

Message

From: Dwyer, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B9F207A623824720907845EAD85383CA-DWYER, STACEY]
Sent: 7/7/2022 6:57:29 PM
To: Leddton, Terry [Leddton.Terry@epa.gov]
Subject: RE: Request for meeting with EPA Region 6 Administrator- Bucket Brigade (Anne Rolfes)

Thank you Terry.

From: Leddton, Terry <Leddton.Terry@epa.gov>
Sent: Thursday, July 7, 2022 1:56 PM
To: Dwyer, Stacey <Dwyer.Stacey@epa.gov>; McGuire, James <McGuire.James@epa.gov>
Cc: Andrews, Suzanne <Andrews.Suzanne@epa.gov>; Wilson, Sherry <Wilson.Sherry@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Turk, James <turk.james@epa.gov>
Subject: RE: Request for meeting with EPA Region 6 Administrator- Bucket Brigade (Anne Rolfes)

Stacey,

There are no ethics concerns with respect to this meeting request. Moreover, the Biden Ethics Pledge is not implicated because no identified attendee is a federally registered lobbyist. As always we recommend consultation with the appropriate EPA programs prior to the requested meeting.

Terry Leddton
Assistant Deputy Ethics Officer

From: Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Sent: Wednesday, July 06, 2022 12:03 PM
To: McGuire, James <McGuire.James@epa.gov>
Cc: Andrews, Suzanne <Andrews.Suzanne@epa.gov>; Leddton, Terry <Leddton.Terry@epa.gov>; Wilson, Sherry <Wilson.Sherry@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Turk, James <turk.james@epa.gov>
Subject: FW: Request for meeting with EPA Region 6 Administrator- Bucket Brigade (Anne Rolfes)

Good afternoon James,

Attached is a meeting request form from Bucket Brigade (Anne Rolfes). Let me know if any conflict exists.

Thanks,
Stacey

From: Shreyas Vasudevan <shreyas@labucketbrigade.org>
Sent: Wednesday, July 6, 2022 11:19 AM
To: Turk, James <turk.james@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Cc: Anne Rolfes <anne@labucketbrigade.org>
Subject: Re: Request for meeting with EPA Region 6 Administrator

Hi,

I have attached the meeting form to this email. Please reach out to me if you require any additional information and/or have any questions. Looking forward to meeting with you all soon.

Best,

Shreyas Vasudevan

On Thu, Jun 30, 2022 at 4:41 PM Shreyas Vasudevan <shreyas@labucketbrigade.org> wrote:

Hi Stacey, Suea, and James,

I wanted to inform you that it would work best for our team to meet with you virtually via Zoom, instead of in person as originally planned. I will submit the meeting form to you all tomorrow and provide an agenda for the meeting as soon as we have one ready to share! Feel free to reach out to me should you need anything in the meantime.

Best,
Shreyas Vasudevan

On Wed, Jun 29, 2022 at 10:20 AM Anne Rolfes <anne@labucketbrigade.org> wrote:

Thank you so much,

I am cc'ing my coworker Shreyas Vasudevan who is going to handle this for us.

We look forward to our meeting in Dallas.

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

On Mon, Jun 27, 2022 at 12:44 PM Dwyer, Stacey <Dwyer.Stacey@epa.gov> wrote:

Anne Rolfes,

It was good talking with you today. Attached is the meeting form. Please send the completed form back to me as well as copy Ms. Sue Davis and Mr. James Turk. They are both copied on this message. If you have an agenda for the meeting, please include that document.

We will be back in touch with you soon regarding potential dates.

Thank you,
Stacey B. Dwyer, P.E.
Senior Advisor to the Regional Administrator
EPA Region 6
(b) (6) EPA Cellphone
214-665-6729 EPA Landline

--

Shreyas Vasudevan
Campaign Researcher
Louisiana Bucket Brigade
Cell: (b) (6)
Work: (504) 484-3433



--

Shreyas Vasudevan
Campaign Researcher
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Work: (504) 484-3433



Message

From: Dwyer, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B9F207A623824720907845EAD85383CA-DWYER, STACEY]
Sent: 7/6/2022 5:03:17 PM
To: Gonzalez, Iris [Gonzalez.Iris@epa.gov]
CC: Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Shaikh, Taimur [Shaikh.Taimur@epa.gov]
Subject: FW: Request for meeting with EPA Region 6 Administrator- Bucket Brigade (Anne Rolfes)
Attachments: EPA Meeting Form.docx.pdf

FYI.

From: Dwyer, Stacey
Sent: Wednesday, July 6, 2022 12:03 PM
To: McGuire, James <McGuire.James@epa.gov>
Cc: Andrews, Suzanne <Andrews.Suzanne@epa.gov>; Leddon, Terry <Leddon.Terry@epa.gov>; Wilson, Sherry <Wilson.Sherry@epa.gov>; Suea Davis <Davis.Suea@epa.gov>; 'James Turk (turk.james@epa.gov)' <turk.james@epa.gov>
Subject: FW: Request for meeting with EPA Region 6 Administrator- Bucket Brigade (Anne Rolfes)

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Thanks,
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Sent: Wednesday, July 6, 2022 11:19 AM
To: Turk, James <turk.james@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Cc: Anne Rolfes <anne@labucketbrigade.org>
Subject: Re: Request for meeting with EPA Region 6 Administrator

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Thank you so much,

I am cc'ing my coworker Shreyas Vasudevan who is going to handle this for us.

We look forward to our meeting in Dallas.

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

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Anne Rolfes,

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We will be back in touch with you soon regarding potential dates.

Thank you,

Stacey B. Dwyer, P.E.

Senior Advisor to the Regional Administrator

EPA Region 6

(b) (6) EPA Cellphone

214-665-6729 EPA Landline

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Shreyas Vasudevan
Campaign Researcher
Louisiana Bucket Brigade
Cell: (b) (6)
Work: (504) 484-3433

--
Shreyas Vasudevan
Campaign Researcher
Louisiana Bucket Brigade
Cell: (b) (6)
Work: (504) 484-3433

Message

From: Davis, Suea [davis.suea@epa.gov]
Sent: 7/18/2022 6:04:17 PM
To: Dwyer, Stacey [Dwyer.Stacey@epa.gov]
Subject: RE: Time sensitive meeting request

I have a hold on 7/31 at 12 PM. I believe we might have put that there. Is that okay?

From: Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Sent: Sunday, July 17, 2022 11:12 AM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Cc: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Garcia, David <Garcia.David@epa.gov>; Ngo, Kim <Ngo.Kim@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Turk, James <turk.james@epa.gov>
Subject: Fwd: Time sensitive meeting request

Dr Nance,

We are scheduled to meet with Bucket Brigade on either the 2nd or 4th week of August (I am waiting on Anne to provide a finalized date).

I am copying David Garcia on this additional issue that she is presenting. I would suggest I work with David Garcia and his staff to get on a call with this community.

Stacey

Sent from my iPhone

Begin forwarded message:

From: Anne Rolfes <anne@labucketbrigade.org>
Date: July 17, 2022 at 5:44:32 AM CDT
To: "Dwyer, Stacey" <Dwyer.Stacey@epa.gov>
Cc: Jo Banner <(b) (6)@gmail.com>, Joy Banner <(b) (6)@gmail.com>
Subject: Time sensitive meeting request

Dear Ms. Dwyer,

I hope you are doing well and appreciate your assistance to help communities in Louisiana. I am CCing the Founders and Directors of a group based in St. John Parish called The Descendants Project. Please meet Jo Banner and Joy Banner. I am giving a brief overview of the situation here but they can of course provide more detail and specifics to their request.

Their descendant community is threatened by Greenfield Louisiana, a grain elevator proposing to build mere feet away from their homes. The air permit is due to expire and so the company has begun activity on the site under the guise of meeting the construction requirements to keep the air permit.

It would be very helpful if the Banners could meet with Dr. Nance this month to make sure the region understands the threat posed by this facility and the permit requirements that are not being met. As usual in Louisiana, we are reaching out to the region because we lack confidence in our state agency.

Thank you!

Message

From: Garcia, David [Garcia.David@epa.gov]
Sent: 7/29/2022 2:23:17 AM
To: Dwyer, Stacey [Dwyer.Stacey@epa.gov]
CC: Ngo, Kim [Ngo.Kim@epa.gov]
Subject: Re: Time sensitive meeting request

Yes, we are in contact with The Banner's

Sent from my iPhone

On Jul 28, 2022, at 4:56 PM, Dwyer, Stacey <Dwyer.Stacey@epa.gov> wrote:

Additional information regarding the grain elevator complaint in St John Parish

Sent from my iPhone

Begin forwarded message:

From: Jo Banner <(b) (6) @gmail.com>
Date: July 28, 2022 at 2:58:23 PM CDT
To: "Dwyer, Stacey" <Dwyer.Stacey@epa.gov>
Cc: Joy Banner <(b) (6) @gmail.com>, Jo Banner <jo@thedescentantsproject.org>, joy@thedescentantsproject.org
Subject: Re: Time sensitive meeting request

Ms. Dwyer,

Thank you for your follow-up regarding the Greenfield, Louisiana, LLC permit application for a proposed grain terminal. Per our conversation, I am attaching the legal documentation for our litigation and letters sent to the organization and agencies. I also included a link to a timeline created by the Center for Constitutional Rights regarding our case. The timeline has all of our case files.

https://drive.google.com/drive/folders/1zc5k_lZvisGpjTB5tiFM3NOWvi0Sqnts?usp=sharing
<https://ccrjustice.org/home/what-we-do/our-cases/descendants-project-v-st-john-baptist-parish-1>

Please let me know if you need anything else on our end. We appreciate you looking into the matter.

Sincerely,

Jo

On Tue, Jul 26, 2022 at 12:26 PM Dwyer, Stacey <Dwyer.Stacey@epa.gov> wrote:

Ms. Joy Banner, Ms. Jo Banner, and Ms. Anne Rolfes,
I am following up to determine if anyone from EPA has contacted you. Please give me a call on my cellphone at 214-535-7427.

Thank you,

Stacey B. Dwyer, P.E.
Senior Advisor to the Regional Administrator
US EPA Region 6
(b) (6) EPA Cellphone
214-665-6729 EPA Landline

-----Original Message-----

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Sunday, July 17, 2022 5:44 AM
To: Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Cc: Jo Banner <(b) (6)@gmail.com>; Joy Banner <(b) (6)@gmail.com>
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It would be very helpful if the Banners could meet with Dr. Nance this month to make sure the region understands the threat posed by this facility and the permit requirements that are not being met. As usual in Louisiana, we are reaching out to the region because we lack confidence in our state agency.

Thank you!

Anne Rolfes

Message

From: Nance, Earthea [Nance.Earthea@epa.gov]
Sent: 7/18/2022 12:05:18 AM
To: Dwyer, Stacey [Dwyer.Stacey@epa.gov]
CC: Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Gonzalez, Iris [Gonzalez.Iris@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Ngo, Kim [Ngo.Kim@epa.gov]; Davis, Suea [davis.suea@epa.gov]; Turk, James [turk.james@epa.gov]
Subject: RE: Time sensitive meeting request

Hi Stacey,

The answer is yes, I would be happy to meet with them. Every community and environmental group that has asked for a meeting has gotten one. It would be good to have some info gathered about the grain elevator for the meeting with Anne, even though the work will continue afterwards. There will be a lot to cover, so this will have to be a full hour meeting. Thanks for bringing this to my attention.

-E

From: Dwyer, Stacey <Dwyer.Stacey@epa.gov>
Sent: Sunday, July 17, 2022 11:12 AM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Cc: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>; Gonzalez, Iris <Gonzalez.Iris@epa.gov>; Garcia, David <Garcia.David@epa.gov>; Ngo, Kim <Ngo.Kim@epa.gov>; Davis, Suea <davis.suea@epa.gov>; Turk, James <turk.james@epa.gov>
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Stacey

Sent from my iPhone

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Date: July 17, 2022 at 5:44:32 AM CDT
To: "Dwyer, Stacey" <Dwyer.Stacey@epa.gov>
Cc: Jo Banner (b) (6) <[REDACTED]@gmail.com>, Joy Banner (b) (6) <[REDACTED]@gmail.com>
Subject: Time sensitive meeting request

Dear Ms. Dwyer,

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from their homes. The air permit is due to expire and so the company has begun activity on the site under the guise of meeting the construction requirements to keep the air permit.

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Thank you!

Anne Rolfes

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Wednesday, June 8, 2022 4:15 PM
To: Shreyas Vasudevan <shreyas@labucketbrigade.org>
Cc: Nance, Earthea <Nance.Earthea@epa.gov>; Bobby Taylor <btcnola@gmail.com>
Subject: Re: Concerned Citizens of St. John and Louisiana Bucket Brigade Letter to EPA

Dear Dr. Nance,

We appreciate your review of this letter. THANK YOU!

Anne Rolfes

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

On Wed, Jun 8, 2022 at 3:40 PM Shreyas Vasudevan <shreyas@labucketbrigade.org> wrote:
Dear Dr. Nance,

On behalf of Concerned Citizens of St. John and the Louisiana Bucket Brigade, I would like to provide you with this letter regarding chloroprene emissions at the Denka facility in St. John's Parish. This letter is also attached to this email in PDF format.

We are writing this letter to advocate that EPA use its enforcement authority to cease the emission of toxic levels of chloroprene at Denka's neoprene manufacturing facility in St. John the Baptist Parish, Louisiana (St. John). As the EPA's efforts to address chloroprene enters its second decade, the perpetrators of this assault on St. John Parish residents, including elementary schoolchildren, have failed to heed the pleas of the public and instead have attempted to subvert efforts to cease emissions of this carcinogen. We do recognize and thank you for the renewed air monitoring at the facility. However, we need enforcement. Therefore, we also urge the Region 6 Administrator's office to use your enforcement authority to hold the companies, DuPont and Denka, accountable for the irreparable harm inflicted upon a historically marginalized population.

The EPA's own findings of extraordinarily high rates of cancer and non-cancer health conditions caused by air pollution in St. John must not be understood as an accident or due to negligence, but as a preventable outcome caused by apathetic actors who were informed of the public damage they were to effectuate. **It is important that the EPA is aware that both Denka and DuPont have employed several tactics to evade accountability for the devastation caused by the facility's emissions, including concealing pertinent information from the public and legal action against the EPA for its reclassification of chloroprene as a likely human carcinogen.** While Denka touts its 2017 voluntary agreement with the Louisiana Department of Environmental Quality to reduce the facility's chloroprene emissions by 85%, the most recent air monitoring report at the facility has recorded an alarming number of days where the chloroprene concentration far exceeded the EPA's threshold. DuPont and Denka have successfully evaded any accountability

for the harm caused by the facility. Both companies have repeatedly failed to meaningfully cooperate or accept their obligation to redress the devastation to local air quality and the health of St. John residents. DuPont and Denka have chosen to continue prioritizing their own profits over the people of St. John Parish.

Background:

DuPont constructed and operated this facility from 1968 for the production of neoprene, eventually becoming the leading producer of this product in North America. Yet as early as 1956, over a decade before it began operating the facility, DuPont had already noted in a technical report on poly chlorobutadiene (neoprene) that exposure to small amounts of its byproduct, chloroprene, may cause “depression of the central nervous system and damage to vital organs,” severe enough to cause death. The following excerpt is taken from the 1956 report.

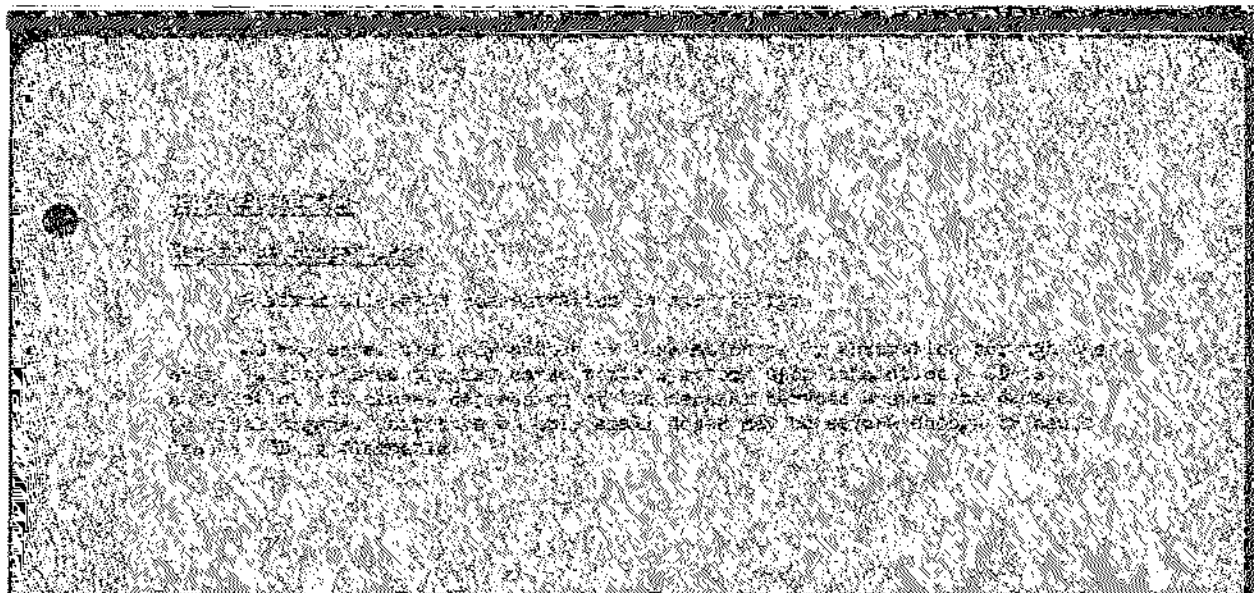


Image taken from page 11 of DuPont's 1956 Technical Manual for Polychlorobutadiene Manufacture

This report deemed the maximum allowable air concentration of chloroprene at 25 ppm and toxic exposure at 83 ppm, far below the EPA's current safety threshold of .2 $\mu\text{g}/\text{m}^3$. Yet DuPont's report shows that the company did have an understanding that exposure to chloroprene causes severe and debilitating symptoms and its potential for lethality. **Despite DuPont's knowledge of chloroprene's toxicity prior to inaugurating the St. John neoprene facility, the company never disclosed this information to the public.** DuPont's decision to begin operating the facility was made in spite of its understanding of chloroprene's severe toxicity. DuPont's attempt to conceal its knowledge of chloroprene was a successful strategy for 44 years when chloroprene was finally deemed a carcinogen by the EPA. The reclassification of the pollutant in 2010 finally forced DuPont to reconsider its ability to continue releasing chloroprene into the air of St. John as freely as it had done for nearly fifty years.

The EPA's focus on chloroprene worried DuPont as early as 2011, according to internal memos uncovered by the Guardian, as the EPA's reclassification of chloroprene indicated that the facility

may soon no longer be able to inundate the surrounding air with large concentrations of chloroprene as it had done since 1968. These memos revealed that while DuPont had developed a plan that could reduce chloroprene emissions from this facility to levels below the EPA's threshold, it decided that selling the plant was more profitable than incurring the costs required to offset its emissions. DuPont attempted to discreetly secure a deal to sell the facility to Denka while also withholding its research on ways to offset the plant's emissions from the new operator. Furthermore, as DuPont still owns the land on which the facility lies, the company stipulated in its lease to Denka a requirement that the latter must operate the facility in the same manner as it had been by DuPont with certain changes in the process requiring DuPont's prior written consent.

Denka's current ownership of the facility makes it difficult for the company to dismiss its own responsibility as easily as DuPont has, yet Denka also continues to resist accountability. From the time it took over the facility in, Denka has sought to obstruct the EPA's regulatory power against chloroprene. Since 2015, Denka initially pressured the EPA to reverse its stance on chloroprene, with no success, and subsequently pursued a Request for Correction appeal to strong-arm the EPA into alignment with the company's interests. While the EPA rejected this appeal in 2022, it allowed Denka to delay the EPA's ability to use its regulatory power to address chloroprene for two more years.

Denka's second approach has been to undermine the legitimacy of the studies on chloroprene conducted by the EPA and others, by funding private studies to support its claim against the pollutant's classification as a carcinogen. Denka continues to attack the validity of the EPA's findings, most recently in response to the EPA civil rights compliance office's probe into environmental discrimination in LDEQ permit process. Additionally, Denka's claims of having reduced the facility's chloroprene emissions by 85% as a part of its voluntary agreement with LDEQ is also opaque and has been met with skepticism by local residents. Even if taken at face value, Denka and LDEQ's arrangement did not consider the EPA's chloroprene safety threshold as a part of this agreement, and an 85% reduction in the facility's chloroprene emissions would still not fall below the .2 $\mu\text{g}/\text{m}^3$ concentration threshold.

Recent air monitoring readings

Air quality readings from January 2022 revealed chloroprene levels at their highest in the last two years. The Fifth Ward Elementary School, a public K-4 school with a 90% Black student population situated a half-mile from the western edge of the Denka plant, is one of the EPA's four continuous air monitoring stations to observe the Denka facility since 2016. These monitors have picked up numerous days on which the chloroprene concentration was far above EPA standards from March 2020 - January 2022. This monitoring report shows seven days over the previous year during which the concentration of chloroprene was over forty times higher than the EPA standards, including on November 23, 2021 where the concentration was 180 times the .2 $\mu\text{g}/\text{m}^3$ threshold. The most recently available air quality data is cause for immense concern on the long-term health of these children.

Summary & Conclusion:

The history of this facility and the actions of DuPont and Denka makes clear that this problem will not be solved by relying on voluntary cooperation or other non-enforceable mechanisms. These

companies have decimated a safe learning environment for the schoolchildren and thwarted attempts to inflict accountability for far too long. DuPont's history in St. John can be summarized by two main strategies – suppressing information and finally desertion. Since Denka's entrance into St. John, the company has continued to emit chloroprene at toxic levels. DuPont's strategy to suppress information has been further developed by Denka into an active misinformation campaign.

The fifty-four year-long assault on the residents of St. John, a primarily Black community with a deep history of racial oppression from the era of slavery, is one of the most acute manifestations of environmental injustice and institutional racism in this country. The Concerned Citizens of St. John and the Louisiana Bucket Brigade beseech you to take action against the continued emission of chloroprene at toxic levels at this facility with urgency, understanding that the half-century of toxic exposure of chloroprene that neighboring communities have been subjected to must not be protracted any longer. We also would like to offer further collaboration with your office to address this issue, especially for the purposes of facilitating communication between the EPA and St. John's Parish residents or the provision of immediate relief services.

As a first step, we invite you to visit St. John Parish and hold a listening session on Dupont / Denka specifically, and chloroprene more generally, a chemical that we feel should be banned from use and production. You can always contact us via email and phone. Our colleague Shreyas Vasudevan (email: shreyas@labucketbrigade.org; cell: 412-515-7709) is the point person on this letter. Should your staff like to arrange for a listening session, Mr. Vasudevan is the contact.

Sincerely,

Robert Taylor, Concerned Citizens of St. John
(504) 559 - 7304
btcnola@gmail.com

Anne Rolfes, Louisiana Bucket Brigade
(504) 452 - 4909
anne@labucketbrigade.org

--

Shreyas Vasudevan
Campaign Researcher
Louisiana Bucket Brigade
Cell: (b) (6)
Work: (504) 484-3433





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

Office of the Regional Administrator

(Date)

Anne Rolfes
Director
Louisiana Bucket Brigade

Robert Taylor
Concerned Citizens of St. John

Dear Ms. Rolfes and Mr. Taylor:

Thank you for your June 8, 2022, letter to the U.S. Environmental Protection Agency requesting that the EPA use its enforcement authorities to address the community risks related to chloroprene emissions from Denka's facility in St. John the Baptist Parish, Louisiana. Your letter also requested that EPA visit St. John the Baptist Parish and hold a listening session with the community to hear their concerns directly.

The EPA is committed to protecting the health of the citizens in St. John the Baptist Parish. Since 2016, the EPA has worked closely with the Louisiana Department of Environmental Quality to characterize air quality in the communities surrounding the Denka facility and to require chloroprene emission reductions from the facility to the ambient air. While we have seen progress in reducing emissions from the facility and, in turn, reducing health risks for the communities, more work must be done. To this end, we are considering all available tools to achieve further emission reductions and health protections for the citizens of St. John the Baptist Parish. We would like to revisit your request that EPA hold a listening session with the community at a later date, when we are able to update you and the community regarding enforcement status that is currently pending.

Thank you for sharing your community's concerns. If you have any questions, please feel to contact me, or James Leathers, Chief of the Air Toxics Enforcement Branch, at (214) 665-6569 or leathers.james@epa.gov.


Sincerely,

Earthca Nance, PhD, PE
Regional Administrator

Appointment

From: Davis, Suea [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=48D3B8D643784F5C8A5A581E081D2EAB-DAVIS, SUEA]
on behalf of Nance, Earthea [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A54D6F295DB49BF9B334B7D971D789F-NANCE, EART]
Sent: 7/13/2022 10:43:17 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Gonzalez, Iris [Gonzalez.Iris@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]; Shaikh, Taimur [Shaikh.Taimur@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Ngo, Kim [Ngo.Kim@epa.gov]; Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Balandran, Olivia-R [balandran.olivia-r@epa.gov]; Acosta, Gerardo [acosta.gerardo@epa.gov]; Vaughn, Gloria [Vaughn.Gloria@epa.gov]; McAtee, Jeffrey [McAtee.Jeffrey@epa.gov]; Acevedo, Janie [acevedo.janie@epa.gov]; McGuire, James [McGuire.James@epa.gov]; Andrews, Suzanne [Andrews.Suzanne@epa.gov]; Eppler, Alexandria [Eppler.Alexandria@epa.gov]; Schoellkopf, Lynde [Schoellkopf.Lynde@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Barnett, Cheryl [Barnett.Cheryl@epa.gov]; Tamez, Adam [Tamez.Adam@epa.gov]
CC: Turk, James [turk.james@epa.gov]; Davis, Suea [davis.suea@epa.gov]; Olszewski, Joshua [olszewski.joshua@epa.gov]; Khalsa, Dharma [Khalsa.Dharma@epa.gov]; Lee, Jamie [Lee.Jamie@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]
Subject: R6 Pre-brief Bucket Brigade
Attachments: 8_2_22 Final Draft Front Office Edits R6-22-000-5163-RA Taylor Rolfes Denka chloroprene St John.docx; R6-22-000-5163-RA Taylor, Rolfes, Denka chloroprene St. John's Parish .pdf; EPA Meeting Form.docx.pdf; 3.31.22 Letter to EPA from La Bucket Brigade w Attachments.pdf; Run of show TPs for Mtg with Bucket Brigade_ August 2022 Draft 08-24-22.docx
Location: Microsoft Teams Meeting
Start: 8/24/2022 5:00:00 PM
End: 8/24/2022 5:30:00 PM
Show Time As: Busy
Required Attendees: Wooden-Aguilar, Helena; Gonzalez, Iris; Dwyer, Stacey; Shaikh, Taimur; Garcia, David; Ngo, Kim; Robinson, Jeffrey; Balandran, Olivia-R; Acosta, Gerardo; Vaughn, Gloria; McAtee, Jeffrey; Acevedo, Janie; McGuire, James; Andrews, Suzanne; Eppler, Alexandria; Schoellkopf, Lynde; Welton, Patricia; Barnett, Cheryl; Tamez, Adam
Optional Attendees: Turk, James; Davis, Suea; Olszewski, Joshua; Khalsa, Dharma; Lee, Jamie; Thompson, Steve; Seager, Cheryl

Davis, Suea has shared a OneDrive for Business file with you. To view it, click the link below.

 PM Monitoring in New Orleans-Met MSA - ARD.docx

ARD input to air monitoring document added. 8/23

Pre-brief for virtual meeting with Bucket Brigade on 8/30 at 10:00 AM.

- Please provide meeting materials at least 48 hours in advance to Sue Davis and James Turk
 - We ask that you connect at least 5 min. before the scheduled starting time.
 - Notify Sue Davis and James Turk to invite others that need to be included in this pre-brief
-

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Message

From: Russel Honore' [(b) (6)]@gmail.com]
Sent: 7/18/2022 7:33:06 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Vaughn, Gloria [Vaughn.Gloria@epa.gov]
Subject: Fwd: Hot Poisoned Water

fyi

----- Forwarded message -----

From: L YC <[(b) (6)]@gmail.com>
Date: Mon, Jul 18, 2022 at 1:47 PM
Subject: Fwd: Hot Poisoned Water
To: Russel Honore' <[(b) (6)]@gmail.com>, nicolas holm <[(b) (6)]@ouutu.com>

FYI

----- Forwarded message -----

From: Michael Tritico <[(b) (6)]@yahoo.com>
Date: Mon, Jul 18, 2022 at 1:34 PM
Subject: Hot Poisoned Water
To: James Hiatt <james@labucketbrigade.org>, Naomi Yoder <naomi@healthygulf.org>, Raleigh Hoke <raleigh@healthygulf.org>, Jack Sweeney <jack@labucketbrigade.org>, MSW Cynthia P. Robertson <cindy@micah68mission.org>

Below is a rough first draft of what I hope to expand and deliver as comments in person at the LDEQ Public Hearing July 28, 6 P.M. at the Westlake City Council Chambers. I would hope that some of you would see that this is an important situation. Rhetorical testimonies make no difference to LDEQ. SOMETIMES fact-based testimonies force them to do something useful.

RESTORE

P.O. Box 233

Longville, LA 70652

(337) [(b) (6)]

[(b) (6)]@yahoo.com

xx/xx/xxxx

LDEQ Public Participation Group

P.O. Box 4313

Baton Rouge, LA 70821-4313

Re: AI Number 226602 Permit Number LA0127532 and Activity Number PER20210003 Louisiana Integrated Polyethylene Joint Venture, LLC

Draft Water Discharge Permit and the Associated Environmental Assessment Statement

Dear Public Participation Group:

I have reviewed several relevant documents in EDMS, Numbers: 13308138 (177 pages), 13206067 (15 pages), 10981526 (4 pages), 11422056 (30 pages), 12885916 (7 pages), and 12540042 (316 pages.) I did NOT go back and review the underlying SASOL, Lyondell, and Basell documents

although undoubtedly those records would have helped clarify what is happening and what could happen in the aftermath of the shifts in responsibilities underway.

Although this proposed permit covers 4 outfalls into Bayou Verdine and 2 into the Calcasieu River, I focused my reviews on the ones going into the river by Nalmar Landing. That is a very narrow part of the Calcasieu River just downstream from Lake Charles.

In previous proceedings I have pointed out that the hot water coming from that SASOL discharge creates a thermal curtain which cooks aquatic biota eggs, larvae, and juveniles that are passively carried into the hot zone. Furthermore the Outfall O81 and C81 thermal barrier either kills adult fish, crabs, and shrimp that are trying to migrate downstream or upstream to fulfill their life cycles or it blocks them - turns them around in final frustration of their instincts.

Despite my efforts to get LDEQ to investigate and address that serious environmental quality issue, now you are proposing to allow the problem to continue unmitigated. Apparently you have not even checked out the situation by simply sending a sampling team to do temperature profiling of the river.

This is a perfect example of the false promise to the public that LDEQ embodies.

Not having any limit on how hot the discharges from the outfalls can be is ridiculous. Even more absurd is the malfeasant charade included in the draft permit materials: "Mixing Zone Calculations" on PDF Pages 149 and 150 of EDMS Document Number 13308138. One of the factors in the formula is T_a , ambient temperature of the receiving stream, given as 95 degrees Fahrenheit year around! Applying that factor LDEQ calculates the allowable temperature of the effluent to be 210.98 degrees Fahrenheit! In other words, if there is not 212 degree boiling water flushing into the Calcasieu River at the City Docks, LDEQ blesses Louisiana Polyethylene Joint Venture, LLC and says "go to it!"

Contained in that 5 million gallons a day of hot water are almost a ton of toxic synthetic molecules a year, some of which are the same ones which led to Seafood Consumption Advisories that are still in existence. There are also many tons of eutrophication-inducing molecules, which not only distort the estuarine and riverine ecosystems but add to the "Dead Zone" problem that exists off the Louisiana to Texas coasts.

Sincerely,

Michael Tritico, Biologist and President of RESTORE

Restore Explicit Symmetry To Our Ravaged Earth

--

Laura Cox

(b) (6) @gmail.com

512-(b) (6)

--

Best Regards,

Russel L. Honore'

LTG, U.S. Army (Retired)

See/Smell Something, Say Something
Do Something, Take a picture. Call 911

www.generalhonore.com

Message

From: Nance, Earthea [Nance.Earthea@epa.gov]
Sent: 4/25/2024 6:09:30 PM
To: Wilson, Sherry [Wilson.Sherry@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]
Subject: FW: Venture Global update

Hi Sherry, please schedule a meeting with the Bucket Brigade re: Venture Global.

Thanks,

-E

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Thursday, April 25, 2024 7:00 AM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: Re: Venture Global update

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you,

We would definitely like to meet regarding Venture Global. The company had a 50 foot flare again yesterday. How shall I proceed for scheduling?

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

On Wed, Apr 24, 2024 at 11:30 PM Nance, Earthea <Nance.Earthea@epa.gov> wrote:

Dear Anne,

This is in response to your recent letter. Please see attached. And please let me know if you'd like to meet.

-E

Message

From: Smith, Melissa [Smith.Melissa@epa.gov]
Sent: 6/20/2024 4:01:19 PM
To: Dwyer, Stacey [Dwyer.Stacey@epa.gov]; Semien, Joy [Semien.Joy@epa.gov]; Lugo Homs, Yessenia [LugoHoms.Yessenia@epa.gov]; Wilson, Sherry [Wilson.Sherry@epa.gov]
CC: Smith, Monica [smith.monica@epa.gov]; Larson, Darrin [Larson.Darrin@epa.gov]; McDonald, James (he/him/his) [McDonald.James@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Hill, Troy [Hill.Troy@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]
Subject: FW: Chemical Waste Mismanagement Meeting last night
Attachments: Chem Waste Management - Tritico letter.pdf

Stacey, just want to give you a heads up that two days ago I received the attached letter from Michael Tritico with RESTORE ("Restore Explicit Symmetry To Our Ravaged Earth") requesting that EPA attend a public meeting on June 19 for a pending LDEQ RCRA permit for the Chemical Waste Management facility in Calcasieu Parish, LA. He raised concerns in his letter about groundwater monitoring and wastes potentially migrating offsite. I sent him a note that we would not be able to attend the meeting but that we would look into the concerns that he raised. (I received this late in the day after we had our hot issues check-in).

Mr. Tritico sent a follow-up message below in which he again outlines the concerns related to groundwater monitoring and also mentions the need for air monitoring. I will include a summary in response to Sue's request for hot issues for the RA's call with LDEQ on Monday, but wanted to give you and the other Directors a heads up as well.

Melissa

Please note that I sent this message at a time that was convenient for me without expectation for a response outside of business hours. If you receive this email outside of your normal working hours, please know that I do not expect a response until you are back at work during your normal hours.

Melissa Smith, Acting Director
Land, Chemicals and Redevelopment Division (LCRD)
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
214-665-7357
smith.melissa@epa.gov



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From: Michael Tritico <(b) (6)@yahoo.com>
Sent: Thursday, June 20, 2024 9:25 AM
To: Smith, Melissa <Smith.Melissa@epa.gov>
Subject: Fw: Chemical Waste Mismanagement Meeting last night

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Ms. Smith, I just sent this around but I want to add a couple of things that might help you to think of some way to get the State to re-open the entire RCRA permit for the CWMI facility in Carlyss, south of Sulphur and west of Lake Charles.

There was a court reporter taking down everything that happened. She said her transcript could be purchased for a price. Unfortunately there were times when the people were so excited that it is unlikely that she got down all of the overlapping comments.

The company people showed great ignorance of the history of their own hazardous waste site, thinking that it had been acquired from someone else in 1987 when actually they put the first three dumptruckloads of waste onto the ground of the old rice field in 1978,

The groundwater man did not know of the breach in the slurry wall on the west side of Cell 7 and apparently is still anchored into the long-since discredited "aquaclude" concept that our regional clay does not provide since it is full of slickensides, fractures, sand chimneys, even crawfish borings.

Even though it was a groundwater meeting, the people were irate and some almost crying because of their experiences in gas clouds that form and spread in nil wind conditions, some residents telling how strong it gets even several miles from the site.

The company has LDEQ buffaloed - the place is NOT under control - it is a nightmare.

Please either revoke LDEQ's primacy or make them do their job right.

Thank you.

Michael Tritico
Restore Explicit Symmetry To Our Ravaged Earth

----- Forwarded Message -----

From: Michael Tritico <[REDACTED]@yahoo.com>
To: Mary Ellender <[REDACTED]@outlook.com>; Robyn Thigpen <[REDACTED]>; Alyssa Portaro <[REDACTED]>; Lois Malvo <[REDACTED]>; Debra Sullivan <[REDACTED]>; Cynthia P. Robertson <cindy@micah68mission.org>; Lori Cooke <lori@labucketbrigade.org>
Cc: Tonya Havens <[REDACTED]>; Laura Cox <lauraycox@gmail.com>; Kim Goodell <kingoodell@icloud.com>; Russel Honore <[REDACTED]>; Jacques Morial <jacquesmorial@gmail.com>; James Hiatt <james@betterbayou.net>; Dustin Granger <[REDACTED]>; Jack Sweeney <[REDACTED]>; Theresa Schmidt <tsanmiguel@kplctv.com>; Rita LeBleu <rita.lebleu@americanpress.com>; Emily Burleigh <emily.burleigh@americanpress.com>; Peggy Frankland <[REDACTED]>; Charlie Atherton <[REDACTED]>; Doug Daigle <[REDACTED]>; Gary Watson <gary@garywatsonllc.com>; Environmental Justice <swlafilmcrew@gmail.com>; Lenn Knapp <[REDACTED]>; David Booth <david@boothenvironmental.com>; Vickie Boothe <[REDACTED]@gmail.com>; Darryl Malek-Wiley <darryl.malek-wiley@sierraclub.org>; Peter Digre <peterdigre@gmail.com>; [REDACTED] <[REDACTED]>; Naomi Yoder <naomi.yoder@tsu.edu>; Michael Orr <michael@leanweb.org>; Marylee Orr <marylee@leanweb.org>; Margie Vicknair-Pray <margie.vicknair-pray@sierraclub.org>; Virginia Richard - SouthWings Account <virginia@southwings.org>; Jim Vanderweele <[REDACTED]>; Wilma Subra <[REDACTED]>
Sent: Thursday, June 20, 2024 at 09:06:40 AM CDT
Subject: Chemical Waste Mismanagement Meeting last night

We did it! That was quite a meeting in Carlyss. To all of you who spoke - thank you!

The company tried very hard to limit the presentation and our comments but when all those neighborhood people that you had rounded up and helped to realize how close they live to something that had been the reason for their unexplained gassings - what a wonderful thing to see a neighborhood grab hold of the truth and run with it! (Probably a good thing that there were two uniformed deputy sheriffs there this time.)

Now we need to get EPA to force LDEQ to stop the stall on the restoration of RCRA Permit conditions for sampling and analysis of ALL the groundwater layers. Along with that we need to push hard for investigation of the breach in the slurry wall and the upwellings and drainings caused by the buried river channel's connection to the adjacent Bayou Choupique. And, as the man said who was cussing out the company now that he knows who made his little girl so sick, the air monitoring system onsite must be "bullshit!" since it finds nothing. Time for a citizen air monitoring event to prove to LDEQ and EPA that not only is the company onsite system useless but so is the nearest State station over near Highway 27.

The permit conditions the Harger and Eliender Families and RESTORE got imposed during our 28 trips to Baton Rouge way back in the early eighties MUST be reinstated because those conditions were what we knew would be the bare minimum for preventing what has now happened. It happened because the company got LDEQ to remove the conditions almost completely.

Likely every petrochemical plant and refinery in Louisiana and many from other states and some from foreign countries continue to send their worst toxic wastes to Carlyss because that site was the last entombment facility to get itself grandfathered in before the new agency at the time, EPA, got up and running.

Too bad EPA also almost immediately punted and gave the primacy ball to the State agency that our efforts had forced into being LDEQ.

Let's hope that the neighborhood people who showed up because you found and got them oriented will pick up the government fumble and score for the sake of their sick families.

Michael Tritico

Restore Explicit Symmetry To Our Ravaged Earth

17 2024

RESTORE
P.O. Box 233
Longville, LA 70652
(337)-(b) (6)
(b) (6) @yahoo.com

05/27/2024

Melissa Smith, Director
Land, Chemicals, and Redevelopment Division
U.S. Environmental Protection Agency
Region 6
1201 Elm Street Suite 500
Dallas, Texas 75270

Dear Ms. Smith,

Please send an observer to the rescheduled Public Meeting on proposed modifications to the RCRA Permit for Chemical Waste Management Incorporated's hazardous waste treatment and entombment facility in Calcasieu Parish, Louisiana.

The meeting that was advertised in the original public notice was cancelled without any notification to those of us who showed up only to be left wondering outside of the locked venue. The new electronic Public Notice says that the next attempt will be at 6 P.M. June 19 at the Carlyss Park Public Meeting Room, 6043 Carlyss Drive, Sulphur, LA 70665.

It is important for you to know that "Primacy" has broken down, that the Louisiana Department of Environmental Quality is in a state of turmoil under a new Secretary, and that citizens are not getting responses to attempted communications about matters such as this one.

CWMI has succeeded in limiting the proposed RCRA Permit Modification to a groundwater monitoring issue in a very limited location at the site even though there are numerous evidences in their latest required reports that grossly-different conditions exist sitewide compared to what had been promised in the permitting proceedings.

There is evidence, for example, that the "slurry wall" that was supposed to establish an "inward gradient" to make sure that nothing would flow out horizontally from the waste tombs has been breached at least on the west side of the site, at Cell 7. There is almost a ten-foot head differential from one side of the slurry wall to the other, meaning that wastes leaking from that tomb could move offsite. The first quarter leachate report for Cell 7 showed 18,000 gallons in the leachate collection system and close to 2,000 gallons in the leak detection layer.

Just north of that area, Cell 14 appears to have had its "leak detection layer" shoved up by hydraulic pressure from the underlying buried river channel (that is connected to the neighboring Bayou Choupique), and the "leachate collection layer" above that is engorged, having yielded about 9,000 gallons in the first quarter of 2024.

Just to the east of Cell 7 and to the southeast of Cell 14 something major is happening at Cell 6. The leachate collection system had, in the first quarter of this year, 676,105 gallons to be removed, and the leak detection layer had 290,631 gallons.

Sadly, through the years the company has convinced LDEQ and EPA to let it drop chemical monitoring in all the various sand layers except the "60 Foot Sand." For that one they are now even trying to relieve themselves of extra monitoring at locations where synthetic molecules have been showing up and where there are dynamic fluctuations of pH and specific conductance.

CWMI has masterfully misdirected the regulators, but bureaucratic pride should not stop any conscientious agency from investigating this mess even though it had to be brought to your attention by the public. Some of us intervened in the earliest permit hearings. We brought forth our own experts who challenged the concepts that the company said would ensure that there would not be leakage into the Sole Source Chicot Aquifer, nor would there be air pollution.

Have someone go look at the place and notice the huge piles of waste sitting under a flimsy canopy open to our driving rains – and notice the asbestos warning signs there on the fence.

PLEASE come to the Juneteenth meeting even though it is being conducted by the company as some sort of way to pick our brains in advance of any further company-friendly actions LDEQ might exercise with its unwarranted primacy.

We need your help and we have needed it since this disaster started back in 1978! Please!

Sincerely,

A handwritten signature in black ink that reads "Michael Tritico". The signature is fluid and cursive, with the first name and last name clearly legible.

Michael Tritico, Biologist and President of RESTORE
Restore Explicit Symmetry To Our Ravaged Earth

From: Eppler, Alexandria
To: Eppler, Alexandria
Subject: FW: Venture Global follow up / briefing
Date: Monday, March 18, 2024 1:35:36 PM

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Thursday, March 14, 2024 10:00 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Cc: Thompson, Steve <thompson.steve@epa.gov>; John Allaire (b) (6) <[\(b\)\(6\)@yahoo.com](mailto:(b)(6)@yahoo.com)>;
Gonzalez, Iris (she/her/hers) <Gonzalez.Iris@epa.gov>
Subject: Fwd: Venture Global follow up / briefing

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

Is it possible to get a reply to this? See email that I sent about a month ago. Thank you!

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

----- Forwarded message -----

From: Anne Rolfes <anne@labucketbrigade.org>
Date: Wed, Mar 6, 2024 at 7:36 AM
Subject: Fwd: Venture Global follow up / briefing
To: <nance.earthea@epa.gov>, Thompson, Steve <thompson.steve@epa.gov>
Cc: John Allaire <(b) (6) <[\(b\)\(6\)@yahoo.com](mailto:(b)(6)@yahoo.com)>>

Hello,

Re sending this. Hope you are all well.

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

----- Forwarded message -----

From: **Anne Rolfes** <anne@labucketbrigade.org>

Date: Thu, Feb 29, 2024 at 4:28 PM

Subject: Venture Global follow up / briefing

To: <nance.earthea@epa.gov>

Cc: John Allaire (b) (6) <[REDACTED]@yahoo.com>, Thompson, Steve <thompson.steve@epa.gov>

Dear Dr. Nance,

Hello. We are including Steve Thompson on this email as he has, in the past, communicated regarding enforcement and Venture Global.

We are wondering if we can both provide and receive an update on Venture Global. The operational problems have been a serious problem and need attention.

Thank you, and let us know.

Anne Rolfes

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909



REGION 6 ADMINISTRATOR

DALLAS, TX 75270

Ms. Anne Rolfes
Director
Louisiana Bucket Brigade

Dear Ms. Rolfes:

Thank you for reaching out to the U.S. Environmental Protection Agency by email on February 29 2024, March 6 2024, March 14, 2024, and on April 23, 2024, asking for an update related to the concerns you raised about operational problems at Venture Global. We shared with LDEQ the information previously provided, and we understand from discussions with LDEQ management that enforcement negotiations are ongoing with Venture Global.

I am committed to working with communities in our region to address environmental concerns and appreciate you contacting me about this matter. Please check out our Region 6 Delivers (attached to the email) for updates on the important work the EPA Region 6 is doing in Louisiana. If you have any additional information that you would like to share or any specific compliance concerns, please provide those directly to Steve Thompson at [[HYPERLINK "mailto:thompson.steve@epa.gov"](mailto:thompson.steve@epa.gov)] or at (214) 665-2769 and he can follow up directly to set up any discussions.

Sincerely,

Earthea Nance PhD, PE
Regional Administrator, Region 6



REGION 6 ADMINISTRATOR

DALLAS, TX 75270

Ms. Anne Rolfes
Director
Louisiana Bucket Brigade

Dear Ms. Rolfes:

Thank you for reaching out to the U.S. Environmental Protection Agency by email on March 14, 2024, and on April 23, 2024, asking for an update related to the concerns you raised about operational problems at Venture Global. We shared with LDEQ the information previously provided, and we understand from discussions with LDEQ management that enforcement negotiations are ongoing with Venture Global.

I am committed to working with communities in our region to address environmental concerns and appreciate you contacting me about this matter. Please check out our Region 6 Delivers (attached to the email) for updates on the important work the EPA Region 6 is doing in Louisiana. If you have any additional information that you would like to share or any specific compliance concerns, please provide those directly to Steve Thompson at [[HYPERLINK "mailto:thompson.steve@epa.gov"](mailto:thompson.steve@epa.gov)] or at (214) 665-2769 and he can follow up directly to set up any discussions.

Sincerely,

Earthea Nance PhD, PE
Regional Administrator, Region 6

Message

From: Eppler, Alexandria [Eppler.Alexandria@epa.gov]
Sent: 4/24/2024 10:09:00 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Wilson, Sherry [Wilson.Sherry@epa.gov]; Davis, Suea [davis.suea@epa.gov]; Turk, James (he/him/his) [turk.james@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]
CC: Acevedo, Janie [Acevedo.Janie@epa.gov]; Balandran, Olivia-R [balandran.olivia-r@epa.gov]; Varughese, Eunice [Varughese.Eunice@epa.gov]; Thurman, Joyce [Thurman.Joyce@epa.gov]; Zavala, Silvia [Zavala.Silvia@epa.gov]; Balandran, Olivia-R [balandran.olivia-r@epa.gov]; Welton, Patricia [Welton.Patricia@epa.gov]; Mills, Clarissa [mills.clarissa@epa.gov]; Larson, Darrin [Larson.Darrin@epa.gov]
Subject: ACTION: 24-02864-R06--ICMPS RA review and signature response to LBB
Attachments: R6Delivers_Louisiana and the Mississippi River Industrial Corridor.pdf; 24-02864-R06--ICMPS Air monitoring in Ascension Parish.pdf; 24-02864-R06--ICMPS Rolfes LBB Rural Roots 4_24_24.docx

Importance: High

Good Afternoon,

Please see the attached draft letter response for review for signature with the R6 Delivers and the Pdf of the incoming email.

XA and ORC have concurred.

Thank you,

Alexandria Eppler

Public Affairs Specialist
Writer-Editor
Correspondence Coordinator
Office of External Affairs
EPA Region 6

From: [Eppler, Alexandria](#)
To: [Eppler, Alexandria](#)
Subject: FW: Air monitoring in Ascension Parish
Date: Friday, March 22, 2024 3:52:13 PM

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Monday, March 4, 2024 3:58 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Cc: Ashley Gagnard <ashley@ruralrootslouisiana.org>; Gonzalez, Iris (she/her/hers) <Gonzalez.Iris@epa.gov>
Subject: Air monitoring in Ascension Parish

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Dr. Nance,

Hello, I hope you are doing well. Please meet Ashley Gagnard of Rural Roots, Louisiana. I believe you met her father, Reverend Harry Joseph, when you were in St. James Parish.

They are doing good work in Ascension Parish and need many things, including air monitoring. I am making the connection in hopes of getting things done! They are near CF industries, which is the largest greenhouse gas emitter in Louisiana (10 million tons a year).

Thank you!

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909



REGION 6 ADMINISTRATOR

DALLAS, TX 75270

[DATE \@ "MMMM d, yyyy"]

Ms. Anne Rolfes
Director
Louisiana Bucket Brigade

Dear Ms. Rolfes:

Thank you for reaching out to me by email on March 4, 2024, following my visit to St. James Parish, to introduce me to Ashley Gaignard. I appreciate the information provided in your email with regards to Ascension Parish and its needs for air monitoring. I look forward to connecting with Ms. Gaignard and linking in the Environmental Justice team here at the EPA Region 6, who can help establish more in-depth discussions between Ms. Gaignard and our program offices.

Working with communities and ensuring their voices and concerns are heard remains a top priority for EPA Region 6. Please check out our Region 6 Delivers (attached to the email) for updates on the important work the EPA Region 6 is doing in Louisiana. If you have any further questions, please contact the Office of Environmental Justice, Community Engagement and Environmental Review Division Director Eunice A. Varughese at (513) 569-7628 or at varughese.eunice@epa.gov.

Sincerely,

Earthea Nance PhD, PE
Regional Administrator, Region 6

Message

From: Nance, Earthea [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A54D6F295DB49BF9B334B7D971D789F-NANCE, EART]
Sent: 5/2/2024 9:18:25 PM
To: Wilson, Sherry [Wilson.Sherry@epa.gov]
Subject: FW: Venture Global update

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Thursday, April 25, 2024 5:41 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: Re: Venture Global update

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Thank you,

I haven't heard from them, FYI.

A

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

On Thu, Apr 25, 2024 at 1:10 PM Nance, Earthea <Nance.Earthea@epa.gov> wrote:

Hi Anne, I've asked my staff to reach out to you.

-E

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Thursday, April 25, 2024 7:00 AM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: Re: Venture Global update

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Thank you,

We would definitely like to meet regarding Venture Global. The company had a 50 foot flare again yesterday. How shall I proceed for scheduling?

Anne

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909

On Wed, Apr 24, 2024 at 11:30 PM Nance, Earthea <Nance.Earthea@epa.gov> wrote:

Dear Anne,

This is in response to your recent letter. Please see attached. And please let me know if you'd like to meet.

-E

Message

From: Nance, Earthea [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A54D6F295DB49BF9B334B7D971D789F-NANCE, EART]
Sent: 5/2/2024 9:18:46 PM
To: Wilson, Sherry [Wilson.Sherry@epa.gov]
Subject: FW: Venture Global Flaring for Four Straight Days Shows Dangers of Gas Export Industry

From: Anne Rolfes <anne@labucketbrigade.org>
Sent: Tuesday, April 23, 2024 1:17 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: Fwd: Venture Global Flaring for Four Straight Days Shows Dangers of Gas Export Industry

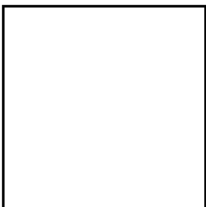
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Dear Dr. Nance and Steve,

FYI Venture Global's CP has been out of control the last few days. Scroll down for link to photo and video folder.

This was going to be on your radar for an inspection. Any update? Steve, I'd communicated with you about this several times over the last year.

Anne Rolfes, Director, Louisiana Bucket Brigade, (504) 452-4909



Venture Global Flaring for Four Straight Days Shows Dangers of Gas Export Industry

FOR IMMEDIATE RELEASE
April 23, 2024

CONTACT:
John Allaire, 225-936-1682, johncallaire@yahoo.com

Anne Rolfes, Director of the Louisiana Bucket Brigade, 504-452-4909,
anne@labucketbrigade.org

CAMERON, LA –Venture Global, a company that is vigorously lobbying against the pause on gas export facilities, is having significant problems at its Calcasieu Pass (CP) gas export terminal. The facility has been flaring for four straight days, a clear sign that there are operational problems at the facility. While there has been no communication from Venture Global to local residents, there are alarms piercing the air and black smoke billowing from the terminal. The inability of the management to get the facility under control underscores the concerns behind the Department of Energy's recent decision to pause permitting of gas export terminals. The pause is intended to give the Biden Administration a chance to review the science and determine if building more facilities is in the public interest.

"As your neighbor when you have an emergency situation, when you're flaring and I can hear the alarms from your plants, please let me know what's going on so that I can respond accordingly for the safety of myself, my family members and my other neighbors here in Holly Beach," said **John Allaire**, a retired environmental engineer who worked in the oil and gas industry for over three decades and whose property is across the river from CP. "This incident shows exactly why we need not just a pause, but a permanent end to permitting any more facilities." Allaire reported seeing excessive, continuous flaring coming from the facility for over 95 hours and photographed flames and smoke coming from the terminal throughout the period.

When a facility is flaring, it's releasing toxic pollutants that cannot be contained. Flaring at facilities like CP is used as an emergency mechanism, and periods of high flaring are associated with shutdowns or operational problems.

"Constant flaring is a sign that Venture Global's operations are out of control," said **Anne Rolfes, Louisiana Bucket Brigade executive director**. "If you look in the government files or listen to captured politicians speak, it's clear that Venture Global spends a huge amount of time and money lobbying. They should stop spending their time in Washington D.C. and get back to Louisiana and figure out how to get the plant under control. This whole episode shows why we desperately need the federal government's pause on permitting gas export terminals and why these facilities are not in the public interest."

Venture Global has made public commitments not to flare and is only permitted for 60 hours of flaring per year. Despite nearby flames that appeared to be dozens of feet tall accompanied by black smoke, large tanker ships continued to dock throughout the incident. Residents received no notice of what had happened or what the risk level might be even as facility alarm bells could be heard throughout the area.

Ongoing operational issues and lack of transparency are nothing new for Venture Global's CP facility. Since beginning its operations, the facility has had repeated problems, as documented in its reporting to the Department of Environmental Quality. In the first half of 2023, the plant had operational problems on at least 63% of days. The accidents have been compiled in a series of reports available on the Louisiana Bucket Brigade website.

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About Louisiana Bucket Brigade

The Louisiana Bucket Brigade collaborates with communities on the fenceline of polluting industry in Louisiana. We engage in grassroots action to hasten the transition from fossil fuels. Visit labucketbrigade.org for more information.

Message

From: Nance, Earthea [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A54D6F295DB49BF9B334B7D971D789F-NANCE, EART]
Sent: 5/2/2024 9:18:14 PM
To: Wilson, Sherry [Wilson.Sherry@epa.gov]
Subject: FW: Still flaring, no word from EPA staff
Attachments: 20240429T052140_facefront_hardware111.mov

-----Original Message-----

From: Anne Rolfes <anne@1abucketbrigade.org>
Sent: Monday, April 29, 2024 6:50 PM
To: Nance, Earthea <Nance.Earthea@epa.gov>
Subject: Still flaring, no word from EPA staff

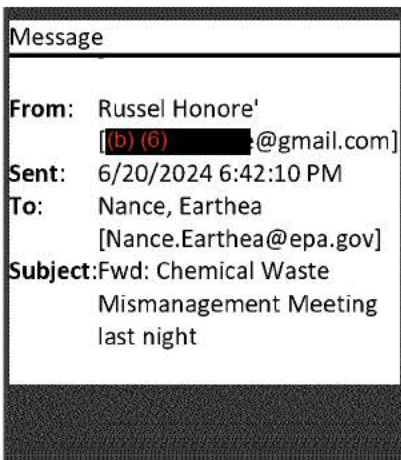
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Dear Dr. Nance,

Attached is a video from 5:30 am today. Venture Global is still flaring. I have not heard from your staff.

Thank you,

Anne Rolfes



Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

----- Forwarded message -----

From: **Michael Tritico** <(b) (6) @yahoo.com>

Date: Thu, Jun 20, 2024 at 10:07 AM

Subject: Chemical Waste Mismanagement Meeting last night

To: Mary Ellender <(b) (6) >, Robyn Thigpen <(b) (6) >, Alyssa Portaro <(b) (6) >, Lois Malvo <(b) (6) >, Debra Sullivan <(b) (6) >, Cynthia P. Robertson <(b) (6) >, Lori Cooke <lori@labucketbrigade.org>

CC: Tonya Havens <(b) (6) >, Laura Cox <(b) (6) >, Kim Goodell <(b) (6) >, Russel Honore <(b) (6) @gmail.com>, Jacques Morial <(b) (6) >, James Hiatt <james@betterbayou.net>, Dustin Granger <(b) (6) >, Jack Sweeney <(b) (6) >, Theresa Schmidt <tsanmiguel@kplctv.com>, Rita LeBleu <rita.lebleu@americanpress.com>, Emily Burleigh <emily.burleigh@americanpress.com>, Peggy Frankland <(b) (6) >, Charlie Atherton <(b) (6) >, Doug Daigle <(b) (6) >, Gary Watson <gary@garywatsonllc.com>, Environmental Justice <swlafilmcrew@gmail.com>, Lenn Knapp <(b) (6) >, David Booth <david@boothenvironmental.com>, Vickie Boothe <(b) (6) >, Darryl Malek-Wiley <darryl.malek-wiley@sierraclub.org>, Peter Digre <(b) (6) >, Naomi Yoder <naomi.yoder@tsu.edu>, Michael Orr <michael@leanweb.org>, Marylee Orr <marylee@leanweb.org>, Margie Vicknair-Pray <margie.vicknair-pray@sierraclub.org>, Virginia Richard - SouthWings Account <virginia@southwings.org>, Jim Vanderweele <(b) (6) >, Wilma Subra <(b) (6) >

We did it! That was quite a meeting in Carlyss. To all of you who spoke - thank you!

The company tried very hard to limit the presentation and our comments but when all those neighborhood people that you had rounded up and helped to realize how close they live to something that had been the reason for their unexplained gassings - what a wonderful thing to see a neighborhood grab hold of the truth and run with it! (Probably a good thing that there were two uniformed deputy sheriffs there this time.)

Now we need to get EPA to force LDEQ to stop the stall on the restoration of RCRA Permit conditions for sampling and analysis of ALL the groundwater layers. Along with that we need to push hard for investigation of the breach in the slurry wall and the upwellings and drainings caused by the buried river channel's connection to the adjacent Bayou Choupique. And, as the man said who was cussing out the company now that he knows who made his little girl so sick, the air monitoring system onsite must be "bullshit!" since it finds nothing. Time for a citizen air monitoring event to prove to LDEQ and EPA that not only is the company onsite system useless but so is the nearest State station over near Highway 27.

The permit conditions the Harger and Ellender Families and RESTORE got imposed during our 28 trips to Baton Rouge way back in the early eighties MUST be reinstated because those conditions were what we knew would be the bare minimum for preventing what has now happened. It happened because the company got LDEQ to remove the conditions almost completely.

Likely every petrochemical plant and refinery in Louisiana and many from other states and some from foreign countries continue to send their worst toxic wastes to Carlyss because that site was the last entombment facility to get itself grandfathered in before the new agency at the time, EPA, got up and running.

Too bad EPA also almost immediately punted and gave the primacy ball to the State agency that our efforts had forced into being LDEQ.

Let's hope that the neighborhood people who showed up because you found and got them oriented will pick up the government fumble and score for the sake of their sick families.

Michael Tritico

Restore Explicit Symmetry To Our Ravaged Earth

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Best Regards, LT General Russel Honore (Ret) www.generalthonore.com (404) 227-1527 See/Smell Something, Say Something, Do Something. Take a picture Call 911