

H David Ramsey
07/16/2001 11:02 AM

To: Dawn D Jackson/CL/DuPont@DuPont, George A Ainsley/SE/DuPont@DuPont
cc:
Subject: FW: Call From Jesse Hanshaw

Three key notes - there are some of us who prefer the State and I both conduct modeling so it is more independent

----- Forwarded by H David Ramsey/SE/DuPont on 07/16/2001 11:01 AM -----

John J Mentink
07/10/2001 08:30:49 AM

To: H David Ramsey/AE/DuPont@DuPont
cc:
Subject: FW: Call From Jesse Hanshaw

This is the note originally issued by Chris Shoop. Note details on modeling and the suggestion from OAQ personnel that we may also wish to model to "check" results. A larger question is how to model - this is a material that we have defined as a particulate [based on an old agreement between the OAQ and Walt Stewart] since it has a boiling point above 120 degrees C. However, it is a VOC and would be classified as "semi-volatile" under current EPA thinking.

This has more than one facet for exposure.

JJM

----- Forwarded by John J Mentink/CL/DuPont on 07/10/2001 08:27 -----

Chris E Shoop 07/09/2001 13:10

To: John J Mentink/CL/DuPont@DuPont
cc:
Subject: FW: Call From Jesse Hanshaw

FYI

----- Forwarded by Chris E Shoop/AE/DuPont on 07/09/2001 01:09 PM -----

Chris E Shoop 07/09/2001 12:26 PM

To: Robert L Ritchey/CL/DuPont@DuPont, David F Aliman/SE/DuPont@DuPont
cc: Karl G Kronberg/AE/DuPont@DuPont
Subject: Call From Jesse Hanshaw

Bob / Dave,

Jesse Hanshaw called me this morning to ask for additional information related to the emissions we described during the phone discussion Friday July 6th. He told me that he had had an additional discussion with his supervision after our call and they decided they would conduct modeling. Jesse requested that we supply the UTM coordinates for the vents described in the discussion. He noted that the only UTM data they have is for the one point in Power & Services and that he would have to estimate the location from aerial photos if we cannot supply the data.

Jesse also requested data for estimated actual emissions. He noted that he might have the data

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available from the Reg. 29 submittal, but asked if this would be an accurate assessment. I commented that some of the vents would include both polymer and C8 in a single particulate number. So Jesse asked that we provide actuals for each of the vents we described.

Jesse suggested that we might want to do modeling ourselves to compare to the results they find.

Jesse asked that I email this data to him in a table. I promised to call him by the end of tomorrow if there would be any delay past that time to get this data to him.

I suggest that we get the UTM coordinates from Joe Gaston's plant mapping system. Joe told me that he could interpolate the UTM coordinates from the map coordinates to better than 0.1 meter accuracy. I know the vent points for my areas are in the map. I will ask Karl to check whether the copoly vents are in there and to show them to Joe.

I believe we already have the estimates for actual emissions. Karl: Please comment if yours are not ready for submittal.

I will forward the draft data table for review before I send it.

Please forward this information as necessary to management, etc..

Chris Shoop

Forwarded by H David Ramsey/SE/DuPont on 07/16/2001 11:01 AM

Robert F Pinchot 07/12/2001 12:33 PM

To: David M Rurak/AE/DuPont@DuPont, H David Ramsey/SE/DuPont@DuPont, Stephen J Gissy/AE/DuPont@DuPont, Robert L Ritchey/CL/DuPont@DuPont, John J Mentink/CL/DuPont@DuPont, Chris E Shoop/AE/DuPont@DuPont, Bernard J Reilly/AE/DuPont@DuPont, John R Bowman/AE/DuPont@DuPont, Andrea V Malinowski/AE/DuPont@DuPont, Oscar T Garza/AE/DuPont@DuPont
cc: Maurice Astorga/AE/DuPont@DuPont, Debbie J Mulrooney/AE/DuPont@DuPont, Catherine A Barton/AE/DuPont@DuPont
Subject: Air dispersion modeling strategy

I have talked with a number of people yesterday and today concerning modeling of APFO emissions from Washington Works. Here are the facts as I understand them at the current time.

1. Jesse Hanshaw, WVDEP permit writer has called Chris Shoop asking for actual emission rates and UTM coordinates for the stacks that emit APFO. He asked this so that the WVDEP can do modeling of airborne exposures.
2. Over the last few weeks in cooperation with legal and DuET, I have developed a modeling proposal to model airborne exposures to better understand exposure potential from all sources at WW. I have approval from Dave Rurak to pursue this program. This modeling program has three parts, the first of which will model, based on actual emissions, the average annual concentration to which a person would be exposed by location; basically the model will generate isopleths of average annual concentration.
3. The modeling that DuET will be doing for this project meets the requirements of 40CFR51 App. W., the standard to which the state regulations refer for modeling. Note to John M.: The model that will be used for this first part of the analysis assumes that the particle size is "small" and the concentrations "low" so that the material acts as air when it comes out the stack.
4. Ann Bradley has discussed the issue with Mr. Hanshaw and he as agreed to wait for the process information until after discussions with Bob R. when he returns from vacation next Monday.
5. WVDEP has a modeler on staff. What models he plans on using for this study are unknown at this time. We will use Industrial Source Complex v. 3 for this modeling.
6. Deb Mulrooney, DuET, has the site specific input files for WW that includes meteorology and

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site buildings/terrain. To run the model she will need the following information for each release point:

- UTM Coordinates
 - Actual Emission rate (and permitted emission rate if we want to model the maximum allowable by the permit)
 - Stack Height
 - Stack Velocity
 - Stack Diameter
 - Emission Temperature.
7. Barring any computer problems, Ms. Mulrooney will need approximately 1 day of undivided work to model the first phase of the program after she has the data in 6. above. She is unavailable on Monday and Tuesday of next week.
 8. It is Ms. Bradley's opinion that regardless of what we do, the WVDEP will want to run their own models. It is unknown at this time what concentration the state will use to compare with the model results.

Based on the above facts, the strategy I propose is as follows:

1. Conduct our modeling of average annual air concentrations as soon as possible.
2. Work with the WVDEP to persuade the agency to use our modeling work. Keep them informed of the modeling progress and make available all the input data and modeling techniques to allow the agency to conduct their own study if warranted. If the state wants to do modeling in addition to ours from the outset, get agreement from them that they will share the methods and results with our experts for our understanding.
3. Try to understand what purpose this modeling will serve for the state. Will it be used to set permit limits? If so, what concentration standard will they use to set the permit limits?

To implement this strategy, I propose the following next steps:

- Forward this note to Ann Bradley, I don't have access to her e-mail address (Bernie, 7/12)
- Get the data in item 6 above for each emission point to Deb Mulrooney (Chris S. as soon as possible)
- Run the dispersion model (Deb by 7/20)
- Set up a conference call for Monday, 7/16 to further develop strategy outlined in 2 and 3 above. Participants should include at a minimum Bernie Reilly, Bob Ritchey, Chris Shoop, Ann Bradley, Trini Garza, and myself. (Bernie, could you please arrange; my secretary is out ill the rest of the week).
- Set up a meeting/conference call with WVDEP personnel based on the outcomes of the Monday conference call (Bob Ritchey).

Let the entire group know if I have missed something.

Regards,
Rob

----- Forwarded by H David Ramsey/SE/DuPont on 07/16/2001 11:01 AM -----

Robert F Pinchot 07/16/2001 08:26 AM

To: Bernard J Reilly/AE/DuPont@DuPont
cc: Andrea V Malinowski/AE/DuPont@DuPont, Chris E Shoop/AE/DuPont@DuPont, Robert L Ritchey/CL/DuPont@DuPont, John J Mentink/CL/DuPont@DuPont, M. Ann Bradley/STB/DUP@DUP, John R Bowman/AE/DuPont@DuPont, Stephen J Gissy/AE/DuPont@DuPont, Oscar T Garza/AE/DuPont@DuPont, David M Rurak/AE/DuPont@DuPont, Debbie J Mulrooney/AE/DuPont@DuPont, H David Ramsey/SE/DuPont@DuPont
Subject: Re: Call-in Number: Monday July 16 to Discuss Air Dispersion Modeling Strategy - 10 AM

Here is a tentative agenda for the meeting at 10:00:

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1. Grounding, Background:
 - Information requested by the DEP (Shoop)
 - Discussions with Jess Hanshaw and WVDEP (Bradley)
 - Potential future permitting considerations such as PM 10, permit revisions, etc. (Mentink)
2. DuPont's modeling Effort (Pinchot)
3. Develop DuPont's response to WVDEP (all)
 - Our modeling proposal (including timing)
 - Process to share information during dual modeling effort.
 - Communication to WVDEP
4. Timing for EPA Preliminary Hazard Assessment for PFOA (Pinchot)
5. Next Steps (all)