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07/30/01 16:03 :02/08 NO:962



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2028

rec'd 7/30/01

**VIA CERTIFIED MAIL:
RETURN RECEIPT REQUESTED**

JUL 24 2001

Mr. Paul Bossert
Plant Manager
E.I. duPont de Nemours & Co., Inc.
Washington Works Facility
Route 892 South duPont Road
Parkersburg, WV 26181

Re: Request for Information

Dear Mr. Bossert:

The U.S. Environmental Protection Agency, Region III ("EPA"), and the West Virginia Division of Environmental Protection ("WVDEP") have received information about the presence of ammonium perfluorooctanoate in the air, soil, surface water and groundwater in and around the DuPont Washington Works facility and the landfills located in Parkersburg, Letart and Dry Run, West Virginia. EPA hereby requires that E.I. duPont de Nemours & Co., Inc. (hereinafter "you") furnish to EPA the information described on the attachment hereto, pursuant to the following authorities:

- Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a);
- Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a);
- Section 11(a) and (b) of the Toxic Substances Control Act, 15 U.S.C. § 2610(a) and (b);
- Sections 3007(a) and 9005(a) of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6927(a) and 6991d(a);
- Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9604(e); and
- Section 1445(a) and (b) of the Safe Drinking Water Act, 42 U.S.C. § 300j-4(a) and (b).

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. 3501-3520.

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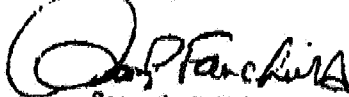
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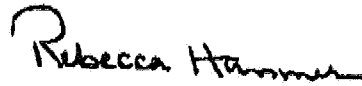
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Please provide your response within thirty calendar days of your receipt of this letter, to Garth Connor (3EC10), U.S. EPA, Region III, 1650 Arch Street, Philadelphia, PA 19103 and Dee Ann Staats, Ph.D., WVDEP, 1356 Hansford Street, Charleston, WV 25301. If you have any questions regarding this request or need additional time to respond to portions of this request, please call Mr. Connor at (215) 814-3209, or have your counsel contact Janet E. Sharke at (215) 814-2689.

Sincerely,



Samantha P. Fairchild
Director
Office of Enforcement, Compliance
and Environmental Justice



Rebecca Hammer
Director
Water Protection Division

attachments

cc: Michael Zeto, WVDEP

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Attachment 1

Instructions

1. You are entitled to assert a claim of business confidentiality claim covering any part of or all of the information requested, pursuant to 40 C.F.R. § 2.203(b), by attaching to such information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent allowed by, and only by means of the procedures set forth in, the regulations at 40 C.F.R. Part 2 Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. In any event, you should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request.
3. Precede each answer with the number of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate by the number of the specific question(s) or subpart of the question to which it responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. For each and every question, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request, identify each such person and the additional information or documents which such person may be able to provide.
6. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control or possession, custody or control of any of your employees or agents, relating to the matters described below. For each and every question, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to each question, identify each person from whom such information or documents may be obtained.

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Attachment 2

Definitions

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.
2. The term "C-8" shall mean ammonium perfluorooctanoate and all its manufacturing and degradation by-products and compounds.
3. The term "Facility" shall mean duPont's Washington Works, West Virginia, facility. The term "Facilities" shall include duPont's Washington Works, West Virginia, facility as well as all locations in West Virginia where C-8 contaminated waste was disposed of, including, but not limited to the landfills at Lotart, Dry Run and Washington, West Virginia.

- Would Northwest Landfill also apply?

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Attachment 3

Information Requested

1. Provide a process flow diagram for each manufacturing process line and treatment system where C-8 is utilized at the Facility. For each process unit in the manufacturing process line or treatment system provide a narrative description of the process unit, a C-8 material balance for each process unit, the identification of the destination of C-8 (whether it is recycled, recovered, emitted to air, land or water), and the concentration of C-8 and its by-products in each of the process streams. The basis for calculation should be the design capacity of the unit.

Plant Lead

- Block Diagrams
- Emissions to air, land, water

- Rob + Plant

2. Describe each treatment process used for the recovery or treatment of C-8 and the effectiveness of each unit in the recovery or treatment of C-8 or substances containing C-8 utilized at the Facility.

Plant

3. For each of the previous five years quantify the amount of C-8 utilized at the Facility and provide the quantity and composition of C-8 released into each media from each process unit and for the Facility as a whole.

Plant

4. Describe the conditions and characteristics necessary for polymerization and/or solubilization of acrylic resins or polymers detected in foam from Dry Run landfill; and describe any chemical interactions between these compounds and C-8 or other surfactants identified in the foam.

Plant

Bob + Gerry

5. Provide a copy of each document and study related to the treatment, disposal, containment, and remediation of C-8, commissioned by or conducted by DuPont, for all Facilities. Include all documents related to such studies (including all capital requests and attachments thereto) and actions taken as the result of such studies.

Very Broad!

- CEG Studies
- Electro, Bio

Spillman - Andrew, Plant - Krak EPA Presentation

6. Provide copies of documents regarding treatment options (including process units and waste treatment units), including efficacy, for C-8 in drinking water, soil and air.

- Same as 5 ↑.

7. Identify all landfills utilized by DuPont to dispose of C-8 from the Facility where seeps or leakage or migration to groundwater have occurred. Describe what measures DuPont has taken to eliminate the seeps, and if the seeps have been eliminated. Provide all sampling data for all constituents from such seeps, including C-8.

All 3, others

Spillman - Andrew

8. Provide all data on any chemical analysis of foam from Dry Run landfill.

9. Provide all monitoring and modeling of C-8 for groundwater, soil, surface water, air, sludges, sediments, terrestrial and aquatic species and humans in West Virginia and Ohio. Include in your response a copy of each capital request for such monitoring and modeling and all attachments thereto.

employees

Rob's Study - SW Modeling (Bill Berti)

Spillman

RFI

Dry Run Sludge (?)

✓
Treatability
Studies

✓

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- ✓ 10. Provide all hydrogeologic information, monitoring well construction details and location for each of the Facilities including General Electric's Parkersburg, WV, facility. *Spillman should have. How?*
11. Provide all sampling analysis and volume of any leachate or groundwater recovery systems in operation at any facility handling C-8 sludges from the Facility, or other teflon manufacturing byproducts, and the location and means of disposal of that waste/wastewater. *Plant*
- ✓ 12. *Andrew Perhaps Mark* Set forth in detail the sampling procedures and analytical methods for C-8 in water, soil, air and biological tissues. Describe if method differs depending on location, e.g., landfill leachate versus effluent outfall. Identify and describe what, if any, limitations or problems (e.g., adhesion to glass), are associated with such procedures or methods.
- ✓ 13. Identify by name and location any private well or public water system in West Virginia or Ohio sampled for C-8. Provide monitoring data for each such well where C-8 has been detected and any actions taken as the result of C-8 contamination. Include in your response a copy of each capital request for such sampling and follow-up action and all attachments thereto. *Signif. Historical Data Exists Spillman*
- ✓ 14. Identify by name and location any public water system with intakes or alluvial wells in the Ohio River within 40 miles of the Facility. *Bob R.*
- ✓ 15. Provide results of any sampling of the Ohio River conducted or commissioned by duPont where C-8 has been detected. *Spillman has*
- 0 16. Provide a copy of each study and document related to existing or potential human health or environmental effects of C-8 conducted or commissioned by you or in your possession. Include all documents related to the need for such studies and actions taken as the result of such studies. *Spillman has*
17. Provide a complete copy of the C-8 monitoring database for Facility employees on disk and identify format. Include any results of blood sampling or urinalyses of the Facility employees where C-8 was detected. *Spillman has* *needs clarification*
- 0 18. Provide copies of all documents related to the assessment of health or environmental impacts of C-8 contamination to drinking water sources, surface water (including the Ohio River), and groundwater. *RFI / Surveillance Data* *LPSD Communication*
19. Provide copies of all documents related to the procedures, justification, background data, analysis, used to establish duPont's community and worker action levels for C-8. *Spillman / Gerry*
- ✓ 20. Identify all data and information regarding the fate and transport characteristics and bioaccumulation and biopersistence characteristics of C-8 (e.g., physicochemical properties, partition coefficients, soil adsorption studies). Provide copies of all such information and data not already provided. *Numerous studies*

Industry work
Bert's Study

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21. Provide copies of all documents related to toxicological and epidemiological information regarding C-8 known to duPont. This includes inhalation studies, physiologically-based toxicokinetic models, absorption/metabolism/distribution/elimination kinetic data, in vivo and in vitro studies, C-8 in a mixture toxicology studies, final report or paper submitted for publication presenting data from the 1998-2000 monkey studies, and the Griffith 1980 monkey exposure paper. Identify the chemical forms of C-8 (e.g., APFO, PFOA, fluoride, organofluoride) analyzed in each toxicological study and describe the evolution of the latest methodology, form chosen, and its suitability (including limitations) as an indicator of exposure.
21. Provide information on any additive or synergistic effects of C-8 with other chemicals, elements, substances or biological systems.
22. Describe any surface activity of C-8 with biological membranes or tissues or organs or with nonbiological materials.
23. Describe any ability of C-8, or any other compound(s) detected in the Dry Run Landfill effluent or foam (such as surfactants or acrylic resins) individually or in concert as a mixture to affect or adhere to biological membranes, including but not limited to, the gastrointestinal tract.
24. Provide all toxicological and epidemiological data for the compounds, particularly C-8, identified in the foam or effluent from the Dry Run landfill, including any additive or synergistic effects, or chemical interactions between these compounds themselves or with biological systems.

*toxicological**Work underway**Wow!*

Post-It Fax Note 7671		Date <i>8/1</i>	# of pages <i>8</i>
To <i>Larry Zarikas</i>	From <i>G. Malenisk</i>	Cn.	
Co/Dept.	Phone # <i>774-6443</i>	Fax #	
Phone #			
Fax # <i>892-7641</i>			

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