

Denka's Response to Press Coverage

Letter to the Editor

August 2, 2017

Recent media and blog reports, not in this publication, created some concern among the community by publicizing a preliminary report prepared by the U.S. Environmental Protection Agency (EPA). The report is still subject to review and correction based on new and additional information. These news outlets, perhaps unintentionally, implied that Denka Performance Elastomer LLC (Denka) was cited for Clean Air Act violations at its LaPlace chemical facility, when in fact EPA and Denka are still discussing the preliminary report and no citations have been issued.

After careful review, Denka requested corrections to most of the report's findings and continues to work with EPA in an open and constructive manner. It's important to note the facility has already addressed some points from the NEIC report. Denka purchased the facility only six months before the inspection. The company has since made major improvements reflected in a voluntary Administrative Order on Consent (AOC) developed in partnership with the Louisiana Department of Environmental Quality (LDEQ). The AOC affirms Denka's commitment to major reductions of chloroprene emissions.

This brings us to another area of concern: a suggestion developed by the National Air Toxics Assessment (NATA) regarding acceptable levels of chloroprene emissions. The study suggested a drastic reduction in the level of acceptable chloroprene emissions based on basic scientific assumptions that Denka and independent consultants believe are incorrect. Denka is working with EPA to address these and other issues. There is no current legal requirement for emission reductions, and any such requirement would involve a change in federal and state standards and law. Neither EPA nor LDEQ has proposed changing the standard or law relevant to permitted releases of chloroprene at this time. Denka has and continues to meet federal and state air permit requirements for the chemical chloroprene.

Denka responded almost immediately to the concerns created by the NATA study. Working with LDEQ, Denka has voluntarily committed to install an \$18 million state-of-the-art emissions reduction system this year. The improvements are designed to reduce chloroprene emissions by 85 percent over 2014 levels. Denka signed the Administrative Order on Consent with LDEQ to affirm those commitments and has made significant progress on the emissions reduction measures defined in the agreement. Two of the four projects have been installed ahead of schedule and are now operational. Both of the other projects are on schedule to be installed by the end of 2017.

Denka is committed to reducing chloroprene emissions and will continue to work diligently with LDEQ and EPA to be a good neighbor and responsible corporate citizen in the St. John the Baptist Parish community.

Respectfully submitted,

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