

AR 226 - 1516

DuPont Fluoroproducts
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DuPont Fluoroproducts

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September 15, 2003

VIA OVERNIGHT MAIL

Document Control Office (DCO)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460

Attention: Docket No. AR-226 and/or OPPT-2003-0012

Re: Submission of DuPont Progress Report on Environmental Assessments Pursuant
to the APFO Users LOI dated March 14, 2003

Dear Sir/Madam:

This progress report is submitted in accordance with commitments made by DuPont in section D2 of the above-referenced APFO Users LOI. More specifically, DuPont committed to report to EPA progress made regarding assessment of air and water APFO levels around its Washington Works facility. Progress is as follows:

Ground and Surface Water Monitoring

DuPont has already conducted extensive ground and surface water sampling and analyses at its Washington Works facility, associated landfills, and surrounding areas, including Ohio. DuPont has submitted to EPA already the following documents, which are listed in Docket Number OPPT-2003-0012, pertaining to this effort:

- OPPT-2003-0012-0037 DuPont response to EPA questions re the water assessment
- OPPT-2003-0012-0038 Consent Order detailing the scope of the assessment
- OPPT-2003-0012-0030 Data Summary Report
- OPPT-2003-0012-0040 Method of Analysis for Determination of APFO in Water
- OPPT-2003-0012-0041 Groundwater Investigation Quality Assurance Project Plan for Washington Works

The ground and surface water assessment was overseen by a Groundwater Investigation Steering Team (GIST) established pursuant to the Consent Order identified above. The GIST was comprised of the following members:

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- Don Criss, Geologist, Groundwater Program, West Virginia DEP
- Garth Conner, Environmental Engineer, Enforcement Division, Region III, United States EPA
- George R. Dasher, Geologist, Groundwater Program, West Virginia DEP
- Andrew Hartten, Principal Project Leader, DuPont Engineering
- Jack C. Hwang, Hydrogeologist, Region III, US EPA
- Bill Toomey, Program Manager, Source Water Protection, Bureau of Public Health, West Virginia Health and Human Resources
- Roger Reinhart, Environmental Engineer, Water Division, Region III, United States EPA
- Dee Ann Staats, Ph.D., Science Advisor, West Virginia DEP
- Dave Watkins, Program Manager, Regulatory Programs Section, West Virginia DEP

The GIST recently issued its final report titled Ammonium Perfluorooctanoate (C-8) Groundwater Investigation Steering Team Report (August 2003). A copy of this final report is provided as Attachment 1. The conclusions and recommendations of the GIST are summarized on pages 3-10 of this final report for each of the following areas:

- West Virginia Private Water Supply Sources
- Ohio Private Water Supply Sources
- West Virginia Public Water Supply Systems
- Ohio Public Water Supply Systems
- Ohio River Surface Water Sampling
- Surface Water and Ground Water Monitoring – Dry Run Landfill
- Surface Water and Ground Water Monitoring – Letart Landfill
- Surface Water and Ground Water Monitoring – Local Landfill
- Surface Water and Ground Water Monitoring – Washington Works Facility
- Groundwater Modeling

In the conclusions of the final report, water results are assessed versus the West Virginia drinking water screening level. For the private and public water supply sources sampled, there were no samples collected that were found to exceed the West Virginia drinking water screening level.

Air Dispersion Modeling

Air dispersion modeling, based upon year 2002 actual emissions for the Washington Works facility and using the EPA approved Industrial Source Complex Short Term 3 (ISCST3) model, as described in the APFO Users LOI, is expected to be complete by October 15, 2003. A report will be submitted to EPA when complete.

Summary

The information and data provided in this submission meet the DuPont commitment made in the LOI to provide EPA with a report on progress made with regard to assessing APFO in air and water at and around the DuPont Washington Works facility. If there are any questions, please contact me at the address or phone number provided in this letter.

Very truly yours,



David M. Rurak
Safety, Health, and Environment Manager
Global Business Manager, APFO
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E-mail: David.M.Rurak@usa.dupont.com

Attachment

cc: Mary Dominiak, EPA (via overnight mail)

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ATTACHMENT

<u>Attachment No.</u>	<u>Title</u>	<u>No. of Pages</u>
1	Ammonium Perfluorooctanoate (C-8) Groundwater Investigation Steering Team Report (August 2003)	50
	- Appendix A	32
	- Appendix B	25
	- Appendix C	37

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