



Denka Performance Elastomer LLC  
560 Highway 44  
LaPlace, LA 70068

March 24, 2016

**Certified Mail; Return Receipt Requested (7013 2250 0001 6409 6918)**

Mr. James Leathers  
Toxics Enforcement Section 6EN-AT  
Compliance Assurance and Enforcement Division  
U.S. EPA - Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

RE: Denka Performance Elastomer LLC  
Clean Air Act Section 114 Information Request - Correction

Dear Mr. Leathers,

The Denka Performance Elastomer LLC (DPE) Pontchartrain Site in LaPlace, LA is submitting this letter to update calculations reported in our 1/22/16 response (the "Response") to the EPA's Clean Air Act Section 114 Information Request (the "Request") dated 12/18/15 and received here on 12/23/15. All responses are included in Attachment A.

The updates apply to the data and calculations provided in the Response to questions 4 and 5 of the Request. The response to those questions and spreadsheets covering those calculations have been amended accordingly and are attached.

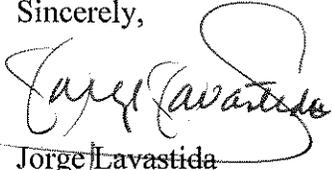
As with the previous response, it should be noted that all calculation methodologies and virtually all of the data required to satisfy EPA's Request come from the time period during which the Neoprene facility was wholly owned by DuPont Performance Polymers or by DuPont Dow Elastomers. DPE cannot certify decisions or actions made or not made during the period preceding its ownership and therefore, this documentation is provided solely in the spirit of cooperation.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the

possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

If you have any questions regarding this submittal, please contact Patrick Walsh at (985) 536-7573.

Sincerely,

A handwritten signature in black ink, appearing to read "Jorge Lavastida". The signature is fluid and cursive, with a large, prominent initial "J".

Jorge Lavastida  
Executive Officer and Plant Manager  
Denka Performance Elastomer LLC

Attachment

# **ATTACHMENT A**

Corrected Documentation

The supporting data is provided on 2 flash drives, Flash Drive 3 (FD3) and Flash Drive 4 (FD4). FD3 contains information that is claimed as Confidential Business Information (CBI) as set forth in Section 114(c) of the Clean Air Act. FD4 contains information for which no CBI claim is made.

The following personnel were involved in collecting response data and reviewing it:

Person	Title
Patrick Walsh	Safety, Health, and Environmental Manager
Doris Grego	SHE Senior Consultant
Denis McCrea	Polymer Principal Engineer
Jorge Lavastida	Executive Officer and Plant Manager
Masanobu Kosaka	Executive Officer and Vice President, Technology
Nao Kawamura	Executive Officer and Vice President, Administration

**Question 4**

***Provide all emission calculations of chloroprene that were prepared for LDEQ air permit applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.***

During review, we discovered that fugitive emissions, point source ID 1-93, for our Neoprene Unit had, been calculated incorrectly. Approximately 30% of the components used in the calculation and reported in the Response are contained in an enclosed structure that is ventilated by fans. These fans are permitted point source IDs 1700-1, 1700-5A, 1700-13, 7000-13A, and 1700-66. The emissions for these fans were calculated by testing the air inside the building they ventilate to determine the average concentration of chloroprene in the building air, which was then used to determine the emissions from those fans, i.e., the average concentration of chloroprene in the fan exhaust.

As a result, in the Response these component emissions were being counted twice—once as part of the fugitive emissions and again as a contributor to chloroprene concentrations in the enclosed structure’s building air. Therefore, the emissions from these components should not have been included in the original fugitive emission calculations. The removal of these components reduced the calculated fugitive emissions to the quantities now shown in our two attachments (Corrected Neoprene Fugitives 2011-2014 and Corrected Table Question 5).

Content	Who assembled	Filename	Location	CBI?
Include: references/bases for emission factors, calculation methodologies, Neoprene Unit	Doris Grego	Corrected Neoprene Fugitives 2011-2014.xlsx	FD3	YES

**Question 5**

*For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2% of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are so similar (e.g., is the previous year's reported emissions used to estimate the future emissions, does the methodology used to estimate emissions leave no room for accuracy, etc.).*

Content	Who assembled	Filename	Location	CBI?
List occurrences, 2011-2014	Doris Grego	Corrected Table Question 5.xlsx	FD4	No

The spreadsheet for the 1/22/16 response to question 5 reported the incorrectly calculated fugitive emissions discussed in question 4. The table has therefore been amended to reflect the updated emission amount.