



Denka Performance Elastomer LLC  
560 Highway 44  
LaPlace, LA 70068

May 6, 2016

**Certified Mail; Return Receipt Requested (7013 2250 0001 6409 6956)**

Ms. Lourdes Iturralde  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

RE: Denka Performance Elastomer LLC  
Fenceline Area Monitoring Proposal

Dear Ms. Iturralde,

The Denka Performance Elastomer LLC (DPE) Pontchartrain Site in LaPlace, LA is submitting this letter in response to LDEQ's 3/29/16 verbal request for a proposal to perform fenceline monitoring for chloroprene. This request was made after LDEQ performed grab sampling in the area and obtained a result of 18 parts per billion (ppb) chloroprene and became concerned about potential offsite effects. The proposal is outlined below.

**Sample Locations**

DPE proposes to target monitoring locations toward the highest potential offsite concentrations based on previous emission modeling results. Consideration is also given to the proximity of sensitive receptors such as residential properties and schools. Monitoring will be performed at the fenceline at breathing height (approximately 5 feet above grade) to best approximate exposures of those receptors. The sampling locations are:

1. Eastern Boundary, Entergy Substation
2. Intersection of Highway 44 and Illinois Central Railroad
3. Western edge of property near intersection of 31<sup>st</sup> Street and Spruce Street, Reserve, LA

Sampling locations are also shown in Attachment A below.

**Analytical Methodology**

DPE will collect the samples with 6L SUMMA canisters. The canisters will be analyzed by an independent third-party laboratory via EPA Method TO-15. DPE will work with the laboratory

to add chloroprene to the list of analytes, and will also have them perform a Method Detection Limit study for chloroprene to ensure that the lowest possible detection limit is obtained.

**Sampling Frequency and Duration**

To determine the overall average concentration of chloroprene in the sampled locations, samples will be collected over a 24-hour period during each sampling run. Sample runs will occur twice per month for 6 months to account for seasonal variations and ensure statistical significance of the results.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Patrick A. Walsh', with a long, sweeping underline.

Patrick A. Walsh, CIH  
Safety, Health, and Environmental Manager  
Denka Performance Elastomer LLC

Attachment

# **ATTACHMENT A**

Sample Map

Sampling Locations:

1. Eastern Boundary, Entergy Substation
2. Intersection of Highway 44 and Illinois Central Railroad
3. Western edge of property near intersection of 31<sup>st</sup> Street and Spruce Street, Reserve, LA

