



State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF THE SECRETARY

May 27, 2016

**CERTIFIED MAIL 7002 2030 0002 8909 4273
RETURN RECEIPT REQUESTED**

Mr. Patrick A. Walsh, CIH
Safety, Health and Environmental Manager
Denka Performance Elastomer LLC
560 Highway 44
LaPlace, LA 70068

RE: Denka Performance Elastomer LLC (DPE) - Pontchartrain Site; LaPlace, St. John the Baptist Parish; Agency Interest No.199310; Air Quality Modeling Protocol and Fenceline Monitoring Proposal for Chloroprene Emissions

Dear Mr. Walsh:

As you are aware, in December 2015, the Environmental Protection Agency (EPA) released the 2010 Integrated Risk Information System (IRIS) data and/or report for several pollutants including, but not limited to, chloroprene. According to this data/report, the annual average standard for chloroprene has been established at $0.2 \mu\text{g}/\text{m}^3$. Whereas, the Ambient Air Standard contained in LAC 33:III.5112-Table 51.2 for chloroprene, a toxic air pollutant (TAP), is $857 \mu\text{g}/\text{m}^3$ (an 8-hour average).

As a result of the December 2015 publication and to assist the Louisiana Department of Environmental Quality (the Department) in further processing of the Title V minor modification permit application submitted on December 8, 2015, the Department requested an Air Quality Modeling Protocol and Fenceline Monitoring Proposal for chloroprene emissions from DPE for its Pontchartrain site for review and approval. The Department has received and reviewed the Air Quality Modeling Protocol and Fenceline Monitoring Proposal for chloroprene emissions, which were received by the Department on or about April 13, 2016 and May 6, 2016, respectively.

The review of the Air Quality Modeling Protocol revealed that $857 \mu\text{g}/\text{m}^3$ (an 8-hour average) will be the comparison standard for the chloroprene emissions instead of $0.2 \mu\text{g}/\text{m}^3$ (annual average). As such, the Department is unable to approve this Air Quality Modeling Protocol. A revised Air Quality Modeling Protocol following EPA modeling guidelines, specifically AERMOD Dispersion Model (Version 15181), which proposes to utilize and/or compare the chloroprene emissions to the current updated annual standard of $0.2 \mu\text{g}/\text{m}^3$ should be prepared and submitted to the Department for review and/or approval.

The following observations were noted during the review of the Fenceline Monitoring Proposal:

- Sample Locations - the proposed locations are approved by the Department. However, the Department is requiring two (2) additional sample locations be established. One (1) location shall be located northeast of the Pontchartrain site and the other location shall be located south of the Pontchartrain site.

- Analytical Methodology - with an exception to the Method Detection Limit (MDL), as noted below, the analytical methodology is acceptable to the Department.
- A laboratory Method Detection Limit (MDL), of at least 0.04 $\mu\text{g}/\text{m}^3$ (0.01 ppbv), isn't being proposed. This MDL is achievable by commercial laboratories and is deemed necessary for the monitoring activities to be deemed successful. Performing a study to determine if the MDL can be detected isn't warranted and therefore, is not approved by the Department.
- Sampling Frequency and Duration – the 24-hour sample type is hereby approved by the Department. However, the frequency of twice per month for 6 months is denied. The sample collection frequency shall be once every six (6) days for a minimum of six (6) months to address and or account for variations in pollutant concentration(s). However, a sample frequency of once every three (3) days is preferable.
- The Protocol does not propose to measure and/or document the following information and/or operating conditions at the facility and/or at certain relevant emission points, which are also essential to demonstrate successfulness of the monitoring activities:
 - Meteorological conditions including hourly averages of wind speed, wind direction, ambient temperature, relative humidity, and barometric pressure.
 - Production rate (per hour) of chloroprene and neoprene at the time of monitoring and the following information, as referenced in permit 2249-V8:
 - VOC emissions (both chloroprene and toluene) calculated on the day of monitoring as per Specific Requirement (SR) 147.
 - Chloroprene emissions calculated on the day of monitoring as per SR 176 and operating rate of CD refining column of EQT 0139 or EQT 0140.
 - All the parameters monitored as per SR 182 at the 1700-2 Strippers Condenser Vent (RLP 0014).
 - Temperature of the Condenser Brine Outlet as per SR 192.
 - Percent Reduction as per SR 193.
 - Compliance status of SR 196.
 - From the Halogen Acid Furnace if it is operating as per permit 206-V3:
 - Combustion chamber temperature
 - Waste flow rate
 - Dynamic scrubber differential pressure
 - Dynamic scrubber pH

Within two (2) weeks of receipt of this letter, please submit a revised Air Quality Modeling Protocol and Fenceline Monitoring Proposal which addresses and incorporates the aforementioned requirements.

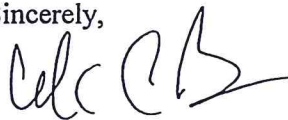
Denka Performance Elastomer LLC (DPE)

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If you have questions or need additional information regarding the revised Air Quality Modeling Protocol, please contact Mr. Donald Trahan at (225) 219-3408 or by e-mail at Donald.Trahan@la.gov. Questions or requests regarding the revised Fenceline Monitoring Proposal should be directed to Mr. Bob Bailey at (225) 219-3991 or via e-mail at Bob.Bailey@la.gov.

Sincerely,



Chuck Carr Brown, Ph.D.

Secretary

Louisiana Department of Environmental Quality

CCB/CJC/cjc

cc: (Via electronic mail)

Jorge Lavastida, Plant Manager, DPE

Wren Stenger, Director; Multimedia Division (EPA Region 6)

John Blevins, Director; Compliance Assurance & Enforcement Division (EPA Region 6)

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