

FLUORO POLYMERS

Item 10: Monitoring - Fluoropolymers
EPA Data Needs: (Draft 9-21-03)

Data Need	LOI Commitment	Additional data needs beyond LOI	EPA Proposal to Address Data Needs
Manufacturing			
Manufacturing Releases Information on release of PFOA to air, water, wastewater, landfill leachate from manufacturing facilities	Data on releases to air, water, wastewater, landfill leachate Continued monitoring of releases	none	
Manufacturing Sites Concentration of PFOA in air, surface water, groundwater, soil, biota, wastewater, landfill leachate at manufacturing facilities	Surface water, groundwater, wastewater, landfill leachate concentrations at manufacturing sites Limited biota data Modeling of PFOA in air	Monitored concentrations of PFOA in air, soil, additional biota	Screening level monitoring of PFOA in air to quantify concentration and extent Screening level monitoring of PFOA in biota (eg. fish and other aquatic species, plants, herbivores, avian, terrestrial species) at manufacturing facilities

EXP000280

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Off Site from Manufacturing Concentration of PFOA in air, surface water, groundwater, soil, and biota down gradient from manufacturing facilities	PFOA concentrations in surface water and groundwater from manufacturing sites Limited biota data Modeling of air contamination	Monitored concentrations of PFOA in air, soil, additional biota	Monitoring of PFOA in air to quantify concentration and extent of off site contamination Additional groundwater monitoring, similar to Washington Works, to quantify PFOA in groundwater offsite contamination at additional manufacturing sites. Groundwater samples should be collected to determine the extent and level of contamination away from the site Soil sampling for PFOA to quantify and determine extent of off site soil contamination Monitoring additional biota for PFOA (plants, herbivores, avian terrestrial species, fish and other aquatic species) near manufacturing facilities

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Use Releases Information on release of PFOA to air, water, wastewater, sludge from use facilities	Composite information on process releases from user facilities representing different use industries Modeling of releases from user facilities (carpet initially)	Monitoring data on release of PFOA to air, water, wastewater, sludges from processing/use facilities	Screening level monitoring studies to measure PFOA releases to air, water, wastewater, and sludges at representative user sites. Number of sites should be sufficient to allow preliminary assessment of releases associated with different use industries. Monitoring should be sufficient to provide baseline data to allow quantification reduction in environmental releases over time. For industries that are clustered fewer sites should be needed.

EXP000282

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Data Need	LOI Commitment	Additional data needs beyond LOI	EPA Proposal to Address Data Needs
Use Sites Concentration of PFOA in air, surface water, groundwater, soil, biota wastewater, landfill leachate at processing/use facilities	Modeling of air, soil, groundwater concentrations	Measured concentrations of PFOA in air, surface water, groundwater, wastewater, soil, sludges biota at use facilities	Screening level monitoring studies at facilities representative of different user industries. Initially 5-10 "Worse case" sites associated with each use industry should be selected for monitoring similar to that done at manufacturing facilities. Monitoring should be designed to provide scoping baseline data to inform future site selection if needed, and to allow qualification efforts to reduce releases. Number of sites and locations dependant on information about number and location of user facilities Monitoring data should be collected sufficient for screening level characterization of PFOA concentrations in environmental media at the site and released from the site. Screening level study design is site/industry dependant, but may include: 5-10 surface water samples upstream, at the site, and downstream, 6-20 wells with quarterly groundwater sampling, 5-10 air samples, monthly wastewater sampling, quarterly sludge sampling if discharges go to POTW, 20-50 soil samples, 20-50 biota samples
Off Site from Use Concentration of PFOA in air, surface water, groundwater, soil, and biota down gradient from use facilities	Modeling of air, soil, groundwater concentrations	Measured concentrations in air, surface water, groundwater, wastewater, soil, sludges, biota down gradient from use facilities	Surface water, groundwater wastewater, air, soil, biota (plants, herbivores, avian terrestrial species) monitoring studies around use facilities Data to characterize environmental concentration away from use site and to identify limit of environmental contamination Wastewater and sludges from POTWs receiving discharge from user facilities should be included