

DECLARATION OF CHRISTOPHER MEYERS, P.E.

Pursuant to 28 U.S.C § 1746, I, Chris Meyers, declare as follows:

1. I am currently employed as the Environmental Affairs Manager for Denka Performance Elastomer, LLC (DPE). I have held this position at the Neoprene plant in LaPlace, Louisiana (the “Facility”), since June 3, 2022. I previously held the position of Environmental Permitting Specialist at DPE from June 28, 2016, to June 2, 2022. Prior to that, I held the position of Senior Consultant at Trinity Consultants where I was periodically engaged by DPE to advise on air permitting matters.

2. On April 9, 2024, EPA made public its final rule in docket EPA-HQ-OAR-2022-0730 (“Final Rule”).¹ The Final Rule requires DPE to implement new emission controls at the Facility to comply with requirements issued under Section 112(f) (“Section 112(f) Control Projects”) and provides only 90 days after the effective date for implementation. The 90-day compliance period for Section 112(f) Control Projects is eight times shorter than the compliance period contained in EPA’s proposed rule (“Proposed Rule”).² I am providing this declaration in support of DPE’s Extension Request seeking at least a two-year compliance period for the Facility to safely design, install, and implement the Section 112(f) Control Projects.³

¹ See EPA, *New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry* (signed Mar. 28, 2024) (pre-publication version).

² *New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry*, 88 Fed. Reg. 25080 (Apr. 25, 2023), available at <https://www.govinfo.gov/content/pkg/FR-2023-04-25/pdf/2023-07188.pdf>.

³ EPA has not yet published the Final Rule or otherwise made available to me the technical documents supporting its Final Rule. I reserve the right to supplement my declaration after