



DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

April 29, 2016

RECEIVE

MAY 2 - 2016

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

**ENVIRONMENTAL TOXICS & INSPECTION
COORDINATION BRANCH
6EN-A**

In Re: DuPont Pontchartrain Works Facility
LaPlace, Louisiana
Clean Air Act Section 114 Information Request

Dear Mr. Leathers:

E.I. du Pont de Nemours and Company (“DuPont”) is submitting this letter as a continuation of DuPont’s February 12, 2016 response to the EPA’s Clean Air Act Section 114 Information Request dated December 18, 2015, regarding the above-referenced facility.

An agreement was previously reached between EPA and DuPont regarding the scope and deadlines for providing responses to the referenced information request. DuPont provided its original February 12, 2016 response in accordance with that agreement. This further response was necessary because it was agreed that since the current operator of the facility, Denka Performance Elastomer LLC (“DPE”), is the party with access to the 2015 data requested in questions 4-6, and is also responsible for compiling that data and submitting the associated required reports in 2016, DuPont was allowed until April 30, 2016 to respond to the portions of questions 4-6 that request 2015 information, to the extent that it is able to.

The responses provided herein are based upon the information and records currently available to DuPont regarding this facility. This includes the continuation response by DPE, which was submitted to the EPA on March 30, 2016. The instant further response by DuPont is subject to each of the qualifications and objections set forth in DuPont’s original February 12, 2016 submission, which are adopted in this response.

Accordingly, notwithstanding the foregoing, and without waiving any of DuPont’s qualifications and objections, the following section provides DuPont’s specific responses to the referenced information request for the year 2015. DuPont has included the relevant numbered request followed by DuPont’s response. The numbers of the responses below correspond to the numbers of the specific requests included in Enclosure A.III of the EPA’s December 18, 2015 request.

Specific Responses

The supporting data and certain responses are provided on one (1) disc. Information is then categorized in folders which are named according to the question they answer: “Question 4”, “Question 5”, and “Question 6”. The disc contains information for which no Confidential Business Information claim is made.

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.

Response 4

The following information is produced in the form provided by DPE, except for the fugitive emissions calculations in each spreadsheet which were generated by DuPont. Fugitive emissions in the attached spreadsheets only include emissions from January 1 through October 31, 2015. DuPont does not have access to the monitoring data after October 31, 2015 and therefore can't perform the same calculations for the method used for the time period prior to October 31, 2015. All other emission sources in the attached spreadsheets are for the 2015 calendar year. As noted above, DPE submitted information covering all of 2015 on March 30, 2016.

Content	Person Responding	Filename	Location	Folder	CBI
2015 emission inventory, Chloroprene Unit	Toni L. Martin	CHLOROPRENE UNIT 2015	Disc 1	Question 4\Chloroprene	No
2015 emission inventory, Neoprene Unit	Toni L. Martin	NEOPRENE UNIT 2015	Disc 1	Question 4\Neoprene	No
2015 emission inventory, HCl Unit	Toni L. Martin	HCl UNIT 2015	Disc 1	Question 4\HCl	No

Persons consulted in the preparation of this response include:

Patrick Walsh
Anthony Fugarino

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.).

Response 5

The following information is produced in the form provided by DPE, except for the 2015 fugitive emissions calculations for each process, which were generated by DuPont for the time period of January 1 through October 31, 2015.

Content	Person Responding	Filename	Location	Folder	CBI
List occurrences, 2015	Toni L. Martin	Table Question 5 with 2015	Disc 1	Question 5	No

Persons consulted in the preparation of this response include:

Patrick Walsh
Anthony Fugarino

Question 6

Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.

Response 6

By agreement with EPA, the time period for the requested data was adjusted to 2011-2015. The 2015 TRI report has not been completed, since it is due on July 1, 2016, but preliminary calculations indicate that DuPont will report 200,000 lbs. of chloroprene stack emissions and 7,700 lbs. of chloroprene fugitive emissions on the CY2015 TRI Report. These amounts represent emissions for the time period of ownership, January 1 through October 31, 2015. Emissions were calculated based on data from the attached spreadsheets from response to question #4 and the attached spreadsheet named "CondXVII Jan-Oct 2015.xls" located in the Question 6 folder of Disc 1. This additional spreadsheet summarizes the GCXVII chloroprene emissions. Chloroprene emissions were calculated for the time period of January 1 through October 31, 2015, since these are the quantities that DuPont will be reporting on CY2015 TRI Report.

Threshold calculations have also not been completed for the TRI Report since it is due on July 1, 2016, but preliminary calculations indicate chloroprene is above the reporting thresholds. The amount produced and processed in 2015 was approximately 70,941,000 lbs.

Person responding - Anthony Fugarino

Persons consulted in the preparation of this response include:

Production numbers are from Denka's March 30, 2016 Response Letter.

Certification

Subject to the qualifications and objections set forth above, 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.

Respectfully submitted,



Ivan Caldwell

Plant Manager
DuPont Pontchartrain Works

cc: Justin Lannen
Assistant Regional Counsel
Air Enforcement Branch
U.S. EPA – Region 6