



DuPont Fluoroproducts

DuPont Fluoroproducts
Chestnut Run Plaza
P.O. Box 80702
Wilmington, DE 19880-0702

September 28, 2001

Mr. Garth Connor (3EC10)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103

Via Federal Express

Dee Ann Staats, Ph. D.
West Virginia Department of Environmental Protection
1356 Hansford Street
Charleston, WV 25301

Via Hand Delivery

Re: First Supplemental Response to July 24, 2001 Request for Information

Dear Mr. Connor and Dr. Staats:

On behalf of E. I. duPont de Nemours and Company ("DuPont") we hereby file this First Supplemental Response to the Request for Information addressed to Mr. Paul Bossert at DuPont's Washington Works facility and dated July 24, 2001 ("Information Request"). This response supplements our initial response which was dated August 31, 2001. In providing this First Supplemental Response, DuPont reiterates and fully incorporates by reference its objections set forth in the August 31, 2001 response. Additionally, this supplement does not include information relating to "capital requests" because DuPont is awaiting clarification from EPA Region III as to meaning of this term. When such clarification is provided, DuPont will address this information in an additional supplemental response.

DuPont's supplemental responses are as follows:

REQUEST NO. 1: Provide a process flow diagram for each manufacturing process line and treatment system where C-8 is utilized at the Facility. For each process unit in the manufacturing process line or treatment system provide a narrative description of the process unit, a C-8 material balance for each process unit, the identification of the destination of C-8 (whether it is recycled, recovered, emitted to air, land or water), and the concentration of C-8 and its by-products in each of the process streams. The basis for calculation should be the design capacity of the unit.

RESPONSE: DuPont's response is provided in Exhibit 1 to this supplemental response.

REQUEST NO. 2: Describe each treatment process used for the recovery or treatment of PFOA and the effectiveness of each unit in the recovery or treatment of PFOA or substances containing PFOA utilized at the Facility.

RESPONSE: DuPont's response is provided in Exhibit 1 to this supplemental response.

REQUEST NO. 3: For each of the previous five years quantify the amount of C-8 utilized at the Facility and provide the quantity and composition of C-8 released into each media from each process unit and for the Facility as a whole.

RESPONSE: DuPont's response is provided in Exhibit 1 to this supplemental response.

REQUEST NO. 5: Provide a copy of each document and study related to the treatment, disposal, containment, and remediation of C-8, commissioned by or conducted by DuPont, for all facilities. Include all documents related to such studies (including all capital requests and attachments thereto) and actions taken as the result of such studies.

RESPONSE: DuPont supplements its August 31, 2001 response with the documents provided in Exhibit 2 to this supplemental response.

REQUEST NO. 7: Identify all landfills utilized by DuPont to dispose of C-8 from the Facility where seeps or leakage or migration to groundwater have occurred. Describe what measures DuPont has taken to eliminate the seeps, and if the seeps have been eliminated. Provide all sampling data for all constituents from such seeps, including C-8.

RESPONSE: DuPont supplements its August 31, 2001 response by providing sampling data for all constituents for the Local, Letart, and Dry Run landfills in Exhibit 3 to this supplemental response.

REQUEST NO. 9: Provide all monitoring and modeling of C-8 for groundwater, soil, surface water, air, sludges, sediments, terrestrial and aquatic species and humans in West Virginia and Ohio. Include in your response a copy of each capital request for such monitoring and modeling and all attachments thereto.

RESPONSE: DuPont supplements its August 31, 2001 response with the documents provided in Exhibits 2 and 4 to this supplemental response. DuPont has initiated an air modeling study for PFOA at the Washington Works facility and when finalized, DuPont will submit the report of this modeling to the agencies.

REQUEST NO. 11: Provide all sampling analysis and volume of any leachate or groundwater recovery systems in operation at any facility handling C-8 sludges from the Facility, or other Teflon manufacturing byproducts, and the location and means of disposal of that waste/wastewater.

RESPONSE: DuPont supplements its August 31, 2001 response with the documents provided in Exhibit 5 to this supplemental response.

REQUEST NO. 12: Set forth in detail the sampling procedures and analytical methods for C-8 in water, soil, air and biological tissues. Describe if method differs depending on location, e.g., landfill leachate versus effluent outfall. Identify and describe what, if any, limitations or problems (e.g., adhesion to glass), are associated with such procedures or methods.

RESPONSE: As a point of clarification, the sampling and analytical procedures described in subparagraph a of DuPont's August 31, 2001 response to Request No. 12 apply to soil, groundwater and surface water.

REQUEST NO. 16: Provide a copy of each study and document related to existing or potential human health or environmental effects of C-8 conducted or commissioned by you or in your possession. Include all documents related to the need for such studies and actions taken as the result of such studies.

RESPONSE: DuPont supplements its August 31, 2001 response with the documents provided in Exhibit 2 to this supplemental response.

REQUEST NO. 17: Provide a complete copy of the C-8 monitoring database for Facility employees on disk and identify format. Include any results of blood sampling or urinalyses of the Facility employees where C-8 was detected.

RESPONSE: In response to this request, DuPont submits a complete copy of the APFO monitoring database for Facility employees on compact disk labeled as Exhibit 6. The database is formatted in MS Word.

REQUEST NO. 19: Provide copies of all documents related to the procedures, justification, background data, analysis, used to establish DuPont's community and worker action levels for C-8.

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RESPONSE: DuPont supplements its August 31, 2001 response with the documents provided in Exhibit 2 to this supplemental response.

Should there be any questions related to this supplemental response please contact me at (302) 999-2415 or Bernard Reilly at (302) 774-5445.

Very truly yours,

David Rurak
by *MB*
David Rurak

Enclosures

cc: Janet E. Sharke, Esq. (w/o encls.)

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