

01/14/2003
01/16/2003

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WV DEP LEGAL SERVICES + 93483881

NO. 948 002
NO. 375 0021

receptor locations where people live?

OhioEPA

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Licenses Government Center
122 S. Front Street
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2929

DEPT. OF AERIALITY

MAILING ADDRESS:

P.O. Box 1046
Columbus, OH 43216-1046

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January 7, 2003 RECEIVED

Mr. Paul Bossert
E.I. Du Pont de Nemours and Company
Washington Works
P.O. Box 1217
Parkersburg, West Virginia 26102

Post-it® Fax Note	7671	Date	1/10/03
To	JOHN REARD	From	BILL SPIRE
Co./Dept.		Co.	
Phone #		Phone #	
Fax #		Fax #	

Re: Ammonium Perfluorooctanoate (C8) Impacts in Little Hocking, Ohio

Dear Mr. Bossert:

I am writing to express Ohio EPA's concerns with respect to air impacts in Ohio due to emissions of C8 from your Washington Works facility. We have been following the progress on the evaluation and review of ambient impacts due to this facility, as well as the evaluation of ambient screening levels for both the air and water pathways developed by the C8 Assessment of Toxicity Team (CATT). We are also aware of additional evaluations in progress by U.S. EPA and the Science Advisory board for reassessing the toxicity and possible carcinogenic effects of C8.

In addition, we have been contacted by a citizens group expressing concern over ambient levels of C8, as predicted by air quality modeling of year 2000 actual emissions. Short term levels used to assess workplace exposures were identified as health based levels not fully considered by the CAT team in the development of an air screening level for C8.

My staff has assessed the modeled ambient impacts resulting from the year 2000 emission levels. Among this averaging times evaluated, my staff has identified predicted eight-hour concentrations well above the ACGIH health based work place standard at multiple receptors in Ohio. While these ambient concentrations may not be directly comparable to workplace exposures, these predicted concentrations raise our level of concern with regards to short term exposures to workers and sensitive populations.

Du Pont has indicated that future production levels, modifications to a scrubber, a taller stack on a major source, as well as agreements with U.S. EPA to reduce releases to all media will limit future impacts in the area. You presented information that future impacts would be below those associated with year 2000 actual impacts. And, the year 2000 emissions are the basis of your agreement with West Virginia to limit future air emission levels. However, we do not believe that there is enough certainty in the assumptions to insure that future ambient air impacts will be significantly below 2000 levels.

Bob Zell, Governor
Marion O'Connor, Lieutenant Governor
Christopher Jones, Director

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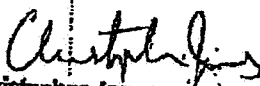
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Mr. Paul Bossert
January 3, 2003

We are requesting that you work with the State of West Virginia to adopt enforceable permit restrictions that will reduce ambient impacts below the workplace exposure limits at all receptors beyond the plant fence line. We believe that this is a prudent interim step until the potential effects of C8 are fully evaluated. Once these evaluations are complete, future acceptable emission levels can be determined.

If you have any questions with respect to our concerns, please feel free to contact Bob Hodanbosl of the Division of Air Pollution Control at 614-644-2270.

Sincerely,


Christopher Jones
Director

cc: Gerard J. Reilly Esq., E.I. Du Pont de Nemours and Company, Legal Dept.
John Benedict, WV Department of Environmental Protection

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