



November 3, 2017

Denka Performance Elastomer clarification of recent news coverage

In response to misleading information recently shared on television and online news media, Denka would like to provide data that, if considered by news media, could have prevented several of these misconceptions.

Emissions and Ambient Concentrations:

Air monitoring data

Denka began collecting and publishing air monitoring data from several areas near the plant in mid-2016. The U.S. Environmental Protection Agency, Louisiana Department of Environmental Quality, and Denka agree that since installing two of the four emission reduction technologies included in the Administrative Order on Consent (AOC), entered into between Denka and LDEQ on January 6, 2017, there is a downward trend to the chloroprene air monitoring levels. These reductions will become even more significant when the two remaining projects are completed later this year.

Denka adheres to and is in compliance with all operating permit requirements. At this time, all agencies are operating under the established $857 \mu\text{g}/\text{m}^3$ eight-hour standard. The $0.2 \mu\text{g}/\text{m}^3$ number that has been in various publications has been derived from an EPA Integrated Risk Information System (IRIS) study, and is intended to relate to average exposure over a 70-year lifetime. It is not an ambient standard, nor is it embodied in any of Denka's permit requirements. The study has serious fundamental flaws and Denka has submitted a formal request to correct it. We are waiting for a response from EPA.

Denka is a safe operator and good employer in the St. John community, and is reducing emissions voluntarily.

Since it acquired the Neoprene facility on November 1, 2015, Denka's chloroprene emissions have generally been 30 to 40 percent below permitted levels. Denka's current emissions levels are not the result of any kind of lack of plant maintenance or equipment damage that would need repair. The largest chloroprene emission reduction project is already underway as a result of the Administrative Order on Consent (AOC) Denka voluntarily entered with LDEQ on January 6th of this year.

Continuing normal plant operations is in the best interest of the community, our employees who depend on the jobs we provide, and the numerous American companies and consumers that

depend on our products, since our facility is the only United States-based manufacturer of Neoprene.

Public Health:

Instances of cancer

The Louisiana Tumor Registry collects information on the incidence of cancer for the state. In that registry, St. John Parish (population of 46,000) recorded the 15th lowest of 64 parishes. In fact, for the two cancers the EPA's literature suggested as likely to be related to chloroprene (which study results are subject to fundamental flaws as noted above), St. John's rates are even lower than the EPA's studies would suggest. For lung cancer, St. John Parish has the seventh-lowest for incidences in the state. For liver cancer, there were less than two cases reported, one of 28 parishes with so few cases of liver cancer.

More important, the census tracts containing the high cancer risk areas EPA has suggested account for two thirds of the population of the parish, and the chloroprene emission rates for 2011 which EPA studied are substantially below emission levels from prior decades. If the risk of cancer were as high as EPA suggests, incidences of cancer recorded by the Louisiana Tumor Registry data would show these effects.

Denka is sensitive to the concerns that the EPA's 2010 IRIS and 2015 NATA studies have generated with parish residents. Even though we do not agree with the science behind these studies and have submitted a Request for Correction to EPA, we have voluntarily entered an Administrative Order on Consent (AOC) with LDEQ to reduce our chloroprene emissions by 85%.

Community Engagement:

Denka has been present and participated in many community and near neighbors meetings. The company has also met several times with community and local government leaders. On these occasions, Denka has provided an update on the emission reduction programs, its dealings with the state and EPA and answered questions from the community. Denka has always been respectful in these matters. Denka will continue to participate in open community forums to help answer any questions members of the community have about plant emissions and our programs.

Denka has voluntarily entered into an Administrative Order of Consent (AOC) with LDEQ to reduce plant chloroprene emissions in response to the concerns of local citizens. Denka is investing over \$20 million in emissions reduction technologies to reduce these plant emissions.

If you have additional questions about Denka or our emissions reduction efforts, [visit us online](#) to view our frequently asked questions.