

7) C-8 storage and use history

Dupont Fluoroproducts began the use of Ammonium Perfluorooctanoate, C-8, in the early 1950's. The material was originally received in 50 lb. containers in a powder form. In the late 1980's we transitioned over to receiving the C-8 as a 20% solids suspension in 300 gallon tote receivers. In the early 1990's we began the shipment of recovered C-8 back to the 3M company as a 20% solids suspension in 300-gallon tote receivers.

C-8 received in 50 lb. containers was temporarily stored in a common concrete floor warehouse and then transferred to the operation areas for use. In the operating areas the containers were placed into laboratory hoods for controlled dispensing.

C-8 in 300-gallon tote receivers is received and shipped back to the 3M company in dedicated over road trucks. The trucks are fitted with special spill control kits. Our records indicate that there has been only one incident of a spill of this material, that occurring on site in 1999 which involved 12 gallons of material spilling to a trailer bed and asphalt. The bulk of the spill was cleaned up using absorbent materials. .

The tote receivers are temporarily stored in a common concrete floor warehouse. All tote receivers in use in the operating areas are placed in concrete dikes for spill control. All spills are cleaned up locally with no release to the environment. Transfers from these tote receivers to process equipment are accomplished with common pumps within the controlled diked area mentioned above. All use is via liquid injection into pressure vessels with no use, which would allow a spray of the fluid into the atmosphere. Area C-8 levels are controlled well below the TLV of 0.56 moles per billion.

8) Plans for future monitoring and corrective action

Dupont's goals are to reduce C-8 emissions to the environment to very low levels. This program includes managing the disposal of solids containing greater than trace levels of C-8 as if they were a RCRA , the treatment of C-8 containing liquids with activated carbon, and minimization of airborne emissions.

Production areas using C-8 monitor airborne levels on a monthly basis. Monitoring of wastewater from the involved process areas will be done on at least a monthly basis. Monitoring of site groundwater is discussed below.

Dupont hazard risk assessments indicate that no remediation of currently contaminated soils or waters is warranted to maintain Dupont's Safety and Health objectives. Contamination of groundwater underlying the Dupont site (derived from former solid waste management units - SWMUs - included in the RFI study we have discussed) is being contained by the pumping of existing water wells. Dupont plans to maintain well

pumping to prevent off-site migration of SWMU-derived groundwater contamination and to conduct long term monitoring to ensure capture of such groundwater.

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