

unreviewed
C-8 file

From: Bill Spires
To: Kay Gilmer
Date: 3/12/03 3:10PM
Subject: Fwd: Dupont update

>>> Bill Spires 03/12/03 07:48AM >>>
Director's update:

DAPC had discussions with both The State of West Virginia and Dupont concerning the air emissions of C8 from the West Virginia facility.

In a conference call with West Virginia on March 11, 2003, we discussed the two major issues expressed in your January 7 2003 letter to Dupont. The first was the concern over the potential need for a short term screening level, potentially comparable to the workplace standard, to augment the current CATT annual screening level of 1.0 ug/m3. The second was the need for actual permit limitations to regulate future emissions of C8.

West Virginia believes the long term screening level developed by the CATT is adequate, but will enter into discussions with our toxicologist and the U.S. EPA lead toxicologist to determine where U.S. EPA is heading with their evaluation of this substance. West Virginia is in agreement with the need for permit limits and will be proposing a compliance plan to Dupont soon.

In a meeting on the afternoon of March 11, 2003, Dupont met with DAPC to discuss the issues in your letter as well as lay out the most recent developments in their efforts to reduce releases of C8.

Dupont presented modeling results for the year 2002 actual emissions and projected 2003 and 2004 emissions. While there are significant reductions (~50%) from the year 2000 levels in 2002 and significantly lower emissions projected for 2003 and 2004, it was not clear how much of the reduction is due to controls and how much is due to reduced production. A table was presented that the draft annual permit allowables that may be included as part of the consent agreement will limit annual emissions to about the same as 2002 emissions. They are checking to see if the draft permits will also include short term limits.

The topic of a short term screening level was also discussed. Dupont indicated that the constraining target was the liver and that it is a long term concern, not short term. Dupont claims that the potential short term effects were included during the CATT analyses and that the long term was still constraining.

We indicated that levels above the workplace limits would not be an acceptable impact on elderly or sensitive citizens in Ohio and indicated that we would urge West Virginia to address the short term in their implementation of the final solution. We have requested the latest modeling files to enable us to evaluate short term impacts. Dupont will consider sending the files.