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DuPont Fluoroproducts

October 20, 2003



Document Control Office (DCO)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460

***VIA OVERNIGHT MAIL***

Attention: Docket No. AR-226 and/or OPPT-2003-0012

Re: Follow-up to September 15, 2003 Submission of DuPont Progress Report on Environmental Assessments Pursuant to the APFO Users LOI dated March 14, 2003: Air Dispersion Modeling Reports

Dear Sir/Madam:

Further to my letter of September 15, 2003 (referenced above) and DuPont commitments made in the above-identified LOI, air dispersion modeling, based upon year 2002 air emissions for the Washington Works facility and using the EPA approved Industrial Source Complex Short Term 3 (ISCST3) model, as described in the APFO Users LOI, has been completed. The report is included as Attachment 1. These modeled results are presented solely for the purpose of establishing a baseline year by which future reductions in air emissions can be compared. Verification of the air model on which these results are based is planned to begin shortly.

In addition, air dispersion modeling based upon air emissions from September 2002 through August 2003 has also been conducted, per request of the West Virginia Department of Environmental Protection. Those results are reported in Attachment 2. The modeled air emissions for this time period are reduced in comparison to the modeled air emissions for baseline year 2002.

The reduction in air emissions is primarily due to the addition, in May 2002, of a secondary recovery scrubber to the largest single emission point. The previously existing packed-bed scrubber collected 50% of the emitted material. The new device uses a deep-bed fiber system to collect fine particles that were not collected by the existing scrubber. The recovery efficiency, measured across both devices, has been demonstrated to be 98% or greater.

Additional reductions in air emissions resulted from improvements applied to scrubbers on other significant emission points. A DuPont study identified improvements to scrubber operating parameters and changes to control strategies that can allow efficiencies to improve from 75% - 85% to 90% or better.

If you need further clarification on the information presented with this letter, please contact me at the number provided below.

Very truly yours,

David M. Rurak
Safety, Health, and Environmental Manager
Global Business Manager, APFO
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Attachments (2)

cc: Mary Dominiak, EPA (via overnight mail)
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Washington, DC 20460
564-4760

ATTACHMENTS

| Attachment No. | Title | No. of Pages |
|---|---|---|
| 1 | Year 2002 Air Dispersion Modeling Analysis of APFO Emissions | 8 |
| 2 | September 2002 through August 2003 Air Dispersion Modeling Analysis of APFO Emissions | 8 |