



State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY

JUN 28 2016

OFFICE OF THE SECRETARY

**CERTIFIED MAIL 7002 2030 0002 8912 6578
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 Monitoring Plan for Chloroprene

Dear Mr. Walsh:

The Louisiana Department of Environmental Quality (LDEQ) has received your letter dated June 14, 2016 in response to LDEQ's letter dated May 27, 2016 with reference to the Air Monitoring Plan. LDEQ by this letter approves Denka's sampling locations as follows:

1. Eastern boundary, Entergy substation
2. Intersection of Highway 44 and Illinois Central Railroad
3. Western edge of property near intersection of 31st Street and Spruce Street, Reserve, LA
4. Mississippi River levee
5. Southwest corner of River Parishes Hospital parking lot

LDEQ also approves the Method Detection Limit (MDL) of 0.05 ppbv for the samples collected. Sampling shall commence no later than August 1, 2016, and will last for at least six months. The sampling frequency shall be once every 6 days and the sampling duration will be a 24-hour period.

Denka shall provide the following information during the monitoring period:

1. Meteorological conditions including hourly averages of wind speed, wind direction, ambient temperature, relative humidity, and barometric pressure.

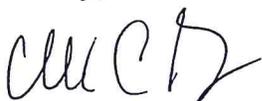
2. Production rate (per hour) of chloroprene and neoprene at the time of monitoring and the following information, as referenced in permit 2249-V8:
 - i. VOC emissions (both chloroprene and toluene) calculated on the day of monitoring as per Specific Requirement (SR) 147.
 - ii. Chloroprene emissions calculated on the day of monitoring as per SR 176 and operating rate of CD refining column of EQT 0139 or EQT 0140.
 - iii. All the parameters monitored as per SR 182 at the 1700-2 Strippers Condenser Vent (RLP 0014).
 - iv. Temperature of the Condenser Brine Outlet as per SR 192.
 - v. Percent Reduction as per SR 193.
 - vi. Compliance status of SR 196.

3. From the Halogen Acid Furnace if it is operating as referenced in permit 206-V3:
 - i. Combustion chamber temperature
 - ii. Waste flow rate
 - iii. Dynamic scrubber differential pressure
 - iv. Dynamic scrubber pH

The records requested in 2.i vi and 3.i iv above are required to be maintained by Denka in accordance with state and federal regulations and/or air quality permit(s). Therefore, please provide this information that coincides with each 24 hour monitoring period.

If you have questions or need additional information regarding this Monitoring Plan, please contact Lourdes Iturralde of my staff at (225) 219-3710 or by e-mail at Lourdes.Iturralde@la.gov.

Sincerely,



Chuck Carr Brown, Ph.D.
Secretary

CCB/GG/gg

cc: (Via electronic mail)

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