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AR226-1774

May 25, 2004

Mary Dominiak
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
EPA East, Room 4410
1201 Constitution Avenue, NW
Washington, DC 20460
564-4760

VIA OVERNIGHT MAIL

Attention: Docket No. AR-226 and/or OPPT-2003-0012
Re: Submission of Air Data - DuPont Washington Works Facility

Dear Mary:

As discussed in various meetings with USEPA on monitoring around the DuPont Washington Works facility in West Virginia (the Site), DuPont is in the process of conducting an Air Modeling Verification Study (the Study). The first part of the Study, pertaining to air monitoring/modeling at the fenceline of the Site (Phase I), has been completed. The following data and information are attached with respect to the first part of this Study:

- 4 page document entitled Air Data (Attachment 1) – this document provides comment on the Phase I work. Note that the Air Modeling Verification Study is not complete; therefore comments at this juncture represent only intermediate results. We are summarizing some of the observations to assist in understanding of the data being submitted with this letter.

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- 9 analytical reports from Exygen Research, each entitled Air Sampling Fluorochemical Report (Attachment 2).

In addition, DuPont has undertaken another effort aimed at evaluating the particle size distribution (PSD) of PFOA in ambient air at the Site. This effort is designed to verify/refine inputs to air deposition modeling. The results to date for this effort are provided with this letter (see Attachment 3, Analytical Report from Exygen Research entitled Fluorochemical Characterization of Filter Samples; Particle Size Distribution Study). A report documenting results from the Particle Size Distribution analysis is under review and will be submitted to EPA upon its completion.

A copy of this entire submission is also being provided to the West Virginia Department of Environmental Protection and the Ohio Environmental Protection Agency.

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

Very truly yours,



Andrea V. Malinowski
Counsel for E. I. DuPont de Nemours and Company

Attachments

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ATTACHMENTS

1. Air Data – DuPont Washington Works Site (4 pages)
 2. The following are bound analytical reports from Exygen Research, all entitled Air Sampling Fluorochemical Report:
 - Round 1 – Report No. L0001277
 - Round 2 – Report No. L0001308
 - Round 4 – Report No. L0001359
 - Round 5 – Report No. L0001400
 - Round 7 – Report No. L0001444
 - Round 8 – Report No. L0001448
 - Round 9 – Report No. L0001508
 - Round 10 – Report No. L0001667
 - Round 11 – Report No. L0001668
- Note that samples were not analyzed for Events 3 and 6. Event 3 was conducted on November 17, 2003, when the on-site meteorological station recorded 17 calm hours out of 24 hours. The ISCST3 model would treat these calm hours by using a default wind speed value of 1 meter per second. Because these data are being used for a modeling verification study, actual data, when possible, should be used as opposed to default information. In fact, it is recommended in the Guideline on Air Quality Models (40 CFR Part 51, Appendix W) that model results are most accurate when no more than 6 calm hours occur. As a result, these samples were not analyzed. Event 6 was attempted on December 5, 2003, but was aborted when it was determined that the major sources of PFOA in the manufacturing process were not operating that day.
3. Bound analytical report from Exygen Research entitled Fluorochemical Characterization of Filter Samples; Particle Size Distribution Study – Report No. L0002178

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