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VIA HAND DELIVERY

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8EHQ-0703-00373

July 11, 2003

Mr. Richard H. Hefter, Chief
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Document Processing Center (7407M)
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U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
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Washington, DC 20460-0001

Dear Mr. Hefter:

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PFOA Drinking Water Monitoring Data

This letter is submitted in follow-up to my letter of June 20, 2003, in which I indicated DuPont would compile and forward to you certain drinking water monitoring data you requested in your letter of May 22, 2003. To reiterate what was stated in the DuPont June 20, 2003 letter, the drinking water monitoring data in issue did not and does not trigger reporting obligations under Section 8(e) of the Toxic Substances Control Act, as some have alleged. DuPont, however, is providing this data to EPA at your request and for EPA's information and use as the Agency develops its regulatory positions on PFOA.

In response to your request, DuPont compiled pertinent documents that provide drinking water monitoring results for drinking water in and around the DuPont Washington Works facility in Parkersburg, West Virginia. Attached are the documents that we have identified to date as being responsive to your request. Note that in these documents, PFOA is referred to as C-8 or FC-143 (the 3M trademark) or APFO. Specifically, attached are the following:

- Attachment 1 is a one-page memorandum entitled "C-8 in Water (3/15/84) and (6/4/84)." This memorandum contains data from the Lubeck, West Virginia and Little Hocking, Ohio monitoring in 1984. You may also note a reference to "Washington," which is part of the Lubeck drinking water supply system. There are other 9 other locations listed; each of them tested as non-detect. Note that in Little Hocking, while C-8 was detected at the detection limit of 0.6 ppb in March 1984, it was not detected in June 1984.
- Attachment 2 is a one-page memorandum entitled "C-8 Levels in Drinking Water." It is a table of data from 1984, 1987, 1988 and repeats some of the 1984 data from the previous document, but it also has 1987 and 1988 samples taken from the Parkersburg, Lubeck, Little

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Hocking, and Ravenswood sampling sites. As you will note, the samples from Little Hocking did not contain detectable C-8 in 1987 or 1988.

- Attachment 3 is a one-page memorandum entitled "C-8 Off Site Sampling Data." This document contains data from 1987-1991 for the Lubeck Public Service District (abbreviated LPSD in some cases).
- Attachment 4 is a one-page memorandum entitled "C-8 On Site Sampling." This memorandum contains results from 1987-1991 for wells on the Washington Works (WW) plant site, as well as the WW drinking water.
- Attachment 5 is a letter from DuPont to the Lubeck Public Service District (LPSD) dated March 23, 1992, reporting test results for FC-143 in three LPSD wells.
- Attachment 6 is a table showing monitoring results for FC-143 from January 19, 2000 to October 11, 2001, taken from sampling stations in the LPSD.
- The results of community drinking water monitoring for public water supplies from December 2001 through November 2002 have been summarized in a comprehensive report titled "C-8 Data Summary Report Consent Order GWR-2001-019" (dated February 2003; hereafter the Summary Report) that DuPont sent to members of the Groundwater Investigation Steering Team (GIST), which includes EPA Region III.¹ DuPont also submitted the Summary Report to EPA public docket OPPT-2003-0012, where it is identified as document OPPT-2003-0012-0039. For your convenience, and since maps of the sampling area have not been included in the public docket, a copy of this Summary Report is included as Attachment 7. Note that sampling methods and test protocols are also disclosed in this Summary Report.
- Attachment 8 is a report dated April 2003 titled "Sampling Investigation Results Little Hocking Water Association Well Field". This report was also sent to the GIST members, which includes EPA Region III. This report contains some results for Little Hocking post-November 2002.
- Attachment 9 is a June 25, 2003 letter from DuPont to the West Virginia Department of Environmental Protection (copy to GIST members) reporting 2nd quarter of 2003 public water supply results for West Virginia and Ohio.

We trust that the information provided in this letter will satisfy EPA's needs. If DuPont identifies any additional documents showing groundwater monitoring data prior to December

¹ The GIST members also received the monthly and quarterly reports that are summarized in the Summary Report. GIST members continue to receive monthly and quarterly reports for work under the Consent Order occurring after November 2001.

Mr. Richard H. Hefter

July 11, 2003
Page 3

2001, we will contact your office. Please ask someone from your staff to contact me if EPA has any remaining questions regarding this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Malinowski", with a long horizontal flourish extending to the right.

Andrea Malinowski, Counsel
E.I. du Pont de Nemours and Company

Attachments

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ATTACHMENTS

<u>Attachment No.</u>	<u>Title</u>	<u>No. of Pages</u>
1	C-8 in Water (3/15/84) and (6/4/84)	1
2	C-8 Levels in Drinking Water	1
3	C-8 Off Site Sampling	1
4	C-8 On Site Sampling	1
5	March 23, 1992 letter from DuPont to the Lubeck Public Service District (LPSD)	4
6	Data Table for LPSD Results – 1/19/00 to 10/11/01	1
7	C-8 Data Summary Report for Consent Order GWR-2001-019 February 2003	
	Text	76
	Tables	59
	Figures	50
	Appendix A	21
	Appendix B	19
	Appendix C	23
	Appendix D	39
	Total	287
8	Sampling Investigation Results Little Hocking Water Association Well Field April 2003	
	Text	21
	Tables	5
	Figures	13
	Appendix A	3
	Appendix B	15
	Appendix C	23
9	June 25, 2003 letter from DuPont to the West Virginia Department of Environmental Protection	6

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