

Denka Performance Elastomer – Privileged and Confidential

# FREQUENTLY ASKED QUESTIONS

## Who is Denka Performance Elastomer in LaPlace, LA?

Denka is a chemicals manufacturing company that assumed operation of its LaPlace facility, located on DuPont's manufacturing site in LaPlace, Louisiana, in late 2015. The facility was previously owned and operated by DuPont. Denka Performance Elastomer's corporate headquarters are also located in LaPlace.

Denka has 235 full-time employees, 125 resident contractors, and a total annual payroll of \$35 million. Over 75 percent of Denka's employees are residents of the River parishes, and total taxes and purchases result in a contribution to the local and regional economies of approximately \$80 million per year. Employees are active members of the community and give back by participating in local programs including the United Way, Household Hazardous Material Collection Day, and Relay for Life, among others.

Denka Performance Elastomer is committed to protecting the environment as well as the health and safety of its employees and community as a whole. This commitment is demonstrated through compliance with applicable environmental permits and regulations.

## What does Denka Performance Elastomer's LaPlace, La. facility produce?

Denka's LaPlace facility produces Neoprene synthetic rubber. The product was invented by DuPont in 1931 and is used in a wide variety of applications including laptop sleeves, orthopedic braces (wrist, knee, etc.), electrical insulation, automotive parts, and wetsuits.

## What is chloroprene?

Chloroprene is a chemical building block used to make Neoprene rubber. Chloroprene molecules react with other chloroprene molecules to make a bonded chain. This chain is called polychloroprene, chloroprene rubber (CR), or Neoprene. It is impossible to make Neoprene without chloroprene.

### What is Denka's voluntary emissions reduction program?

In response to a U.S. Environmental Protection Agency National Air Toxics Assessment report published in November 2015 that suggested concerns about



chloroprene exposure, Denka voluntarily developed and implemented four major projects designed to reduce the facility's emissions of chloroprene by 85 percent. The projects were developed in cooperation with the Louisiana Department of Environmental Quality and completed on schedule by the end of 2017 at a final cost of more than \$30 million.

These four projects include:

- Installation of a brine condenser on the Poly Kettles Vent in series with the existing chilled water condenser. This project was completed in February 2017. Initial engineering studies indicate that this project is more efficient than originally thought, and is reducing emissions from that source by more than 65 percent.
- 2) Installation of the 2nd interim measure, which includes a vacuum pump and vent condenser on the CD column in the Poly area. This project was completed in May and June 2017.
- 3) Routing of various specified emissions sources for combustion in the HCl Unit. This project was completed in December 2017.
- 4) Installation and operation of a Regenerative Thermal Oxidizer (RTO). This project was completed in December 2017.

Denka has held numerous meetings with governmental and regulatory groups and residents in the local community to share its findings and plans. Denka hopes to continue to have a constructive dialogue with the community.

### How is Denka assessing its progress?

Denka monitors ambient air concentrations of chloroprene in cooperation with EPA. EPA and LDEQ agree data from ambient air quality monitoring show an overall decrease in the average concentration of chloroprene in the air near the facility over the past year. Since the completion of all emissions reduction methods, Denka expects to see additional decreases in ambient concentrations in the first half of 2018.

Variations in air monitoring data can be caused by wind direction or other environmental factors. However, these readings are not representative of the overall trend of data, which shows significantly reduced ambient concentrations across all monitoring locations.

## NATA STUDY

### What is the National Air Toxics Assessment (NATA)?



The NATA study is a screening level environmental study conducted by a group within the EPA. The study compiles information about air emissions and other environmental impacts over geographic areas of the country. EPA published the 2011 NATA study on its website on December 17, 2015, one month after Denka assumed operation of the plant.

The study suggested an increased risk of health effects due to chloroprene exposure. However, neither EPA nor LDEQ have set any new limits regarding chloroprene exposure as a result of the 2011 NATA report. There is no evidence to suggest Denka's operations are harmful to local residents.

Denka has identified basic scientific issues with the NATA's suggestions through scientific review by a third-party expert and has submitted a Request for Correction to the EPA to address the issue. The Request for Correction is currently under review by federal regulators.

EPA has stated on its website, "The results of the NATA report cannot be used to identify exposures and risks for specific individuals, or even to identify exposures and risks in small geographic regions such as a specific census block, i.e., hotspots."

### How did Denka respond to issues raised by the NATA report?

Soon after the report was published, Denka, EPA and LDEQ initiated public outreach programs to inform various stakeholders including local residents and Louisiana environmental groups of the report and the company's response. In cooperation with regulatory agencies, Denka hosted community meetings to share the culmination of months of work spent reviewing and assessing the significance of the 2011 NATA study with the public. Denka has and continues to speak with its employees, near neighbors and the community.

Though Denka does not believe its operations pose any risk, the company voluntarily agreed in January 2017 to implement four major emission reduction projects designed to reduce chloroprene emissions at the facility by 85 percent. Denka completed those projects on schedule by the end of 2017.