

Denka Performance Elastomer LLC
560 Highway 44
LaPlace, LA 70068

RECEIVE

APR - 4 2016

Air Toxics & Inspection
Coordination Branch
6EN-A

March 30, 2016

Certified Mail; Return Receipt Requested (7013 2250 0001 6409 6857)

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 – 2015 Data

Dear Mr. Leathers,

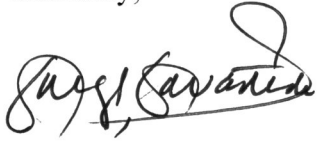
The Denka Performance Elastomer LLC (DPE) Pontchartrain Site in LaPlace, LA is submitting this letter in response to the EPA's Clean Air Act Section 114 Information Request dated 12/18/15 and received here on 12/23/15. This letter will provide the 2015 data for questions 4, 5, and 6 requested via email from Justin Lannen on 1/12/16. All responses are included in Attachment A.

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. These records were provided with the facility when DPE assumed ownership of it on 11/1/15. DPE cannot certify decisions or actions made or not made during the period preceding its ownership and the data 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 written in a cursive style with a large initial "J" and "L".

Jorge Lavastida
Executive Officer and Plant Manager
Denka Performance Elastomer LLC

Attachment

ATTACHMENT A

Documentation

The supporting data is provided on a flash drive, Flash Drive 5 (FD5). None of the information presented on FD5 claimed as Confidential Business Information (CBI) as set forth in Section 114(c) of the Clean Air Act.

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.

The required information is contained in the files shown below. Fugitive emissions in the Neoprene Unit have been updated as described in our 3/24/16 amendment letter.

Content	Who Assembled	Filename	Location	Folder	CBI?
2015 emission inventories, Chloroprene Unit	Doris Grego	Chloroprene 2015.xls	FD5	Question 4	No
2015 emission inventories, Neoprene Unit	Doris Grego	NEOPRENE UNIT 2015.xlsx	FD5	Question 4	No
2015 emission inventories, HCl Unit	Doris Grego	HCl UNIT 15.xls	FD5	Question 4	No

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.).

The required information is contained in the files shown below. Fugitive emissions in the Neoprene Unit have been updated as described in our 3/24/16 amendment letter.

Content	Who assembled	Filename	Location	Folder	CBI?
List occurrences, 2011-2015	Doris Grego	Table Question 5 with 2015.xlsx	FD5	Question 5	No

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.

Based on an email from Justin Lannen to Patrick Walsh on 1/12/16, EPA adjusted the time period for the requested data to 2011 to 2015.

Air emission calculations done for the LDEQ annual emissions inventory (ERIC) are the same calculations used for the TRI report, air section. Therefore, the data provided for question 4 above should adequately answer this portion of the request.

Because the site manufactures chloroprene for use in manufacturing neoprene, neoprene production data is used for determining the threshold for this chemical. Below are the neoprene production rates (in million pounds per year) for years 2011 through 2015.

Year	Production (10 ⁶ lbs/yr)
2011	79.297
2012	69.979
2013	69.741
2014	72.482
2015	70.941