

AR226-1680

From: Bernard J. Reilly on 10/04/2001 08:26 AM
To: rharris@environcorp.com; swashburn@environcorp.com
cc: M. Ann Bradley/STB/DUP@DUP; John R. Bowman/AE/DuPont@DuPont; Isidoros J. Zanikos/AE/DuPont@DuPont; Martha L. Rees/AE/DuPont@DuPont; David M. Rurak/AE/DuPont@DuPont
Subject: Next Week at Region 3?

We have serious concerns that when we shift to the new analytical technique using Exagent, LC/MS/MS along with improved sample gathering techniques e.g. avoiding glass, that we will get numbers considerably above the DuPont CEG of 1 ppb (or 3 ppb where there is no air exposure). Region 3 has told us they plan to order DuPont to provide alternative drinking water for any user above the 1 ppb. When they told us this (Sep 7) we did not know how striking might be the increase compared to Lancaster Lab that we have been using, could be a factor of 10 or more, and thus greatly over the CEG, maybe range of 5 to 10 ppb or even higher (hoping recent steps to curb river discharge starting to impact wells).

To try to avoid such an Order (although we may decide to provide drinking water on a voluntary basis), we therefore plan to get to EPA Region 3 drinking water (Karen Johnson) and risk (Sam Rotenberg) people next week, if they are willing to meet. Our purpose would be to express concern that our very conservative number may be used against us, and that is not fair. Then inform them that using the traditional tools of interpreting animal data to humans a far higher number than the CEG does is obtained. We are certain they have not worked through such a process. The Environ monograph would be essential in this regard, and we would hope Environ can be there to present a summary of it. Of course another key part of the presentation is the lack of human health impacts based on all studies to date. We have an internal call on this at 9 AM today, then Izzy will try to set up something with Region 3, we will first check your availability.

-- Bernie

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