

▶ **Robert L Ritchey**
07/23/2001 08:26 AM

To: Robbin Banerjee/AE/DuPont@DuPont
cc: (bcc: Robert L Ritchey/CL/DuPont)
Subject: Re: Air Modeling Discussion with Jesse Hanshaw, WVDEP-DAQ [D]

Yes. Actually it is better for us, in my view, to have the independent modeling done by the State in parallel with ours rather than to have them using ours only.
Robbin Banerjee

✍ **Robbin Banerjee**
07/20/2001 07:50 AM

To: Robert L Ritchey/CL/DuPont@DuPont
cc:
Subject: Re: Air Modeling Discussion with Jesse Hanshaw, WVDEP-DAQ [D]

Bob,

this sounds like a pretty reasonable pathforward to me.....I assume you see it that way also?

Rob
Robert L Ritchey

▶ **Robert L Ritchey**
07/19/2001 10:15 AM

To: John R Bowman/AE/DuPont@DuPont
cc: Bernard J Reilly/AE/DuPont@DuPont, Andrea V Malinowski/AE/DuPont@DuPont, Chris E Shoop/AE/DuPont@DuPont, M. Ann Bradley/STB/DUP@DUP, Stephen J Gissy/AE/DuPont@DuPont, Oscar T Garza/AE/DuPont@DuPont, David M Rurak/AE/DuPont@DuPont, Debbie J Mulrooney/AE/DuPont@DuPont, H David Ramsey/SE/DuPont@DuPont, Robert F Pinchof/DEV/AE/DuPont@DuPont, Karl G Kronberg/AE/DuPont@DuPont, Robbin Banerjee/AE/DuPont@DuPont
Subject: Air Modeling Discussion with Jesse Hanshaw, WVDEP-DAQ

I was finally able to talk with Jesse Hanshaw, WVDEP-DAQ, late yesterday afternoon, July 18, regarding DuPont's current effort to conduct air modeling for APFO emissions from our Fluoropolymers plant.

I explained that we have experience with an EPA approved model for this analysis and that it would be done by modeling experts in our DuET group. I indicated that we will be using the Industrial Source Complex, v.3, and that the modeling meets the requirements of 40CFR51 App W, the standard the State regulations refer to for modeling. I indicated we expect initial results by the end of the month, modeling on actual emissions, and that we also plan to model permitted emissions.

Mr. Hanshaw indicated he had heard of this plan through WVDEP's Dr. Staats (Ann Bradley briefed her recently), and that the DAQ had already had some discussion and concluded that they would still need to do their own modeling. He did not know what model they plan to use. We agreed that it would be best if our modeler called the DAQ modeler and discussed details, and provided our inputs to DAQ to ensure we are using the same information. They would also require a written documentation of our modeling protocol. His impression is that the DAQ would agree that we would each share methods

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and results from the modeling. He indicated that they do plan to do deposition modeling and would need particle size and density inputs, and that they also plan to look at fence-line or property-line concentrations. I asked how DAQ intended to use the results of this study, and he indicated that to his knowledge that had not been discussed, but he believes they will be comparing results to both worker and community exposure guidelines. He stated that it is part of having a good understanding of the overall picture so that DAQ is able to address questions that may arise from the public or at any public hearing (public comments on air permit applications can lead to public hearings).

I asked Mr. Hanshaw if our modeling results not being available until month-end would slow them down, and he indicated that it would not....that their modeler is tied up on another project at this time and it will be a couple of weeks before he can get to it. Their modeler is Mr. Chris Arrington, and they have recently added Mr. Dave Roberts to their modeling group and he will assist in this project. I indicated to Mr. Hanshaw that I would talk to DuPont's modeler, Deb Mulrooney, on July 19 and have her make contact with Mr. Arrington. (Deb: he is at 304-926-3647)