



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/18-21/2022	
Media Program:	Water	
Regulatory Program(s)	CWA-NPDES	
Company Name:	Denka Performance Elastomer LLC	
Facility Name:	Pontchartrain Plant	
Facility Physical Location:	560 Highway 44	
(city, state, zip code)	LaPlace, Louisiana 70068	
Mailing address:	560 Highway 44	
(city, state, zip code)	LaPlace, Louisiana 70068	
County/Parish:	St. John the Baptist Parish	
Facility Phone Number	985-536-7802	
Facility Contact:	Patrick Walsh	SHE/PSM Manager
	patrick-walsh@denka-pe.com	
FRS Number:	110067396669	
Identification/Permit Number:	LA0127190	
Media Identifier Number:	LAR000009415	
NAICS:	325212 – Synthetic Rubber	
SIC:	2822 – Synthetic Rubber	
Personnel participating in inspection:		
Kenneth AuBuchon	US EPA – Region 6	Environmental Engineer
Justin Young	US EPA – Headquarters	Environmental Scientist
John Penland	US EPA – Region 6	Environmental Scientist
Janosh Wolters	ERG	EPA Contractor
George Wieber	ERG	EPA Contractor
Joseph Watson	ERG	EPA Contractor
Patrick Walsh	Denka	Denka Environmental Manager
Chris Meyers	Denka	Denka Environmental
Cory Green	Denka	Denka Environmental
Kevin Voelkel	Bracewell	Denka Counsel
Akihiko Kusaka	Denka	Denka Counsel
Jimbo Earles	LDEQ	Louisiana State Inspector
Jenifer Kidd	LDEQ	Louisiana State Inspector
Karen Price	LDEQ	Louisiana State Inspector
Terry Dedon	LDEQ	Louisiana State Inspector
EPA Lead Inspector Signature/Date		
	Kenneth AuBuchon	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION**PURPOSE OF THE INSPECTION**

EPA Region 6 inspector Kenneth AuBuchon arrived at the Denka Performance Elastomer LLC - Pontchartrain Plant at 9:00am on April 18, 2022, for an unannounced Compliance Evaluation Inspection (CEI). The National Pollutant Discharge Elimination System (NPDES) CEI was conducted in conjunction with a Resource Conservation and Recovery Act (RCRA) CEI. This was an EPA Headquarters RCRA and EPA Headquarters RCRA contractor (ERG) lead inspection. We met with Chris Meyers and Cory Green, both with Denka Environmental, at the Opening Conference. We presented our credentials to everyone that was present at the opening conference including Mr. Chris Meyers. After the RCRA inspectors presented their credentials and informed Denka representatives on the scope of the RCRA inspection, I informed Mr. Meyers and other Denka representatives, that this was also an EPA NPDES inspection to determine compliance with the facility's NPDES permit and the Clean Water Act (CWA). The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

This NPDES report is based on information supplied by Denka Performance Elastomer LLC - Pontchartrain Plant representatives (the permittee), observations made by the U.S. EPA inspectors, and records and reports maintained by the permittee, the State of Louisiana, and the U.S. EPA. A separate RCRA report will be written containing observations and areas of concern related to the Resource Conservation and Recovery Act.

FACILITY DESCRIPTION

Denka Performance Elastomer LLC (Denka) owns and operates the Pontchartrain Plant located at 560 Louisiana Highway 44, approximately 2.8 miles west of LaPlace, Louisiana in St. John the Baptist Parish. In the 1960s, E.I. DuPont de Nemours & Co. (DuPont) constructed the Pontchartrain Works facility to manufacture adiponitrile, used in the manufacturing of nylon. Over time, the facility began manufacturing both Neoprene and Kevlar at the site. The Neoprene unit eventually became one of the largest manufacturing sites of Neoprene in North America. Denka purchased and took over manufacturing operations of the Pontchartrain Plant, specifically the Neoprene, Chloroprene, and Hydrochloric Acid (HCl) Recovery units, from DuPont in 2015. As landowners of the entire Pontchartrain Works property, DuPont retained the Diamine manufacturing unit and support operations as well as providing various grades of utility water. This portion of the facility is known as DuPont's Pontchartrain Works. Overall, the Pontchartrain facility employs an average of 300-500 workers.

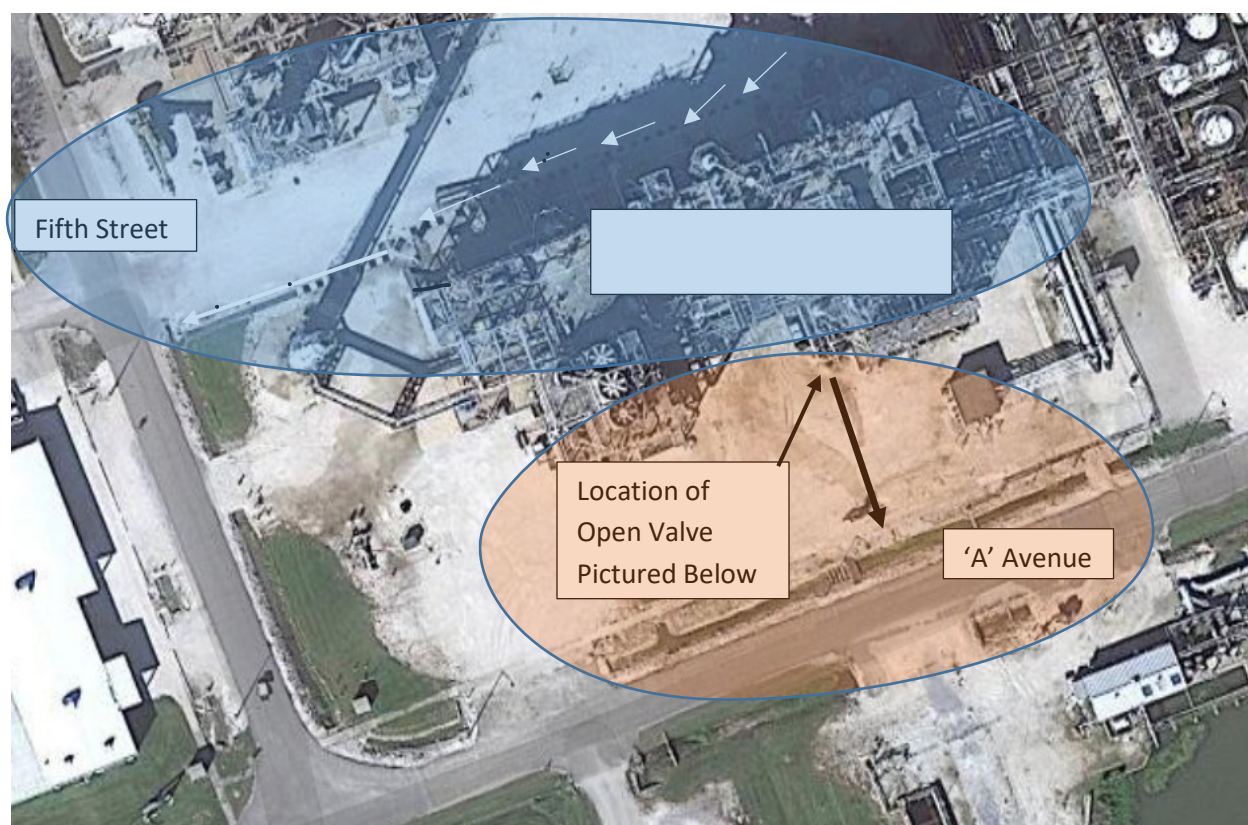
Section II - OBSERVATIONS

At the opening meeting introductions were made and the inspection objectives for both the RCRA CEI and NPDES CEI were presented. Due to Confidential Business Information (CBI) and Homeland Security sensitive information (HSSI) claims by the facility, many of the documents presented and discussed were declared sensitive until a final CBI substantiation determination is made by EPA and not included in this report. The facility's claims regarding CBI and HSSI did not restrict the facility's presentation or discussions and do not restrict the information presented in this report. For the purposes of this inspection report, the information presented has been taken from public NPDES permits, NPDES permit

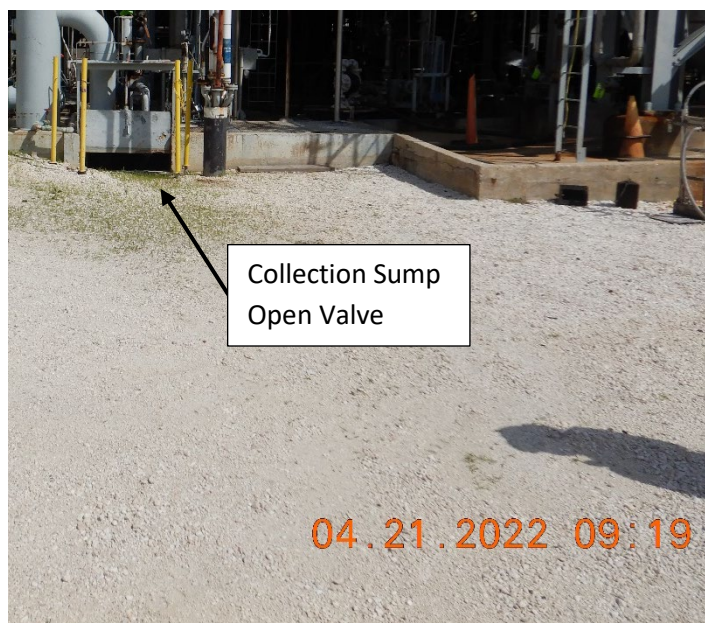
applications, information publicly available, and observations not claimed as CBI or HSSI by the facility. The inspection consisted of multiple days of process reviews and field visits to review Denka's Neoprene manufacturing and supporting operations. The following units of Denka's Neoprene manufacturing and supporting operations were reviewed and discussed:

It was explained that the Chloroprene unit manufactures chloroprene from the raw materials N-pentane, 1,3-butadiene, chlorine, and sodium hydroxide. Chloroprene is an intermediate product used as a feedstock for the manufacturing of Neoprene rubber. The process wastewaters and process area storm waters from the chloroprene unit are collected and routed to the Aqueous Waste (AW) Area for disposal through one of three permitted hazardous waste UIC deep wells and not discharged to surface waters.

During a visit to the Chloroprene unit, I observed a concrete-lined ditch next to the Chloroprene unit's northside that lead to Dupont's fifth street internal roadside ditch. This concrete-lined ditch had gate valves from the Chloroprene unit along its length. The following overhead view was obtained from Google maps and the blue shaded area show the ditch and ditch flow to fifth street. At the time of the inspection there were no indications of discharges from the Chloroprene unit into the concrete-lined ditch. Concerns regarding the concrete ditch are contained in the Areas of Concern Section of this report.



Later I observed a gate valve located on the southside of the Chloroprene unit, open, as seen in the following picture.



The open valve is located at the Chloroprene unit's process wastewater and process area storm water collection sump. It was explained at the time that outer gate valves are maintained open in the event of a fire but before flow would be allowed to overflow and go thru the valves that pumps are used to evacuate the wastewaters to the AW Area before a discharge would occur. I requested the process SOPs for this operation of controlling process wastewaters and fire activities. At the time of this report no SOPs were provided. The aerial contained on the previous page shows the red shaded area where the open valve was located and flow direction to Dupont's 'A' avenue internal roadside ditch. At the time of the inspection there were no indication of discharges from the Chloroprene unit collection sump thru the open valve. Concerns regarding the open valve at the collection sump are contained in the Areas of Concern Section of this report.

The Anti-Crystallization Reagent (ACR) manufacturing unit is located in the Chloroprene Area, and manufactures 2,3-dichloro-1,3-butadiene from the intermediate t-1,4-dichloro-2-butene and chlorine. ACR is an intermediate product used as a feedstock for the onsite manufacture of Neoprene rubber or it can be blended with perchloroethylene, dichloromethane or xylene for offsite sales and shipment. The ACR unit footprint shares part of the Chloroprene and Neoprene manufacturing areas. Process wastewater and process area storm water from the portion of the ACR unit located in the Chloroprene manufacturing area is collected and routed to the AW Area for disposal through one of three permitted hazardous waste UIC deep wells, and not discharged to surface waters. Process wastewater and process area storm water from the portion of the ACR unit located in the Neoprene manufacturing area are routed to the Neoprene biological wastewater treatment plant (BWWTTP).

The Neoprene manufacturing unit manufactures liquid rubber emulsions and ACR blends and dry polychloroprene synthetic rubber (Neoprene) using Chloroprene, Neoprene emulsions, and ACR as the primary raw materials. Certain surfactants, catalysts and numerous additives are required. The process

wastewater, process area storm water runoff, laboratory wastewaters and incidental non-process wastewaters from the Neoprene unit are co-located and routed to the BWWTWP.

The HCL Recovery unit receives as a feedstock, chlorinated wastes from the Chloroprene and Neoprene units that is combusted in a Hydrochloric Acid Production Furnace (HAPF) to make HCL that is recycled back into manufacturing process operations. Process generated wastewater and process area storm water from the HCL Recovery unit are routed to the AW Area for underground injection via permitted disposal wells. No process wastewater or process area storm water from the HCL Recovery unit are discharged to surface waters.

Wastewaters sent to the AW Area undergoes the process of storage, clarification, neutralization and filtration prior to being deep well injected through one of three permitted hazardous waste UIC deep wells. All process wastewater and process area storm waters that make up the Neoprene business are disposed through one of three permitted hazardous waste UIC deep wells, except for the Neoprene manufacturing unit where process wastewater and process area storm water that is treated by the BWWTWP.

The BWWTWP receives and treats process wastewaters, process area storm waters, laboratory wastewaters and non-process wastewaters generated within the process area associated with Neoprene unit and supporting operations. Effluent from the BWWTWP is monitored at Outfall 101 prior to being routed to the River Water Return system for final discharge through Outfall 001 to the Mississippi River. The BWWTWP includes the following treatment system processes, equalization, sedimentation, activated sludge, clarification, sludge dewatering, and effluent pH adjustment (as necessary). The BWWTWP is pictured below, the aerial was obtained from Google maps.



DuPont's Pontchartrain Works units or areas were not reviewed as part of this inspection.

Section III – AREAS OF CONCERN

Requirement: LPDES Permit LA0127190, Other Conditions: In addition to the standard conditions required in all NPDES permits and listed in standard conditions for LPDES permits, the Louisiana Department of Environmental Quality (LDEQ) has established the following additional conditions in accordance with the Louisiana Water Quality Regulations. A. This permit does not in any way authorize the permittee to discharge a pollutant not listed or quantified in the application or limited or monitored for in the permit. As stated in the facility's permit application, the process wastewaters and process area storm waters from the Chloroprene unit are collected and routed to the Aqueous Waste (AW) Area for disposal through one of three permitted hazardous waste UIC deep wells and not discharged to surface waters.

Concern 1: As described on page 3 of this report, the Chloroprene unit has a concrete ditch along the Northside of the unit. If process wastewaters or stormwaters are released into this ditch and flow to DuPont's internal ditch on fifth street this would constitute an unpermitted discharge and would be a violation of the Clean Water Act. No discharges thru this ditch were observed or could be verified at time of the inspection.

Concern 2: As described on page 4 of this report, I observed an open valve on the southside of the Chloroprene unit. This open valve is located at the process wastewater and storm water collection sump inside the Chloroprene unit. If the sump overflows thru this open valve and releases into DuPont's internal ditch on 'A' Avenue this would constitute an unpermitted discharge and would be a violation of the Clean Water Act. Requested process SOPs for the operation of controlling process wastewaters and fire activities related to this valve were not provided prior to the time of this report. No discharges thru this valve were observed or could be verified at time of the inspection.

EPA Region 6 inspectors Kenneth AuBuchon conducted a closing conference at Denka Performance Elastomer LLC - Pontchartrain Plant at approximately 4:30pm on April 21, 2022, for the NPDES inspection. During the closing conference, Kenneth AuBuchon reviewed the NPDES Areas of Concern noted during the inspection.

Section IV – FOLLOW UP

Additional information was received by EPA inspectors after exiting the facility on April 21, 2022. Documents were requested under the authority by RCRA § 3007(a), 42 U.S.C. § 6927 and CWA § 308, 33 U.S.C. § 1318.

Section V – LIST OF APPENDICES

No appendices are attached to this report. All documents received under RCRA CBI and Homeland Security sensitive information (HSSI) claims by the facility will be contained in a separate RCRA report using RCRA CBI requirements.