

From: Jesse Hanshaw
To: DEE ANN STAATS
Date: 4/16/02 5:10PM
Subject: C8 update from air quality

Hi Dee Ann,

We are currently in the process of coordinating our modeling efforts with DuPont. A meeting between DuPont and DAQ to discuss modeling protocol and process input parameters has been scheduled for next Wed. 4/24/02 in our Kanawha City Office from 1:00 to 3:00pm, Conference Rm. C. You are invited to attend if your schedule allows.

Dave Roberts contacted DuPont's modeler, Debbie Mulrooney, last week in order to see if there has been any changes to the modeling input parameters that were supplied to DAQ as a result of the Multimedia Consent Order. Mulrooney stated that there has been no changes to the model inputs since the last submittal. Debbie followed up their conversation by sending Dave a copy of her electronic files used as inputs to the dispersion model. Our modeling section plans to build a revised input file this week and then work on running another air dispersion simulation before our meeting next week. Another interesting fact Debbie shared with Dave was that DuPont has run a deposition model using software different than the standard ISC model. She stated the reason the ISC model was not used is that it doesn't take into account vapor phase deposition. This also corresponds with what Al Simmirelli, EPA's modeling expert, told us when Chris and Dave questioned him about the feasibility of running such a model with the inputs DuPont had supplied to us. Dave noted that this may be something DAQ might want to probe DuPont for more information on in the future if we decide to attempt to correlate deposition with the water modeling and monitoring results. In order for DAQ to run this type of model it seems that we will have to use something different than our ISC model.

From a permitting standpoint DAQ still has 3 C-8 permit modifications under review. Two of these three are very close to final approval. Shawn Hickman is working on R13-1823A, Fluoropolymer Monomers, which involves the replacement of an incinerator which is planned to be used for C8 containing waste water destruction. R13-1823A is currently finishing up a 45 day public notice period. Provided there are no public comments to be addressed this permit will be approved shortly after the end of this notice period.

The second permit modification, which is close to final approval is the R13-2365A permit, which covers the Fluoropolymer CoPolymers area. The 45 day public comment period has passed on this permit mod. without any response from the public. The application was placed on hold after the public comment period had commenced due to DuPont sampling and finding C8 in a plugged filter in a part of the production line, which was originally thought to contain no C8. What it boiled down to is that not all of the C8 is removed in the dryer some residual amounts are further removed downstream of the dryer thus adding some new C8 emission points. There was an initial effort to require DuPont to undergo another 45 day public comment period based on the new facts, although it was realized that a new legal ad would not have changed from the original since DuPont's net emission changes as a result of the modification was still negative with respect to PM10. Typically the legal ads only state the emission increases due to the process modification. Therefore running another ad would not benefit the public since it would be stated in exactly the same way as the first, which didn't receive any comments. The only thing holding this permit from being approved is that DuPont has asked for some additional time to have their process people review the recordkeeping requirements one last time to make sure there are no questions.

The third and last C8 permit being processed currently is the R13-815E permit modification. The fine powder production unit covered by this permit is the one that inadvertently triggered PSD for PM10 last year. Currently they are operating under a Consent Order, which limits DuPont to production rates below that which would trigger PSD applicability under 45CSR14. This permit ranks #5 on my permitting to do list which I plan to have completed by the end of the year. This is also the unit which had a stack test on its dryers last month. I am still waiting to see the result from the testing and also planning to use the test

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