinyl chloride	mg/L	ND	0.0020	05/11/22 19:49	
4-Bromofluorobenzene (S)	%.	99	78-121	05/11/22 19:49	
Dibromofluoromethane (S)	%.	102	74-128	05/11/22 19:49	
Toluene-d8 (S)	%.	104	76-124	05/11/22 19:49	

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2,2-Tetrachloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1,2-Trichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,1-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromo-3-chloropropane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dibromoethane (EDB)	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloroethane	mg/L	ND	0.0050	05/12/22 11:06	
1,2-Dichloropropane	mg/L	ND	0.0050	05/12/22 11:06	
2-Butanone (MEK)	mg/L	ND	0.010	05/12/22 11:06	
2-Hexanone	mg/L	ND	0.010	05/12/22 11:06	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	0.010	05/12/22 11:06	
Acetone	mg/L	ND	0.010	05/12/22 11:06	
Benzene	mg/L	ND	0.0050	05/12/22 11:06	
Bromodichloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Bromoform	mg/L	ND	0.0050	05/12/22 11:06	
Bromomethane	mg/L	ND	0.0050	05/12/22 11:06	
Carbon disulfide	mg/L	ND	0.0050	05/12/22 11:06	
Carbon tetrachloride	mg/L	ND	0.0050	05/12/22 11:06	
Chlorobenzene	mg/L	ND	0.0050	05/12/22 11:06	
Chloroethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroform	mg/L	ND	0.0050	05/12/22 11:06	
Chloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Chloroprene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
cis-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Dibromochloromethane	mg/L	ND	0.0050	05/12/22 11:06	
Dichlorodifluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Ethylbenzene	mg/L	ND	0.0050	05/12/22 11:06	
Isopropylbenzene (Cumene)	mg/L	ND	0.0050	05/12/22 11:06	
m&p-Xylene	mg/L	ND	0.010	05/12/22 11:06	
Methyl acetate	mg/L	ND	0.010	05/12/22 11:06	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1213802 Matrix: Water
Associated Lab Samples: 20243028001, 20243028002, 20243028003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Methyl-tert-butyl ether	mg/L	ND	0.0050	05/12/22 11:06	
Methylene Chloride	mg/L	ND	0.0050	05/12/22 11:06	
o-Xylene	mg/L	ND	0.0050	05/12/22 11:06	
Styrene	mg/L	ND	0.0050	05/12/22 11:06	
Tetrachloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Toluene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,2-Dichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
trans-1,3-Dichloropropene	mg/L	ND	0.0050	05/12/22 11:06	
Trichloroethene	mg/L	ND	0.0050	05/12/22 11:06	
Trichlorofluoromethane	mg/L	ND	0.0050	05/12/22 11:06	
Vinyl chloride	mg/L	ND	0.0020	05/12/22 11:06	
4-Bromofluorobenzene (S)	%.	98	78-121	05/12/22 11:06	
Dibromofluoromethane (S)	%.	103	74-128	05/12/22 11:06	
Toluene-d8 (S)	%.	102	76-124	05/12/22 11:06	

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.048	96	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.062	123	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.056	112	75-121	
1,1-Dichloroethane	mg/L	0.05	0.051	101	71-127	
1,1-Dichloroethene	mg/L	0.05	0.046	92	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.050	100	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.055	109	75-125	
1,2-Dichloroethane	mg/L	0.05	0.052	103	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	105	72-125	
2-Butanone (MEK)	mg/L	0.05	0.059	117	34-170	
2-Hexanone	mg/L	0.05	0.061	122	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.057	115	58-141	
Acetone	mg/L	0.05	0.068	135	16-192	
Benzene	mg/L	0.05	0.051	101	74-132	
Bromodichloromethane	mg/L	0.05	0.054	108	73-117	
Bromoform	mg/L	0.05	0.056	112	58-132	
Bromomethane	mg/L	0.05	0.037	74	47-157	
Carbon disulfide	mg/L	0.05	0.043	87	52-145	
Carbon tetrachloride	mg/L	0.05	0.049	98	68-129	
Chlorobenzene	mg/L	0.05	0.052	103	79-121	
Chloroethane	mg/L	0.05	0.043	86	34-160	
Chloroform	mg/L	0.05	0.050	100	70-120	
Chloromethane	mg/L	0.05	0.038	76	44-142	
Chloroprene	mg/L	0.05	0.047	94	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.048	95	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.052	105	77-121	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213306

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Dibromochloromethane	mg/L	0.05	0.053	106	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.031	62	28-148	
Ethylbenzene	mg/L	0.05	0.052	104	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.050	100	77-126	
m&p-Xylene	mg/L	0.1	0.10	103	78-119	
Methyl acetate	mg/L	0.05	0.053	106	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.053	106	58-135	
Methylene Chloride	mg/L	0.05	0.048	95	49-145	
o-Xylene	mg/L	0.05	0.051	103	77-121	
Styrene	mg/L	0.05	0.050	101	81-123	
Tetrachloroethene	mg/L	0.05	0.059	117	62-138	
Toluene	mg/L	0.05	0.051	102	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.048	95	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.050	99	77-117	
Trichlorofluoromethane	mg/L	0.05	0.040	79	45-164	
Vinyl chloride	mg/L	0.05	0.035	70	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			102	74-128	
Toluene-d8 (S)	%.			104	76-124	

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/L	0.05	0.050	100	76-126	
1,1,2,2-Tetrachloroethane	mg/L	0.05	0.057	115	65-129	
1,1,2-Trichloroethane	mg/L	0.05	0.054	108	75-121	
1,1-Dichloroethane	mg/L	0.05	0.054	108	71-127	
1,1-Dichloroethene	mg/L	0.05	0.051	102	63-130	
1,2-Dibromo-3-chloropropane	mg/L	0.05	0.047	95	59-131	
1,2-Dibromoethane (EDB)	mg/L	0.05	0.051	103	75-125	
1,2-Dichloroethane	mg/L	0.05	0.054	107	65-131	
1,2-Dichloropropane	mg/L	0.05	0.053	106	72-125	
2-Butanone (MEK)	mg/L	0.05	0.055	110	34-170	
2-Hexanone	mg/L	0.05	0.053	106	52-147	
4-Methyl-2-pentanone (MIBK)	mg/L	0.05	0.052	104	58-141	
Acetone	mg/L	0.05	0.065	129	16-192	
Benzene	mg/L	0.05	0.053	106	74-132	
Bromodichloromethane	mg/L	0.05	0.053	106	73-117	
Bromoform	mg/L	0.05	0.050	99	58-132	
Bromomethane	mg/L	0.05	0.057	113	47-157	
Carbon disulfide	mg/L	0.05	0.049	97	52-145	
Carbon tetrachloride	mg/L	0.05	0.051	101	68-129	
Chlorobenzene	mg/L	0.05	0.053	107	79-121	
Chloroethane	mg/L	0.05	0.071	143	34-160	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1213803

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloroform	mg/L	0.05	0.052	105	70-120	
Chloromethane	mg/L	0.05	0.063	127	44-142	
Chloroprene	mg/L	0.05	0.049	98	64-140	
cis-1,2-Dichloroethene	mg/L	0.05	0.050	101	71-124	
cis-1,3-Dichloropropene	mg/L	0.05	0.053	106	77-121	
Dibromochloromethane	mg/L	0.05	0.050	100	67-122	
Dichlorodifluoromethane	mg/L	0.05	0.052	104	28-148	
Ethylbenzene	mg/L	0.05	0.053	106	79-116	
Isopropylbenzene (Cumene)	mg/L	0.05	0.051	102	77-126	
m&p-Xylene	mg/L	0.1	0.11	107	78-119	
Methyl acetate	mg/L	0.05	0.046	92	47-155	
Methyl-tert-butyl ether	mg/L	0.05	0.052	104	58-135	
Methylene Chloride	mg/L	0.05	0.054	107	49-145	
o-Xylene	mg/L	0.05	0.052	103	77-121	
Styrene	mg/L	0.05	0.051	101	81-123	
Tetrachloroethene	mg/L	0.05	0.051	102	62-138	
Toluene	mg/L	0.05	0.051	103	79-120	
trans-1,2-Dichloroethene	mg/L	0.05	0.052	104	68-125	
trans-1,3-Dichloropropene	mg/L	0.05	0.053	107	77-121	
Trichloroethene	mg/L	0.05	0.051	102	77-117	
Trichlorofluoromethane	mg/L	0.05	0.053	106	45-164	
Vinyl chloride	mg/L	0.05	0.053	106	48-130	
4-Bromofluorobenzene (S)	%.			99	78-121	
Dibromofluoromethane (S)	%.			104	74-128	
Toluene-d8 (S)	%.			102	76-124	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/L	ND	5	5	4.8	5.6	96	112	73-141	15	20	
1,1,2,2-Tetrachloroethane	mg/L	ND	5	5	5.5	6.8	110	135	48-148	20	20	
1,1,2-Trichloroethane	mg/L	ND	5	5	5.1	6.1	101	121	46-154	18	20	
1,1-Dichloroethane	mg/L	ND	5	5	5.8	6.7	116	134	63-145	15	20	
1,1-Dichloroethene	mg/L	ND	5	5	4.9	5.5	98	109	28-176	11	20	
1,2-Dibromo-3-chloropropane	mg/L	ND	5	5	4.4	5.5	89	110	40-152	21	20	R1
1,2-Dibromoethane (EDB)	mg/L	ND	5	5	4.9	5.8	98	116	69-134	17	20	
1,2-Dichloroethane	mg/L	ND	5	5	4.7	5.7	95	114	51-147	18	20	
1,2-Dichloropropane	mg/L	ND	5	5	4.9	5.7	98	113	64-140	15	20	
2-Butanone (MEK)	mg/L	ND	5	5	5.1	6.0	101	120	10-200	17	20	
2-Hexanone	mg/L	ND	5	5	5.2	6.3	105	125	40-157	18	20	
4-Methyl-2-pentanone (MIBK)	mg/L	ND	5	5	5.0	6.1	99	121	36-165	20	20	
Acetone	mg/L	ND	5	5	6.1	7.2	122	143	10-200	16	20	
Benzene	mg/L	ND	5	5	5.0	5.8	100	117	29-186	16	20	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1213307 1213308

Parameter	Units	20243028001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Bromodichloromethane	mg/L	ND	5	5	4.9	5.8	99	116	58-139	16	20	
Bromoform	mg/L	ND	5	5	5.0	6.0	101	121	57-135	18	20	
Bromomethane	mg/L	ND	5	5	4.0	4.1	80	81	42-168	1	20	
Carbon disulfide	mg/L	ND	5	5	4.9	5.1	97	102	44-170	4	20	
Carbon tetrachloride	mg/L	ND	5	5	5.1	5.9	101	119	45-162	16	20	
Chlorobenzene	mg/L	ND	5	5	4.9	5.8	99	116	71-135	17	20	
Chloroethane	mg/L	ND	5	5	4.7	4.8	95	96	32-175	1	20	
Chloroform	mg/L	ND	5	5	4.8	5.7	96	114	61-136	17	20	
Chloromethane	mg/L	ND	5	5	4.1	4.1	80	79	38-154	1	20	
Chloroprene	mg/L	62.8	5	5	64.6	62.7	37	-2	59-153	3	20	M1
cis-1,2-Dichloroethene	mg/L	ND	5	5	4.7	5.5	93	109	44-160	16	20	
cis-1,3-Dichloropropene	mg/L	ND	5	5	4.8	5.6	96	112	47-153	15	20	
Dibromochloromethane	mg/L	ND	5	5	4.8	5.8	97	116	64-130	18	20	
Dichlorodifluoromethane	mg/L	ND	5	5	3.6	3.6	72	72	22-160	0	20	
Ethylbenzene	mg/L	ND	5	5	5.0	6.0	100	119	51-153	17	20	
Isopropylbenzene (Cumene)	mg/L	ND	5	5	5.0	6.1	101	123	68-145	20	20	
m&p-Xylene	mg/L	ND	10	10	10.1	11.9	101	119	30-173	16	20	
Methyl acetate	mg/L	ND	5	5	4.5	5.7	90	114	20-173	23	20	R1
Methyl-tert-butyl ether	mg/L	ND	5	5	4.8	5.8	96	117	36-160	19	20	
Methylene Chloride	mg/L	ND	5	5	4.8	5.5	95	110	56-140	14	20	
o-Xylene	mg/L	ND	5	5	4.9	5.9	98	118	10-197	18	20	
Styrene	mg/L	ND	5	5	4.8	5.6	95	111	37-163	16	20	
Tetrachloroethene	mg/L	ND	5	5	5.1	5.9	102	117	18-193	14	20	
Toluene	mg/L	8.4	5	5	13.0	13.2	93	97	33-175	2	20	D4
trans-1,2-Dichloroethene	mg/L	ND	5	5	4.9	5.6	99	112	63-140	13	20	
trans-1,3-Dichloropropene	mg/L	ND	5	5	4.9	5.8	98	116	47-153	17	20	
Trichloroethene	mg/L	ND	5	5	4.9	5.6	97	112	24-181	14	20	
Trichlorofluoromethane	mg/L	ND	5	5	4.5	4.7	91	94	37-182	3	20	
Vinyl chloride	mg/L	ND	5	5	4.0	4.1	81	81	19-169	0	20	
4-Bromofluorobenzene (S)	%.						101	104	78-121			
Dibromofluoromethane (S)	%.						102	102	74-128			
Toluene-d8 (S)	%.						103	101	76-124			

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

QC Batch: 255724
QC Batch Method: EPA 5035/5030B
Analysis Method: EPA 8260
Analysis Description: 8260 MSV 5030 Med Level
Laboratory: Pace Analytical Services - New Orleans
Associated Lab Samples: 20243028004

METHOD BLANK: 1217688
Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1,2-Trichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,1-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromo-3-chloropropane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dibromoethane (EDB)	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloroethane	mg/kg	ND	0.25	05/19/22 10:03	
1,2-Dichloropropane	mg/kg	ND	0.25	05/19/22 10:03	
2-Butanone (MEK)	mg/kg	ND	0.50	05/19/22 10:03	
2-Hexanone	mg/kg	ND	0.50	05/19/22 10:03	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.50	05/19/22 10:03	
Acetone	mg/kg	ND	0.50	05/19/22 10:03	
Benzene	mg/kg	ND	0.25	05/19/22 10:03	
Bromodichloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Bromoform	mg/kg	ND	0.25	05/19/22 10:03	
Bromomethane	mg/kg	ND	0.25	05/19/22 10:03	
Carbon disulfide	mg/kg	ND	0.25	05/19/22 10:03	
Carbon tetrachloride	mg/kg	ND	0.25	05/19/22 10:03	
Chlorobenzene	mg/kg	ND	0.25	05/19/22 10:03	
Chloroethane	mg/kg	ND	0.25	05/19/22 10:03	
Chloroform	mg/kg	ND	0.25	05/19/22 10:03	
Chloromethane	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
cis-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Dibromochloromethane	mg/kg	ND	0.25	05/19/22 10:03	
Dichlorodifluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Ethylbenzene	mg/kg	ND	0.25	05/19/22 10:03	
Isopropylbenzene (Cumene)	mg/kg	ND	0.25	05/19/22 10:03	
m&p-Xylene	mg/kg	ND	0.50	05/19/22 10:03	
Methyl acetate	mg/kg	ND	0.50	05/19/22 10:03	
Methyl-tert-butyl ether	mg/kg	ND	0.25	05/19/22 10:03	
Methylene Chloride	mg/kg	ND	0.25	05/19/22 10:03	
o-Xylene	mg/kg	ND	0.25	05/19/22 10:03	
Styrene	mg/kg	ND	0.25	05/19/22 10:03	
Tetrachloroethene	mg/kg	ND	0.25	05/19/22 10:03	
Toluene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,2-Dichloroethene	mg/kg	ND	0.25	05/19/22 10:03	
trans-1,3-Dichloropropene	mg/kg	ND	0.25	05/19/22 10:03	
Trichloroethene	mg/kg	ND	0.25	05/19/22 10:03	

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QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

METHOD BLANK: 1217688 Matrix: Solid
Associated Lab Samples: 20243028004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Trichlorofluoromethane	mg/kg	ND	0.25	05/19/22 10:03	
Vinyl chloride	mg/kg	ND	0.10	05/19/22 10:03	
4-Bromofluorobenzene (S)	%.	101	64-139	05/19/22 10:03	
Dibromofluoromethane (S)	%.	102	66-143	05/19/22 10:03	
Toluene-d8 (S)	%.	101	75-125	05/19/22 10:03	

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	2.5	2.4	97	76-126	
1,1,2,2-Tetrachloroethane	mg/kg	2.5	2.7	107	65-129	
1,1,2-Trichloroethane	mg/kg	2.5	2.5	101	75-121	
1,1-Dichloroethane	mg/kg	2.5	2.5	99	71-127	
1,1-Dichloroethene	mg/kg	2.5	2.1	82	63-130	
1,2-Dibromo-3-chloropropane	mg/kg	2.5	2.4	98	59-131	
1,2-Dibromoethane (EDB)	mg/kg	2.5	2.6	102	75-125	
1,2-Dichloroethane	mg/kg	2.5	2.4	94	65-131	
1,2-Dichloropropane	mg/kg	2.5	2.6	104	72-125	
2-Butanone (MEK)	mg/kg	2.5	2.9	116	34-170	
2-Hexanone	mg/kg	2.5	2.8	112	52-147	
4-Methyl-2-pentanone (MIBK)	mg/kg	2.5	2.7	110	58-141	
Acetone	mg/kg	2.5	2.9	117	16-192	
Benzene	mg/kg	2.5	2.6	106	74-132	
Bromodichloromethane	mg/kg	2.5	2.4	96	73-117	
Bromoform	mg/kg	2.5	2.6	102	58-132	
Bromomethane	mg/kg	2.5	2.0	81	47-157	
Carbon disulfide	mg/kg	2.5	2.0	80	52-145	
Carbon tetrachloride	mg/kg	2.5	2.5	101	68-129	
Chlorobenzene	mg/kg	2.5	2.5	101	79-121	
Chloroethane	mg/kg	2.5	1.9	77	34-160	
Chloroform	mg/kg	2.5	2.5	98	70-120	
Chloromethane	mg/kg	2.5	3.1	122	44-142	
cis-1,2-Dichloroethene	mg/kg	2.5	2.5	100	71-124	
cis-1,3-Dichloropropene	mg/kg	2.5	2.5	102	77-121	
Dibromochloromethane	mg/kg	2.5	2.5	100	67-122	
Dichlorodifluoromethane	mg/kg	2.5	2.5	99	28-148	
Ethylbenzene	mg/kg	2.5	2.5	101	79-116	
Isopropylbenzene (Cumene)	mg/kg	2.5	2.6	103	77-126	
m&p-Xylene	mg/kg	5	5.0	100	78-119	
Methyl acetate	mg/kg	2.5	2.6	103	47-155	
Methyl-tert-butyl ether	mg/kg	2.5	2.4	97	58-135	
Methylene Chloride	mg/kg	2.5	2.4	97	49-145	
o-Xylene	mg/kg	2.5	2.5	101	77-121	
Styrene	mg/kg	2.5	2.5	99	81-123	

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St. Rose, LA 70087
(504)469-0333

QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

LABORATORY CONTROL SAMPLE: 1217689

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Tetrachloroethene	mg/kg	2.5	2.6	105	62-138	
Toluene	mg/kg	2.5	2.5	99	79-120	
trans-1,2-Dichloroethene	mg/kg	2.5	2.6	102	68-125	
trans-1,3-Dichloropropene	mg/kg	2.5	2.4	98	77-121	
Trichloroethene	mg/kg	2.5	2.6	104	77-117	
Trichlorofluoromethane	mg/kg	2.5	2.1	82	45-164	
Vinyl chloride	mg/kg	2.5	1.9	77	48-130	
4-Bromofluorobenzene (S)	%.			101	64-139	
Dibromofluoromethane (S)	%.			98	66-143	
Toluene-d8 (S)	%.			100	75-125	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	106	73-141	3	20	
1,1,2,2-Tetrachloroethane	mg/kg	ND	2.6	2.6	2.9	2.9	110	110	48-148	0	20	
1,1,2-Trichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	105	106	46-154	1	20	
1,1-Dichloroethane	mg/kg	ND	2.6	2.6	2.8	2.8	106	108	63-145	1	20	
1,1-Dichloroethene	mg/kg	ND	2.6	2.6	2.1	2.1	80	81	28-176	1	20	
1,2-Dibromo-3-chloropropane	mg/kg	ND	2.6	2.6	2.5	2.7	96	101	40-152	5	20	
1,2-Dibromoethane (EDB)	mg/kg	ND	2.6	2.6	2.8	2.9	105	109	69-134	3	20	
1,2-Dichloroethane	mg/kg	ND	2.6	2.6	2.6	2.6	97	99	51-147	2	20	
1,2-Dichloropropane	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	64-140	2	20	
2-Butanone (MEK)	mg/kg	ND	2.6	2.6	2.8	2.9	94	100	10-200	5	20	
2-Hexanone	mg/kg	ND	2.6	2.6	2.9	3.1	108	116	40-157	7	20	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	2.6	2.6	2.8	2.9	107	110	36-165	2	20	
Acetone	mg/kg	ND	2.6	2.6	2.8	3.1	94	105	10-200	10	20	
Benzene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	29-186	2	20	
Bromodichloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	103	104	58-139	1	20	
Bromoform	mg/kg	ND	2.6	2.6	2.7	2.8	102	107	57-135	4	20	
Bromomethane	mg/kg	ND	2.6	2.6	2.0	2.0	75	75	42-168	0	20	
Carbon disulfide	mg/kg	ND	2.6	2.6	2.0	2.0	75	76	44-170	2	20	
Carbon tetrachloride	mg/kg	ND	2.6	2.6	2.8	2.9	107	109	45-162	2	20	
Chlorobenzene	mg/kg	ND	2.6	2.6	2.9	2.9	109	111	71-135	2	20	
Chloroethane	mg/kg	ND	2.6	2.6	0.90	0.74	34	28	32-175	19	20	M1
Chloroform	mg/kg	ND	2.6	2.6	2.7	2.8	104	106	61-136	2	20	
Chloromethane	mg/kg	ND	2.6	2.6	3.4	3.4	128	127	38-154	1	20	
Chloroprene	mg/kg				2.8	2.8				2	20	
cis-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	44-160	1	20	
cis-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	47-153	1	20	
Dibromochloromethane	mg/kg	ND	2.6	2.6	2.7	2.8	102	104	64-130	2	20	
Dichlorodifluoromethane	mg/kg	ND	2.6	2.6	2.8	2.7	105	103	22-160	2	20	
Ethylbenzene	mg/kg	ND	2.6	2.6	2.9	2.9	110	111	51-153	1	20	

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REPORT OF LABORATORY ANALYSIS

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(504)469-0333

QUALITY CONTROL DATA

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1217690 1217691

Parameter	Units	20242755001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Isopropylbenzene (Cumene)	mg/kg	ND	2.6	2.6	3.0	3.0	114	114	68-145	0	20	
m&p-Xylene	mg/kg	ND	5.3	5.3	5.7	5.8	108	110	30-173	1	20	
Methyl acetate	mg/kg	ND	2.6	2.6	2.6	2.7	99	103	20-173	4	20	
Methyl-tert-butyl ether	mg/kg	ND	2.6	2.6	2.7	2.7	100	102	36-160	2	20	
Methylene Chloride	mg/kg	ND	2.6	2.6	2.9	2.9	108	109	56-140	1	20	
o-Xylene	mg/kg	ND	2.6	2.6	3.0	3.0	113	113	10-197	1	20	
Styrene	mg/kg	ND	2.6	2.6	2.8	2.9	107	108	37-163	1	20	
Tetrachloroethene	mg/kg	ND	2.6	2.6	3.2	3.4	120	127	18-193	6	20	
Toluene	mg/kg	ND	2.6	2.6	2.8	2.8	107	108	33-175	0	20	
trans-1,2-Dichloroethene	mg/kg	ND	2.6	2.6	2.9	2.9	108	108	63-140	0	20	
trans-1,3-Dichloropropene	mg/kg	ND	2.6	2.6	2.7	2.7	101	102	47-153	1	20	
Trichloroethene	mg/kg	ND	2.6	2.6	3.0	3.0	112	114	24-181	1	20	
Trichlorofluoromethane	mg/kg	ND	2.6	2.6	1.9	2.0	73	74	37-182	1	20	
Vinyl chloride	mg/kg	ND	2.6	2.6	2.1	2.1	78	81	19-169	3	20	
4-Bromofluorobenzene (S)	%.						104	103	64-139			
Dibromofluoromethane (S)	%.						95	96	66-143			
Toluene-d8 (S)	%.						101	100	75-125			

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QUALIFIERS

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The Nelac Institute

ANALYTE QUALIFIERS

D4	Sample was diluted due to the presence of high levels of target analytes.
E	Analyte concentration exceeded the calibration range. The reported result is estimated.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
R1	RPD value was outside control limits.

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St. Rose, LA 70087
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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Voaltiles + Chloroprene
Pace Project No.: 20243028

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20243028001	**DR-L-LB-05052022-01**	EPA 8260	255081		
20243028002	**DR-L-LB-05052022-02**	EPA 8260	255081		
20243028003	**DR-L-LA-05052022-01**	EPA 8260	255081		
20243028004	**DR-S-BP-05052022-02**	EPA 5035/5030B	255724	EPA 8260	255848

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Pace

CHAIN-OF-CUSTODY / Analytical Request Docum

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be com

Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at https://info.pacelabs.com/

WO# : 20243028

20243028

tion A	Section B	Section C
uired Client Information:	Required Project Information:	Invoice Information:
ıpany: weston solution inc.	Report To: Jeff Wright	Attention:
ress: 4324 S. Sherwood Forest Blvd #100	Copy To:	Company Name:
n Rouge , LA 70816		Address:
il: jeff.wright@westonsolutions.com	Purchase Order #:	Pace Quote:
ne: 225-772-7921 Fax:	Project Name:	Pace Project Manager: clay.ledet@pacelabs.com,
uested Due Date: 48 hr	Project #:	Pace Profile #: 17402/1&2

Regulatory Agency

State / Location

Requested Analysis Filtered (Y/N)

#	SAMPLE ID (One Character per box. (A-Z, 0-9 / , -) Sample Ids must be unique)	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED START DATE	COLLECTED START TIME	COLLECTED END DATE	COLLECTED END TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Other	Analyses Test Y/N	8260 Full List	8260 Full List	8260 Full List	Residual Chlorine (Y/N)
1	DR-L-LB-05052022-01	WW	G	5/5/22	1545				3				X						X			
2	DR-L-LB-05052022-02	WW	G	5/5/22	1545				3				X						X			
3	DR-L-LA-05052022-01	WW	G	5/5/22	~~1715~~ 1710				3				X						X			
4	DR-S-BP-05052022-01	S	G	5/5/22	1610				2	X									X			
5																						
6																						
7																						
8																						
9																						
10																						
11																						
12																						

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
	[signature] weston	5/6/22	14:15	[signature]	5/6/22	14:15				
	[signature]	5/6/22	14:15	[signature]	5/6/22	15:15				
	[signature]	5/6/22	1750	[signature]	5/6/2022	1750	1.8 TT	Y	Y	Y

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE of SAMPLER: DATE Signed:

TEMP in C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

E34 3.0

ED_013532_00008991-00135

WO#: 20243028

Pace

1000 Riverbend. Blvd., Suite F
St. Rose, LA 70087

Project : PM: CAL Due Date: 05/12/22
CLIENT: 20-WestonSol

Courier: ☑ Pace Courier ☐ Hired Courier ☐ Fed X ☐ UPS ☐ DHL ☐ USPS ☐ Customer ☐ Other

Custody Seal on Cooler/Box Present: ☐ YES ☑ NO **Custody Seals intact:** ☐ YES ☐ NO

Samples on ice: ☑ YES ☐ NO **Type of Ice:** Wet Blue None

Date and Initials of person examining contents: 5/9/22 CAL

Temp should be ≤6°C *Temp must be measured from Temperature blank when present

Cooler #1 Thermometer Used: 10 Cooler Temp °C: (Observed) 1.8 (CF) 0 (Actual) 1.8
Cooler #2 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #3 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____
Cooler #4 Thermometer Used: ____ Cooler Temp °C: (Observed) ____ (CF) ____ (Actual) ____

Tracking #: ____

Temperature Blank Present*?	☐Yes ☐No ☑N/A	
Chain of Custody Present:	☑Yes ☐No ☐N/A	
Chain of Custody Complete:	☑Yes ☐No ☐N/A	
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	
Sampler Name & Signature on COC:	☐Yes ☑No ☐N/A	
Samples Arrived within Hold Time:	☑Yes ☐No ☐N/A	
Sufficient Volume:	☑Yes ☐No ☐N/A	
Correct Containers Used:	☑Yes ☐No ☐N/A	
Filtered vol. Rec. for Diss. tests	☐Yes ☐No ☑N/A	
Sample Labels match COC:	☑Yes ☐No ☐N/A	
All containers received within manafacture's precautionary and/or expiration dates.	☑Yes ☐No ☐N/A	
All containers needing chemical preservation have been checked (except VOA, coliform, & O&G).	☐Yes ☐No ☑N/A	If No, was preserative added? ☐Yes ☐No If added record lot #.: HNO3 ____ H2SO4 ____ Date: ____ Time: ____
All containers preservation checked found to be in compliance with EPA recommendation.	☐Yes ☐No ☑N/A	
Headspace in VOA Vials (>6mm):	☐Yes ☑No ☐N/A	
Trip Blank Present:	☐Yes ☑No	

Client Notification/ Resolution:

Person Contacted: ____ Date/Time: ____

Comments/ Resolution: ____

Attachment 8

Daily Activity Summary for May 5, 2022 – FY2022 Denka Sampling Investigation

From: Penland, John
To: christopher-meyers@denkape.com; Bordelon, David
Cc: Osbourne, Margaret; Yurk, Jeffrey; Delgado, Eric
Subject: Daily Summary May 5, 2022 - FY2022 RCRA Sampling Investigation at the Denka facility located in LaPlace, LA (LAR000009415)
Date: Thursday, May 5, 2022 11:23:00 PM

All,
Here is a summary of my notes from today's inspection. If there are any errors or omissions please le t me know.

Inspection Participants

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Chris Meyers		Denka Performance Elastomer, LLC.		christopher-meyers@denkape.com
Cory Green	Sr. SHE Consultant	Denka Performance Elastomer, LLC.	985-536-7583	cory-green@denkape.com
Patrick Walsh	SHE/PSM Manager	Denka Performance Elastomer, LLC.	985-536-7573	patrick-walsh@denkape.com
David Bordelon		EPA - START		david.bordelon@westonsolutions.com
Derrick Cobb		EPA - START		derrick.cobb@westonsolutions.com
Jose Ojeda		EPA - START		jose.ojeda@westonsolutions.com
Jeff Wright		EPA - START		jeff.wright@westonsolutions.com
Luke Murray		EPA - START		luke.murray@mecx.net
Bob Holden		Jones Walker		
Jason Hutt		Bracewell		
Kevin Volkell		Bracewell		
Jorge Lavastida		Denka Performance Elastomer, LLC.		

Introduction

On May 5, 2022, I conducted an onsite inspection of the Denka Performance Elastomers, LLC. Manufacturing facility located in LaPlace, St. John the Baptist Parish, Louisiana (Denka). Denka has notified as a large quantity generator of hazardous waste and was issued the EPA identification number LAR000009415. Denka is a treatment, storage, and disposal facility and operates under the requirements of RCRA permit LAR000009415-OP-1 issued by the Louisiana Department of Environmental Quality. This inspection is a follow-up to the April 18-21, 2021, RCRA inspection where initial concerns were raised about the generation and management of the "neoprene popcorn" generated in the poly unit. This inspection involved observation of the facility's standard operating procedures and sample collection of air, liquid, and solid media associated with or impacted by the "neoprene popcorn" generation and management procedures.

Summary

- Inspection start – approximately 09:30am
- I presented my credentials to Mr. Patrick Walsh, Mr. Cory Green, and Mr. Chris Meyer and informed them that I was there under the authority of section 3007 of RCRA and Condition II.E.8 of RCRA permit LAR000009415-OP-1 to conduct a follow-up inspection of the Denka facility.
- Denka had been notified of this sampling inspection through their counsel on April 29, 2022 and again through their counsel on May 4, 2022. The April 29, 2022, notification provided a basic list of planned samples and offered Denka the opportunity to prepare containers for the collection of split samples.
- During our initial meeting I explained that the purpose of this sampling inspection was to collect information and samples related to the generation and management of the "neoprene popcorn". At this time, EPA is assessing this material as a solid waste and potentially a hazardous waste. This concern was previously identified during the April 18-21, 2022 inspection.
- According to Chris Meyers, following the completion of the April 18-21, 2022 inspection, additional information concerning the amount of residual chloroprene present in the "neoprene popcorn" was located and will be provided as part of the response to the records request originating from EPA during that inspection.
- I asked whether Denka considered the "neoprene popcorn" to be a solid waste based on the definition of "abandoned" in 40 CFR 261.2. Cory Green acknowledged that the solid waste definition could apply. Patrick Walsh asserted that Denka had sold the stabilized "neoprene popcorn" for its commercial value previously, though it does not currently do so.
- I explained the D001 flammable solids definition and asked whether that could apply as the "neoprene popcorn" had been previously described by the Poly Unit Production Manager as a self-heating material. Cory Green disputed that the material would ignite or burn vigorously since the material is wet as generated.
- I explained the D003 reactivity definition and its association with the property of auto-polymerization. Both Patrick Walsh and Cory Green acknowledged that auto-polymerization is an attribute of the "neoprene popcorn".
- As part of this inspection, I requested and received the following documents marked as Confidential:
    - PK Pump Out and Strainer Cleaning Operation

Clearing Unstripped Emulsion Storage Tank for Cleaning
    - 3 Engineering Drawings of the Brine Pit
    - Raw Materials Characteristics and Hazards
    - Emergency Stabilizer Make-up
- David Bordelon arrived at approximately 12:00pm
- At approximately 12:30pm we conducted our initial reconnaissance of the planned sample collection area and equipment staging location.
- We departed the facility for lunch at approximately 1:00pm
- We returned to the facility at approximately 2:15pm and briefed the START contractors.
- Initiated sampling at approximately 3:30pm
- A detailed sampling report will be prepared by the START contractors to accompany the report from the laboratory
- Following the conclusion of sampling activities, we returned to the Denka offices where I summarized the activities listed above to Denka representatives and their counsel.
- During this inspection I collected both photos and video recordings which are being claimed as Confidential by Denka.
- For all Confidential claims asserted by Denka please refer to the Region 6 CBI letter provided during the April 18-21, 2022 inspection.

John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270
(214)665-9717

Message

From: Kudla, Courtney [kudla.courtney@epa.gov]
Sent: 8/17/2022 5:45:03 PM
To: LaBombard, Will [LaBombard.Will@epa.gov]
CC: Lawrence, Sherry [lawrence.sherry@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]
Subject: RE: Denka Sampling Assignment and Information Needs

Will,

I am wanting to follow-up on the initial funding we placed on the Denka Sampling for START. I talked with Shaun Burke this morning. He said that they have put $124,000 on a PR for the initial sampling and the ongoing air monitoring.

Will this money be reprogrammed/returned to ECAD? If not, would we be able to utilize the START contract for additional sampling at another location?

Thanks,
Courtney

From: LaBombard, Will <LaBombard.Will@epa.gov>
Sent: Friday, April 22, 2022 7:34 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>
Cc: Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

There was only $22,950 in the E44 account, so we changed the PR to be $22k from E44 and $18k from E50. Is that okay with everyone?

Will LaBombard
972-514-7799

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 22, 2022 5:53 PM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>
Cc: Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>; Penland, John <Penland.John@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>
Subject: Re: Denka Sampling Assignment and Information Needs

Yes Courtney confirmed that earlier today we have $138K

Sent from my iPhone

> On Apr 22, 2022, at 5:39 PM, Gilrein, Stephen <gilrein.stephen@epa.gov> wrote:
>
> Do we have $40,000 to put on this?
>
> ---
>
> **From:** LaBombard, Will <LaBombard.Will@epa.gov>
> **Sent:** Friday, April 22, 2022 4:34 PM
> **To:** Gilrein, Stephen <gilrein.stephen@epa.gov>

Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>; Kudla, Courtney <kudla.courtney@epa.gov>; Lawrence, Sherry <lawrence.sherry@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Hi Steve,

I just routed a PR to you for this sampling effort. Please let me know if you have any questions. Thanks!

Will LaBombard
972-514-7799

From: Kudla, Courtney <kudla.courtney@epa.gov>
Sent: Friday, April 22, 2022 2:02 PM
To: LaBombard, Will <LaBombard.Will@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Looks accurate to me. Margaret/John-Can you confirm there isn't anything else you need?

From: LaBombard, Will <LaBombard.Will@epa.gov>
Sent: Friday, April 22, 2022 1:43 PM
To: Kudla, Courtney <kudla.courtney@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: RE: Denka Sampling Assignment and Information Needs

Okay, this is what I came up with based on your email. Will this work for you?
Note that I left out the 3-4 people language. Do we care how many people they bring for the sampling? Or was that just what was used to estimate the cost?

The initial expense limit for this TDD is set at $40,000. When available, all TDD costs shall be invoiced against the oldest 000E44 task order funding.

This TDD's cost category is ECAD.

Eric Delgado will be the primary COR for this TDD.

The contractor shall:
-Develop a HASP, QAPP, and final report for sampling at the Denka/DuPont LaPlace, LA facility.
-Attend phone and in-person meetings with the COR and other stakeholders.
-Conduct air, solid, and liquid sampling as directed by the COR. Initial estimates are for 10 liquid/solid samples and 10 air samples, but additional sampling may be required. Level B PPE is needed for entry to the location.
-As directed by the COR, provide analytical services for samples taken or ship/deliver samples to a lab designated by the COR.
-If directed by the COR, provide expert advice regarding alternative solutions.
-Provide other technical support as directed by the COR.
-Contact the COR immediately upon receipt of this TDD to coordinate mobilization and sampling schedule. Anticipated need is during the week of 4/25 through 4/29.

Will LaBombard
972-514-7799

From: Kudla, Courtney <kudla.courtney@epa.gov>
Sent: Friday, April 22, 2022 12:58 PM
To: LaBombard, Will <LaBombard.Will@epa.gov>
Cc: Osbourne, Margaret <osbourne.margaret@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: FW: Denka Sampling Assignment and Information Needs

Will,

Do you have an example of what this narrative should be?

Would something such as this work:

Requesting development of a HASP, QAPP, and final report for sampling at the Denka/DuPont LaPlace, LA facility. Needing 3-4individuals to take 10 liquid/solid samples and 10 air samples. Level B PPE is needed for entry. Estimating costs of $40,000 for travel, labor, and lab analysis.

Thanks,
Courtney

From: Osbourne, Margaret <osbourne.margaret@epa.gov>
Sent: Friday, April 22, 2022 12:22 PM
To: Kudla, Courtney <kudla.courtney@epa.gov>; Penland, John <Penland.John@epa.gov>
Subject: Fwd: Denka Sampling Assignment and Information Needs

Sent from my iPhone

Begin forwarded message:

> **From:** "LaBombard, Will" <LaBombard.Will@epa.gov>
> **Date:** April 22, 2022 at 11:35:00 AM CDT
> **To:** "Osbourne, Margaret" <osbourne.margaret@epa.gov>
> **Cc:** "Petersen, Chris" <petersen.chris@epa.gov>, "Nguyen, Lyndsey" <Nguyen.Lyndsey@epa.gov>, "Carroll, Craig" <Carroll.Craig@epa.gov>
> **Subject: RE: Denka Sampling Assignment and Information Needs**
>
> Hi Margaret,
>
> Adding to what Craig said, we don't need an IGCE, just a narrative estimate of cost for the PR amount and TDD expenditure limit. Your folks can do an IGCE if that helps come up with the number, but I don't need it since this work will go under an existing TO that already has an IGCE for all EPM work.
>
> Will LaBombard
> 972-514-7799
>
> **From:** Carroll, Craig <Carroll.Craig@epa.gov>
> **Sent:** Friday, April 22, 2022 9:49 AM
> **To:** Osbourne, Margaret <osbourne.margaret@epa.gov>
> **Cc:** Petersen, Chris <petersen.chris@epa.gov>; Nguyen, Lyndsey

<Nguyen.Lyndsey@epa.gov>; LaBombard, Will <LaBombard.Will@epa.gov>
Subject: Denka Sampling Assignment and Information Needs

Hi Margaret,

Eric Delegado will be the OSC assigned to coordinate the sampling under the START contract. As soon as we receive a general scope of work, cost estimate, and timeline from ECAD, Eric work with Will to generate a TDD and with START to develop the QASP, HASP, and any other necessary documents.

Craig Carroll

Chief, Emergency Management Branch

U.S. EPA, Region 6

Ph. (214)665-2220

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 3/7/2022 5:14:06 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

Have you talked with Lynn yet as to whether we are going with ERG or NEIC for Denka inspection?

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 4/21/2022 7:12:33 PM
To: Carroll, Craig [Carroll.Craig@epa.gov]

Hey - need to talk to you asap about needing a START contractor to do some sampling at a facility in LaPlace, LA. OECA would fund it.

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 4/22/2022 10:03:06 PM
To: Penland, John [Penland.John@epa.gov]

Are you available to go on inspection next week back to Denka?

Message

From: Penland, John [Penland.John@epa.gov]
Sent: 5/2/2022 4:40:55 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

check with Eric on the Denka Sampling. from the email chain it looks like the probes to collect solid samples may be the bottleneck. if so I think we go anyway and just do air and water samples

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 8/11/2022 3:00:51 PM
To: Osbourne, Margaret [osbourne.margaret@epa.gov]

Lynn wants John to set up a call with Denka (Bob Holden) to go over the redactions next Monday to see what we can come to agreement on before posting. I assume I can ask John to set up the call, but did you want to post the report sooner than Monday? John is supposed to hear back from Denka on the sampling report appendices by COB today.

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 6/16/2022 7:34:21 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]

I've made some suggestions/edits to the Denka briefing sheet if you want to review. I need some dates on the inspection report stuff. I've also left some placeholders for Marcia.

Appointment

From: Thompson, Steve [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DEB5F1524AE94DC69ED0F4B2D6CA446A-THOMPSON, STEVE]
on behalf of Caballero, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e3c28123c2f148419cb920b5a88b01e8-Kcaballe]
Sent: 2/23/2022 3:15:14 PM
To: Leathers, James [leathers.james@epa.gov]

Subject: FW: Coordination on RCRA/CAA inspection at Denka
Location: Microsoft Teams Meeting

Start: 2/23/2022 9:00:00 PM
End: 2/23/2022 10:00:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Caballero, Kathryn <Caballero.Kathryn@epa.gov>
Sent: Friday, February 18, 2022 9:58 AM
To: Caballero, Kathryn; Seager, Cheryl; Greene, Mary; Fried, Gregory; Spina, Providence; Foley, Patrick; Parrish, Robert; Sullivan, Greg; Davies, Lynne; Saenz, Diana; Gilrein, Stephen; Welton, Patricia; Osbourne, Margaret; Thompson, Steve
Cc: McGuire, James; Connell, Rebecca; Murdock, Russell; Moncrieffe, Marcia; Lannen, Justin; Canzler, Erica; Cruz, FranciscoJ; Russo, Rebecca; Chavez, Kimberly; Mostaghim, Negin
Subject: Coordination on RCRA/CAA inspection at Denka
When: Wednesday, February 23, 2022 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Happy Friday. Schedules are challenging and we are asked to schedule this coordination meeting as soon as possible. Please let us know if you cannot attend and also forward to others who should be invited.

Thank you,
Kathryn

Kathryn Pirrotta Caballero
Associate Director (acting), Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Washington, DC 20460
(202) 564 -1849 (w)
(202) 441 -3905 (c)

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Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 2/24/2022 7:33:11 PM
To: Thompson, Steve [thompson.steve@epa.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]
Subject: FW: Denka inspection

Fyi, you too

From: Seager, Cheryl <Seager.Cheryl@epa.gov>
Sent: Thursday, February 24, 2022 1:31 PM
To: Gilrein, Stephen <gilrein.stephen@epa.gov>; Osbourne, Margaret <osbourne.margaret@epa.gov>; Welton, Patricia <Welton.Patricia@epa.gov>
Subject: FW: Denka inspection

From: Cozad, David <Cozad.David@epa.gov>
Sent: Thursday, February 24, 2022 1:25 PM
To: Seager, Cheryl <Seager.Cheryl@epa.gov>; Greene, Mary <Greene.Mary.E@epa.gov>
Cc: Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>
Subject: Fwd: Denka inspection

FYI

Sent from my iPhone

Begin forwarded message:

> **From:** "Starfield, Lawrence" <Starfield.Lawrence@epa.gov>
> **Date:** February 24, 2022 at 1:05:37 PM CST
> **To:** "Canzler, Erica" <Canzler.Erica@epa.gov>, "Cruz, FranciscoJ" <Cruz.FranciscoJ@epa.gov>
> **Cc:** "Cozad, David" <Cozad.David@epa.gov>, "Barnet, Henry" <Barnet.Henry@epa.gov>, "Mazakas, Pam" <Mazakas.Pam@epa.gov>
> **Subject: Denka inspection**
>
> Erica and Francisco,
>
> I need your help in scheduling soon a CAA/RCRA inspection of the Denka facility in Louisiana, even if it means postponing another inspection or two. We are getting air monitoring data from the company that we'll need to share with the community, and expectations for action are high in the wake of the Journey to Justice tour. Region 6 is issuing an information request tomorrow, and we really need a greater understanding on the ground of the brine pit, Poly Building, and other potentially significant sources of chloroprene releases – we are evaluating a possible RCRA action.
>
> Please do what you can to prioritize this inspection (early April?), and let me know if I can help. I'm happy to call DRAs in Regions whose inspection is being delayed.
>
> Thank you.

Larry

This message is CONFIDENTIAL, and may contain legally privileged information. If you are not the intended recipient, or believe you received this communication in error, please delete it immediately, do not copy, and notify the sender. Thank you.

Message

From: Yurk, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C384C253FEC84AB7AF14A4BD1B15F6D1-YURK, JEFF]
Sent: 3/31/2022 4:44:27 PM
To: Thompson, Steve [thompson.steve@epa.gov]
Subject: Denka

The RCRA inspection at the Denka Performance Elastomer facility scheduled for the week of April 18th will be conducted by OECA Contractor ERG with EPA Region 6 inspectors present. Air samples will be collected in the air space adjacent to sites of solid and hazardous waste sample collection utilizing using Drager tubes specifically designed to measure chloroprene concentrations. In addition Region 6 Air Enforcement will be conducting a G-Map survey in the area....

Appointment

From: Young, Justin [Young.Justin@epa.gov]
Sent: 3/14/2022 2:02:56 PM
To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]
CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]; Leathers, James [Leathers.James@epa.gov]

Subject: Denka Inspection Planning
Attachments: Untitled Attachment; Untitled Attachment; Untitled Attachment; Untitled Attachment
Location: Microsoft Teams Meeting

Start: 3/14/2022 4:30:00 PM
End: 3/14/2022 5:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 12:30 PM to 1:00 PM
Required Attendees: Young, Justin; Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh
Optional Attendees: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Keteles, Kristen; Paul Buellesbach; Leathers, James

Agenda for 3/21/22

1. Documents with John Penland
2. Safety/PPE
3. NEIC/R6 pollution accountability
4. Other items

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Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]

CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Helmich, Richard [Helmich.Richard@epa.gov]

Start: 3/21/2022 4:30:00 PM
End: 3/21/2022 5:30:00 PM

Recurrence: (none)

Optional Attendees: Janosh Wolters; George Wieber; Yurk, Jeffrey; Mostaghim, Negin; Bellot, Michael; Helmich, Richard

Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]; Leathers, James [Leathers.James@epa.gov]
CC: Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]

Start: 3/28/2022 4:30:00 PM
End: 3/28/2022 5:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh; Leathers, James

All,

I have updated the agenda for 3/28/22. I left a spot for general questions at the end, but if there is a specific topic anyone would like to discuss please let me know.

1. Roles/Responsibilities of Team
2. Safety/PPE
3. Sampling
4. GMAP

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Appointment

To: Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]
CC: George Wieber [george.wieber@erg.com]; Janosh Wolters [Janosh.Wolters@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]

Start: 4/4/2022 4:30:00 PM
End: 4/4/2022 5:00:00 PM
Show Time As: Busy

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh

Agenda for 4/4/22

1. Safety/PPE
2. Pre inspection documents
3. Other items

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Appointment

To: Wolters, Janosh [Wolters.Janosh@epa.gov]; Joe Watson [joe.watson@erg.com]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Penland, John [Penland.John@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Young, Justin [Young.Justin@epa.gov]; Davies, Lynne [Davies.Lynne@epa.gov]; Chavez, Kimberly [Chavez.Kimberly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Deppe, Fred [Deppe.Fred@epa.gov]; Penland, John [Penland.John@epa.gov]; Franklyn, Valarie [Franklyn.Valarie@epa.gov]; Aubuchon, Kenneth [Aubuchon.Kenneth@epa.gov]; Joe Watson [joe.watson@erg.com]; Wolters, Janosh [Wolters.Janosh@epa.gov]

CC: Keteles, Kristen [Keteles.Kristen@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Janosh Wolters [Janosh.Wolters@erg.com]; George Wieber [george.wieber@erg.com]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Mostaghim, Negin [Mostaghim.Negin@epa.gov]; Bellot, Michael [Bellot.Michael@epa.gov]; Keteles, Kristen [Keteles.Kristen@epa.gov]; Paul Buellesbach [Paul.Buellesbach@erg.com]; George Wieber [george.wieber@erg.com]

Start: 4/11/2022 4:30:00 PM
End: 4/11/2022 5:00:00 PM

Recurrence: (none)

Required Attendees: Davies, Lynne; Chavez, Kimberly; Moncrieffe, Marcia; Osbourne, Margaret; Deppe, Fred; Penland, John; Franklyn, Valarie; Aubuchon, Kenneth; Joe Watson; Wolters, Janosh

Agenda for 4/11/22

1. Pre inspection meeting location
2. H&S/PPE review
3. Any other questions/comments

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Appointment

From: Nance, Earthea [Nance.Earthea@epa.gov]
Sent: 4/13/2022 7:27:15 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]; Rodrigues, Cecil [rodrigues.cecil@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Lannen, Justin [Lannen.Justin@epa.gov]; Murray, Beverly [murray.beverly@epa.gov]; Moncrieffe, Marcia [Moncrieffe.Marcia@epa.gov]; Cheryl Seager [Seager.Cheryl@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Steve Thompson [thompson.steve@epa.gov]; Osbourne, Margaret [osbourne.margaret@epa.gov]; Leathers, James [Leathers.James@epa.gov]; Kudla, Courtney [kudla.courtney@epa.gov]; Lyke, Jennifer L. (ATSDR/DCHI/CB) [jlf1@cdc.gov]; Lyke, Jennifer [Lyke.Jennifer@epa.gov]; Gonzalez, Delia [Gonzalez.Delia@epa.gov]
CC: I-JUNG CHIANG [chiang.i-jung@epa.gov]; Turk, James [turk.james@epa.gov]; SUE DAVIS [Davis.Suea@epa.gov]; Murdock, Russell [Murdock.Russell@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]

Subject: Denka LDH
Attachments: Denka email followup.pdf; EPA Request for Techincal Assistance DLM 4.11.2022-Final.pdf; LSU_Chloroprene Monitoring Report_2022_DRAFT_04112022.pdf; LDHPreliminaryChloropreneAssessment-June2018.pdf; EPA Request for Techincal Assistance DLM 4.11.2022-Final (003).pdf
Location: Microsoft Teams Meeting

Start: 4/20/2022 4:30:00 PM
End: 4/20/2022 5:00:00 PM
Show Time As: Tentative

-----Original Appointment-----
From: Nance, Earthea <Nance.Earthea@epa.gov>
Sent: Wednesday, April 13, 2022 2:27 PM
To: Nance, Earthea; Nance, Earthea; Rodrigues, Cecil; Dwyer, Stacey; McGuire, James; Welton, Patricia; Barnett, Cheryl; Lannen, Justin; Murray, Beverly; Moncrieffe, Marcia; Cheryl Seager; Gilrein, Stephen; Steve Thompson; Osbourne, Margaret; Leathers, James; Yurk, Jeffrey; Kudla, Courtney; Lyke, Jennifer L. (ATSDR/DCHI/CB); Lyke, Jennifer; Gonzalez, Delia
Cc: I-JUNG CHIANG; Turk, James; SUE DAVIS; Murdock, Russell; Garcia, David; Robinson, Jeffrey
Subject: Denka LDH
When: Wednesday, April 20, 2022 11:30 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

Materials added from 3/30 meeting. 4/13

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Turk, James

From: Nance, Earthea
Sent: Tuesday, April 12, 2022 8:06 AM
To: Starfield, Lawrence
Cc: Rodrigues, Cecil; Chiang, I-Jung; Dwyer, Stacey; Gonzalez, Delia; Davis, Suea; Turk, James
Subject: FW: Denka Performance Elastomer, LLC
Attachments: EPA Request for Techincal Assistance DLM 4.11.2022-Final.pdf; LSU_Chloroprene Monitoring Report_2022_DRAFT_04112022.pdf; LDHPreliminaryChloropreneAssessment-June2018.pdf; EPA Request for Techincal Assistance DLM 4.11.2022-Final.pdf

Hi Larry,

I'm sharing a new report from Louisiana State University re: their latest data on community exposures to chloroprene. I'm calling a meeting with my technical staff asap to discuss our response and want to be in lock step with you. At my staff meeting we will develop questions for Dr. Kanter.

-E
cell: 214-980-4620

From: Charlaynne Prentiss <Char.Prentiss@LA.GOV>
Sent: Monday, April 11, 2022 4:23 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Cc: Joseph Kanter <Joseph.Kanter@la.gov>; Aly Neel <Aly.Curro@la.gov>; Kimberly Sullivan <Kimberly.Sullivan@LA.GOV>; Kimberly Humbles <Kimberly.Humbles@LA.GOV>; Neal Elliott <Neal.Elliott@LA.GOV>; Stephen Russo <Stephen.Russo@LA.GOV>; Shannon Soileau <Shannon.Soileau@LA.GOV>; Theresa Sokol <Theresa.Sokol@LA.GOV>; Kimberly Hood <Kimberly.Hood@la.gov>
Subject: Denka Performance Elastomer, LLC

Good Afternoon Dr. Nance:

Please find attached a letter from Dr. Joseph Kanter, State Health Officer of the Louisiana Department of Health regarding Denka Performance Elastomer, LLC, along with the following three (3) attachments:

1- Attachment 1: new LSU report
2- Attachment 2: old LDH report
3- Attachment 3: old LSU report

If you have any questions, please feel free to reach us at (225) 342-3417 or you may email Dr. Kanter directly via joseph.kanter@la.gov

Thank you!

Char Prentiss
Assistant to Joseph Kanter, M.D.
State Health Officer
Louisiana Department of Health (LDH)
628 N. 4th Street, 9th floor (physical)
P. O. Box 629
Baton Rouge, LA 70802

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(225) 342-3417 (voice)
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Char.prentiss@la.gov

John Bel Edwards
GOVERNOR

Dr. Courtney N. Phillips
SECRETARY

State of Louisiana

Louisiana Department of Health
Office of Public Health

April 11, 2022

Via email

EPA Region 6 Administrator
Earthea Nance, PhD, PE
U.S. EPA Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
Nance.Earthea@epa.gov

Re: Denka Performance Elastomer, LLC

Dear Dr. Nance:

Although applicable Louisiana statutes place industrial chemical air emissions under the regulatory purview of the Louisiana Department of Environmental Quality (LDEQ), the Louisiana Department of Health (LDH) has for several years been consulting and working with LDEQ and the affected community to determine and address human health concerns related to emissions of chloroprene from the Denka Performance Elastomer facility in St. John the Baptist Parish, Louisiana (the "Facility"). To that end, LDH has received a copy of the enclosed draft report concerning a demonstration project commissioned by LDH and conducted by the Louisiana State University Health Sciences Center (LSUHSC), entitled *St. John the Baptist Parish Chloroprene Monitoring Demonstration; Subproject of "Cancer Reporting in St. John the Baptist Parish ("CRISP") Project*, dated April 11, 2022. The report raises new concerns about the possible levels of exposure to chloroprene and other chemicals being sustained by community residents near the Facility. LDH is providing you with a copy of the report to enable you to take whatever actions or measures you deem appropriate with regard thereto. Additionally, LDH respectfully requests the assistance and expertise of your agencies with:

- Technical analysis of LSUHSC's newly reported data and findings,
- Assessment of the *need* for additional monitoring, data collection, or other measures, and

- Recommendations regarding *implementation* of any recommended additional monitoring or data collection efforts, including additional public health measures and public advisories.

For reference, we have included herewith copies of the following additional reports related to Denka emissions:

- *Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish* (LDH\OPH, June 14, 2018)
- *Cancer Reporting in St. John Parish* (LSUHSC, Final Report 2021)

Please do not hesitate to contact my office if you need any additional information or reports. We have made a similar request to the U.S. Agency for Toxic Substances and Disease Registry (ATSDR).

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

Joseph Kanter, MD, MPH
State Health Officer
Louisiana Department of Health

Enclosures

cc: Michael S. Regan. EPA Administrator
ATSDR
LDEQ

St. John the Baptist Parish Chloroprene Monitoring Demonstration

Subproject of

"Cancer Reporting in St. John the Baptist Parish (CRISP") Project

Prepared for

Louisiana Department of Health
Office of Public Health

April 11, 2022

Prepared by
Adrienne Katner, D.Env., M.S.
Associate Professor
Environmental and Occupational Health
School of Public Health
Louisiana State University Health- New Orleans

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Disclaimer: The Louisiana State Health Sciences Center (LSUHSC) or LSUHSC School of Public Health (SPH) bear no responsibility for analyses or interpretations of data presented here. Opinions expressed herein, including policy implications, are those of the authors and not of LSUHSC or SPH.

Acknowledgements: This report is based on work supported by the Louisiana Department of Health, Office of Public Health. Drs. Edward Trapido and Donna Williams are acknowledged for their critical review of this report and generous feedback.

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SUMMARY

This report is part of a larger project to review cancer cases in St. John the Baptist Parish, Louisiana "Cancer Risk in St John Parish" (CRISP).[1] This report presents the results of a proof-of-concept demonstration to evaluate the feasibility of applying specific analytical procedures for detecting chloroprene in air and urine. This demonstration was not designed to characterize average chloroprene concentrations at resident homes or to estimate ongoing resident exposures to Denka's chloroprene emissions. Due to limited financial resources, we could collect and analyze only a small number of air and biomonitoring samples.

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to the US Environmental Protection Agency (EPA) for September 2021 revealed that facility operators reported that all chloroprene and neoprene production had ceased throughout the entire month of September.[2] Thus, the air monitoring and biomonitoring results in this report are more characteristics of months in which there is no chloroprene production.

However, the limited air and biomonitoring that was conducted indicate there is a need for further investigation and precautionary policies. Air monitoring revealed chloroprene in the air offsite in areas downwind of the facility, including one elementary school, at levels exceeding the EPA's recommended maximum annual average chloroprene concentration of 0.2 μg/m^3 (0.78 and 0.85 μg/m^3), during a month in which no chloroprene was being produced and emissions were reportedly the lowest on record (Sept 2021). Biomonitoring of residents in the surrounding area also suggested the presence of metabolites of three parent compounds, chloroprene, 1,3-butadiene, and epichlorohydrin, which EPA classifies as likely, known and probable carcinogens, respectively.

[1] For more information about this project see: https://louisianacancer.org/st-john/

[2] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

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APPROACH

Ten residents within a half mile of the Denka Performance Elastomer facility in LaPlace, LA were recruited by word of mouth for air and urine sampling at locations #1,3 and 4 on **Figure 1**). Participants were recruited in the month prior to field sampling, but Hurricane Ida hit the area on August 29, 2021, disrupting monitoring plans as many residents had evacuated and could not return due to widespread destruction. Between September 22nd and 23rd, 2021, air monitoring around the Denka Performance Elastomer on River Road, LaPlace, LA commenced. Prior to sample collection we asked study participants to avoid using products or engaging in activities that would ordinarily expose them to VOCs, in an attempt to isolate exposures that may be coming from Denka. Air samplers were situated outside at the residence location. There were no active generators or other potential sources of VOCs in the area of air sample collection. Active sampling was used where air is pumped through a tube with sorbent material to capture volatile organic compounds (VOCs). On the 22nd wind was blowing from the northwest to the southeast and air samples were collected at sites 1,2, 3, 4 and 8 (**Figure 1**). On the 23rd wind was blowing from the northeast to the southwest and air samples were collected at sites 4, 5, 6, 7 and 9 (**Figure 1**). Urine samples (30 mL) were also collected from available participants residing at the locations where air samples were collected. Urine samples were collected on the night of September 22 and/or the morning of September 23 (sites 1,3 and 4, **Figure 1**). All urine samples were coded for de-identification purposes, double-wrapped in zip lock bags, placed in ice chests immediately after collection, transferred to a freezer and frozen for 24 hours before being packed in ice and shipped to the appropriate laboratory overnight. Dr. Adrienne Katner of LSU Health conducted all sample collection. Dr. Chung-Ho Lin conducted all sample analyses at the University of Missouri-Columbia.[3] Air samples were evaluated for chloroprene and other VOCs; and urine samples were evaluated for chloroprene metabolites. **Appendix A** presents the laboratory report on the air sample analysis, QA/QC protocols and results. **Appendix B** presents the laboratory report on urine sample analysis, QA/QC protocols and results.[4] **Appendix C** presents a summary of all air and urine sample results.

---

[3] Sorbent Tube Analysis: INSTAAR Labs (Institute of Arctic and Alpine Research—Dr Detlev Helmig) INSTARR uses FID/MS protocols for VOC analysis in air samples collected in sorbent tubes. Sorbent tubes (SKC Inc. Eighty Four, PA, Cat# MX062131 4-1/2" L packed with 20:35 mesh Tenax-TA/ Carboxen 1000/Carbosieve SIII) are the most widely used collection media for sampling hazardous gases and vapors in air, mostly as it relates to industrial hygiene. They were developed by the US National Institute for Occupational Safety and Health (NIOSH) for air quality testing of workers. Sorbent tubes are typically made of glass and contain various types of solid adsorbent material). Commonly used sorbents include activated charcoal, silica gel, and organic porous polymers. Solid sorbents are selected for sampling specific compounds in air because they: 1. Trap and retain the compound(s) of interest even in the presence of other compounds 2. Do not alter the compound(s) of interest 3. Allow collected compounds to be easily desorbed or extracted for analysis. Sorbent tubes are attached to air sampling pumps for sample collection. A pump with a calibrated flow rate in ml/min is normally placed on a study participant's belt or other clothing, and it draws a known volume of air through the sorbent tube. Chemicals are trapped onto the sorbent material throughout the sampling period. The absorbent tube is then placed in a heated chamber and purged with an inert gas. VOCs are thermally desorbed into a cryogenic trap, cryofocused onto the transfer line, separated by GC and analyzed by a positive ion electron impact Mass Spectrometer (MS).

[4] Urine Analysis Protocol: Dr Chung-Ho Li (University of Missouri) Analysis of VOCs by SPME followed by GC-MS To quantify the volatile organic compounds (VOCs) in the urine samples, including benzene, toluene, xylene, trimethylbenzene, the toluene-d8 was spiked into the samples as the internal standard, the VOCs were extracted by a headspace solid-phase microextraction (SPME) using a 85mm carboxen/polydimethylsiloxane fiber followed by the analysis with an Agilent 6890N gas chromatography coupled with an Agilent 5973N quadrupole mass spectrometer (GC-MS). Analysis of Hydrophobic Metabolites by Liquid-Liquid Extraction followed by GC-MS The hydrophobic metabolites in the urine samples were extracted by a water:dichloromethane (1:1, v/v) liquid– liquid procedure described

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RESULTS

Air Sampling and Analysis

Two out of ten air samples had detectable chloroprene (Sample #4 and 5 in **Figure 1** and **Appendix C**). Both sampling sites were downwind of the Denka plant on the day the sample was collected (9/23/2021). **Chloroprene was not detected in the air samples collected for the remaining samples on September 22 or 23, 2021.** This could occur if there were no chloroprene in the air at the specific sample collection site on that date or if the chloroprene levels were below the analytical limits of detection (<0.005 µg/m^3).

- **One positive air sample (0.78 µg/m^3) was collected on September 23, 2021 by the 5th Ward Elementary School** at the gate of the EPA air monitor (west of Denka) at 158 Panther Dr. Reserve LA 70084 (site #5 in **Figure 1**). No air samples were collected from this site on Sept 22nd. Active air sampling started at 11:33 am on this day and lasted until 5:58 pm. Winds were from the northeast to the southwest that day, thus this area would be in the direction of winds blowing from Denka. On this same day, the school also had relatively higher levels of toluene, benzene and xylene (**Appendix C**); however, air concentrations for these VOCs did not exceed EPA's chronic exposure Reference Concentrations (RfC) for non-cancer health effects. It should be remembered that Denka was not operational during the month of September 2021 due to Hurricane Ida.[5] EPA had previously requested that Denka undertake air monitoring for 1,3-butadiene, along with chloroprene, toluene, benzene, xylene and ethylbenzene.[6] Results for 1,3-butadiene are still pending due to delays in the specific reference standards.
- **Another positive chloroprene sample (0.85 µg/m^3) was collected on September 23, 2001**, at residence #4 across the street from the 5th Ward Elementary School (see **Figure 1**). Active air sampling started at 11:37 am and lasted until 5:58 pm. Winds were blowing in this direction from Denka. This residence also had relatively higher concentrations of benzene and toluene on the same day; however, air concentrations for these VOCs did not exceed EPA's RfC. The prior day (Sept 22nd), this residence had relatively higher concentrations of benzene, 1,2,4-trimethylbenzene,[7] toluene and xylene; however levels were lower than EPA's RfC. The resident at this home also had detectable DHBMA, HOBMA, CHPMA, Cl-MA-II

by Lin (2007 and 2008). The identification and quantification of these metabolites were performed using a Varian 3400cx GC with a Hewlett Packard cross-linked methylsiloxane DB-5 capillary column (30 m x 0.25 mm I.D.) coupled with a Varian Saturn 2000 ion-trap mass selective detector (Varian Inc., Walnut Creek, CA).

[5] The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

[6] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

[7] We could not find reports of 1,2,4-trimethyebenzene emissions from Denka. This compound is used to make high performance polymers and resins.

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and III metabolites in their urine on Sept 23rd, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin, which are all used in the plastics industry.

- **Other sites had detectable levels of other VOCs.** Relatively higher levels of toluene were detected at Sites 1, 2, 3, 7 and 8; and higher levels of benzene (>1 μg/m³) were detected at Sites residences 1 and 4, and site 5, the Fifth Ward Elementary School (see **Figure 1** and **Appendix C**).[8] A resident at site #1 also had detectable levels of DHBMA, HOBMA, CHPMA, Cl-MA-I, II, and III, suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin. EPA monitoring detected other VOCs around Denka on Sept. 16 and 18, 2021, and found acrylonitrile and vinyl chloride at air levels above Response Screening Values.[9]

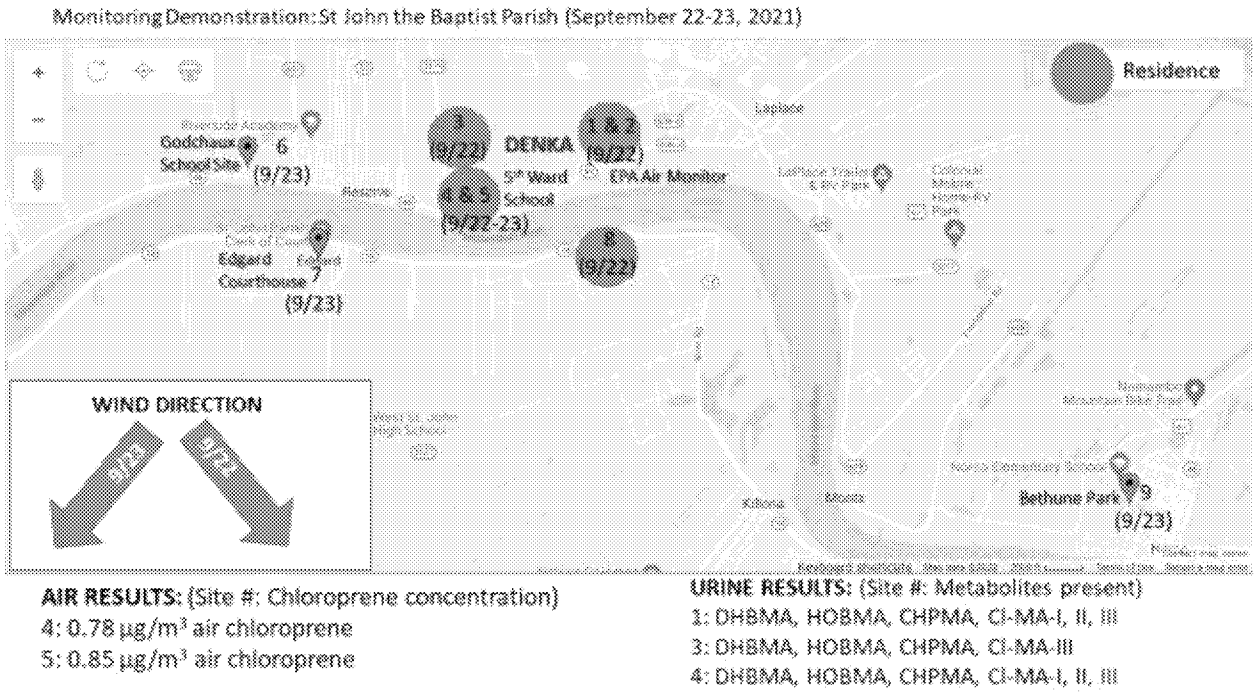

Figure 1. Air sample locations around the Denka facility (2021). In total nine sites were monitored numbered 1 through 9). Dates in which air samples were collected are indicated in parentheses near each site in the map. Sites in bold red are residential areas where urine samples were collected from residents. The locations of residences are shielded with a larger circle to protect residents' privacy.

[8] For every 1 μg/m³ of benzene there is 2.2 cancers per every one million people exposed, based on EPA's Inhalation Unit Risk value for benzene of 2.2E-06 per μg/m³. Benzene is formed from both natural processes and human activities. Sources include fires, gasoline, cigarette smoke, but it is also emitted by Denka.
[9] EPA performed 24 hour summa canister collected air samples upwind and downwind of the Denka facility beginning on September 11, 2021. September 16, 2021, the Denka downwind air sample contained Acrylonitrile above the Response Screening Level of 2.09 ug/m3. The value was 3.62 ug/m3. On September 18, 2021, the Denka downwind air sample contained Vinyl Chloride above the Response Screening Level of 2.24 ug/m3. The value was 2.61 ug/m3. **Acrylonitrile** causes severe irritation of the skin and blistering. It can irritate the eyes, nose and throat. Breathing Acrylonitrile can irritate the lungs, causing coughing and/or shortness of breath. Acrylonitrile can cause headaches, dizziness, confusion, nausea, vomiting. **Vinyl Chloride** causes severe irritation and burns the skin and eyes with possible eye damage. Breathing Vinyl Chloride can irritate the nose, throat and lungs, causing coughing wheezing and/or shortness of breath. Vinyl Chloride can cause headaches, nausea, vomiting, dizziness, fatigue, weakness and confusion. Acrylonitrile is used to produce high-impact plastics; while vinyl chloride is used to make polyvinyl chloride (PVC), which is used to make a variety of products, including plastics.

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Urine Sampling and Analysis

Metabolites indicating VOC exposures were detected in all of the nine urine samples collected from seven participants residing at the three locations sampled (#4, #3 and #1) (**Figure 1**). These were the only sites where non-evacuee residents were available to provide urine samples. **Metabolites detected included DHBMA, HOBMA, CL-MA-I, II, and III,** suggesting exposure to chloroprene, 1,3-butadiene and epichlorohydrin.

- **DHBMA, a metabolite of both chloroprene and 1,3-butadiene, was detected in all urine samples collected.** The highest levels of DHBMA were from the participant at site #1, adjacent to EPA's air monitor southeast of Denka (**Figure 1**).[10] DHBMA is the main product in chloroprene metabolism, but it is also a product of 1,3-butadiene metabolism. Denka is the sole source of chloroprene in the area— it does not occur naturally (NTP 2011)[11].Chloroprene is classified by EPA as likely to be carcinogenic to humans; and is associated with irritation to eyes, skin, and airways, damage to lungs, liver and kidneys, headaches, fatigue, irritability, dermatitis, hair loss, and cardiovascular and immune systems disorders. While chloroprene is Denka's highest risk emission release (35,718 pounds), the third highest risk emission from Denka based on EPA's analysis is 1,3-butadiene (2,039 pounds), a known carcinogen.[12] Denka's production of chloroprene is dependent on 1,3-butadiene to produce synthetic rubber, but it is also found in smaller amounts in automobile exhaust, tobacco smoke and other sources. EPA requested Denka monitor for 1,3-butadiene, which began in December, 2021, along with monitoring for toluene, chloroprene, xylene, benzene and ethylbenzene. 1,3 Butadiene was detected at the Western edge of Denka property on August 26, 2021 (7.7 $\mu g/m^3$); at Ochsner Hospital on August 31, 2021 (4.4 $\mu g/m^3$); and at the Western edge of the Denka property on January 12, 2022 (2.6 $\mu g/m^3$), and January 26, 2022 (8.1 $\mu g/m^3$).
- **We suspect the presence of HOBMA, CHPMA, and Cl-MA-I, II, and III metabolites in participant urine;[13] however, we could not verify the identity of these metabolites due to the lack of specific reference standards.** Cl-MA-I, II and III are unique metabolites of chloroprene; HOBMA is a metabolite of both chloroprene and 1,3-butadiene; and CHPMA is a specific metabolite of the probable carcinogen epichlorohydrin.[14-15] Five of seven residents had CHPMA in urine— the highest levels were at sites 1 and 4 (**Figure 1** and **Appendix C**).

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[10] For non-smokers, median DHBMA were 100-300 µg/l creatinine. In this demonstration, DHBMA concentrations ranged from 139 $\mu g/m^3$ to 568 $\mu g/m^3$.
[11] NTP (National Toxicology Program). (1998). Toxicology and Carcinogenesis Studies of Chloroprene (CAS No. 126-99-8). National Toxicology Program Technical Report Series, 9(467), 1–379. Retrieved from http://www.ncbi.nlm.nih.gov/pubmed/12579206
[12] EPA classifies 1,3-butadiene as a known human carcinogen. It is also associated with irritation to the eyes, throat, nose, and lungs; damage to the central nervous system, distorted vision, vertigo, fatigue, decreased blood pressure, headache, nausea and fainting. EPA EasyRSEI Dashboard V 2.3.10 for Denka: LINK
[13] **Notes:** (1) 3,4-dihydroxybutyl mercapturic acid (DHBMA); (2) 4-hydroxy-3-oxobutyl mercapturic acid (HOBMA); (3) 3-chloro-2-hydroxypropyl mercapturic acid (CHPMA); (4) 4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I); (5) 4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II); (6) 3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III). See: https://onlinelibrary.wiley.com/doi/pdf/10.1002/3527600418.bi12699e2115
[14] Epichlorohydrin is a highly reactive compound used in the production of glycerol, plastics, epoxy glues and resins, epoxy diluents and elastomers. Exposure to epichlorohydrin may irritate mucous membranes, and cause nausea, cough, labored breathing, lung inflammation, renal lesions, and hematological effects.
[15] The only source of epichlorohydrin in the area appears to be Shell Norco (7-8 miles away). LDEQ EDMS Query for "epichlorohydrin". Available at: https://edms.deq.louisiana.gov/edms/v2/advanced-search

DISCUSSION

Several logistical issues and field conditions impacted the likelihood of detecting chloroprene in the air, or chloroprene metabolites in urine. By the time researchers commenced monitoring, chloroprene and neoprene production at Denka had ceased due to Hurricane Ida, which severely impacted the area on August 29th, 2021. A retrospective review of Denka's emissions reported to EPA for September 2021 revealed that facility operators reported no chloroprene production throughout the entire month of September.[16] Denka calculated a monthly average chloroprene emission of 0.04 µg/m^3 for September 2021, the lowest on record.

However, chloroprene was detected downwind of Denka on September 23rd, 2021, during a period of no reported chloroprene production. Chloroprene does not occur naturally in the environment— Denka is the sole source of emissions in the area. Chloroprene levels at or across the street from the elementary school were estimated to be 0.78 and 0.85 µg/m^3 on Sept. 23rd—approximately four times above the EPA's recommended maximum annual average chloroprene air concentration of 0.2 µg/m^3. This recommended chloroprene air concentration was set to limit cancer risk among 1 million persons to 100 cancer cases per year. Denka's air monitors also detected chloroprene in September 2021, with concentrations as high as 4.7 µg/m^3 (Sept. 22) at the western edge of Denka's property, and 24 µg/m^3 (Sept. 27) at the eastern edge. These levels were between 23 and 2120 times above 0.2 µg/m^3.[17] The EPA's chloroprene air limit is a recommendation, not a required regulatory standard. However, it is important to understand that levels below state and national air quality standards cannot always ensure zero health risks,[18] especially when considered in the context of simultaneous exposures to other facility-specific emissions.

The facts presented support concerns about a likelihood of chronic exposure to low doses of chloroprene at levels which may have potential health impacts on vulnerable populations. Children attending 5th Ward Elementary School and residing in the community may be regularly exposed to levels of chloroprene at or above 0.2 µg/m^3, which when considered in conjunction

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[16] In the EPA Emergency Response report from Hurricane Ida, Denka Performance Elastomer, LLC Facility Report, Denka reported on September 1, 2021, no pollution threat. Assessment condition was reported as "damaged- no discharge/release, facility did not flood, facility is operating on generator, no further action". On September 17, 2021, Denka reported "The damage to the report is extensive, but limited almost entirely to office buildings and we sustained no releases of chemicals. If we have reasonable expectations of tropical storm force winds or stronger impacting the site, we clear out all the units and send everything back to tanks for the duration of the storm, and we maintain a crew onsite to deal with any issues should they arise, which they didn't in this case, aside for losing power for several days."

[17] LDEQ Electronic Document Management System. AI: 199310 for monthly monitoring and emission estimate reports: LIHK

[18] For example, extensive research suggests that certain pollutants (e.g., PM2.5) have negative health impacts below current air quality standards. See the Oct 22, 2019 Letter to EPA Secretary Andrew Wheeler from the Independent Particulate Matter Review Panel summarizing the scientific evidence that the current PM2.5 standard is inadequate to protect public health. Available at https://yosemite.epa.gov/sab/sabproduct.nsf/81DF5685460CC14F8526849800431448/%24File/Independent+Particulate+Matter+Review+Panel+Letter+on+Draft+PA.pdf/.

with exposures to other VOC emissions from Denka, is a concern.[19] Chloroprene has been manufactured at this site since 1969, thus it constitutes a chronic (>5 decades) exposure. Based on air monitoring data from both EPA and Denka, chloroprene continues to occur with some regularity at levels exceeding 0.2 μg/m^3, even after emission control technologies were installed in February 2018.[20] In 2021, chloroprene air concentrations were as high as 1.8 μg/m^3 at a site two miles away from the facility (at Edgard Courthouse, site #7 on **Figure 1**); and as high as 20.2 μg/m^3 at a site one mile from the facility (at Ochsner Hospital). When the proximity of 5th Ward Elementary School is considered (0.3 miles or 500 yards from the Denka facility), it is not unexpected that levels were detected at the school in 2021 as high as 20.7 μg/m^3 by Denka (103 times higher than 0.2 μg/m^3), and as high as 3.34 μg/m^3 by EPA (16 times higher than 0.2 μg/m^3).

While biomonitoring data did not conclusively link exposures to chloroprene, the presence of metabolites of chloroprene, 1,3-butadiene and/or epichlorohydrin are a concern as these are likely, known and probable carcinogens, respectively, which are associated with plastics production. Furthermore, their presence was unanticipated, given the absence of chloroprene production throughout September (2021). While the source of epichlorohydrin is currently unknown, it was not entirely unexpected to find metabolites of chloroprene and/or 1,3-butadiene in resident urine. On June 15, 2021, the EPA requested Denka to undertake air monitoring for 1,3-butadiene, which commenced in Dec. of 2021, along with monitoring for chloroprene.[21] 1,3 Butadiene was detected at the Western edge of Denka property on Aug. 26, 2021 (7.7 μg/m^3); at Ochsner Hospital on Aug. 31, 2021 (4.4 μg/m^3); and again at the Western edge of Denka property on Jan. 12, 2022 (2.6 μg/m^3), and Jan. 26, 2022 (8.1 μg/m^3).

There is a need for a cumulative risk assessment for all Denka emissions, both carcinogens and non-carcinogens, especially considering the similarities in health outcomes from many of the VOCs found in resident air space and/or urine. The current health assessment approach used by LDH which bases risk decisions on one chemical, chloroprene, is unrealistic and underestimates risks faced by this population from other emissions and emission sources. Currently, LDEQ's process for evaluating whether or not there is an environmental injustice prior to approving a permit application is also limited in scope, such that the real-world exposures to communities are

[19] Even with the decrease in production of Chloroprene and Neoprene from July to August 2021, the August 2021 monthly average Chloroprene ambient air emissions concentration increased 3.4 fold when compared to July 2021 (0.81 ug/m3 to 2.76 ug/m3 monthly average).

[20] A review of chloroprene air concentrations based on data collected in 2021, revealed that the highest chloroprene levels occurred in January 2021 at three of the six air monitoring locations: 1) the Intersection of Hwy 44 and IC Railroad (36.9 μg/m^3); 2) the southwest corner of Ochsner Hospital (20.2 μg/m^3); and 3) the Mississippi River Levee (19.2 μg/m^3). During this month (Jan 2021), Denka estimated a monthly average chloroprene emission of 3.49 μg/m^3.

[21] The EPA request was based on the May 6, 2021, EPA Office of Inspector General's report, "EPA Should Conduct New Residual Risk and Technology Review for Chloroprene and Ethylene Oxide-Emitting Source Categories to Protect Human Health, May 6, 2021: EPA. EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health. Report #21-P-0129. US EPA Office of Inspector General. May 6, 2021. Available at: https://www.epa.gov/office-inspector-general/report-epa-should-conduct-new-residual-risk-and-technology-reviews.

not considered, i.e., the cumulative and synergistic effects of multiple pollutants from all facilities within an area. Cumulative health impacts from population exposures beyond cancer have largely been ignored in studies of this population. The single-minded focus on cancer may have distracted authorities from identifying other health impacts of Denka's emissions. Cancer has a long latency of years to decades, yet, the increasing frequency of disasters like Hurricane Katrina, the Great Flood of 2016, and Hurricane Ida makes it improbable that this population will remain in place long enough to enable a prospective study of cancer rates in this population. It could also be that many in the population aren't living long enough to develop cancer due to earlier deaths from respiratory or cardiovascular diseases, or they may be moving away for access to better healthcare or jobs. It is a widespread and oft-repeated misconception that the lack of significantly higher cancer rates for a larger geographic area means there is no problem in a subpopulation within that area. It is hard to achieve statistical significance for any health statistic when the population is small, as is the case in fenceline communities. One also cannot assume that data for a broader geographic area characterizes health effects of a smaller circumscribed community, as rates for the relevant community are often diluted by those of the larger unexposed population. This makes detection of problems difficult to identify in fenceline communities, even if they do exist.[22-23]

There is a lack of prompt risk communication and transparency from several agencies within the State that is frustrating efforts to establish trust with the surrounding community. Despite years of air monitoring that is now available in the aftermath of the installation of Denka's chloroprene emissions reduction technology, no follow-up to the "Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish" of 2018 has ever been conducted by the Louisiana Department of Health (LDH).[24-25] However, biomonitoring conducted for this and prior investigations by the lab supporting this demonstration confirms community exposure to chloroprene is occurring.[26] In another event from 2015, LDH documented two separate incidents of sudden onset student illnesses that occurred down the street from the Fifth Ward Elementary School, at St. John the Baptist District's Leon Godchaux School, in which it concluded that

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[22] LDH dismissed the "all cancer" incidence rate on the basis that it "is not very useful for explaining or exploring potential etiologies since there are many known risk factors for cancer such as smoking, occupational exposures, etc. that are not controlled in the cancer incidence rates." While this is true, it should be acknowledged that it is often difficult to link some chemicals to a specific disease especially when the chemical has been associated with different diseases, as is the case with chloroprene. This is particularly important given the fact that chloroprene is a mutagen. One characteristic of mutagenesis is induction of tumors at multiple sites and in different species, and this can be triggered theoretically by a single molecule. In mice, chloroprene caused tumors "in a wide variety of mouse tissues, including lung, kidney, Haderian gland, mammary gland, forestomach, liver, skin, mesentery, and Zymbal's gland." Thus, there is the likelihood that different exposed individuals in a population may manifest cancer in different organs, thereby rendering the investigation of an "all cancer" rate necessary in such cases. See "Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John Parish: Evaluation of Potential Health Risks for Elementary School Students based on Early Sampling Results following Emissions Reduction". Louisiana Department of Health, Office of Public Health, Section of Environmental Epidemiology and Toxicology. New Orleans, LA June 14, 2018. LINK

[23] ATSDR. 2005. Ch 7: Health Effects Evaluation: Screening Analysis, Public Health Assessment Guidance Manual. LINK; EPA Toxicological Review of Chloroprene (CAS No. 126-99-8). In Support of Summary Information on the Integrated Risk Information System (IRIS). September 2010. Washington DC: US EPA. LINK

[24] LDH. A Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish. June 14, 2018. OPH, SEET. Available at: https://ldh.la.gov/assets/oph/Center-EH/DENA/PreliminaryChloropreneReport.pdf

[25] Katner A. Independent assessment of the environmental conditions of public school locations within St. John the Baptist Parish, Louisiana. Prepared for the NAACP. September 30, 2020.

student illnesses, which included respiratory ailments, headache, vomiting, burning eyes and weakness, were likely due to industry emissions.[26] LDH has never released its report of this public health emergency— it is unknown whether school district administrators, parents, residents and other parish officials were ever aware of these incidents. The school impacted by these releases is adjacent to Air Product/Evonik, which made the EPA's 2018 list of the 25 facilities releasing the most ethylene oxide in the nation. The specific health symptoms reported by the LDH during the prior 2015 events are similar to those reported in the literature for ethylene oxide and methyl isobutyl ketone, both chemicals emitted from the Evonik. EPA advised Louisiana Department of Environmental Quality (LDEQ) officials to alert the community around this facility about potential risks, but this information was also not communicated to the public. It would not be until August 24th, 2021 when these communications were finally made by EPA to individuals within this population, six years after the events at the Leon Godchaux school.

These and other facts support the need for further investigation and precautionary practices, considering the five decades of chloroprene use at the site and ongoing release of VOCs during that period, the ongoing detection of chloroprene at levels of potential concern at offsite areas where vulnerable populations congregate and live, the gaps in scientific knowledge about the carcinogenic and noncarcinogenic health effects of chronic exposure to industrially released VOC mixtures, and the plausibility of adverse cumulative health impacts on vulnerable populations from chronic exposures to low levels of chloroprene and VOC mixtures. The presence of children a mere 500 yards from the Denka facility should trigger proactive precautionary measures in the absence of direct evidence of harm, to address gaps in public health protection that may be brought on by weaknesses in LA's regulatory oversight and public risk communications that were previously reported by other government oversight officials.[27] Given LA's history of industrial accidents,[28] it is also critical that authorities put in place systems to protect children and residents from adverse outcomes in the event of accidental releases and emergency incidents. Between 2017 and 2021, there were nine emergency incidents reported at Denka alone based on LDEQ records (averaging >1 per year). Louisiana's Administrative code defines an emergency condition as any "which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land,

[26] Action Plan: Denka Performance Elastomer, LLC- Pontchartrain Facility: LaPlace, St. John Parish, Louisiana. US EPA, Washington, DC. June 2016. LINK
[27] The years-long delayed risk communications by LDEQ to the public regarding ethylene oxide emissions from Evonik and Union Carbide which results in excess risks in every census tract in St. John the Baptist Parish was admonished by the EPA- see EPA Office of Inspector General. 2020. Report #20-N-0128. Management Alert- Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns. Available at: https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide/inspector-general-follow-ethylene-oxide-0).
[28] Surveillance reports are limited due to lack of ongoing funding, but state incidents recorded by the State include: (1) Louisiana Hazardous Substances Emergency Events Surveillance (HSEES) System. 2001-2009: A Cumulative Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2001-2009_HSEES_Report.pdf; and (2) Louisiana Toxic Substances Incident Program (LATSIP). 2010-2013: A Summation Report. Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available at: Section of Environmental Epidemiology and Toxicology, LA Department of Health and Hospitals. Available https://ldh.la.gov/assets/oph/Center-EH/envepi/LaTSIP/Documents/Annual_Reports/2010-2013_LaSTSIP_Report.pdf

water or air environment, or cause severe damage to property" (LAC 33:I.3915). Currently, communities are only notified of emergency incidents in their area when there is an order for shelter-in-place or evacuation. Incidents reported to LDEQ, State Police or parish emergency response agencies are often not posted publically, rather they are posted on LDEQ's Electronic Documents Management System (EDMS), a system which the public is unfamiliar with, and which only reports emergency incidents after delays of up to a week.

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RECOMMENDATIONS

It is important to note that the academic reaction to data such as those in this project is to call for more studies. While it is always important to add to the body of knowledge concerning public health, particularly when it is sparse, as is the case with chloroprene, when there are expected risks to a population, the emphasis should be on proactive monitoring, mitigation and exposure prevention.

- **Cumulative risk assessments should be conducted by LDH and LDEQ for health assessments, and permit applications, respectively.** In the case of Denka, both carcinogenic and non-carcinogenic health risks should be estimated, based on the mixtures of chemical releases by source and in association to other sources. These risks can be based on both reported estimated emissions and offsite air monitoring results for chloroprene and other VOCs. Chemicals of potential concern include: chloroprene, 1,3-butadiene, BTEX (benzene, toluene, ethylbenzene, xylene), and 1,4-dichloro-2-butene. Further investigation of the source and levels of epichlorohydrin in the air may also be warranted. Other emissions of potential concern may be released by other facilities in the area, like Union Carbide's and Evonik's release of ethylene oxide. EPA is releasing a revision of its 2003 "Framework for Cumulative Risk Assessment", which enables consideration of chemical mixtures.[29] It is recommended that LDH and LDEQ follow this framework to conduct more real-world analyses of risks to fenceline communities.[30] Chemicals of potential concern will have to be determined for each site, but they should be based on EPA's Toxic Release Inventory Risk Screening Indicator (RSEI) model.

- **In addition to cancer outcomes, LDH should track non-cancer health outcomes** to evaluate potential impacts to the population from multiple emissions released by Denka and other facilities in the area. Other adverse health outcomes which may be due to cumulative exposures to pollutant mixtures should be evaluated including, but not limited to those which are common for VOC's like irritation to eyes, nose and throat, headaches and nausea, skin reactions, fatigue, damage to lungs, liver, kidneys, and central nervous systems, blurred vision. Other health effects of potential concern include: cardiovascular and respiratory diseases like COPD and asthma, reproductive and immune system disorders, hematological effects and psychosocial impacts. Some of the more serious diseases can be tracked via Louisiana's

[29] U.S. EPA. Framework for Cumulative Risk Assessment. Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.
[30] U.S. EPA. Framework for Cumulative Risk Assessment. US EPA, Office of Research and Development, Center for Public Health and Environmental Assessment (CPHEA), formerly known as the National Center for Environmental Assessment (NCEA), Washington Office, Washington, DC, EPA/600/P-02/001F, 2003.

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Hospital Inpatient Discharge Database (LAHIDD), but other sources like Louisiana's Emergency Department dataset will be more useful for documenting less impactful, sudden onset outcomes like asthma outbreaks.

- **LDH should implement a school-based health surveillance system.** High risk schools in fenceline communities should have the infrastructure necessary to implement active health surveillance and support programs. Case counts should be collected daily for asthma, rashes, nausea, vomiting, burning nose and eyes, headache, dizziness, etc. In instances where health risks and/or effects are documented, LDH should be proactive in ensuring access to appropriate health care for affected communities. If a health surveillance system were established in high-risk fenceline schools, this information should be released to the public to enable informed decision-making, especially by parents of sick or immune-suppressed children. School officials should also be taught how to engage with LDH, LDEQ, Parish, and neighboring industry officials to investigate adverse health outcomes and events in relation to suspected industry emissions.

- **If funds allow, biomonitoring should be used by LDH to quantify resident and child exposures to chloroprene.** It is advised to use reference standards specific to chloroprene's unique metabolites, Cl-MA-I, II and III, in conjunction with reference standards specific to DHBMA, chloroprene's predominant metabolite. Simultaneous collection of personal air samples of both chloroprene and 1,3-butadiene will be useful to better characterize exposures and related metabolites by gender, age group, physical activities, and other associated factors. Biomonitoring will establish population exposures to a unique industrially produced compound. It will enable further tracking of these residents over time to establish potential health effects, both carcinogenic and noncarcinogenic. Epidemiologists should be engaged to ensure the study design meets scientific standards needed to characterize dose-response relationships.

- **Denka should to be required by LDEQ to conduct online real-time fenceline and offsite continuous air monitoring** to track the spatial dispersion and temporal patterns of chloroprene and other VOC air emissions (i.e., 1,3-butadiene, 1,4-dichloro-2-butene, and BTEX) in areas around the facility used by vulnerable individuals (e.g., 5th Ward Elementary School). This online air monitoring system should allow for real-time text messages or email alerts to residents, authorities and vulnerable groups (e.g., school authorities, day care operators, etc.) when concentrations exceed regulatory standards and health-based guidance.

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- **It is critical that the LDH and the LDEQ work together to adopt proactive precautionary practices and policies and establish a trust-based supportive relationship with the community.** Frequent public communication, timely follow-up of concerns, prompt risk communication during emergencies, and data and report transparency is essential to establishing trust within this and other fenceline communities. Ultimately, there is a need for the LDH and LDEQ to adopt proactive precautionary practices and policies to prevent future siting of industries adjacent to residences, schools, daycares, parks, hospitals, nursing homes, and low-income housing, when these industries put citizens at risk. It is of paramount importance that LDH and LDEQ set higher standards for the safety and well-being of this, and other fenceline communities.

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Analysis of Pollutants in the Air Samples by Thermal-Desorption coupled with Gas-Chromatography Mass Spectrometry (TDU-GC/MS)

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Sample collection

The volatile organic compounds (VOCs) were sampled by passing approximately 74 liters of air at flow rate of 0.18 L/min (depending on the sampling duration and individual calibrated pump flow rate) through pre-conditioned sampling tubes (70 mm long and 6 mm in outer diameter) containing layers of sorbent material (CDS 20:35 mesh Tenax-TA/Carboxen1000/Carbosieve). The air pump (SKC Model 222-3, SKC Inc., Pennsylvania, USA) with the sampling tube was carried (or attached) by the individual who worked or lived near by the sources of the pollutants. After completion of the sampling, the tubes were removed from the samplers and sealed in clean glass tubes, and stored at –20°C until analysis.

Thermal desorption and GC-MS analysis

The VOCs were analyzed using a thermal desorption unit (TDU) interfaced to gas chromatography–mass spectrometry. In brief, air sampling tubes were loaded in CDS Model 7500 Thermal Desorption Autosampler (Oxford, PA) which was followed by Dynatherm 9300 TDA (Oxford, PA) interfaced to an Agilent 6890N Gas chromatograph. The VOCs were thermally desorbed by TDU at 300°C for 5 min. Helium was used as carrier gas at a flow rate of 20 mL/min. Following the desorption process, the VOCs were concentrated by a focusing trap packed with 60:80 mesh Tenax-TA/Carboxen 1000/Carbosieve SIII. The focusing trap was initially set at 45°C, and the oven temperature was then raised to 300°C. The analytes were then transferred to an Agilent 6890N gas chromatography system coupled with an Agilent 5973 quadrupole mass spectrometer (GC-MS) through a transfer line set at 225°C. The VOCs were separated by a 5% phenyl 95% dimethylarylene siloxane Agilent DB-5MS capillary column (30 m x 0.25 mm I.D.). The GC temperature program was initially set at 45°C for 3 minutes, then increased to 250°C at 15°C/min, and was held for 10 minutes, using split injection with split ratio 5:1 and constant carrier gas flow (He, 1.0 mL/min). Injector temperature was held at 275°C, transfer line between the GC and mass spectrometer was held at 150°C, and the MS source (quadrupole) was held at 230°C. The mass spectra of each peak identified on chromatograms were characterized by comparison with the mass spectra of commercially available reference standards and mass spectral libraries supplied by National Institute for Standard and Technology (NIST/EPA/NIH). Acquisition was started after a 3 minute solvent delay (Lin et al. 2007). The selected ions, retention times, calibration equations, extraction recovery rates, reproducibility and correlation coefficients of the calibration equations, limits of detection (LOD) for the detection and quantification were summarized in **Table 1** as described from our previous air quality studies (Vu et al. 2018).

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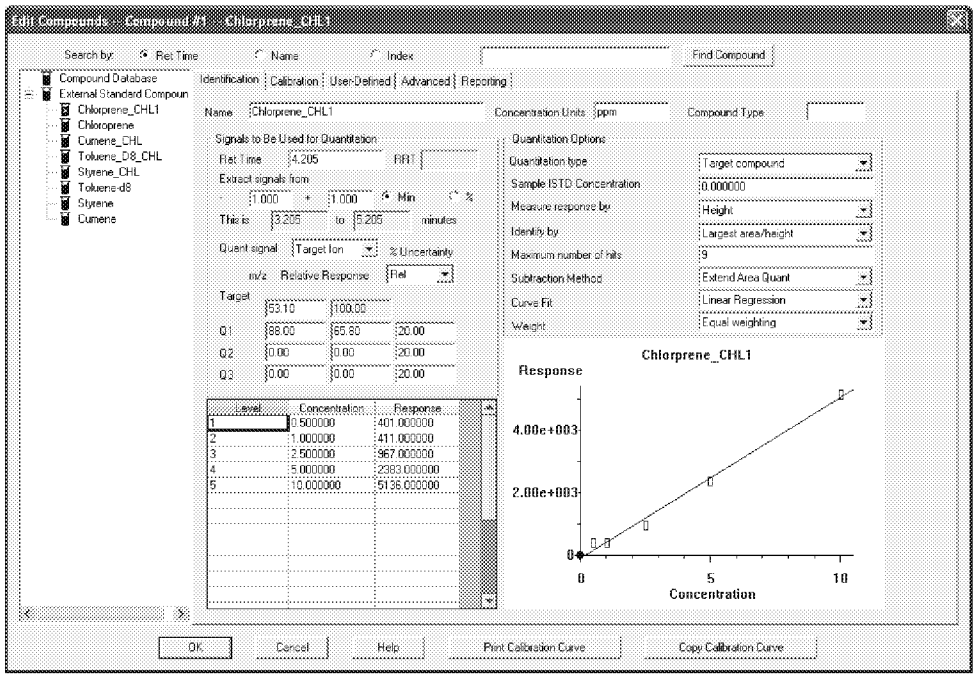
Chloroprene

The instrument LOD is 0.25ppm (ng/µL) x 2 µL = 0.5 ng

LOD = 0.5 ng/100L = 0.005 ng/L = 0.005 µg/m^3

The signals responses were determined by the signal height and signal peak areas. The R^2 of the correlation for the calibration equation is 0.992.



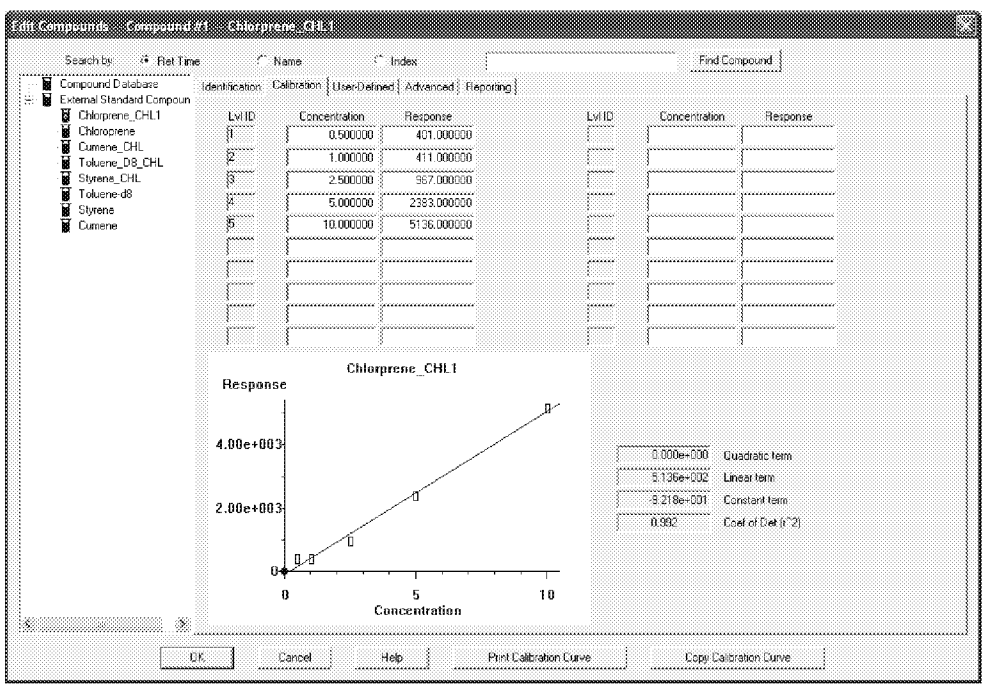


Table 1. Summary of retention times, monitored ions, calibration curves, and recoveries, precisions and detection limits of the other targeted VOCs

No.	Compounds	Retention time (min)	Monitored primary* and secondary ions	Equation	Coefficient of determination R^2	LOD, $\mu g/m^3$	LOQ, $\mu g/m^3$
1	1,2,3-Trimethylbenzene	10.73	105, 120	1	y = 10650x	0.0026	0.0087
2	1,2,4,5-Tetramethylbenzene	11.81	119, 134, 91	1	y = 13000x	0.0014	0.0047
3	1,2,4-Trimethylbenzene	10.33	105, 120	1	y = 10350x	0.0009	0.0030
4	1,3,5-Trimethylbenzene	9.98	105, 120	1	y = 9590x	0.0007	0.0023
5	1-Dodecanol	15.15	55, 69, 83, 97	0.992	y = 1693x	0.0163	0.0543
6	1-Methylnaphthalene	14.07	142, 141, 115	1	y = 13640x	0.0013	0.0043
7	2 ethyl 1 hexanol	10.58	57, 70, 83, 112	0.998	y = 4391x	0.0121	0.0402
8	2-Heptanone	8.79	58, 71, 114, 59	1	y = 3471x	0.0017	0.0058
9	2-Methylnaphthalene	13.88	142, 141, 115	1	y = 13010x	0.0012	0.0040
10	4-Heptanone	8.55	71, 58, 114, 91	1	y = 4924x	0.0016	0.0055
11	alpha-pinene	9.62	93, 92, 91, 77	0.999	y = 4864x	0.0034	0.0114
12	Benzaldehyde	9.89	77, 106, 105, 78	1	y = 4359x	0.0042	0.0140
13	Benzene	5.34	78, 77	0.999	y = 11790x	0.0021	0.0070
14	Butylcyclohexane	10.81	83, 82, 55, 140	1	y = 5596x	0.0016	0.0054
15	Cumene	9.40	105, 120	1	y = 11090x	0.0011	0.0035
16	Decanal	12.60	57, 70, 82, 112	0.999	y = 1399x	0.0074	0.0247
17	Decane	10.25	57, 71, 85, 142	0.998	y = 3651x	0.0016	0.0053
18	D-Limonene	10.77	68, 93, 67, 79	0.999	y = 3536x	0.0039	0.0131
19	Dodecane	12.51	57, 71, 85, 170	1	y = 4964x	0.0026	0.0084
20	Ethylbenzene	8.52	91, 106	1	y = 11430x	0.0012	0.0039
21	Ethylcyclohexane	8.13	83, 82, 55, 112	1	y = 1723x	0.0062	0.0206
22	Heptanal	8.95	70, 55, 57, 81	1	y = 1602x	0.0071	0.0236
23	Hexanal	7.46	56, 57, 72, 82	1	y = 1643x	0.0047	0.0159
24	m/p-Diethylbenzene	10.98	105, 119, 134	0.998	y = 3193x	0.0061	0.0201
25	m/p-Ethyltoluene	9.89	105, 120	0.998	y = 12780x	0.0006	0.0018
26	m/p-Xylene	8.63	91, 106	1	y = 17860x	0.0004	0.0014
27	Methyl salicylate	12.70	120, 92, 152, 121	0.998	y = 6674x	0.0033	0.0110
28	Naphthalene	12.73	128	1	y = 19720x	0.0011	0.0033
29	n-Nonane	8.94	57, 71, 85, 128	0.998	y = 3049x	0.0034	0.0114
30	n-Octanal	10.28	56, 57, 84, 69	0.999	y = 1081x	0.0048	0.0160
31	n-propylbenzene	9.80	91, 120	1	y = 13520x	0.0004	0.0013
32	Octane	7.48	57, 71, 85, 114	0.995	y = 851.6x	0.0047	0.0156
33	o-Diethylbenzene	11.07	119, 105, 134	0.997	y = 4038x	0.0032	0.0106
34	o-Xylene	8.97	91, 106	1	y = 9568x	0.0007	0.0025
35	Pentadecane	15.36	57, 71, 85, 212	1	y = 5415x	0.0039	0.0132
36	Styrene	8.94	104, 103, 78	1	y = 7932x	0.0015	0.0051
37	Tetradecane	14.47	57, 71, 85, 198	1	y = 5415x	0.0021	0.0069
38	Toluene	7.05	91, 92	0.998	y = 7523x	0.0013	0.0046
39	Tridecane	13.52	57, 71, 85, 184	1	y = 4913x	0.0012	0.0038
40	Undecane	11.43	57, 71, 85, 156	0.999	y = 4510x	0.0011	0.0036

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Table 3. Toxicity values

Compounds	RfC, mg/m^3	IUR $\times 10^{-6}$, $(\mu g/m^3)^{-1}$	References
1,2,3-Trimethylbenzene	0.06		EPA
1,2,4-Trimethylbenzene	0.06		EPA
1,3,5-Trimethylbenzene	0.06		EPA
Benzene	0.03	29	EPA, OEHHA
Cumene	0.4		EPA
Ethylbenzene	1	2.5	EPA, OEHHA
Xylenes	0.1		EPA
Naphthalene	0.003	34	EPA, OEHHA
Styrene	1		EPA
Toluene	5		EPA
2-Butoxyethanol	1.6		EPA
1,4-Dichlorobenzene	0.8	11	EPA, OEHHA
Tetrachloroethylene (PERC)	0.04	6.1	EPA, OEHHA
Trichloroethylene (TCE)	0.002	2	EPA, OEHHA

EPA. 2009. Risk Assessment Guidance for Superfund (RAGS): Part F. 2009. https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf
Integrated Risk Information System (IRIS) Assessments. 2018. https://cfpub.epa.gov/ncea/iris/search/index.cfm. Assessed July 4th 2018 The Office of Environmental Health Hazard Assessment (OEHHA). Toxicity criteria on chemicals evaulated by OEHHA.

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Results

1. #6 A-1B-23-LF and #9 A-4B-23-FW have the highest concentrations of chloroprene, with 0.85 and 0.78 $\mu g/m^3$, repectively. The LOD is 0.005 μg/m3
2. Significantly higher concentration of beneze (>1 $\mu g/m^3$) were detected at A-1A-22-LF (#1), A-2A-22-GH (#2), A-1B-23-LF (#6), A-4B-23-FW (#9), the inhalation unit risks [IURs] and EPA Reference Concentration (RfC) were listed in the Table 3.
3. A-1A-22-LF (#1) and A-2A-22-GH (#2) have the highest concentartions of the naphthalene
4. A-1A-22-LF (#1) and A-4B-23-FW (#9) have signtificantly higher concentrations of the 1,2,4-trimethylbenzene.
5. A-1A-22-LF (#1), A-4A-22-AM (#4), A-5A-22-LS (#5) and A-4B-23-FW (#9) have signtificantly higher concentrations of toluene.
6. A-1A-22-LF (#1) and A-4B-23-FW (#9) have significantly higher concentrations of xylene
7. A-1A-22-LF (#1) has the highest concnetration of M-methyltoluene.

References

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APPENDIX B. Laboratory Analysis of Chloroprene Metabolites in Urine Samples

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Metabolites of the Chloroprene

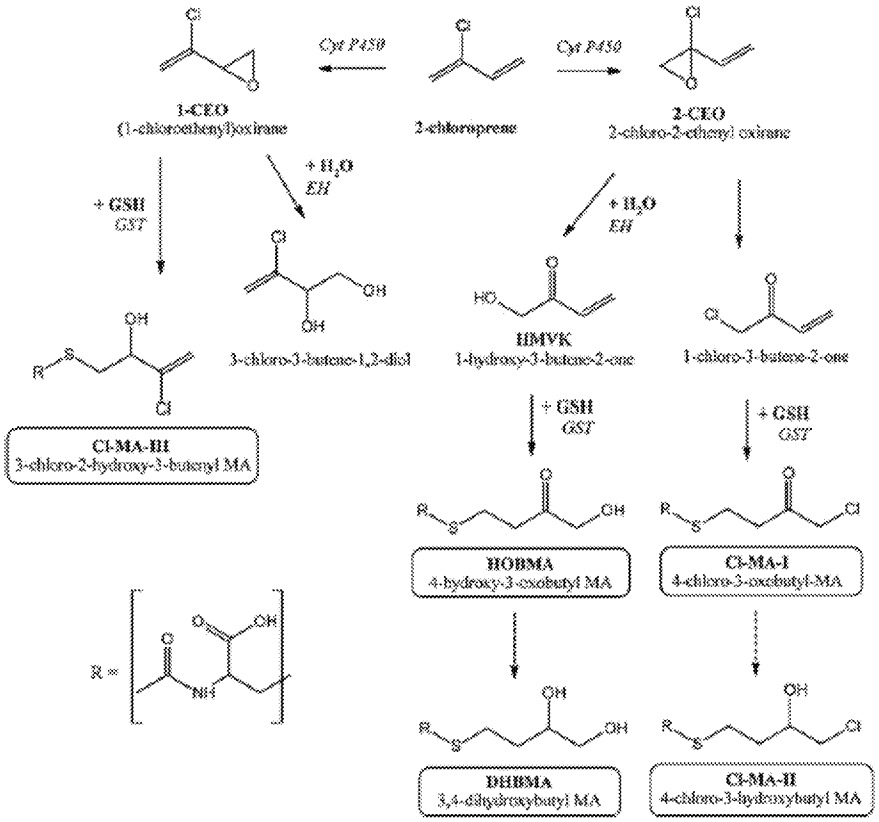

Fig. 1. Proposed biotransformation of 2-chloroprene according to Munter et al. [5,6], modified (Cyt P450 – cytochrome P450; GSH – glutathione; GST – glutathione-S-transferase; EH – epoxide hydrolase; MA – mercapturic acid).

Analysis of the Chloroprene Metabolites in the Urine Samples by UPLC-MS/MS

Sample Preparation

Take 0.5 ml of urine + 9.5 ml (10 mM ammonium acetate with formic acid). Fifty microliter of 40 ppm (mg/L) internal standard enrofloxin-D5** (stable isotope) was added into each sample to achieve concentration of 200 ppb (□g/L) for quality control and quality assurance.

The concentrations of the chloroprene metabolites DHBMA**, HOBMA, CHPMA, Cl-MA-I, Cl-MA-II , Cl-MA-III, creatinine (for dilution factor adjustment) and internal standard creatinine-D3 were determined by a Waters Ultra-Performance Liquid Chromatography connected to a Xevo triple-quadrupole mass spectrometer (UPLC-MS/MS). All the samples were injected with triplicates (n =3).

Analytical Standards https://www.trc-canada.com/checkout/

3,4-dihydroxybutyl mercapturic acid (DHBMA)** (A173710) (D-Isotope A173712)
4-hydroxy-3-oxobutyl mercapturic acid (HOBMA) (H949823)
3-chloro-2-hydroxypropyl mercapturic acid (CHPMA) (A187838)
4-chloro-3-oxobutyl mercapturic acid (Cl-MA-I) (A187828)
4-chloro-3-hydroxybutyl mercapturic acid (Cl-MA-II)
3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA-III)

The compounds and the internal standards were separated by a Synergi Max RP C12 150 × 3.0 mm, 4□m reverse-phase Phenomenex column (Torrance, CA). A guard column (C12 4×3 mm from Phenomenex) was used. The elution gradient consists of: 1. mobile phase A (mixture of 88% water, 12% methanol and 0.02% formic acid), 2. mobile phase B (mixture of 10% water, 90% methanol and 0.02% formic acid) and 3. mobile phase C (0.5% aqueous formic acid) with a constant flow rate of 0.3 mL/min as shown in Table 1.

Time (min)	Mobile Phase A (%)	Mobile Phase B (%)	Mobile Phase C (%)	Flow Rate (ml/min)
0.0	100	0	0	0.3
2.0	100	0	0	0.3
5.0	75	25	0	0.3
6.5	50	38	12	0.3
11.5	0	88	12	0.3
13.0	0	88	12	0.3
14.5	12	88	0	0.3
19.0	100	0	0	0.3
30.0	100	0	0	0.3

The MS/MS system operated in the multi-reaction monitoring (MRM) mode with the electrospray ionization sources (ES- or ES+). The ionization energy, MRM transition ions (precursor and product ions; Table 1), capillary and cone voltage, desolvation gas flow and collision energy were optimized by Waters optimization software package. The Table 1 summarizes the ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. **Table 1.** The ionization mode, retention time, precursor and product ions selected for the analysis of chloroprene metabolites, creatinine and internal standard. To optimize the method, the gradient was shortened to 15min as follows: Initial conditions 0%B, 1min 0%B; 2.5min 25%B; 3.25min 38%B, 12%C; 5.625min 88%B, 12%C; 6.5min 88%/12%C; 7.25min 88%B, 0%C; 9.5min 100%A; 15min 100%A.

Chloroprene Metabolites (UPLC-MSMS)					
	ES	Retention time	Precursor ion	Product ion	qualifer ions
DHBMA** (STD)	ES-	4.96	250.0	121.0	75
HOBMA	ES-	4.95 (confirmed)	248.0	162.0	84
CHPMA	ES-	4.96 (confirmed)	254.0	218.0	89
Cl-MA-1	ES-	4.95/7.2	266.0	162.0	84
Cl-MA-II	ES-	4.97 (confirmed)	268.0	232.0	75
Cl-MA-III	ES-	*4.97/5.97/6.94/7.2	266.0	137.0	128

Results

I. The concentrations of DHBMA in urine samples (absolutely confirmed and quantified using analytical standards)

No.	Samples	DHBMA (ppb; ug/L)	Creatinine (ppb; ug/L)	Creatinine (g/L)	DHBMA ug per g of Creatinine
1	U1B23LF	65	348116	0.35	186
2	U1A22LF	485	1826755	1.83	265
3	U2B23LHW	458	3308768	3.31	139
4	U2B23BLW	652	1147677	1.15	568
5	U2B23LEH	299	653870	0.65	457
6	U2B23GAHSR	1032	1926979	1.93	535
7	U2B23GAH2	535	1880189	1.88	285
8	U3B23BT	331	1035490	1.04	319
9	U3A22BT	360	1096646	1.10	329

The chloroprene metabolite DHBMA was detected in all the urine samples. The highest concentrations of DHBMA (ug/g of creatinine) were found in the samples U2B23BLW, U2B23LEH, and U2B23GA

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II. Relative concentrations (signal intensity- number of the ions) of other metabolites HOBMA, CHPMA, Cl-MA-I, Cl-MA-II, Cl-MA-III (no analytical standards available)

		[redacted]		CHPMA RT = 7.38 min		Cl-MA-I RT = 7.5 min		[redacted]		Cl-MA-II** RT = 7.98 min		Cl-MA-III RT = 6.84 min		Cl-MA-III RT = 7.64 min		Cl-MA-III RT = 8.34 min	
No.	Samples	248>162	248>84 (q)	254>218	254>89 (q)	266>162	266>84(q)	266>162	266>84(q)	268>232	268>75 (q)	266>137	266>128 (q)	266>137	266>128 (q)	266>137	266>128 (q)
1	U1B23LF	4864.81	930.42	4607.34	0.00	27.08	244.73	0.00	0.00	339.42	1.27	98.97	216.06	100.74	2931.40	33.89	435.54
2	U1A22LF	24048.26	4670.74	51.42	1.61	0.00	1277.68	0.00	0.00	0.79	186.30	666.38	992.11	731.91	6973.20	259.64	3042.21
3	U2B23LHW	49677.89	9577.78	1.41	1.18	0.00	0.00	[redacted]		0.00	3.12	231.19	390.11	375.28	4459.15	46523.66	23064.76
4	U2B23BLW	70541.73	14684.31	50.37	0.00	0.00	859.02	0.00	0.00	0.00	11.40	963.81	1860.41	525.81	704.47	125.17	1116.11
5	U2B23LEH	111718.53	23060.38	1.07	5.07	0.01	564.29	0.00	0.00	0.33	0.85	802.15	1497.76	420.55	4416.46	19692.81	10414.69
6	U2B23GAHSR	92727.61	19181.89	0.00	0.15	0.00	1531.14	0.00	0.00	0.00	4.91	423.03	1111.24	1041.74	3289.71	464.16	1224.19
7	U2B23GAH2	62944.75	12538.85	0.03	3.02	0.00	0.00	[redacted]		0.00	0.62	149.39	513.94	141.54	2968.98	161115.79	81873.15
8	U3B23BT	31637.88	6137.57	3132.29	0.25	0.00	36.42	0.00	0.00	75.00	0.01	351.74	738.04	40.06	3092.81	8.16	264.68
9	U3A22BT	43426.81	9065.61	0.25	0.92	0.00	144.77	0.00	0.00	0.02	0.00	567.36	1002.85	129.66	3221.70	8.12	643.51

Similar to the findings from DHBMA analysis, HOBMA was detected in all the samples, and the relative concentrations of HOBMA were highest in the samples U2B23BLW, U2B23LEH, and U2B23GAHSR.

For the analysis of CHPMA, Cl-MA-I and Cl-MA-II, due to lack of reference analytical standards, we have to rely on the molecular ions and fragmented product ions and qualifier for the confirmation and quantification purpose. The inconsistence between qualifier ion and pair of molecular/product ions made it impossible to draw any conclusion.

For the analysis of Cl-MA-III, 3 possible signals could be the Cl-MA-III. It could be the signals with retention time 6.84 min, 7.64 min, or 8.34 min. By comparing the results of DHBMA and HOBMA, it is most likely the signal at the retention time of 6.84 min. If that is the case, Cl-MA-III were detected in all the urine samples, and the samples U2B23BLW, U2B23LEH and U2B23GAHSR have the highest concentrations of the metabolite Cl-MA-III.

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APPENDIX C. Summary of Urine Metabolites and Volatile Organic Compounds in Air (St. John Parish, Sept. 2021)

		Urine Metabolites										Volatile Organic Compounds (RfC ug/m3)							
SITE NO.	Name	**Urine Sample Date**	**DHBMA** ug/g creatinine (metabolite of chloroprene and 1,3-butadiene)	**HOBMA** Signal Intensity/ g creatinine (metabolite of chloroprene and 1,3-butadiene)	**CHPMA** Signal Intensity/ g creatinine (metabolite of epichlorohydrin)	**CL-MA-I** Signal Intensity/ g creatinine (metabolite of chloroprene)		**CL-MA-II** Signal Intensity/ g creatinine (metabolite of chloroprene)	**CL-MA-III** Signal Intensity/ g of creatinine (metabolite of chloroprene)			**Air Sample Date** (Duration hr:min)	**Chloroprene** (ug/m3) (20)	**Benzene** (ug/m3) (30)	**Napthalene** (ug/m3) (3)	**1,2,4-trimethyl-benzene** (ug/m3) (60)	**Toluene** (ug/m3) (5000)	**Xylene** (ug/m3) (100)	**Ethylbenzene** (ug/m3) (1000)
1	Residence 1-Resident 1	9/23 (am)	139	300280	304	0	0	0	1397	2268	281214	9/22 (8:00)	below LOD	1.36	0.17	0.26	1.69	0.63	0.18
1	Residence 1-Resident 2	9/23 (am)	568	1229295	19	0	0	6	16796	9163	2181								
1	Residence 1-Resident 3	9/23 (am)	457	3417148	0	0	0	0	24536	12863	602346								
1	Residence 1-Resident 4	9/23 (am)	535	962414	0	0	36587	0	4391	10812	4818								
1	Residence 1-Resident 5	9/23 (am)	285	669558	33319	0	0	798	1589	1506	1713826								
2	River Road EPA Air Monitor SE of Denka, La Place, LA											9/22 (7:56)	below LOD	0.78	0.07	0.34	7.58	1.14	0.31
3	Residence 3	9/22 (pm)	329	791993	0	0	0	0	10347	2365	148	9/22 (8:00)	below LOD	0.59	0.05	0.11	2.71	0.47	0.12
3	Residence 3	9/23 (am)	319	611071	5	0	0	0	6794	774	158								
4	Residence 2	9/22 (pm)	265	263289	15	0	11135	0	7296	8013	2843	9/22 (8:00)	below LOD	1.87	0.16	1.37	3.03	2.54	0.63
4	Residence 2	9/23 (am)	186	279493	2954	0	0	45	5686	5788	1947	9/23 (6:58)	0.85	1.08	0.07	0.19	2.16	0.42	0.12
5	5th Ward School (by EPA monitor)											9/23 (6:58)	0.78	2.11	0.18	0.95	10.82	2.49	0.66
6	Godchaux School Site, Reserve LA											9/23 (7:33)	below LOD	0.59	0.02	0.06	1.14	0.24	0.06
7	Edgard Courthouse (westbank)											9/23 (9:45)	below LOD	0.86	0.04	0.23	2.86	0.89	0.21
8	Residence 4											9/22 (7:21)	below LOD	0.72	0.04	0.15	5.09	0.73	0.23
9	Bethune Park (between Norco Manufacturing Complex and Shell Refinery, Destrehan LA, St Charles Parish											9/23 (7:08)	below LOD	0.55	0.04	0.09	0.28	0.32	0.07

The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime.

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A REFERENCE DOCUMENT FOR THE PRELIMINARY ASSESSMENT OF CHLOROPRENE LEVELS IN ST. JOHN THE BAPTIST PARISH:

Evaluation of Potential Health Risks for Elementary School Students based on Early Sampling Results following Emissions Reductions

June 14, 2018

Louisiana Department of Health
Office of Public Health
Section of Environmental Epidemiology and Toxicology

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Background and Statement of Issues

Site History

In 1931, the DuPont chemical company invented Neoprene, a synthetic chemical-resistant and weather-resistant rubber best recognized for its use in wet suits and as a base resin in adhesives and coatings. DuPont's Ponchartrain Works facility, located on the east bank of the Mississippi River in LaPlace, LA, became the leading producer of Neoprene. Neoprene is the trade name for polychloroprene, a rubber polymer formed by linking together molecules of chloroprene. in North America. The DuPont facility's Neoprene operations were taken over by DENKA Co. Ltd. on November 1, 2015 [1].

National Air Toxics Assessment

On December 17, 2015, the U.S. Environmental Protection Agency (EPA) 2011 National Air Toxics Assessment (NATA) was released. EPA developed NATA as a broad-scale screening tool to prioritize the evaluation of air pollutants and emission sources in locations of interest to gain a better understanding of risks. As stated by EPA, NATA "is subject to limitations in the data, modeling, and default assumptions used. As a result, the NATA should only be used to identify areas for further investigation and not to identify actual exposures and associated risks to specific individuals" [3]. Modeling estimates performed by this screening tool indicated the possibility of elevated cancer risk from chloroprene emissions from Denka/Dupont Neoprene production facility operations in LaPlace, Louisiana [1, 2]. Based on animal studies and a lack of human data, chloroprene has been classified by EPA as "likely to be carcinogenic to humans" since September 2010 [1, 4].

Preliminary Air Sampling

In response to the possibility of elevated risk modeled by NATA, EPA Region 6 and the Louisiana Department of Environmental (LDEQ) conducted preliminary ambient air sampling in March of 2016 to decide if a more extensive and comprehensive monitoring and assessment plan was needed. LDEQ collected instantaneous or "grab" samples and analyzed those samples using LDEQ's Mobile Air Monitoring Lab (MAML). Additionally, EPA collected a small number of 8-hour and 24-hour canister samples. Both EPA's and LDEQ's air monitoring detected chloroprene off-site within and outside of a 1-mile radius of Denka.

Establishment of Current Sampling Protocol

The concentrations of chloroprene detected during the preliminary sampling events indicated the need to collect additional air monitoring data in order to adequately assess potential health risks to the community. In a 2016 memo, EPA stressed that because the primary potential health concern associated with long-term exposure to chloroprene emissions is related to cancer risk, more community air data is necessary to gain an understanding of the potential health risk that might be associated with the long-term presence of chloroprene in the area [5].

Figure 1. Map of Air Monitors in the Community Adjacent to the Denka Facility in LaPlace, LA

Source: https://www.epa.gov/la/laplace-louisiana-air-monitoring-map

EPA selected the following six sites as locations for monitoring levels of chloroprene in ambient air (see Figure 1):

- 238 Chad Baker
- Acorn and Highway 44
- East St. John High School
- 5th Ward Elementary School
- Mississippi River Levee
- Ochsner Hospital

The ongoing ambient air sampling follows a 1-in-3 schedule (once every third day) with each sampling event occurring over a 24-hour period. Samples are collected using SUMMA canisters calibrated for 24-hour sampling [6].The EPA set up an informational website at https://www.epa.gov/la/laplace-st-john-baptist-parish-louisiana to keep the community updated on ambient air sampling results.

Administrative Order on Consent

On January 6, 2017, LDEQ and Denka signed an Administrative Order on Consent (AOC) outlining Denka's voluntary commitment to reduce emissions of chloroprene at the LaPlace facility by 85 percent from the facility's 2014 baseline chloroprene emissions [2]. Installation of emissions controls at the facility began in February 2017 and was completed in December 2017.

Demographics

Figure 2 shows the population distribution in the community surrounding the Denka facility. The current total population of St John the Baptist Parish is 45,924. Of this total population, 51.4% are female and 48.6% are male. Fifty-six point four percent (56.4%) are African American and 40.6% are White. The remaining 3.0% are from other races. Approximately 13.6% of the total population are 65 years of age or older. The median household annual income in 2016 was $51,406 and 18.5% of the population was living below the poverty threshold [7].

Figure 3 shows the locations of schools near the Denka facility. The community has expressed concerns about the safety of children attending local schools, specifically focusing on whether students at the school closest to the facility, Fifth Ward Elementary School, should be relocated to a site farther away.

Figure 2: Population Distribution Surrounding the Denka Facility

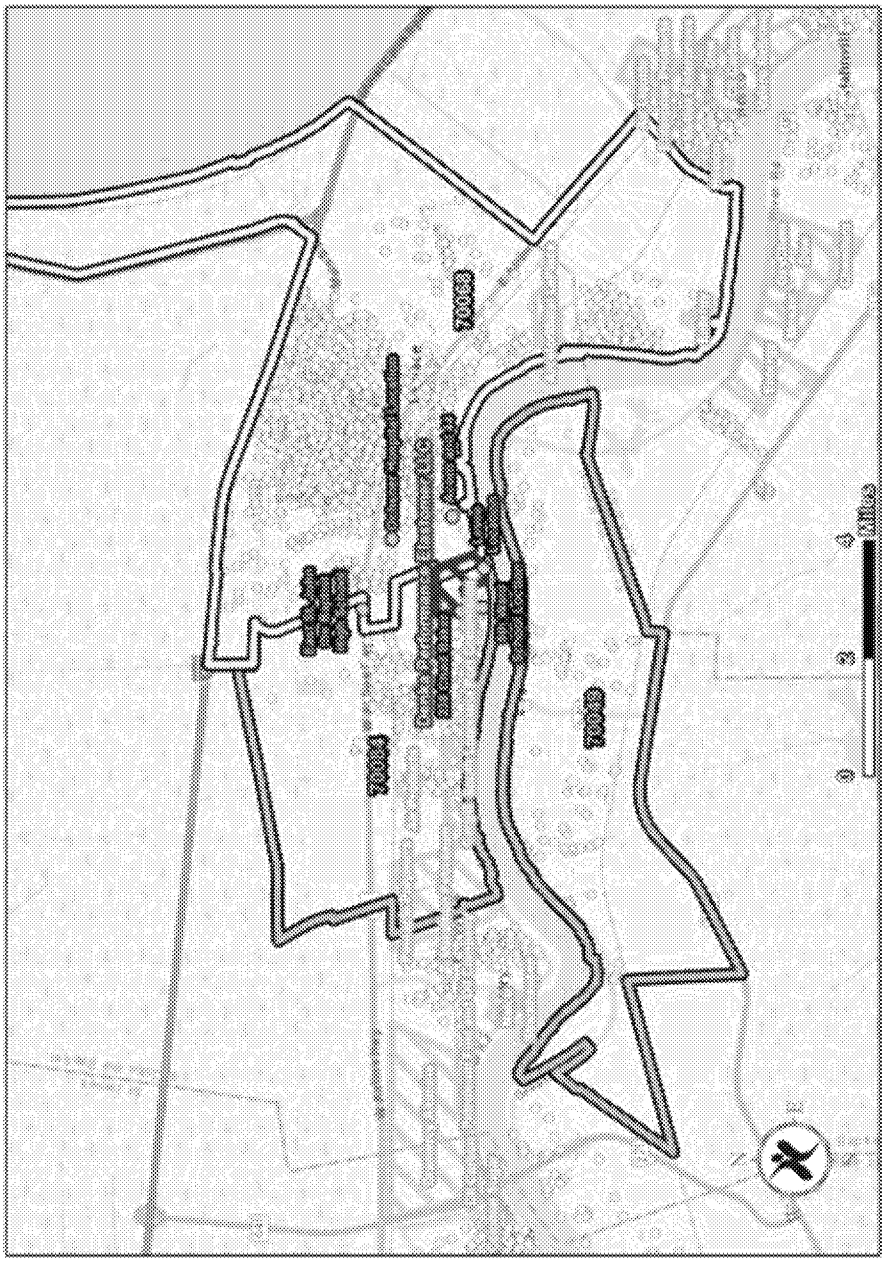
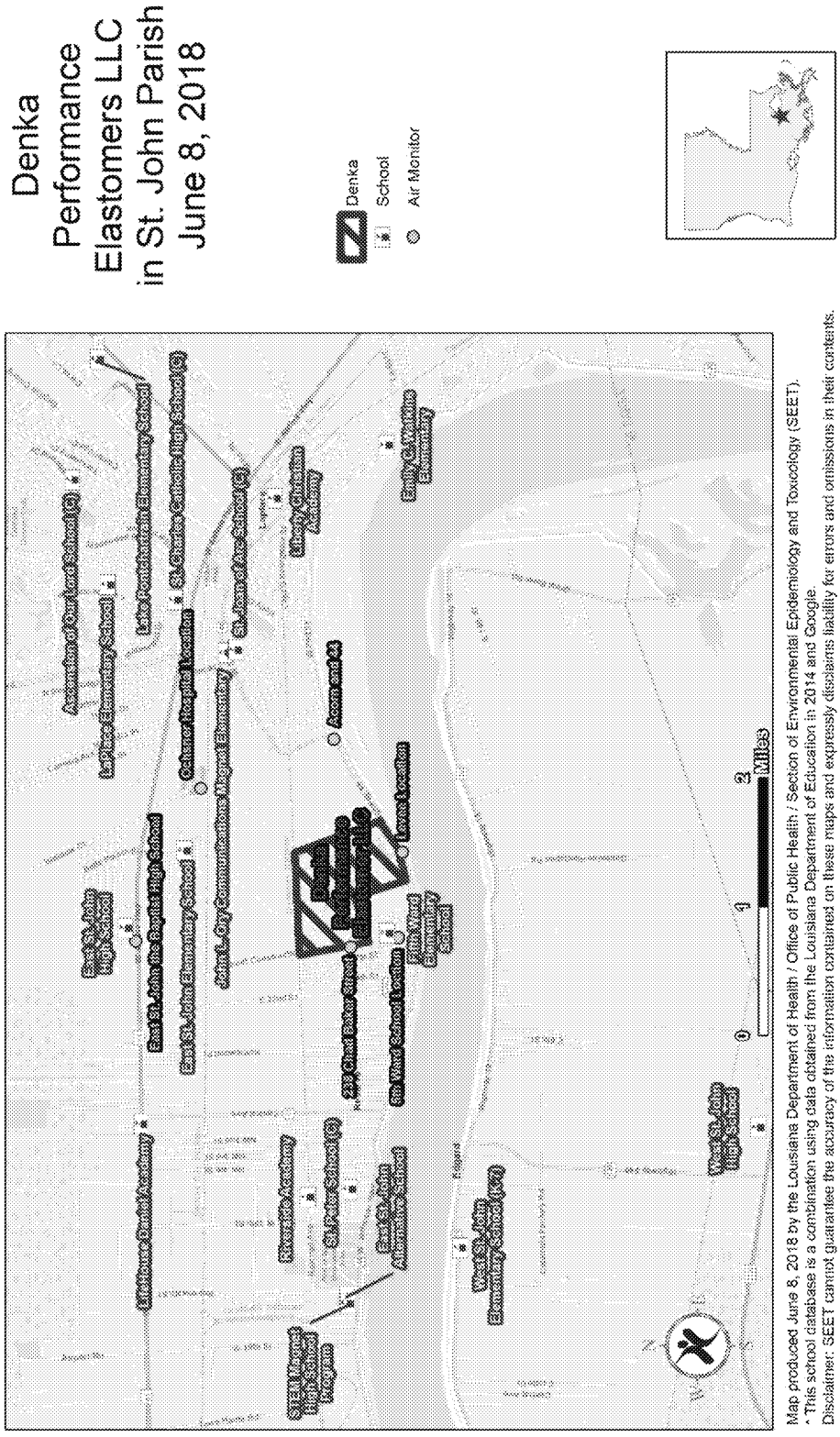


Figure 3. Schools near the Denka Performance Elastomers, LLC Facility



Data Summary Results

Results from validated ambient air data sampled from May 2016 to May 2018 are listed in Appendix A, Table A-1. A total of 1,431 samples, excluding those with invalid results or no results reported, were collected during this period. Results reported as not detected (ND) are highlighted in blue.

The full dataset is evaluated in Appendix B:

Tables B-1 through B-4 summarize the chloroprene concentrations detected in air sampled from the community during 2016, 2017, and 2018.

Figures B-1 through B-6 display the following information for each air sampling site:

- the percentages of samples in which chloroprene was found at levels above the method detection limit at each location,
- the percentage of samples with chloroprene concentrations below the non-cancer comparison value (20 ug/m3), and
- the percentage of samples with chloroprene concentrations below the EPA's 100-in-1 million preliminary cancer risk-based comparison level (0.2 ug/m3).

Figures B-7 – B-9 summarize the above mentioned information across all of the air sampling sites.

Figure B-10 displays the average chloroprene concentrations at each site from 2016-2018.

Statistical analyses of chloroprene concentrations measured at each sampling site are included in Appendix C. Tables C-1 to C-6 and Figures C-1 to C-6 display the averages for each site during each year, with the confidence interval whiskers on each bar marking the range of values that are certain to contain the true mean 95% of the time. A trend of decreasing chloroprene concentrations in ambient air was observed at all sites from the initial sampling year (2016) until 2018. LDH cannot predict how chloroprene concentrations will continue to trend in the community as more data is collected.

Toxicology Evaluation

Chloroprene (2-chlorobutadiene): Much of the toxicological information on chloroprene is derived from occupational exposures in workers. The Occupational Safety and Health Administration (OSHA) time weighed average (TWA) is 25 parts per million (ppm) (90,500 ug/m^3) (skin); the American Conference of Governmental Industrial Hygienists (ACGIH) has a 10 ppm (36,200 ug/m^3) threshold limit value-time weighed average (TLV-TWA); and the National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) is 1 ppm (3,620 ug/m^3). Acute (short term) occupational exposures above the standards may cause headache, irritability, giddiness, dizziness, respiratory irritation, nausea, gastrointestinal disorders, skin and eye irritation and fatigue in workers. Chronic exposures (longer

term) in the work place in ppm concentration levels may contribute to liver function abnormalities, disorders of the cardiovascular system and depression of the immune system. Animal studies have found an increased risk of tumors and are the evidence for the classification of chloroprene as a likely carcinogen. The few studies on the carcinogenic effects in humans are inconclusive because of co-exposure to other occupational chemicals, smoking, and other risk factors for cancer.

For non-occupational exposures, EPA derives a chronic RfC (reference concentration) for continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. Animal studies that derived a LOAEL (lowest observed adverse effect level) was determined to be 12.8 ppm (46.3 mg/m3). The RfC was derived using a 10% benchmark dose (BMD) of 2 mg/m3 (5.5 ppm) to which uncertainty factors, lack of data, and interspecies extrapolations of 100 were applied to derived the RfC of 0.02 mg/m3 or 20 ug/m3 (55 ppb).

When inhaled, chloroprene enters the body through the respiratory system, is absorbed into the bloodstream, and distributed throughout the body. Chloroprene is rapidly metabolized, which makes it difficult to measure in the body. During metabolism, chloroprene may generate reactive intermediates that are a mechanism of its toxicity and are a factor in its being considered a potential carcinogen. There are insufficient data on the toxicokinetics to describe how chloroprene acts in the body.

Chloroprene is oxidized in the liver through the cytochrome P-450 system (CYP2E1) to form a monoepoxide free radical which is the reactive intermediate which may react for the carcinogenic effects. Further metabolism serves to detoxify the reactive intermediate: epoxide hydrolase rapidly hydrolyzes the epoxide to much less toxic metabolites; these metabolites are then rapidly conjugated with glutathione to form the 3-chloro-2-hydroxy-3-butenyl mercapturic acid (Cl-MA III) which is a unique metabolite of chloroprene. Other chloroprene metabolites such as DHBMA (3,4-dihyrdroxybutyl-MA) and HOBMA (4-hydroxy-3-oxybutyl–MA) are also metabolites of butadiene and other compounds that are found in cigarette smoke and gasoline.

These metabolites are excreted in urine. The urinary metabolites may serve as biomarkers to indicate exposure to chloroprene but are not biomarkers of effect or indications of potential damage that may result in a cell mutation in future years. The Cl-MA III is a metabolic conjugate of chloroprene that has been detoxified and excreted.

The concentrations of chloroprene detected in air monitoring in St. John the Baptist parish are in the parts per billion (ppb) range and more than 1000 times less (10^{-3}) than occupational levels and concentrations used in the animal studies. At this low level, health effects (including cancer) will not be directly observed in people. For this reason, risk assessment modeling is used to provide information to regulatory agencies for determining standards and remedial actions. Risk assessment modeling does not provide information on the prediction or estimation of direct effects, but is a useful tool for comparison of risks using standardized conditions.

Cancer Statistics Reviews

In a previous Letter Health Consultation dated March 2, 2018, LDH evaluated the Louisiana Tumor Registry's (LTR) cancer rate incidence data (1988-2014) for St. John the Baptist Parish for lung and liver cancers, which are both related to chloroprene exposure. Overall, cancer incidence rates of the lung and liver in St. John the Baptist Parish from 1988-2014 did not differ significantly from those in Louisiana [8].

Act 373 of the 2017 Louisiana Legislative Session requires that the Louisiana Tumor Registry deliver yearly census tract data to local parish governments. Upon review of this recently published census tract cancer incidence data (March 2018) for St. John the Baptist Parish, all cancers combined and prostate cancer have significantly higher incidence rates than state rates for the years 2006-2014 based on the Census 2010 state population. Prostate cancer is not related to chloroprene exposure [9]. The cancer incidence rates for all cancers combined is not very useful for explaining or exploring potential etiologies since there are many known risk factors for cancer such as smoking, occupational exposures, etc. that are not controlled in the cancer incidence rates

Risk Assessment for Elementary School Students

Methodology

ATSDR's Partnership to Promote Local Efforts to Reduce Environmental Exposure (APPLETREE) Program Project Officer arranged a conference call between LDH, DEQ, and two ATSDR Air Subject Matter Experts. Factors influencing air monitoring and data limitations were discussed. The lack of sample points since the implementation of emissions controls was emphasized. Following the call, LDH reached out to EPA Region 6 to request an increase in the frequency of community air monitoring. In addition to the phone consultation on the limited air monitoring dataset, ATSDR has been providing technical support on the evaluation and interpretation of cancer incidence data.

The Ambient Air Standard listed for chloroprene (classified as a Louisiana Toxic Air Pollutant, or TAP) under the Louisiana Administrative Code is 857 ug/m^3 (an 8-hour average) [10].

The EPA has established a non-cancer comparison value for long-term exposure of 20 ug/m^3. A continuous inhalation exposure to chloroprene at this concentration for humans, including sensitive individuals, is likely to be without a significant risk of harmful effects during a lifetime. Assessment of non-cancer health risks was not evaluated because ambient chloroprene concentrations in the community surrounding the Denka facility did not exceed 20 ug/m^3 for prolonged periods of time during the March-May 2018 interval.

Assessment of the theoretical excess cancer risks posed to elementary school students in the community surrounding the Denka facility were performed using data limited to the March – May 2018 sampling

events. Although installation of the emissions controls was completed in December 2017, the upgraded system was not fully functional until March 2018.

To determine whether concentrations of chloroprene detected in ambient air in LaPlace, LA would increase an individual's risk of developing cancer, LDH estimated the excess cancer risk for exposure to the reported chloroprene sampling result concentrations. The theoretical excess cancer risk represents the increase in the probability of an individual developing cancer as a result of being exposed to a contaminant over a lifetime. Because of the uncertainties involved in estimating carcinogenic risk, a weight-of-evidence approach is used to describe carcinogenic risk in words as well as numeric terms. The results of the carcinogenic risk calculations estimate the worst-case maximum increase in the risk of developing cancer after exposure to the contaminant. This estimation is accurate within one order of magnitude greater or less than calculated. In other words, a calculated cancer risk of 2 excess cancers per 10,000 people might actually be 2 excess cancers per 1,000 people or 2 excess cancers per 100,000 people. The lifetime excess cancer risk of 10-4 (or 1.0E-04), which is 1 excess cancer per 10,000 people, is the upper bound of the range used by EPA's Superfund program to make decisions about the need to take action at contaminated sites . Estimates of theoretical cancer risks that fall below 1.0E-06 (or one in 1,000,000) are considered to pose no significant increase in cancer risk [11].

The increases in theoretical excess cancer risk potentially associated with exposures to chloroprene in the community were estimated separately for children attending school at the current Fifth Ward Elementary School campus and for children attending school at another location within the parish. To ensure that sufficient data points were available for evaluation, the ambient air data collected by EPA from March–May 2018 was separated into two "campus locations", excluding the Acorn & Highway 44 location:

1. Data from the three air sampling sites closest to the Denka facility, 238 Chad Baker, Fifth Ward Elementary School, and Mississippi River Levee, were combined to represent exposures for students at the current Fifth Ward Elementary School campus,
2. Data from the two sites furthest from the Denka facility, East St. John High School and Ochsner Hospital, were chosen to represent exposures for students attending schools at another location. For the purpose of this assessment, the other location is identified as East St John Elementary School, which is the campus located between these two monitors

Chloroprene concentrations averaged for each campus location were used to calculate exposure concentrations for children during school hours at each location; all other exposure concentrations were calculated using averages from all six sampling sites in the community. Table 1 lists the concentrations and lower and upper 95% confidence limits used for risk assessment at each school location and for all six sampling sites together.

Table 1. Chloroprene Concentrations (in ug/m^3)

	Average	95% LCL	95% UCL
All 6 Sampling Sites	1.07	0.60	1.54
Fifth Ward Elementary School	1.54	0.67	2.41
Est St John Elementary School	0.40	0.20	0.59

LCL = Lower Confidence Limit
UCL = Upper Confidence Limit

Assessments for exposure scenarios at each school location were performed using the average concentrations and their corresponding 95% confidence intervals. As a conservative estimate, samples reported as ND were assessed using a concentration of half the current detection limit.

Theoretical increases in excess cancer risks for exposures to chloroprene by inhalation were estimated using the following equation:

Risk = IUR x EC x ADAF

Where: IUR (ug/m^3)$^{-1}$ = Inhalation Unit Risk (3 x10^{-4} per ug/m^3 for chloroprene)

EC (ug/m^3) = exposure concentration

ADAF: Because chloroprene has been identified as having a mutagenic mode of action, cancer risk assessments for early-life exposures to chloroprene include Age Dependent Adjustment Factors (ADAFs). An ADAF of 3 (for 2 to less than 16 years of age) was used for chloroprene cancer risk assessments [12].

To calculate EC for the excess cancer risk equation:

EC = (CA x ET x EF x ED)/AT

Where: CA (µg/m^3) = contaminant concentration in air;

ET (hours/day) = exposure time;

EF (days/year) = exposure frequency;

ED (years) = exposure duration; and

AT (lifetime in years x 365 days/year x 24 hours/day) = averaging time (where lifetime in years = 70)

Table 2 lists the standard values used to estimate the concentrations of chloroprene children would be exposed to at school and at home. Exposure concentrations calculated for each school location exposure are listed in Table 3.

Table 2. Standard Values Used to Estimate Exposure Concentrations for School Children 5 to 10 years of age

	Exposure Scenario		
	School	Home	Summers/Weekends
ET	8	16	24
EF	180	180	185
ED	5	5	5

ET = exposure time in hours/day
EF = exposure frequency in days/year
ED = exposure duration in years

Table 3. Exposure Concentrations (in ug/m^3) for School Children 5 to 10 years of age

	Exposure Scenario			
	Fifth Ward	St John	Home	Summers/Weekends
Mean	0.02	0.00	0.03	0.04
95% LCL	0.01	0.00	0.01	0.02
95% UCL	0.03	0.01	0.04	0.06

LCL = Lower Confidence Limit
UCL = Upper Confidence Limit

The equation illustrating the theoretical increase in excess cancer risk associated with chloroprene exposures for elementary school children is therefore as follows:

Risk during five years of school attendance at either location:

$$Risk_{school\ years} = (IUR \times EC_{school} \times ADAF_{2\ to\ <16}) + (IUR \times EC_{home} \times ADAF_{2\ to\ <16}) + (IUR \times EC_{sum/wkds} \times ADAF_{2\ to\ <16})$$

Results

The excess cancer risks estimated for each exposure scenario (school attendance, being home, summers and weekends) experienced during five years of elementary school attendance are listed in Table 4. The theoretical excess cancer risks estimated for the elementary school years are listed in Table 5.

Table 4. Excess Cancer Risk Estimated for Exposure Scenarios during Elementary School Attendance Years (unitless)

	Exposure Scenario 5-10 years of age			
	Fifth Ward	St John	Home	Summers/Weekends
Mean	1.63E-05	4.20E-06	2.26E-05	3.49E-05
95% LCL	7.05E-06	2.11E-06	1.27E-05	1.96E-05
95% UCL	2.55E-05	6.28E-06	3.26E-05	5.02E-05

LCL = Lower Confidence Limit
UCL = Upper Confidence Limit

Table 5. Excess Cancer Risk Estimated for Elementary School Students at Fifth Ward Elementary vs. East St John Elementary (unitless)

	Five Years at Fifth Ward Elementary School	Five Years at East St John Elementary School
Mean	7.E-05	6.E-05
95% LCL	4.E-05	3.E-05
95% UCL	1.E-04	9.E-05

LCL = Lower Confidence Limit
UCL = Upper Confidence Limit

Estimation of theoretical excess cancer risks was used in this assessment as a method to compare theoretical risks due to chloroprene exposures at the Fifth Ward Elementary School site compared to the East St. John Elementary School site (as a surrogate for any site at a farther distance from Denka). These estimates do not predict the occurrence of health effects.

The excess cancer risk estimated for exposure to the concentrations of chloroprene encountered by children spending their elementary school years at the current Fifth Ward Elementary School campus location is 7×10^{-5} (95 % confidence interval = 4×10^{-5} to 1×10^{-4}). In other words, exposure to the average concentrations of chloroprene measured near the current Fifth Ward Elementary School campus location is conservatively estimated to pose a risk of the development of 0.4 to one excess cancer per 10,000 people, with an average of less than one excess cancer per 10,000 people.

The excess cancer risk estimated for exposure to the concentrations of chloroprene encountered by children spending their elementary school years at East St. John Elementary School is 6×10^{-5} (95 % confidence interval = 3×10^{-5} to 9×10^{-5}). In other words, exposure to the average concentrations of

chloroprene measured near an alternate school campus location is conservatively estimated to pose a risk of the development of 0.3 to 0.9 excess cancer per 10,000 people, with an average of less than one excess cancer per 10,000 people.

Limitations

Data evaluated for this assessment was limited to the time period during which the emission controls were fully functional (March-May 2018). The confidence intervals calculated for each site reflect variability caused by the small sample sizes.

The theoretical excess cancer risks calculated for this assessment are conservative theoretical estimates and do not directly translate into health effects. Calculation of these risks will change as more data are collected and evaluated.

The ambient air samples are collected over a 24-hour period every three days. These samples may not give an accurate representation of daily contaminant concentrations. Contaminant levels may be higher or lower during other times of year, different weather conditions, or different facility operations. Air modeling based on prevailing winds and other factors was not performed as a part of this assessment.

The results of this assessment cannot be generalized to predict the past, current, or future potential for health effects in individuals.

Preliminary Evaluation

An overall trend of decreasing concentrations from 2016 to 2018 has been observed at all six ambient air sampling sites in the community surrounding the Denka facility.

Based on data limited to the March-May 2018 sampling results, exposure to chloroprene in the community surrounding the Denka facility is not expected to cause non-cancer health effects.

Based on data limited to the March-May 2018 sampling results, transferring children from the current Fifth Ward Elementary School location to another location within the community would not greatly decrease their theoretical risks of developing excess cancers from exposure to chloroprene. The risks calculated for this assessment are conservative theoretical estimates and are not meant to predict actual health effects. These risk estimates may change as additional data become available.

As of June 2018, interpretation of future long-term estimates of risk (30- and 70-years) are limited due to lack of sufficient ambient air data on which to base assessments. More data would be needed to perform a comprehensive assessment of community health risks.

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APPENDIX A: Chloroprene Data

Table A-1. Chloroprene concentrations (in ug/m^3) in EPA ambient air canister samples (24-hr) collected from LaPlace, LA, May 2016 – March 2018

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
5/25/2016	ND*	1.29	0.831	ND	ND	ND
5/28/2016	--§	Invalid†	Invalid	--	Invalid	--
5/31/2016	7.58	30.3	2.02	3.07	6.13	17.5
6/2/2016	7.15	0.073	2.67	1.88	2.64	0.083
6/5/2016	11.1	ND	0.341	4.97	20.5	0.809
6/9/2016	5.48	0.624	1.25	3.41	4.93	4.68
6/12/2016	5.37	0.983	5.15	0.573	0.272	1.28
6/15/2016	1.21	0.225	1.07	1.74	0.366	10.8
6/18/2016	7.87	4.39	0.268	1.89	2.7	2.98
6/21/2016	5.08	ND	1.04	1.3	0.413	0.686
6/24/2016	0.305	6.82	0.029	ND	0.319	7.54
6/27/2016	0.163	1.19	0.417	ND	0.04	1.61
6/30/2016	4.53	ND	0.352	3.5	7.15	ND
7/3/2016	ND	0.054	1.69	ND	ND	4.28
7/6/2016	ND	ND	0.12	ND	ND	9.61
7/9/2016	1.71	4.75	0.762	0.345	1.88	6.02
7/12/2016	6.89	1.23	2.36	5.62	0.722	0.232
7/15/2016	12.4	0.881	0.914	3.63	6.46	1.53
7/18/2016	37	ND	0.276	44.3	1.7	ND
7/21/2016	5.01	1.18	2.12	11.3	4.9	1.06
7/24/2016	16.7	9.07	8.16	8.09	9.47	10
7/27/2016	ND	1.71	0.196	ND	ND	3.59
7/30/2016	2.49	5.3	2.67	3.15	6.35	11.2
8/2/2016	0.254	0.881	1.86	10.3	16.8	6.56
8/5/2016	5.84	12.5	2.39	8.67	21.4	5.48
8/8/2016	0.417	4.86	1.63	0.569	2.77	0.827
8/11/2016	ND	12.8	ND	ND	0.649	2.43
8/14/2016	Invalid	Invalid	Invalid	Invalid	Invalid	Invalid
8/23/2016	5.19	34.7	8.56	--	--	24
8/26/2016	1.61	0.468	0.301	6.06	2.23	1.37
8/29/2016	25.6	ND	0.627	38.4	0.073	ND
9/1/2016	0.798	ND	ND	13.1	8.09	ND
9/4/2016	31	39.2	10.2	34.7	74.7	7.65
9/7/2016	Invalid	2.21	2.17	3.44	2.14	1.17

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
9/10/2016	10.9	0.16	4.9	6.27	2.53	0.791
9/13/2016	46.1	ND	0.12	16.1	0.232	ND
9/16/2016	28.6	ND	0.921	0.693	ND	ND
9/19/2016	ND	0.105	0.033	ND	1.32	0.076
9/22/2016	0.363	ND	0.065	0.722	0.18	ND
9/25/2016	0.109	0.073	0.127	0.105	0.548	ND
9/28/2016	0.073	0.432	0.051	0.555	3.37	0.301
10/1/2016	0.051	ND	ND	ND	10.3	ND
10/4/2016	37.4	1.27	24.9	42.4	26.8	6.06
10/7/2016	32.8	0.403	1.37	5.77	4.24	0.704
10/10/2016	8.49	ND	ND	12.5	8.74	ND
10/13/2016	18.8	ND	3.57	1.76	1.27	0.258
10/16/2016	32.3	ND	ND	25.6	3.33	ND
10/19/2016	12.1	ND	1.7	0.232	ND	ND
10/22/2016	0.41	ND	ND	ND	13.5	0.073
10/25/2016	29.8	57.3	12	33	67.5	43.5
10/28/2016	25	ND	0.07	11.1	11.9	ND
10/31/2016	5.04	17.5	16.2	1.96	29.6	27.5
11/3/2016	18.8	ND	ND	66.4	2.3	ND
11/6/2016	32.6	0.54	0.102	28.9	3.12	0.12
11/9/2016	0.921	ND	ND	16.4	ND	ND
11/12/2016	0.221	ND	15.1	2.22	ND	ND
11/15/2016	ND	106	0.268	ND	54.8	59.8
11/18/2016	16.9	0.827	3.61	23.4	0.21	0.831
11/21/2016	8.27	153	0.388	1.6	147	66.7
11/24/2016	2.81	5.66	0.87	1.02	17.1	3.77
11/27/2016	3.74	0.025	ND	5.4	4.9	0.018
11/30/2016	0.018	0.025	0.058	0.025	0.802	0.218
12/3/2016	40.6	0.044	ND	0.979	ND	ND
12/6/2016	2.42	3.41	0.413	0.635	0.029	0.787
12/9/2016	ND	ND	ND	0.433	0.537	ND
12/12/2016	ND	0.196	2.41	ND	0.381	2.44
12/15/2016	ND	ND	ND	0.025	21.3	ND
12/18/2016	ND	ND	ND	ND	8.81	2.22
12/21/2016	40.3	1.71	0.889	37.4	17.4	3.21
12/24/2016	26.2	ND	0.82	20.9	10.6	ND
12/27/2016	17.1	0.649	1.11	16.7	0.812	0.232
12/30/2016	3.18	ND	ND	4.82	17.6	ND
1/2/2017	19.5	3.06	2.93	0.664	ND	2.76

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
1/5/2017	33.2	ND	0.577	17.5	4.68	ND
1/8/2017	1.28	ND	ND	1.81	Invalid	ND
1/11/2017	ND	ND	20.3	0.033	0.029	0.083
1/14/2017	20	ND	ND	75.1	0.381	ND
1/17/2017	ND	0.036	11	ND	0.036	0.522
1/20/2017	ND	7.76	0.145	ND	ND	1.78
1/23/2017	ND	6.09	ND	ND	ND	0.022
1/26/2017	ND	ND	ND	ND	0.939	0.297
1/29/2017	ND	0.352	ND	ND	ND	ND
2/1/2017	ND	ND	0.051	ND	ND	0.051
2/4/2017	0.058	ND	ND	0.141	0.203	ND
2/7/2017	ND	ND	0.087	ND	ND	0.051
2/10/2017	1.32	ND	0.022	1.15	9.68	ND
2/13/2017	0.316	14.2	ND	8.56	0.656	0.04
2/16/2017	0.073	2.69	ND	0.218	2.62	ND
2/19/2017	0.551	0.301	0.682	1.74	0.334	0.112
2/22/2017	0.109	1.96	0.047	0.091	3.06	0.16
2/25/2017	ND	0.939	ND	ND	35.8	11.1
2/28/2017	ND	0.265	7.76	ND	ND	1.27
3/3/2017	2.58	ND	ND	1.36	2.25	ND
3/6/2017	ND	ND	0.62	ND	ND	ND
3/9/2017	14.8	ND	1.44	3.15	0.112	0.047
3/12/2017	5.6	ND	0.076	11.9	0.279	ND
3/15/2017	0.497	0.04	0.025	2.44	2.25	0.025
3/18/2017	0.152	0.25	2.21	0.022	0.022	0.562
3/21/2017	ND	2.84	ND	0.025	0.022	13.3
3/24/2017	0.062	0.029	0.178	ND	0.025	0.025
3/27/2017	ND	0.022	4.86	ND	0.022	0.033
3/30/2017	2.67	0.881	2.66	0.283	0.406	2.67
4/2/2017	4.9	ND	ND	0.044	ND	ND
4/5/2017	0.334	0.729	0.21	ND	ND	3.74
4/8/2017	17.3	0.925	3.2	13.7	28.3	1.05
4/11/2017	8.96	0.029	0.294	3.84	0.036	-Blank-
4/14/2017	24.6	ND	1.35	51.1	12.5	0.218
4/17/2017	18.4	0.029	1.53	17.6	0.12	0.276
4/20/2017	8.27	ND	0.381	7.62	0.319	0.109
4/23/2017	0.765	0.816	0.102	0.051	10.6	0.232
4/26/2017	0.025	0.029	Invalid	0.054	0.029	2.39
4/29/2017	0.044	0.029	2.19	0.033	0.033	0.029

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
5/2/2017	9.94	11.5	6.6	4.64	9.9	17.6
5/5/2017	ND	2.81	ND	ND	0.174	0.312
5/8/2017	0.508	11	0.297	0.323	9.68	14.9
5/11/2017	0.729	0.254	2.25	ND	0.022	0.247
5/14/2017	ND	ND	ND	ND	1.22	ND
5/17/2017	ND	ND	0.109	ND	ND	ND
5/20/2017	ND	ND	0.025	ND	ND	0.018
5/23/2017	0.098	0.062	ND	ND	ND	0.062
5/26/2017	ND	ND	0.054	ND	ND	0.163
5/29/2017	0.395	0.134	0.323	0.323	1.48	0.725
6/1/2017	7.73	0.214	0.109	2.06	0.366	0.102
6/4/2017	2.57	0.943	2.56	0.116	0.479	0.751
6/7/2017	0.872	ND	ND	1.18	5.59	ND
6/10/2017	19.7	ND	0.91	6.27	ND	ND
6/13/2017	28.6	ND	1.59	0.823	ND	0.758
6/16/2017	ND	4.82	ND	ND	ND	35.9
6/19/2017	26.7	2.59	1.6	10.7	7.76	2.47
6/22/2017	0.16	ND	4.43	ND	ND	ND
6/25/2017	11.8	7.15	0.61	11.8	13.9	0.384
6/28/2017	45.7	ND	2.14	6.6	0.199	ND
7/1/2017	ND	0.167	ND	ND	ND	4.5
7/4/2017	0.058	0.28	ND	ND	ND	6.06
7/7/2017	1.42	6.49	0.308	1.65	2.68	0.94
7/10/2017	0.152	8.31	0.083	4.21	34.2	0.334
7/13/2017	4.63	2.4	0.878	3.7	2.81	1.17
7/16/2017	4.64	5.04	2.73	2.09	5.88	11.2
7/19/2017	1.58	3.55	0.878	3.35	3.81	5.51
7/22/2017	5.11	13.9	1.06	10.2	7	2.02
7/25/2017	ND	0.929	0.345	ND	0.744	2.73
7/28/2017	ND	1.97	ND	ND	0.087	9.14
7/31/2017	4.28	ND	ND	1.76	2.63	ND
8/3/2017	14.3	ND	0.493	5.55	0.892	ND
8/6/2017	5.51	1.66	0.86	1.7	1.1	0.914
8/9/2017	45.3	0.076	ND	26.2	0.479	ND
8/12/2017	ND	12.3	0.276	0.058	0.736	4.68
8/15/2017	4.24	0.526	3.92	2.45	0.831	1.38
8/18/2017	ND	2.92	0.05	ND	0.461	3.41
8/21/2017	5.77	0.225	2.2	0.613	3.59	0.352
8/24/2017	3.27	0.218	0.033	7	1.72	0.776

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
8/27/2017	33.3	0.432	0.054	1.16	0.406	0.17
8/30/2017	13.9	0.025	2.29	0.308	ND	0.094
9/2/2017	2.39	0.174	0.07	2.81	2.66	0.127
9/5/2017	INVALID	1.15	2.29	0.247	2.15	3.92
9/8/2017	1.18	ND	ND	5.01	3.13	ND
9/11/2017	0.029	ND	ND	17.1	4.28	ND
9/14/2017	4.94	0.13	2.45	6.57	0.37	1.55
9/17/2017	16.2	0.95	1.5	19	4.32	1.3
9/20/2017	0.26	0.04	1.54	0.1	0.05	6.71
9/23/2017	4.53	0.196	0.312	4.9	4.46	0.93
9/26/2017	22.7	0.033	0.025	8.2	1.72	0.018
9/29/2017	29.2	3.59	1.6	21.5	22	3.55
10/2/2017	34.1	0.044	0.062	4.13	0.029	0.033
10/5/2017	29.7	0.025	ND	23.2	0.559	ND
10/8/2017	0.929	0.475	0.022	0.831	0.936	0.058
10/11/2017	0.355	0.279	1.6	0.258	4.79	0.987
10/14/2017	30.4	ND	0.058	15.7	0.047	ND
10/17/2017	0.112	0.044	0.029	0.504	4.82	0.044
10/20/2017	21	0.036	0.036	13.7	0.044	0.036
10/23/2017	0.827	0.794	0.179	0.207	2.09	0.131
10/26/2017	ND	15.5	1.61	0.036	2.99	43.2
10/29/2017	0.033	0.033	0.033	0.036	15.9	0.025
11/1/2017	19.5	0.036	1.44	1.65	0.033	0.025
11/4/2017	7.29	0.029	2.13	0.646	ND	0.127
11/7/2017	0.167	4.28	0.769	0.033	ND	1.44
11/10/2017	1.37	1.2	0.025	2.33	6.46	0.025
11/13/2017	6.2	0.033	0.029	32.1	0.21	0.029
11/16/2017	28.8	0.044	0.036	32.4	0.649	0.036
11/19/2017	0.033	0.138	0.036	0.036	24.1	0.192
11/22/2017	0.464	0.062	0.025	8.2	2.7	0.036
11/25/2017	21.3	17.3	39.5	6.2	21.1	89.2
11/28/2017	70	Invalid	15.4	151	1.07	0.069
12/1/2017	0.192	0.131	0.254	0.395	1.65	0.127
12/4/2017	1.33	ND	0.051	0.794	0.036	-Blank-
12/7/2017	ND	ND	ND	0.076	0.319	ND
12/10/2017	0.083	0.12	ND	0.123	0.395	0.276
12/13/2017	0.029	0.283	0.316	0.018	1.15	0.49
12/16/2017	1.02	0.022	0.015	0.929	0.954	0.018
12/19/2017	3.51	ND	0.58	12.3	--	ND

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
12/22/2017	ND	ND	1.44	ND	ND	0.258
12/25/2017	0.566	0.015	0.015	2.8	5.59	ND
12/28/2017	0.015	0.018	0.015	1.06	0.468	ND
12/31/2017	6.75	ND	ND	9.39	4.24	ND
1/3/2018	ND	ND	ND	0.0598	2.66	ND
1/6/2018	16.9	ND	0.0526	23.6	2.72	ND
1/9/2018	ND	ND	ND	ND	11.6	ND
1/12/2018	ND	1.6	0.392	ND	0.289	1.66
1/15/2018	2.65	3.84	3.84	4.5	12	5.37
1/19/2018	2.15	6.06	0.566	2.49	4.64	5.55
1/22/2018	15.6	ND	2.09	3.17	ND	1.78
1/25/2018	7	0.025	0.0225	2.62	26.4	ND
1/28/2018	1.7	0.0196	0.0236	10.8	10.5	0.0221
1/31/2018	30.9	ND	30.3	INVALID	9.68	0.111
2/3/2018	8.45	0.016	0.0185	3.55	0.018	ND
2/6/2018	32	ND	0.016	32.4	0.598	ND
2/9/2018	16.5	ND	0.0406	3.95	Invalid	ND
2/12/2018	0.0319	0.0348	ND	0.0243	1.19	0.0334
2/15/2018	0.0308	ND	3.12	0.0406	0.0337	Invalid
2/18/2018	4.43	0.889	0.424	0.972	0.852	3.95
2/21/2018	ND	0.0323	0.773	0.0305	0.0243	0.0316
2/24/2018	0.624	0.0297	1.02	0.0229	ND	0.0591
2/27/2018	8.02	0.0265	0.0374	1.2	0.0497	0.0232
3/2/2018	0.0606	0.0479	0.0247	0.896	0.889	0.021
3/5/2018	0.747	ND	0.33	0.49	0.403	0.088
3/8/2018	ND	ND	ND	0.0809	0.91	ND
3/11/2018	1.36	0.0736	0.722	0.136	0.191	0.0939
3/14/2018	0.128	13.8	0.0196	3.57	28.3	0.228
3/17/2018	ND	ND	0.718	ND	ND	1.06
3/20/2018	ND	0.453	ND	ND	ND	0.199
3/23/2018	4.75	0.849	1.04	5.15	2.42	2.75
3/26/2018	ND	0.0345	0.907	0.0374	0.0359	0.114
3/29/2018	0.0218	0.0406	0.689	0.0196	0.443	0.105
4/1/2018	3.7	ND	0.783	8.96	2.7	0.053
4/4/2018	0.285	0.0925	0.377	0.319	0.715	0.49
4/7/2018	ND	0.482	0.359	ND	0.321	0.0693
4/10/2018	0.0424	ND	ND	0.119	1.04	ND
4/13/2018	ND	ND	2.47	ND	ND	0.0178
4/16/2018	ND	0.388	ND	ND	0.0243	0.0185

Sample Date	Sample Locations					
	238 Chad Baker	Acorn & Hwy 44	ESJH	5th Ward Elem	Levee	Ochsner
4/19/2018	ND	1.11	ND	ND	2.54	1.49
4/22/2018	0.421	ND	0.482	0.101	ND	0.0258
4/25/2018	ND	3.99	ND	ND	4.72	0.12
4/28/2018	0.522	7.51	ND	4.86	22.1	ND
5/1/2018	0.261	0.0229	0.1	INVALID	ND	ND
5/4/2018	ND	0.0272	0.049	INVALID	0.0268	0.0297
5/7/2018	ND	0.34	ND	ND	1.35	ND
5/10/2018	10.8	ND	4.53	2.22	0.0479	0.328
5/13/2018	3.35	ND	0.299	0.947	0.0341	0.0185
5/16/2018	0.0341	0.235	0.106	0.0428	1.82	0.226
5/19/2018	0.827	0.598	0.54	0.172	0.297	0.435
5/22/2018	ND	0.504	0.0671	0.0105	1.26	0.7
5/25/2018	0.1	0.885	0.116	0.222	2.29	0.0591
5/28/2018	0.468	ND	ND	0.103	3.53	ND

*ND = Concentration not detected
§-- = No sample received in lab
†Invalid = Sample was invalid
‡U = Concentration below method detection limit
**-Blank- = Data cell left empty in EPA data file
NOTE: No samples collected on August 16-20, 2016 due to flooding in Louisiana
Highlighted in yellow = concentration above 20 ug/m3
Highlighted in blue = concentration not detected

APPENDIX B: Evaluation of Chloroprene Data, May 2016-May 2018

Table B-1. Summary of chloroprene concentrations in micrograms per cubic meter (ug/m^3) in EPA ambient air canister samples (24-hr) collected from LaPlace, LA, in 2016

	2016			
Air Monitor Location	Samples per Location	% Detects Per Location	% Concentrations > 0.2 ug/m^3	% Concentrations > 20 ug/m^3
238 Chad Baker	69	84.06	76.81	20.29
Acorn & Hwy 44	70	64.29	51.43	8.57
ESJH	70	80.00	64.29	1.43
5th Ward Elem	69	81.16	76.81	15.94
Levee	69	86.96	81.16	13.04
Ochsner	70	68.57	89.58	7.14

Table B-2. Summary of chloroprene concentrations in micrograms per cubic meter (ug/m^3) in EPA ambient air canister samples (24-hr) collected from LaPlace, LA, in 2017

	2017			
Air Monitor Location	Samples per Location	% Detects Per Location	% Concentrations > 0.2 ug/m^3	% Concentrations > 20 ug/m^3
238 Chad Baker	121	77.69	61.16	13.22
Acorn & Hwy 44	121	71.07	42.98	0.00
ESJH	121	76.86	47.93	1.65
5th Ward Elem	122	77.05	61.48	6.56
Levee	120	80.00	62.50	5.00
Ochsner	120	75.83	45.00	2.50

Table B-3. Summary of chloroprene concentrations in micrograms per cubic meter (ug/m^3) in EPA ambient air canister samples (24-hr) collected from LaPlace, LA, in 2018

	2018			
Air Monitor Location	Samples per Location	% Detects Per Location	% Concentrations > 0.2 ug/m^3	% Concentrations > 20 ug/m^3
238 Chad Baker	49	67.35	51.02	4.08
Acorn & Hwy 44	49	63.27	34.69	0.00
ESJH	49	75.51	46.94	2.04
5th Ward Elem	46	78.26	45.65	4.35
Levee	48	85.42	64.58	6.25
Ochsner	48	72.92	29.17	0.00

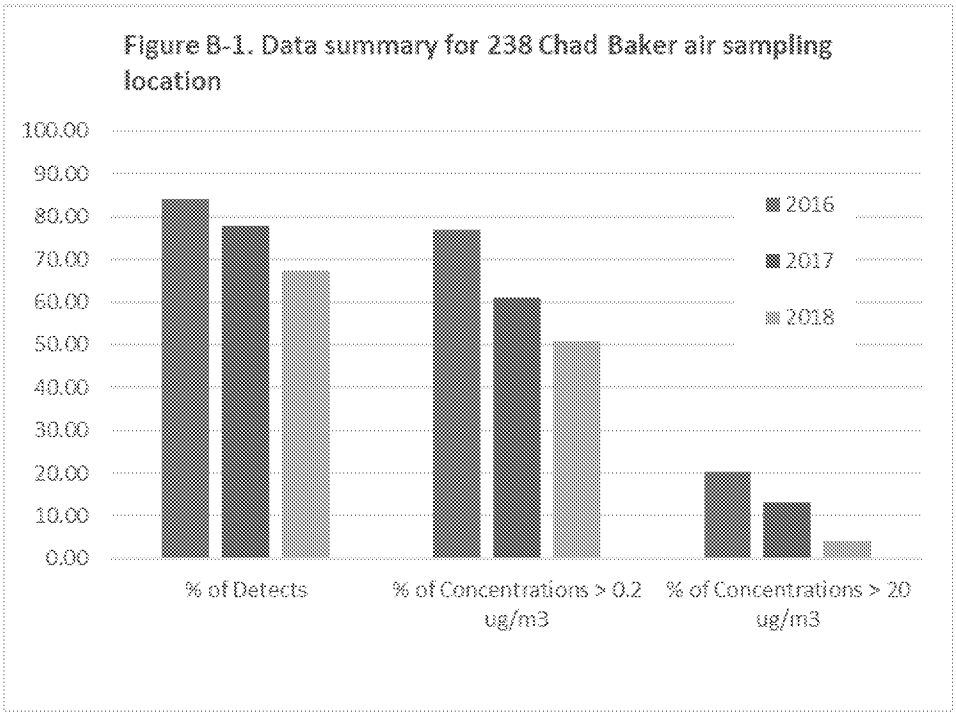
Figure B-1. Data summary for 238 Chad Baker air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

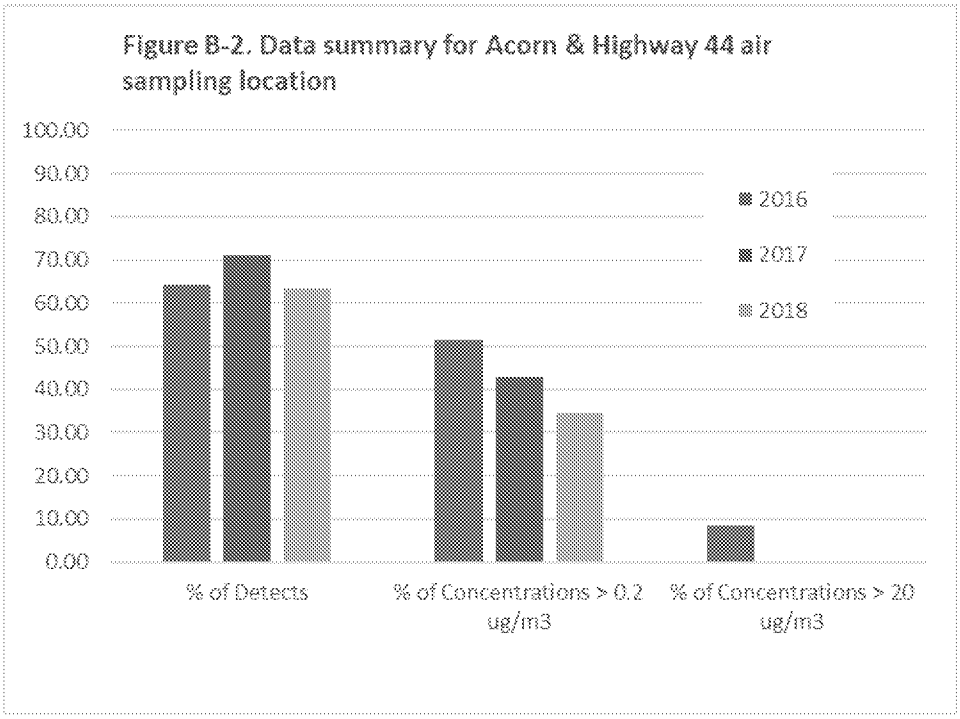
Figure B-2. Data summary for Acorn & Highway 44 air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

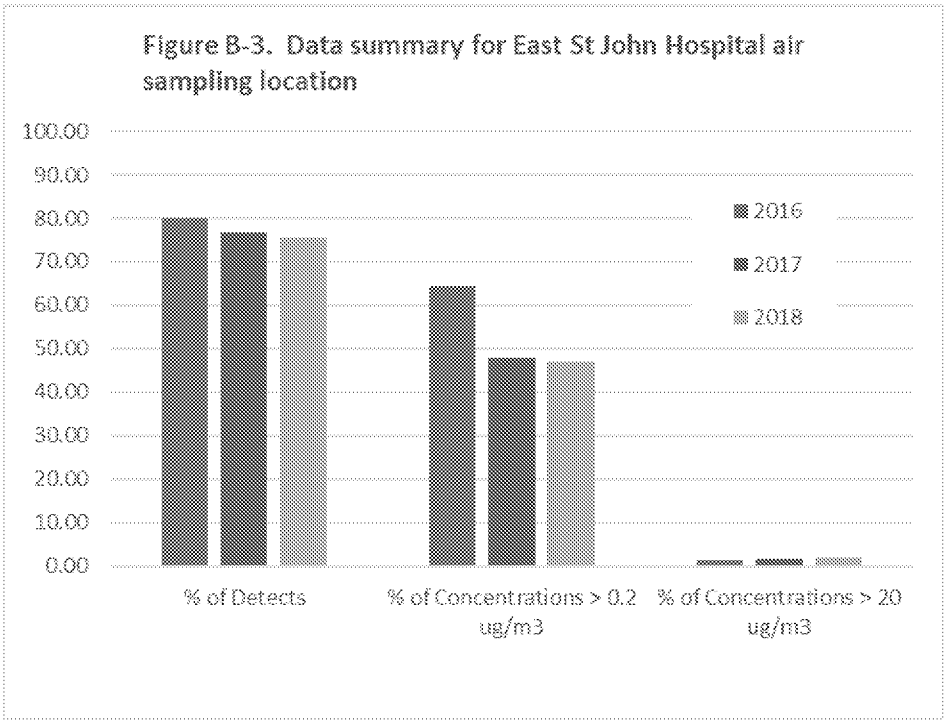
Figure B-3. Data summary for East St John Hospital air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

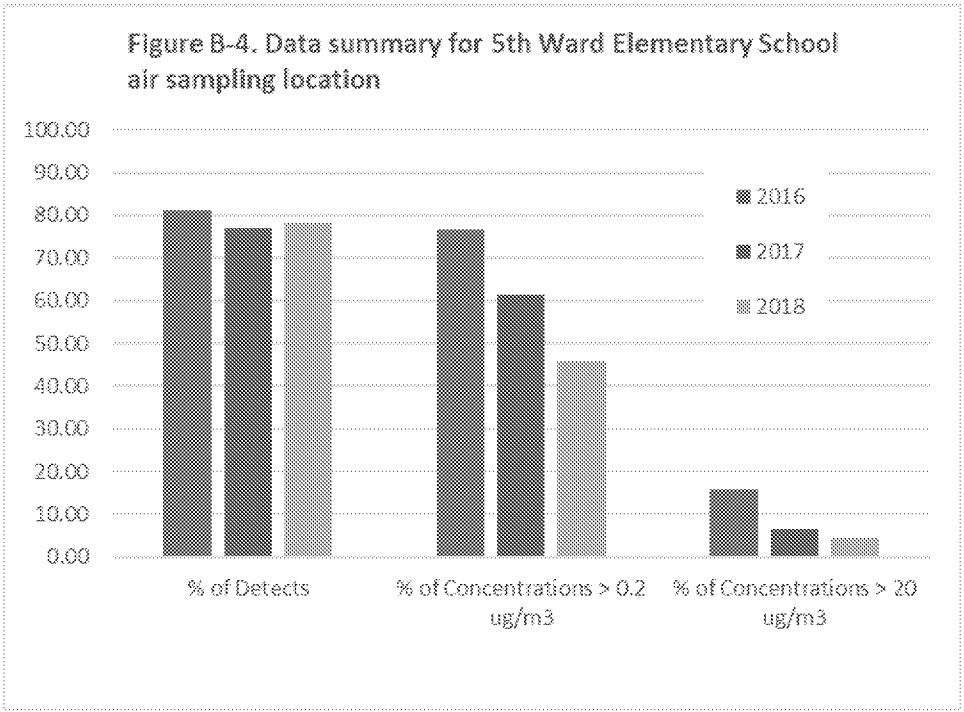
Figure B-4. Data summary for 5th Ward Elementary School air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

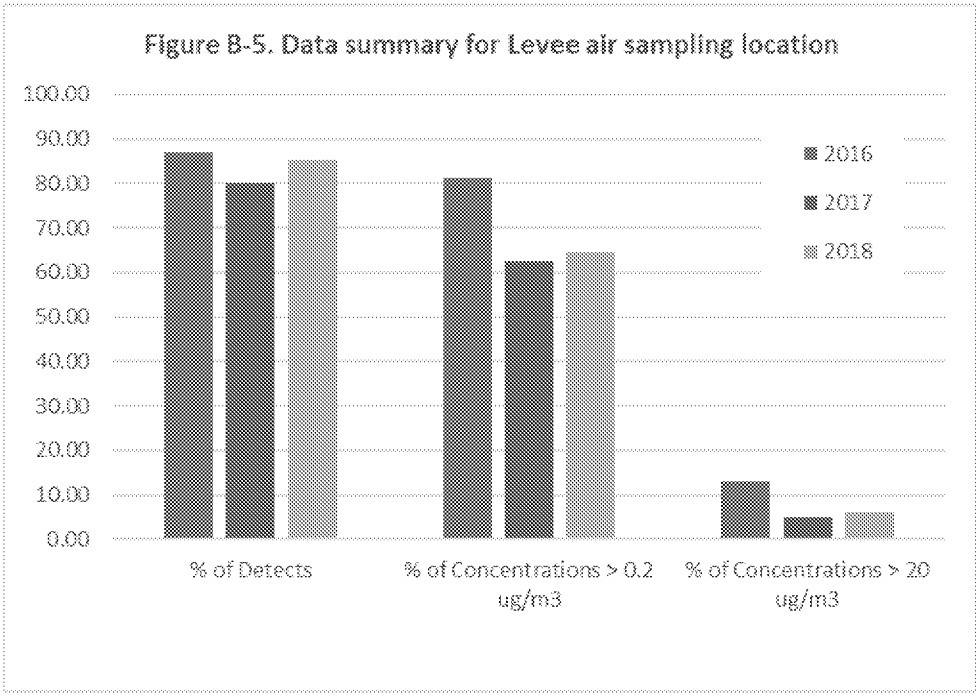
Figure B-5. Data summary for Levee air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

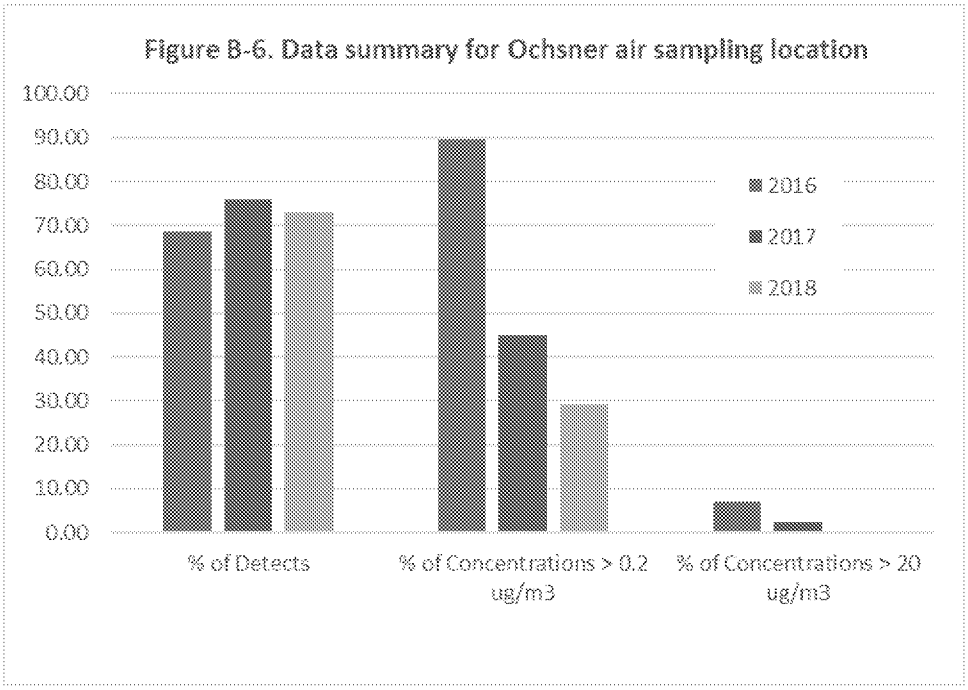
Figure B-6. Data summary for Ochsner air sampling location
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
20.00
10.00
0.00
2016
2017
2018
% of Detects
% of Concentrations > 0.2 ug/m3
% of Concentrations > 20 ug/m3

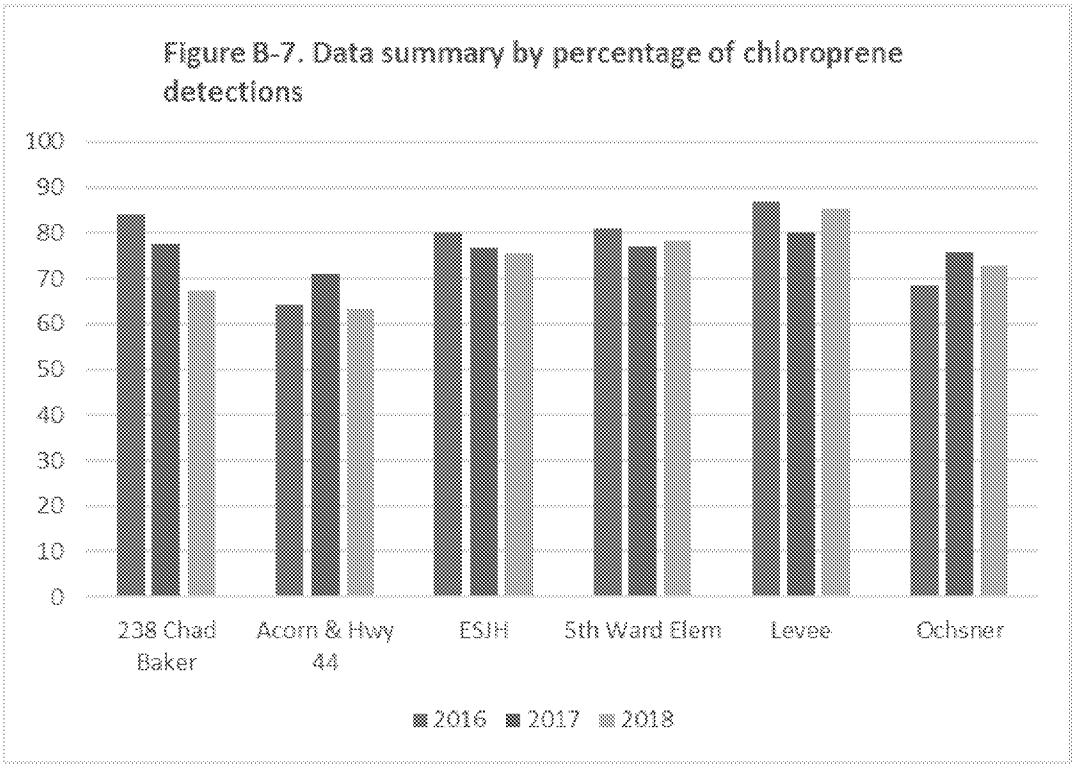
Figure B-7. Data summary by percentage of chloroprene detections
100
90
80
70
60
50
40
30
20
10
0
238 Chad Baker
Acorn & Hwy 44
ESJH
5th Ward Elem
Levee
Ochsner
2016
2017
2018

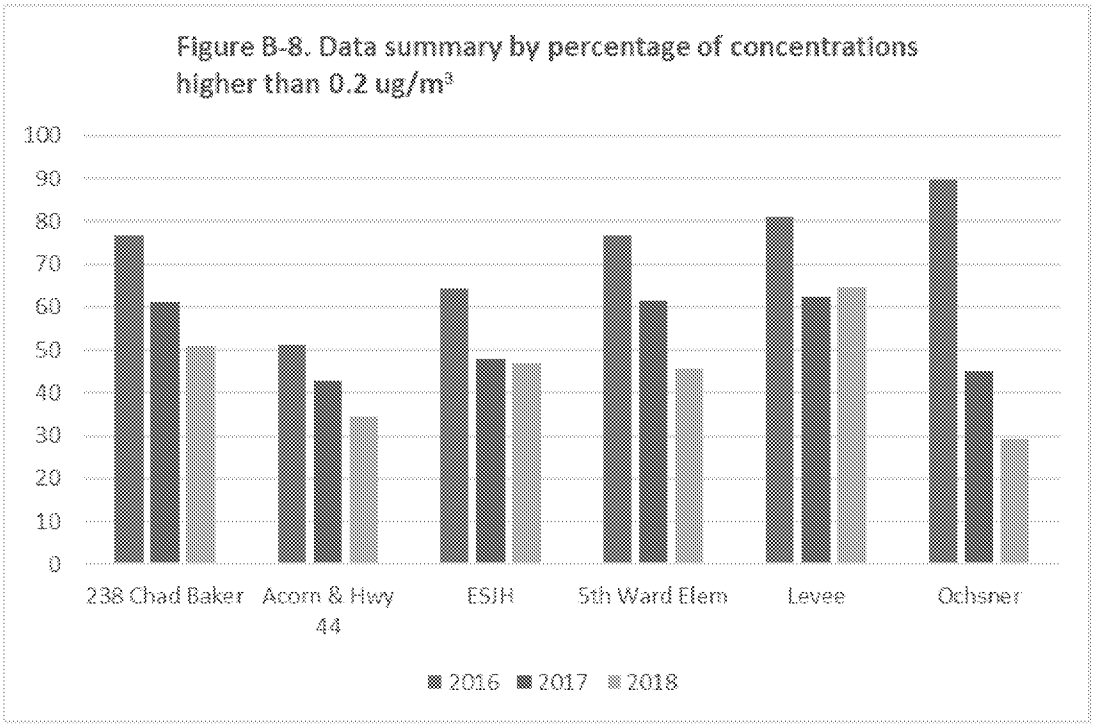
Figure B-8. Data summary by percentage of concentrations higher than 0.2 ug/m³
100
90
80
70
60
50
40
30
20
10
0
238 Chad Baker
Acorn & Hwy 44
ESJH
5th Ward Elem
Levee
Ochsner
2016
2017
2018

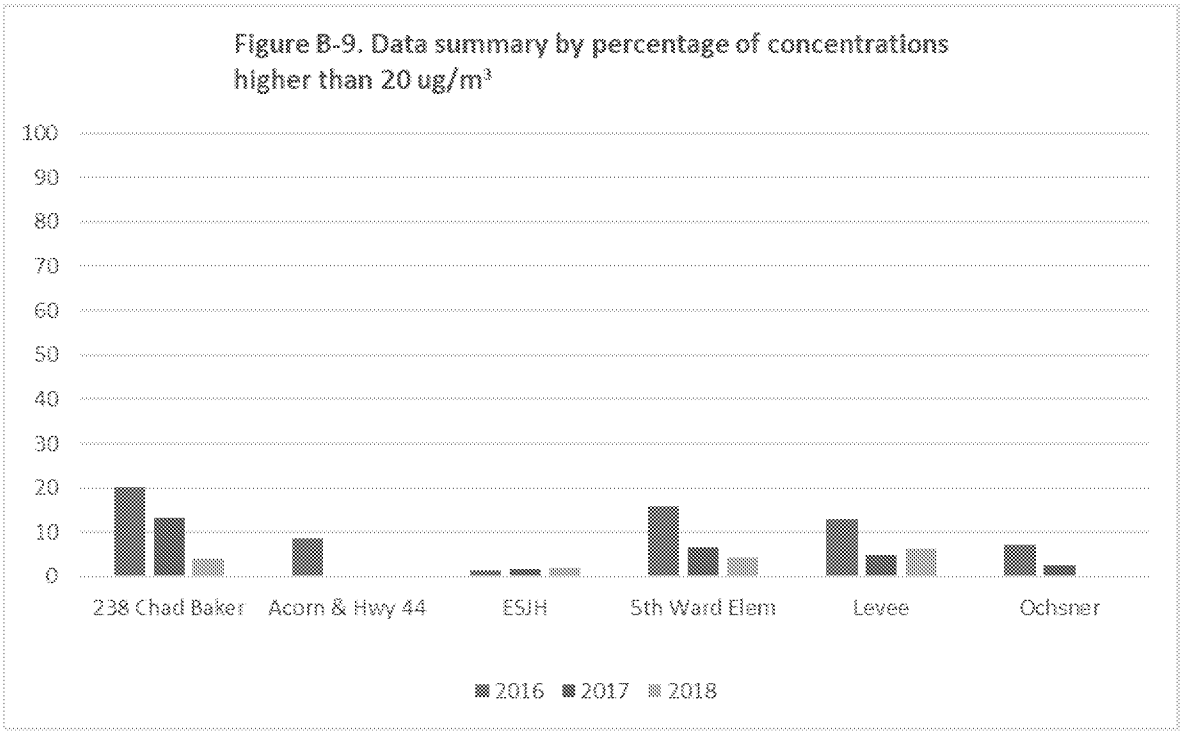
Figure B-9. Data summary by percentage of concentrations higher than 20 ug/m³
100
90
80
70
60
50
40
30
20
10
0
238 Chad Baker
Acorn & Hwy 44
ESJH
5th Ward Elem
Levee
Ochsner
2016
2017
2018

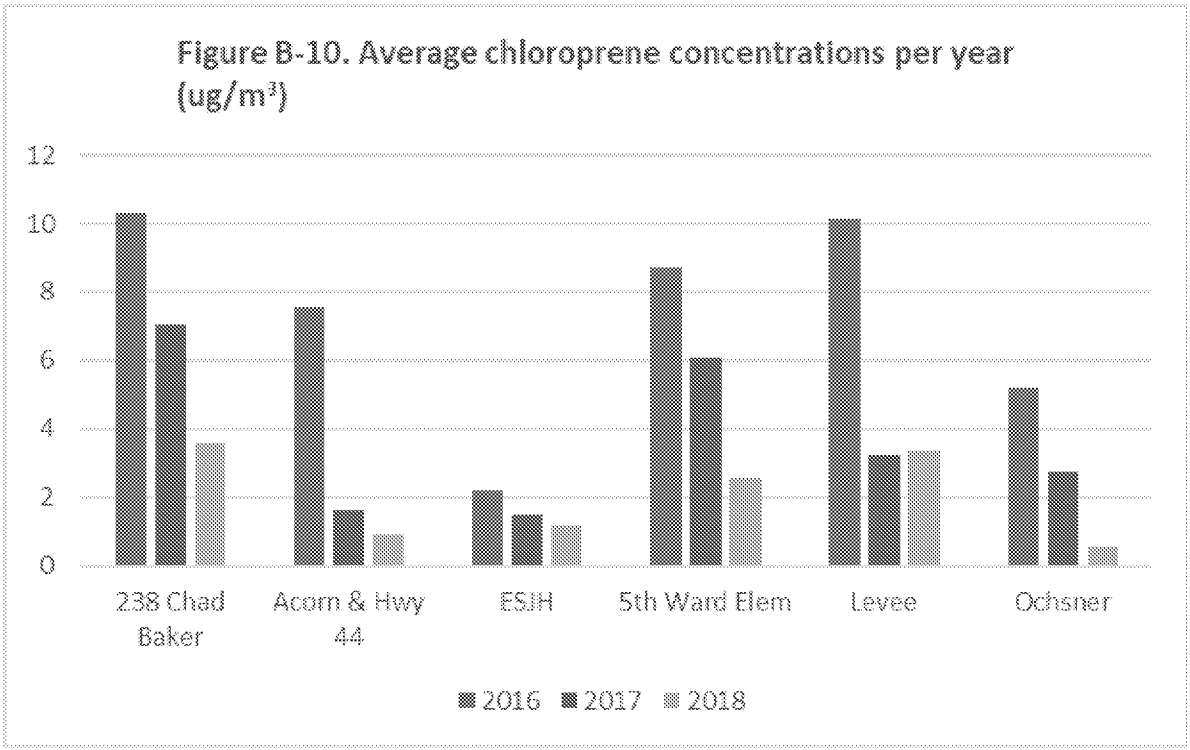
Figure B-10. Average chloroprene concentrations per year (ug/m³)
12
10
8
6
4
2
0
238 Chad Baker
Acorn & Hwy 44
ESJH
5th Ward Elem
Levee
Ochsner
2016
2017
2018

APPENDIX C: Statistical Analyses of Chloroprene Data

For the statistical analyses, samples reported as nondetects (ND) were conservatively assessed using a concentration of half the current detection limit. The EPA laboratory re-calculates the lowest concentration detectable by the laboratory method (the method detection limit, or MDL) on an annual basis; consequently, the MDL used to analyze the chloroprene data changed from 0.036 ug/m3 in 2016 to 0.073 ug/m3 in February 2017 and to 0.0468 ug/m3 in January 2018 (US EPA). Half of the current detection limit of 0.0468 ug/m^3 is 0.0234 ug/m^3.

Table C-1. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the 238 Chad Baker air sampling site

	2016	2017	2018
Average	10.31	7.08	3.57
Lower CI	7.20	4.92	1.48
Upper CI	13.42	9.25	5.66
St Dev	12.94	12.03	7.28
Sample Size	69	121	49

CI = Confidence Interval
St Dev = Standard Deviation

Table C-2. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the Acorn & Highway 44 sampling site

	2016	2017	2018
Average	7.53	1.61	0.90
Lower CI	1.89	0.98	0.20
Upper CI	13.16	2.23	1.60
St Dev	23.63	3.48	2.42
Sample Size	70	121	49

CI = Confidence Interval
St Dev = Standard Deviation

Table C-3. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the East St John High School site

	2016	2017	2018
Average	2.21	1.49	1.17
Lower CI	1.17	0.70	-0.08
Upper CI	3.24	2.29	2.43
St Dev	4.35	4.42	4.36
Sample Size	70	121	49

CI = Confidence Interval
St Dev = Standard Deviation

Table C-4. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the Fifth Ward Elementary School air sampling site

	2016	2017	2018
Average	8.70	6.09	2.56
Lower CI	5.43	3.11	0.77
Upper CI	11.96	9.08	4.36
St Dev	13.58	16.68	6.05
Sample Size	69	122	46

CI = Confidence Interval
St Dev = Standard Deviation

Table C-5. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the Levee air sampling site

	2016	2017	2018
Average	10.13	3.21	3.37
Lower CI	4.84	2.03	1.46
Upper CI	15.42	4.39	5.28
St Dev	22.02	6.52	6.58
Sample Size	69	120	48

CI = Confidence Interval
St Dev = Standard Deviation

Table C-6. Statistical analyses of average chloroprene concentrations (in ug/m^3) at the Ochsner air sampling site

	2016	2017	2018
Average	5.21	2.73	0.57
Lower CI	2.27	0.95	0.20
Upper CI	8.15	4.51	0.94
St Dev	12.32	9.84	1.29
Sample Size	70	120	48

CI = Confidence Interval
St Dev = Standard Deviation

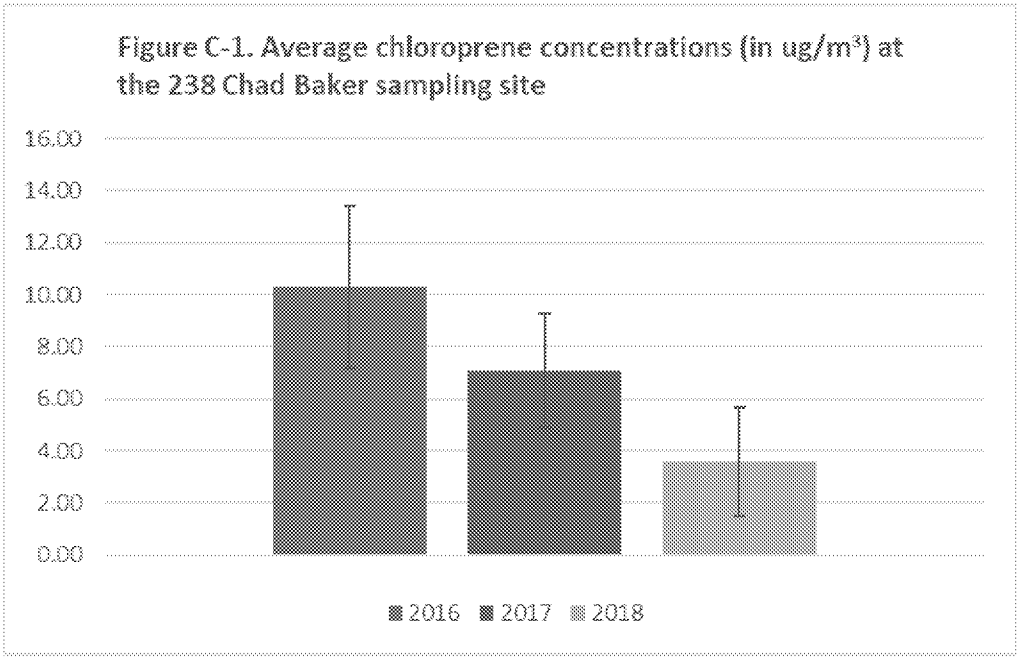
Figure C-1. Average chloroprene concentrations (in ug/m³) at the 238 Chad Baker sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

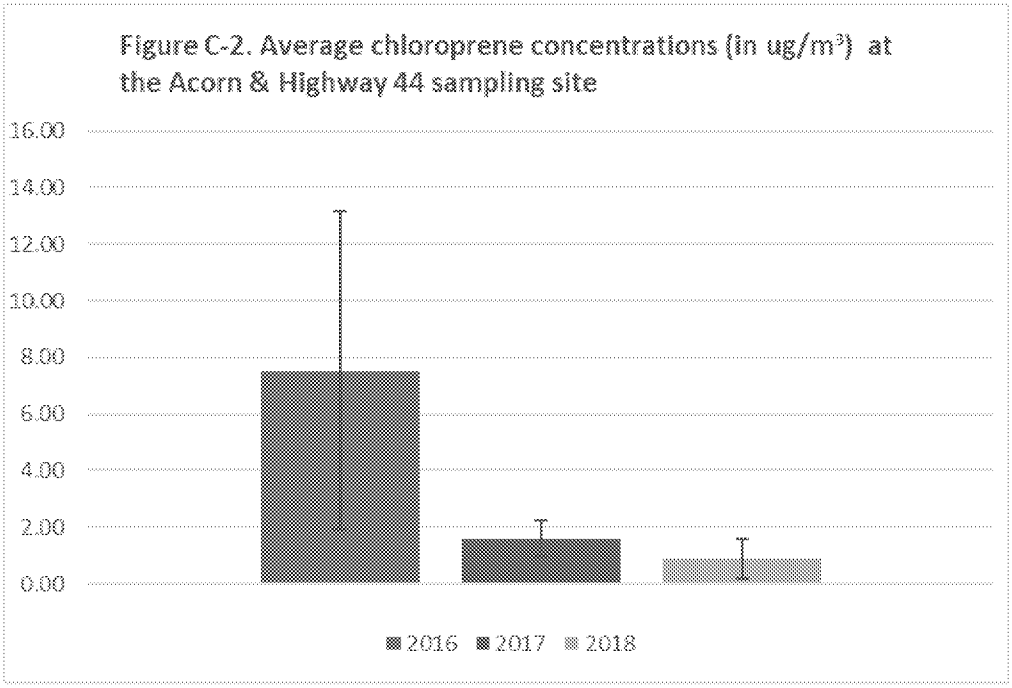
Figure C-2. Average chloroprene concentrations (in ug/m³) at the Acorn & Highway 44 sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

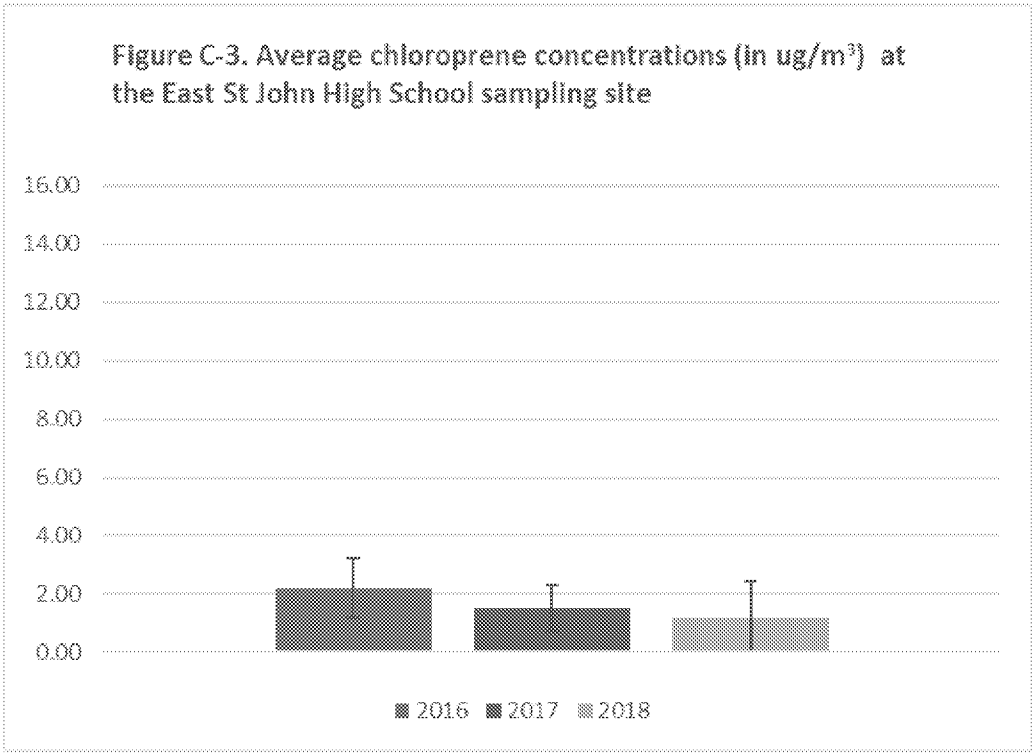
Figure C-3. Average chloroprene concentrations (in ug/m³) at the East St John High School sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

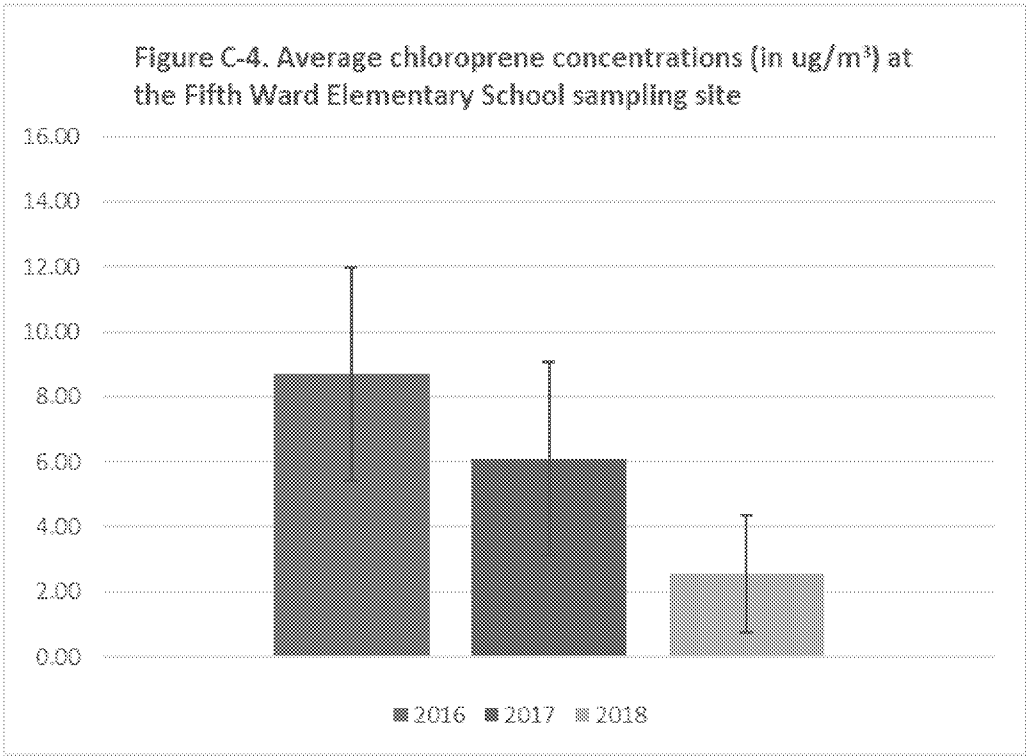
Figure C-4. Average chloroprene concentrations (in ug/m³) at the Fifth Ward Elementary School sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

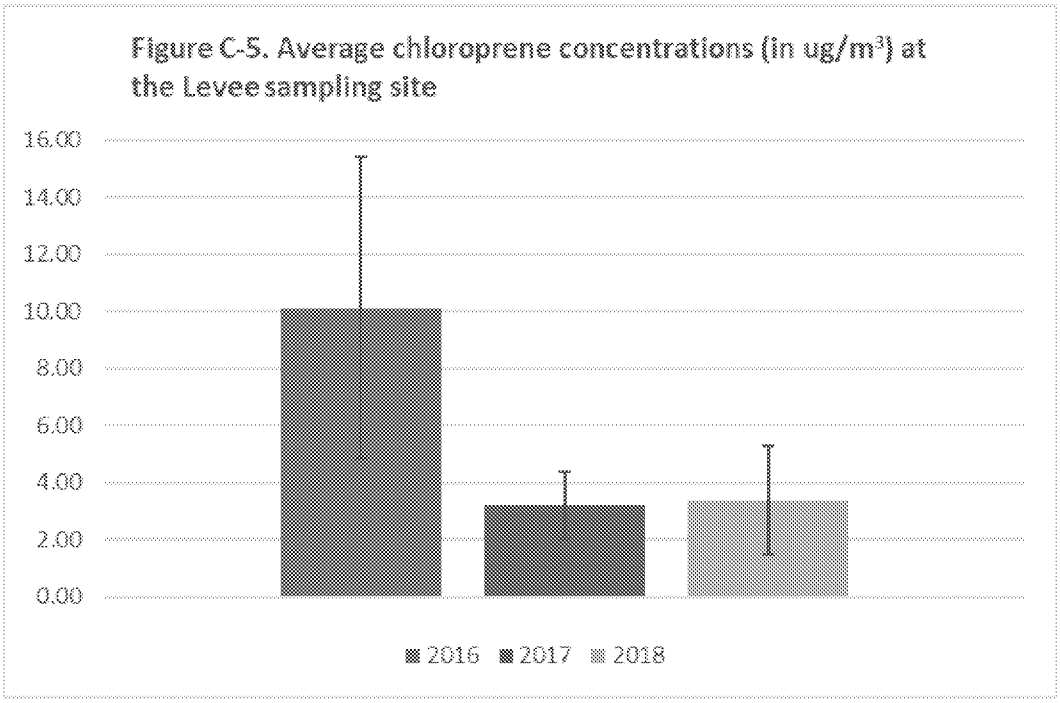
Figure C-5. Average chloroprene concentrations (in ug/m³) at the Levee sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

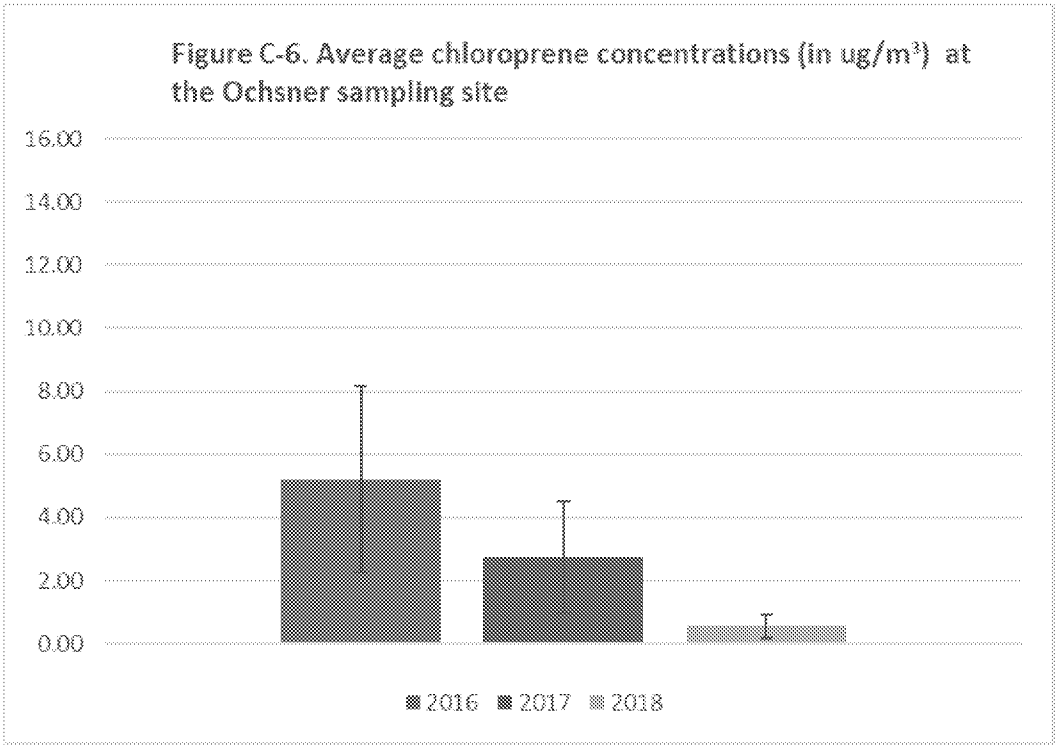
Figure C-6. Average chloroprene concentrations (in ug/m³) at the Ochsner sampling site
16.00
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2016
2017
2018

John Bel Edwards
GOVERNOR

Dr. Courtney N. Phillips
SECRETARY

State of Louisiana

Louisiana Department of Health
Office of Public Health

April 11, 2022

Via email

EPA Region 6 Administrator
Earthea Nance, PhD, PE
U.S. EPA Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
Nance.Earthea@epa.gov

Re: Denka Performance Elastomer, LLC

Dear Dr. Nance:

Although applicable Louisiana statutes place industrial chemical air emissions under the regulatory purview of the Louisiana Department of Environmental Quality (LDEQ), the Louisiana Department of Health (LDH) has for several years been consulting and working with LDEQ and the affected community to determine and address human health concerns related to emissions of chloroprene from the Denka Performance Elastomer facility in St. John the Baptist Parish, Louisiana (the "Facility"). To that end, LDH has received a copy of the enclosed draft report concerning a demonstration project commissioned by LDH and conducted by the Louisiana State University Health Sciences Center (LSUHSC), entitled *St. John the Baptist Parish Chloroprene Monitoring Demonstration; Subproject of "Cancer Reporting in St. John the Baptist Parish ("CRISP") Project*, dated April 11, 2022. The report raises new concerns about the possible levels of exposure to chloroprene and other chemicals being sustained by community residents near the Facility. LDH is providing you with a copy of the report to enable you to take whatever actions or measures you deem appropriate with regard thereto. Additionally, LDH respectfully requests the assistance and expertise of your agencies with:

- Technical analysis of LSUHSC's newly reported data and findings,
- Assessment of the *need* for additional monitoring, data collection, or other measures, and

- Recommendations regarding *implementation* of any recommended additional monitoring or data collection efforts, including additional public health measures and public advisories.

For reference, we have included herewith copies of the following additional reports related to Denka emissions:

- *Reference Document for the Preliminary Assessment of Chloroprene Levels in St. John the Baptist Parish* (LDH\OPH, June 14, 2018)
- *Cancer Reporting in St. John Parish* (LSUHSC, Final Report 2021)

Please do not hesitate to contact my office if you need any additional information or reports. We have made a similar request to the U.S. Agency for Toxic Substances and Disease Registry (ATSDR).

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

Joseph Kanter, MD, MPH
State Health Officer
Louisiana Department of Health

Enclosures

cc: Michael S. Regan. EPA Administrator
ATSDR
LDEQ